

Caribbean, Gulf of Mexico, and South Atlantic Fishery Management Councils

Re: Spiny Lobster Scoping Meeting

January 28, 2008

Having reviewed the December 2007 Scoping Document – **“Amendment to Address the Importation of Spiny Lobster Products That Do Not Meet US Conservation Standards”**, I wish to forward the following recommendations:

- 1 Puerto Rico & the Virgin Islands have a higher conservation standard than the Continental US. So **their standard should be protected**, imports into Puerto Rico & the Virgin Islands must meet their minimum standards.
- 2 The US should take a hard look at why their annual harvests have been lower than expectations and consider improving their conservation standards in line with the Puerto Rico & the Virgin Islands criteria. As a means for conservation, the **Continental US** should match the Puerto Rico & Virgin Island **minimum size limits of 3.5” carapace**. The US should be setting the example.

Please note both references below as having a valid bearing on the lobster fishery.

FWC Spiny Lobster Ad Hoc Advisory Board Synopsis reads as follows:

For spiny lobster, the typical number of eggs produced per clutch of a 3 inch carapace length female is 300 thousand eggs. A 3 ½ inch carapace length female produces 500 thousand eggs, a 4 inch carapace length female produces 700 thousand eggs. A 3 inch carapace length lobster may produce two clutches, by the time female lobsters attain a 4 inch carapace, the typical number of clutches per breeding season is three, perhaps four clutches.

With the size limit raised from 3" to 3.5", the translation would be an increase of 250 % to 350 % more eggs being released each year, per lobster, which would have a significant impact on the future lobster population.

Amendment 3 reads as follows:

The minimum size of female reproductive maturity is about 70 mm (2.75") carapace length(CL). However, reproductive activity is greatest among female in the 80 - 85 mm (3.14" - 3.34") size class (Gregory et al. 1982). The present legal minimum size is 76 mm (2.99") CL, but the effective minimum size is less due to short mortality resulting from baiting practices. It takes approximately one year for a lobster to grow from 48 mm (1.88") CL to the legal size of 76 mm (2.99") CL (Hunt and Lyons 1986).

If the 50 % spawning size for Spiny Lobster is 3.25", then an increased minimum size to 3.5" in the US would be a logical step. At that point, the Continental US, Puerto Rico, & the Virgin Islands would all have the same size limits. We could then encourage all of

the other countries to use the same minimum size limits. There would be a larger number of lobsters by volume, increased spawning and a quicker stock recovery as a whole.

The new regulations in the short term (first year, maybe two) will obviously affect the lobster fisherman and would be anticipated, however, the long term productivity should be enhanced by the implementation of a system that will prevent overfishing and aid in the stock recovery.

Sincerely,

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