



Beyond Our Shores Foundation
Dolphinfish Research Program

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South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC, 29405

Dear Mr. John Carmichael and Council Members:

As the Director of the Beyond Our Shores Foundation, a 501(c)(3) formed to expand the Dolphinfish Research Program (DRP), an international angler-driven scientific capture-mark-recapture program for dolphinfish (*Coryphaena hippurus*), we would like to provide additional comments on the future direction of framework actions or new amendments being considered for the U.S. Dolphin and Wahoo fishery management plan. We hope you consider this constructive feedback meant to strengthen dolphinfish conservation and management throughout the region.

Include Gulf of Mexico and U.S. Caribbean Sea Fishery Management Councils in Discussions

Using conventional tagging data collected in conjunction with our tagging program, dolphinfish from both the Gulf of Mexico and U.S. Caribbean Sea have been linked with locations along the U.S. Atlantic coast within the same calendar year or less than a year between mark and recapture events (Figure 1). Given that the South Atlantic Fishery Management Council (SAFMC) manages the most comprehensive approach to dolphinfish management and conservation in the entire Western Central Atlantic Ocean (WCA), in an effort to lead by example, we suggest that the SAFMC include members of the Gulf of Mexico and Caribbean Fishery Management Council in future SAFMC dolphin FMP discussions as it pertains to the new framework action to expand the geographic range of the species minimum size. Given the linkages identified above, plus evidence that suggests recreational fishing effort for dolphinfish is on the rise in both regions (Table 1), we suggest the minimum size should be expanded to include the GFMC and CFMC jurisdictions. According to public comments submitted on the SAFMC public comment board during the amendment 10 process, anglers exist within both regions that support a minimum size for the species.

Dolphinfish fisheries in the Bahamas

Public records of dolphinfish landings data from the Bahamas are difficult to obtain. The country does not submit commercial catch records to the Food and Agriculture Organization and there are few public sources that document recreational catch. For recreational catch, a source of data that exist is reconstructed recreational catch for the Bahamas from the Sea Around Us¹ project. According to their reconstructed recreational catch analysis, the Bahamas is the second largest recreational sector in the WCA with landings estimated at 475

¹ www.seaaroundus.org



metric tons in 2016 (Table 1). Assuming this estimate is accurate given the complexity of the reconstruction catch analysis, the Bahamas recreational sector was 88 metric tons larger than the combination of the U.S. GOM and New England recreational sectors. We believe the first step toward better international management of dolphinfish would be to engage the Bahamas in dolphinfish management and conservation discussions given the country's close proximity to the U.S. Atlantic Coast and likely impact on seasonal abundance of the species along the U.S. East Coast through their recreational and commercial harvest. In addition, anglers within the Bahamas have recaptured fish that were tagged and released in waters within the South Atlantic Bight (Figure 1). In all but one case, these fish were released at lengths less than 21" and recaptured at sizes that ranged from 33" to 55" fork-length. The minimum size applied within the South Atlantic Bight is a policy that has enabled Bahamian anglers to catch larger dolphin. We support further SAFMC research and the development of discussions with the relevant fishery agency counterparts in the Bahamas to strengthen dolphinfish management within the Bahamas. Any measures applied within Bahamian waters will help to benefit U.S. Atlantic Coast anglers.

Dolphinfish fisheries in Mexico (Gulf of Mexico and Yucatán)

In 2009, commercial dolphinfish catch reported by Mexico for FAO zone 31 (WCA) dropped from an annual average of 205 metric tons to 5 metric tons. Why did Mexico's FAO zone 31 commercial catch decrease so abruptly? Given that most coastal and offshore locations within Mexico's WCA exclusive economic zone (EEZ) contains the environmental conditions necessary for dolphinfish to inhabit those waters year-round, an argument that dolphinfish abundance within Mexico's waters decreased is not likely. Plus, given the proximity of Mexico's WCA EEZ to the U.S. GOM and Atlantic Coast, the reported decrease in Mexico's commercial catch should have resulted in an increase in commercial or recreational catch within U.S. waters which was not the case. This information was presented to merely raise the point that significant uncertainty surrounds commercial catch reporting for dolphinfish in Mexico's GOM and Yucatán region. This region, similar to the Bahamas, shares EEZ boundaries with the U.S. yet management and conservation for a species that travels between those zones is not managed jointly. Add onto the uncertainty of commercial catch in Mexico's GOM and Caribbean waters the lack of accurate landings for the recreational sector, and the uncertainty of the size of Mexico's annual harvest of dolphinfish in the WCA grows. In recent years, we have had recreational anglers off Cozumel start to tag and release dolphinfish. Through this collaboration, those anglers have voiced their concerns with the stock citing a lack of big dolphinfish and the delayed arrival of fish, eerily similar to what anglers are reporting from Key West to South Florida. Plus, these anglers have also shared that a two fish angler limit for the recreational sector is not being followed by recreational vessels in Cozumel and Isla Mujeres. In order to better manage and conserve dolphinfish within U.S. waters, we support further SAFMC research and the development of discussions with the relevant fishery agency counterparts in Mexico to strengthen dolphinfish management within the Mexico's WCA waters. Any measures applied within Mexico's WCA waters will help to benefit U.S. GOM and Atlantic Coast anglers.

