

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

Re: Spiny Lobster Scoping Meeting

January 28, 2008

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

- 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.
- The US should take a hard look at why their annual harvests have been well below their expectations & consider improving their conservation standards in line with the Puerto Rico & the Virgin Islands criteria. As a minimum the **Continental US** should match the Puerto Rico & Virgin Island **minimum size limits of 3.5” carapace**. The US should be setting the example.

If the 50 % spawning size for Spiny Lobster is 3.5”, then we should increase the minimum size in the US to 3.5”, then 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 larger lobsters, more spawning, & therefore more recruits.

FWC Spiny Lobster Ad Hoc Advisory Board Synopsis

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.

The average size in Monroe County has consistently been 3 ¼ inch CL, just barely legal size. This indicates that the fishery is heavily reliant on a single year class of lobsters each season - those that have just grown to legal size.

A minimum Carapace size of 3.5” will translate into an increase of **250 to 350 % more eggs** being released each year, which would have a significant impact on the future lobster population. Since the fishery is doing badly we must allow more lobsters to reach adulthood, spawn & reproduce before harvest. If enough of the lobsters do not reproduce the stock will not recover.

I know it won't be a popular idea, because the lobstermen will take a hit the first year or two, but in the long run they will be able to reap the benefits of a more sustainable fishery.

Sincerely,


Jim Atack, Spiny Lobster Advisory Panel Member, SAFMC