



Beyond Our Shores Foundation
Dolphinfish Research Program

PO BOX 3506
Newport, RI, 02840
(787) 436-8300
wess@beyondourshores.org
beyondourshores.org / dolphintagging.com

October 28, 2024

Dear Sarah Stephenson:

As the Director of the Beyond Our Shores Foundation (BOSF), 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*) and wahoo (*Acanthocybium solandri*), we would like to provide a comment on the Caribbean Fishery Management Council's (CFMC) proposed changes to Amendment 3 of its pelagic fishery management plan.

Available indicators, both scientific and anecdotal, point to a significant decline of the dolphinfish stock in the Western Central Atlantic (WCA) having taken place over the past 30 years, with that decline still progressing. The data shows a reduction in both the number of fish, size at capture, and changes in stock exploitation. Examples of those indicators are included below.

- The U.S. MRIP survey that shows a decline from an average annual catch of 21.9 million pounds (mp) (9,933 metric tons (mt)) over the 1994-2003 period to 14.0 mp (6,350 mt) for the most recent ten-year period, 2019-2023, with the last five years even lower at 10.0 mp (4,535 mt).
- A volunteer vessel catch and effort monitoring program conducted by BOSF in Puerto Rico encompassing charter, recreational and small-scale commercial vessels shows declines. Unpublished data from 2016-2023 shows year-over-year catch success based on 2,596 trips decreased from 65% to 49%. Annual catch success is defined as the number of trips anglers landed one target species (dolphinfish, tuna, wahoo) or released a billfish. The percentage of trips that resulted in no catch increased from 35% to 51% over that period. The 2023-24 season around Puerto Rico was the worst documented.
- A paper, "Condition of the international fisheries, catch and effort trends, and fishery data gaps for dolphinfish from 1950 to 2018 in the Western Central Atlantic Ocean" by Merten et al., showed that the US Atlantic recreational fishery represents the largest reporting sector by two-fold and when combined with reported commercial landings for 2016, total direct dolphinfish catch was 14,110 mt (31.1 mp), of which 62% was estimated to be recreational catch. Results stress the immediate need for WCA nations to adopt a precautionary approach for proper fishery management of dolphinfish throughout the WCA, not only to increase spawning biomass but also for overall stock health and its conservation.
- A paper, "Spatiotemporal dynamics of dolphinfish in the western Atlantic Ocean" by Damiano et al., indicated that, based on U.S. pelagic longline logbook data, abundance of dolphinfish appeared to be stable during 1986–2018 and then declined during 2019–2022. This trend occurred in all regions, except



for in Atlantic waters from Cape Hatteras, North Carolina, to the southern border of Georgia, where abundance remained stable during 2019–2022.

- A paper, “Temporal changes in lengths of dolphinfish revealed by sampling sportfishing tournaments in the southeastern United States” by Rudershausen et al., showed meaningful temporal declines in the length of males and females were found for four of the five tournaments (no changes in length were observed for the fifth tournament). Median total length declines of 168, 105, 103, and 426 mm were observed for males, and declines of 354, 133, 131, and 246 mm were observed for females.
- A recent paper, “Estimation of Biological Reference Points Utilizing CMSY and BSM Methods for Dolphinfish in the Western Central Atlantic (WCA) Ocean” by Narváez and Arocha, based on FAO (1950-2021) and SAU (1950-2019) data, indicated dolphinfish are overfished and experiencing over exploitation.
- Fishing tournaments in the Cayman Islands, where historically the largest dolphinfish category was won by a fish in the 50 pound range, have dropped that category due to the lack of large dolphinfish caught. During the last BK Classic tournament in 2024, 94 plus boats fished and only one qualifying dolphinfish (> 10 pounds) was weighed.
- In Florida and South Carolina the for-hire and recreational fleets have been reporting a marked decline in the number and size of dolphinfish caught for ten-plus years. In addition, BOSF conducted a study from 2017 to 2021 of vessel tracking, dolphinfish tagging, and dolphinfish landings data for every outing of a private recreational fishing vessel active off the Lower Keys in Florida. Over the course of 91 outings, the vessel never landed a dolphinfish greater than 20 pounds and only had one encounter with a fish of that size class. The largest landed fish was a 12-pound male.

Based on these trends, an immediate and strong precautionary approach to management is needed for dolphinfish in the WCA. It is likely there are multiple factors contributing to the decline that has been observed, with ocean conditions and over-exploitation top contributing factors. In terms of influencing a reversal in the declining trend, stock conservation and management through regulatory actions offer the most viable approach.

Although some specifics remain to be defined, movement data suggest the stock seasonally migrates through the WCA, Gulf of Mexico and Caribbean Sea. Several movement papers have connected those regions through conventional and satellite dolphinfish tagging data. Thus, to slow and reverse the level of decline that has taken place, strong conservation measures need to be implemented throughout the stock’s WCA range, with each individual jurisdiction having a responsibility to fully do their part. Unfortunately, to date there has been very little progress in that direction, with only four or 9% of the jurisdictions in the region having any regulations for dolphinfish in place and some of those only partially.

For wahoo, an ongoing BOSF analysis showed that reported landings increased nearly fivefold from 1950 to 2021, but 26 nations still do not report explicit wahoo landings to the FAO yet are known to catch wahoo. When combined with reported commercial landings for 2019, total direct wahoo catch was 3,547 mt (7.8 mp), of which 57% was estimated to be recreational catch. When compared to dolphinfish catch, wahoo was nearly four times lower for the region, but several nations report more substantial wahoo fisheries than dolphinfish fisheries and there are also nations that are substantially underreporting their wahoo commercial



(industrial/artisanal) landings. Despite the importance of the recreational wahoo sector throughout the region, artisanal landings are estimated to be higher according to Sea Around Us catch reconstruction data. Similar to dolphinfish, the presence of fish aggregating devices (FADs) in different parts of the WCA as well as environmental processes (e.g., Sargassum blooms) lead to the presumption that higher amounts of juvenile wahoo may be caught throughout the region and anecdotal evidence of stock decline has been suggested. Results stress the immediate need for WCA nations to adopt a precautionary approach for proper fishery management of wahoo throughout the WCA, not only to increase spawning biomass but also for overall stock health and its conservation.

It is encouraging to see the CFMC independently take the lead by proposing to strengthen management in their areas of jurisdiction for dolphinfish and wahoo. By incorporating regulations for bag limits, vessel limits, and minimum sizes for dolphinfish and wahoo, the proposed regulations are an example of the needed meaningful level of conservation for these species in the regions and should be implemented as promptly as possible.

Thank you for the opportunity to provide comments on this amendment.

Best Regards,

A handwritten signature in blue ink, appearing to read 'Wessley Merten', written over a white background.

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