Dolphinfish Fisheries of the Greater Antilles

Recreational landings among nations that make up a portion of the Greater Antilles (Bahamas, Turks and Caicos, Dominican Republic, Puerto Rico, U.S.V.Is, B.V.Is) were estimated at 622 MT in 2016 (Table 1). When combined with FAO reported commercial catch, annual landings among these nations equaled 1070 metric tons in 2016. This value is only 30 metric tons lower than the reported recreational catch for the Gulf of



Mexico, Mid-Atlantic Bight, and New England regions combined. However, there is likely a high incidence of underreporting for nations that make up the Greater Antilles with at least two nations (Haiti and Jamaica) reporting increases and extremely high landings of unidentified marine fishes of which dolphinfish may make up a significant proportion. Putting the issue of underreporting aside for Greater Antilles nations, the magnitude of best estimate of recreational and commercial dolphinfish take is similar or higher in amount than U.S. sectors yet there are no conservation and management measures being discussed for either commercial and recreational sectors in these jurisdictions. We support further SAFMC research and the development of discussions with the relevant fishery agency counterparts among Greater Antillean nations to strengthen dolphinfish management within the Greater Antilles. Any measures applied within the Greater Antilles will help to benefit U.S. GOM and Atlantic Coast anglers.

As the development of a new framework action to expand protection of young of the year dolphinfish along the U.S. Atlantic coast proceeds, we hope that a key step the SAFMC takes is to include in the discussion fishery management and stakeholder counterparts in the above mentioned regions to set the precedent for future joint management of this stock. As stated in a previous letter to the council, current management is not considering the full impacts on the stock. Now is the time to work with all Atlantic domestic jurisdictions and key international partners (the Bahamas and Mexico for starters) to strengthen data collection programs and improve management to ensure the future sustainability of the WCA dolphinfish stock. Thank you for the opportunity to comment on this process.

Best Regards,

A handwritten signature in blue ink, appearing to read "Wessley Merten", is written over a light blue circular watermark.

Wessley Merten, Ph.D.
Director
Beyond Our Shores Foundation
Dolphinfish Research Program



