



WBA Response's to FMP Billfish

I. The WBA is opposed to the NMFS Preferred Alternative, which would allow only catch and release fishing for Atlantic white marlin effective 01/01/2007 through 12/31/2011. Anglers have adopted a very strong, voluntary conservation ethic where white marlin catch and release rates are already 99%. The entire U.S. recreational fleet & charter/headboats are landing very few white marlin each year, merely 227 total fish over the last three years, has little or no impact on the stock but generates tremendous social and economic benefits for coastal communities particularly where tournaments are held. **The WBA supports Alternative E1, which maintains existing regulations regarding recreational billfish fishing.**

II. The WBA is opposed to the NMFS Preferred Alternative to consolidate the Atlantic Billfish FMP with HMS FMP. Considering that billfish fisheries are strictly recreational which includes charter/headboats and are largely catch and release, they should not be lumped into the same management plan as tuna, swordfish, and shark where management measures aim to fully utilize, in harvest, country specific quotas administered through ICCAT. **The billfish fishery is unique and should retain its own fishery management plan separate from tuna, swordfish, and sharks.**

II. The WBA is opposed to the NMFS Preferred Alternative to limit all Atlantic Billfish tournament participants to using only non-offset circle hooks when using natural baits or natural bait/artificial lure combinations. While the WBA supports the continued conservation ethic that has resulted in 99% catch and release rates for billfish, we are opposed to making the use of circle hooks MANDATORY. NMFS needs to developed specification on the off-set and shank length before use of circle hooks are even consider MANDATORY. With the deep commitment of billfish anglers to billfish conservation and with the sector representing a small percentage of domestic and international mortality on marlin, **we support the VOLUNTARY use of circle hooks until these specification on off-set and shank length can be established.**

V. The WBA is opposed to the NMFS Preferred Alternative of Continuing the 250 blue and white marlin annual landing limit because it is completely unnecessary. The WBA has long held that the 250 blue and white marlin annual landing cap imposed upon the recreational charter/headboat fishing sector was a completely unnecessary concession. Mandating this cap when low marlin landings were already driven by a strong, voluntary conservation ethic was irrelevant in reducing overall marlin mortality. NMFS own analysis finds that the ecological benefits of this alternative are likely to be limited. WBA disagrees that accepting this 250 fish cap provides the US with greater negotiating leverage when trying to promote stronger conservation measures for billfish with other ICCAT countries. From a conservation and negotiating standpoint, the 250 landing cap is neither needed or of any value to the US. **We support the strong catch and release ethic of U.S. anglers and the current minimum size limits for the few fish that are landed. We are also in total disagreement that a US documented vessel fishing outside the US waters that may land a billfish be counted as a US landed fish.**