



BOBBY JINDAL  
GOVERNOR

*State of Louisiana*  
DEPARTMENT OF WILDLIFE AND FISHERIES  
OFFICE OF SECRETARY

ROBERT J. BARHAM  
SECRETARY

March 23, 2015

Kevin Anson  
Chairman, Gulf of Mexico Fishery Management Council  
2203 N. Lois Avenue, Suite 1100  
Tampa, Florida 33607

Chairman Anson,

As the Gulf of Mexico Fishery Management Council considers the scoping document for Amendment 17 to the Shrimp Fishery Management Plan at its upcoming meeting, the Louisiana Department of Wildlife and Fisheries (LDWF) recommends the Shrimp Committee and the Council to work toward a solution that provides for the best use of the resource and allows for sustained participation in the fishery.

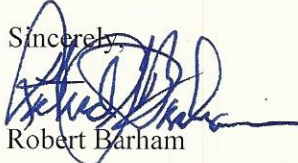
As Louisiana is consistently the number one harvester of penaeid shrimp in the nation, LDWF adamantly objects to any action that further constrains the shrimp fishery. As a solution, we recommend that the Council extend the moratorium but also increase the available permits to 2008 levels (1,933 permits) and create a reserve permit procedure and system that makes expired permits available to fishermen. This will allow marginal growth in this fishery while ensuring no overcapitalization and no overfishing, consistent with the purpose of and need for Amendment 17. Further shrinking the fleet will not accomplish these goals.

Shrimp are a very short-lived, annual crop. Their populations are influenced more by environmental factors than fishing. Unlike long-lived reef fish that can contribute to the spawning population for decades, once shrimp recruit to offshore waters, they are either harvested or they die. When you limit the capacity of offshore shrimp fleet, you limit harvest of this annual crop below optimum yield and essentially waste harvestable shrimp. This is especially unfortunate at a time when more than 90 percent of the shrimp eaten in the United States is imported, and these imports control the market.

When the Council established the current permit moratorium in 2006, it limited the number of permitted vessels to 2,666, a number thought appropriate to prevent overcapacity and promote economic stability in the fishery. Only 1,933 permits were issued at the beginning of the moratorium. In addition, when these permits expire, they are terminated and cannot be allotted to other vessels. As of November 2014, only 1,476 permitted vessels were operating in the fishery, with a number of these reporting little to no harvest activity; 457 permits have expired and are no longer available to the fishery. Many Louisiana shrimpers operate vessels large enough to fish offshore, but the current permit system leaves them little means to obtain a permit to do so. These shrimpers are limited to fishing state inland and coastal waters and have been denied access to fishing even in nearshore federal waters for a number of years. This passive reduction of available permits has taken away opportunities to participate in the fishery and constrained fishing capacity—the fishery is currently operating well under the established cap, and therefore well under the effort needed to achieve optimum yield.

Again, LDWF urges the Council to adopt Option 2, with permits capped at 2008 levels and with the addition of a reserve permit procedure and system. This approach would help achieve optimum yield and promote economic stability for this fishery.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Barham", written over the word "Sincerely,".

Robert Barham

c     Randy Pausina  
       Doug Gregory  
       Carrie Simmons



2021 Lakeshore Drive, Suite 310  
New Orleans, Louisiana 70122

March 23, 2015

Kevin Anson  
Chairman, Gulf of Mexico Fishery Management Council  
2203 N. Lois Avenue, Suite 1100  
Tampa, Florida 33607

Chairman Anson,

Louisiana's Shrimp Task Force represents the state's shrimp industry and is responsible for studying and monitoring the shrimp industry and making recommendations on improving production and the economic sustainability of the industry. With these responsibilities in mind, the Shrimp Task Force recommends that the Gulf of Mexico Fishery Management Council and Shrimp Committee work toward a solution that provides for the best use of the resource and allows for sustained participation in the fishery as they consider the scoping document for Amendment 17 to the Shrimp Fishery Management Plan at the upcoming Committee and Council meetings.

Louisiana's shrimp industry is the top producer of penaeid shrimp in the nation. On behalf of this valuable industry, the Shrimp Task Force adamantly objects to any action that further constrains the shrimp fishery and threatens our culture and way of life. As a solution, we recommended that the Council extend the moratorium but also increase the available permits to 2008 levels (1,933 permits) and create a reserve permit procedure and system that makes expired permits available to fishermen. This will allow marginal growth in this fishery while ensuring no overcapitalization and no overfishing, consistent with the purpose of and need for Amendment 17. Further shrinking the fleet will not accomplish these goals.

Shrimp are a very short-lived, annual crop. Their populations are influenced more by environmental factors than fishing. Unlike long-lived reef fish that can contribute to the spawning population for decades, once shrimp recruit to offshore waters, they are either harvested or they die. When you limit the capacity of offshore shrimp fleet, you limit harvest of this annual crop below optimum yield and essentially waste harvestable shrimp. This is especially unfortunate at a time when more than 90 percent of the shrimp eaten in the United States is imported, and these imports control the market.

When the Council established the current permit moratorium in 2006, it limited the number of permitted vessels to 2,666, a number thought appropriate to prevent overcapacity and promote economic stability in the fishery. Only 1,933 permits were issued at the beginning of the moratorium. In addition, when these permits expire, they are terminated and cannot

be allotted to other vessels. As of November 2014, only 1,476 permitted vessels were operating in the fishery, with a number of these reporting little to no harvest activity; 457 permits have expired and are no longer available to the fishery. Many Louisiana shrimpers operate vessels large enough to fish offshore, but the current permit system leaves them little means to obtain a permit to do so. These shrimpers are limited to fishing state inland and coastal waters and have been denied access to fishing even in nearshore federal waters for a number of years. This passive reduction of available permits has taken away opportunities to participate in the fishery and constrained fishing capacity—the fishery is currently operating well under the established cap, and therefore well under the effort needed to achieve optimum yield.

Again, as representatives of Louisiana’s shrimp industry, we urge the Council to adopt Option 2, with permits capped at 2008 levels and with the addition of a reserve permit procedure and system. This approach would help achieve optimum yield and promote economic stability for our shrimping community.

Sincerely,

A handwritten signature in black ink that reads "Mark Abraham". The signature is written in a cursive, slightly slanted style.

Mark Abraham  
Chairman, Louisiana Shrimp Task Force