References

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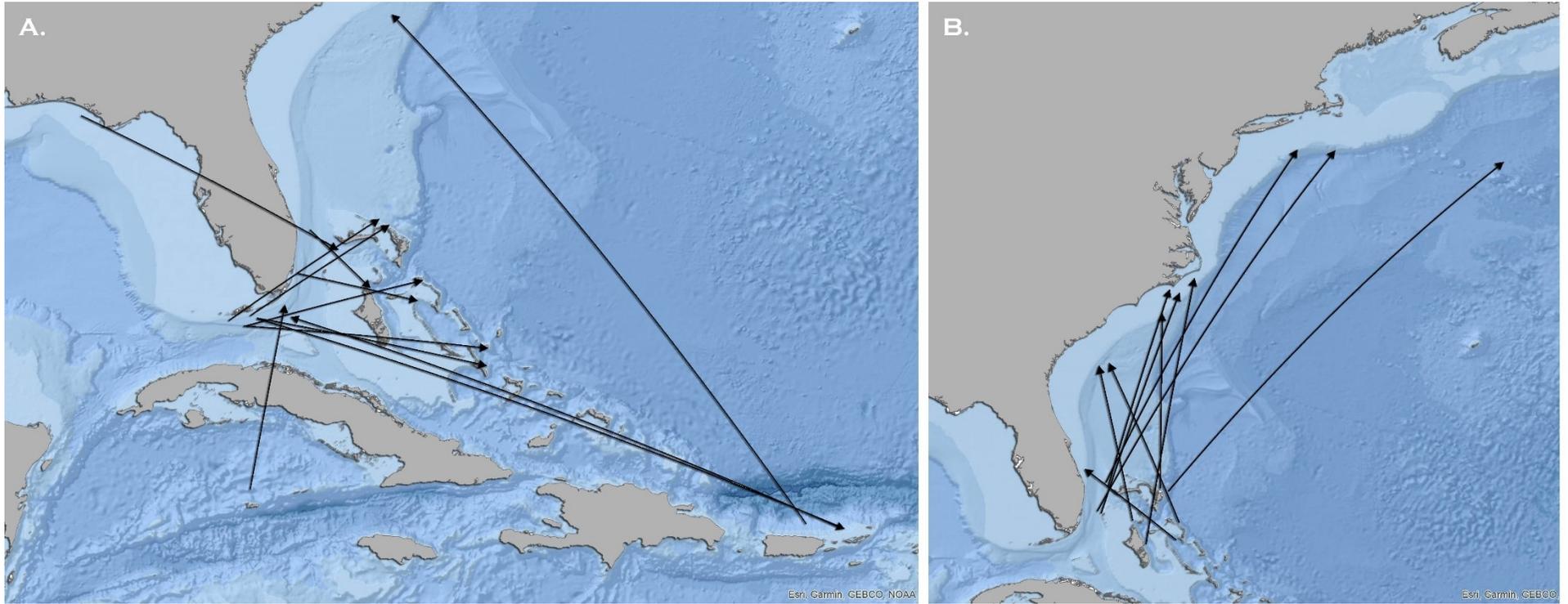


Figure 1 Straight-line horizontal movements (black arrows) of dolphinfish (*Coryphaena hippurus*) acquired from conventional tagging data collected in the Dolphinfish Research Program from 2002 to 2020 in the Western Central Atlantic Ocean, Caribbean Sea, and Gulf of Mexico. Movement connections between the Gulf of Mexico and Florida Straits (in 45 days), U.S. Caribbean Sea to Florida Straits (51 days), U.S. Caribbean Sea to South Atlantic Bight (204 days), Grand Cayman to the Florida Straits (in 37 days), Florida Straits to U.S. Caribbean Sea (in 210 days), and from the Florida Straits to the Bahamas (range from 211-318 days) are provided in subpanel A. In subpanel B, movements from the Bahamas to the U.S. East Coast and North Atlantic Ocean are provided (range from 37-87 days).

Table 1 Average commercial landings (metric tons) for dolphinfish in the wider Caribbean region (Zone 31 and 41) between two time periods for countries (arranged alphabetically) reporting dolphinfish to the FAO. Unidentified commercial landings of fishes that could include dolphinfish are shown for all countries in three categories and presented in alphabetical order: unidentified marine fishes (# italics), unidentified pelagic fishes (# bold), and unidentified tuna-like fishes (# underlined). The trend for each category is presented as follows: trend began (S), decreased (-), or increased (+) in amount. For recreational fleets, reconstructed 2016 dolphinfish specific landings, percent dolphinfish of total recreational catch or total recreational catch, and sector trend is provided from the Sea Around Us. This table was modified following Mahon (1999). NR = not reporting during that time period. n/a = not applicable

Country	Fleet	Dolphinfish Landings			Unidentified Landings				Recreational Fleet		
		1990-94 (MT)	2014-18 (MT)	Trend	1990-94 (MT)	2014-18 (MT)	Trend	Trend	2016 DOL TC (MT)	% Total Or Total (MT)	Trend
Countries reporting dolphinfish landings to the FAO											
Antigua and Barbuda	RAC	NR	29.4	S	<i>820, 2</i>	<i>187, 24</i>	-	+	0	216	+
Barbados	RAC	820.6	286.4	-	65, 128	230	+	-	.01 ^{DOL}	1%	+
Belize	RC	NR	1.8	S	<i>274</i>	<i>119</i>	-		n/r	n/r	+
Bermuda	RAC	NR	4	S	<i>119</i>	<i>4</i>	-	n/a	n/r	n/r	+
Brazil	RAC	NR	1,333	S	<i>0</i>	<i>0</i>	n/a	n/a	n/r	neg.	+
British Virgin Islands	RAC	5	1	-	<i>392, 20^x</i>	<i>770^x</i>	+	-	29 ^{DOL}	25%	+
Costa Rica	RAC	NR	75.6	S	<i>65, 2</i>	<i>28, 141</i>	-	+	n/r	neg.	+
Cuba	RAC	NR	19	S	<i>22,096</i>	<i>5,583</i>	-	n/a	n/r	neg.	+
Dominica	RAC	NR	239.2	S	<i>549</i>	<i>156</i>	-	n/a	n/r	neg.	S
Dominican Republic	RAC	242	327.2	+	1,077, 113	1,498	+	-	39 ^{DOL}	25%	+
Grenada	RAC	135	103.2	-	<i>354</i>	<i>34</i>	-	n/a	.15 ^{DOL}	8%	+
Guadeloupe	RAC	656	260	-	<i>5,555</i>	<i>2,028</i>	-	n/a	n/r	.01	+
Martinique	RAC	333	45	-	<i>2,487</i>	<i>227</i>	-	n/a	n/r	.03	+
Mexico	RAC	59	7	-	<i>142, 578</i>	<i>13, 106</i>	-	-	n/r	3,800	+
Puerto Rico	RAC	NR	38.2	S	<i>499, 79</i>	<i>104, 1</i>	-	-	39 ^{DOL}	3%	+
St. Lucia	RAC	NR	428	S	609, 44	425, 19	-	-	.70 ^{DOL}	9%	+
St. Kitts/Nevis	RAC	NR	53.6	S	<i>254</i>	<i>44, 9</i>	-	+	.28 ^{DOL}	25%	+
St. Vincent/Grenadines	RAC	NR	57	S	<i>1,125</i>	<i>9</i>	-	n/a	.08 ^{DOL}	8%	+
Suriname	AC	NR	147.6	S	<i>9,010</i>	<i>32,154</i>	+	n/a	n/a	n/a	n/a
Trinidad & Tobago	RC	NR	12	S	2,773, 2,334	6,078, 369	+	-	111 ^{DOL}	9%	+
USA	RC	657	176	-	26,245, 93	1,753, 8	-	-	7,448 ^{DOL}	3%	+
U.S.V.I	RAC	NR	24	Began	<i>723</i>	<i>19, 4</i>	-	+	22 ^{DOL}	24%	+
Venezuela	RC	657	1,226.2	+	32,436, 487	1,760, 41	-	-	0	0	-

Countries not reporting dolphinfish landings to the FAO

Aruba	RA	232	48	-	n/a	109 ^{DOL}	13%	+
Bahamas	RA	442	12	-	n/a	475 ^{DOL}	8%	+
Cayman Islands	R	122	125 ^X	-	n/a	.05 ^{DOL}	.2%	+
Columbia	R	1,456, 909	2,761, 7	+	-	n/r	n/r	UNK
French Guiana	R	3,401	52	-	n/a	n/r	n/r	UNK
Guinea	UNK	0	0	n/a	n/a	n/r	n/r	UNK
Guatemala	R	102	80, 54	-	+	n/r	n/r	UNK
Guyana	R	35,969	16,291, 86	-	+	n/r	n/r	UNK
Haiti	RA	3,476	15,130 ^X	+	n/a	n/r	n/r	UNK
Honduras	RAC	500	410	-	n/a	21 ^{DOL}	30%	+
Jamaica	RAC	7,120	11,753	+	n/a	1 ^{DOL}	17%	+
Japan	C	6	3 ^X	-	n/a	n/a	n/a	n/a
Montserrat	RAC	69	32	-	n/a	n/r	n/r	UNK
Netherlands Antilles ¹	RA	566	0	-	n/a	12 ^{DOL}	9%	+
Nicaragua	R	203	203	same	n/a	n/r	n/r	UNK
Panama	R	628	833	+	n/a	n/r	n/r	UNK
Korea	C	0	0	n/a	n/a	n/a	n/a	n/a
Spain	RAC	0	6	+	n/a	n/a	n/a	n/a
St. Barthélemy	R	0	100 ^X	+	n/a	6 ^{DOL}	20%	+
St. Martin	R	0	90 ^X	+	n/a	21 ^{DOL}	20%	+
Turks and Caicos	R	287	30 ^X	-	n/a	18 ^{DOL}	10%	+