



Drew Minkiewicz
Attorney at Law
Black Point Maritime
Law PLLC
202 870 4013

Bob Beal
Executive Director
Atlantic States Marine Fisheries Commission
1050 N Highland St #200
Arlington, VA 22201

Via Email

Comments Regarding Addendum 27 & 30 to the Atlantic Lobster Management Plan

Bob:

I am writing on behalf of the North American Lobster Alliance (NALA) regarding Addendums 27 & 30 to the Atlantic Lobster Management Plan. NALA represents lobster dealers and processors from Massachusetts to Maine. NALA's membership has ascertained that the combined impacts of the Addendums 27 & 30 are a grave threat to the continuation of their businesses.

Addendum 27 Delay

It has come to our attention that the ASMFC will consider a delay to the implementation of the gauge increases in Addendum 27. NALA strongly supports a delay of the gauge increase as it will allow for its members to work with the states to ensure the continued existence of their businesses and provide a strong market for lobster purchases.

Specifically, NALA supports a delay of the gauge increase to January 1, 2026. A delay of a year will not have a significant conservation impact as it is estimated to impact 10% of the catch. A year long delay will have a significant impact on the conservation of NALA's membership. This delay will allow time for NALA's membership to implement new business strategies to survive the shock to their business from disrupted trade patterns, if there is a ban on importation of 3 ¼" lobsters.

Alternatively, if the ASMFC cannot grant a delay until January 1, 2026, then NALA supports a delay until July 15, 2025. The rationale for the July 15 delay is that it will allow for the completion of the Canadian spring season, which is the only significant source of lobsters for dealers and processors in April, May, and June. Without the Canadian spring season in 2025, Processors and dealers will have to cut their year by at least three months and the economic consequences of that cut will be overwhelming.

June Delay Not Supported

NALA's members are aware of a proposal to delay the gauge increase until June 1, 2025. NALA does not support this delay and would prefer no delay to a June 1 delay. June is right in the middle of the United States and Canadian fishing year. A change in June would upend the industry and not provide enough time to work with States to rectify the economic consequences of the gauge increase. NALA members would prefer to seek relief in other fora, than live through the disruption of a June change in the gauge size.

Addendum 30

NALA remains steadfastly opposed to the passage of Addendum 30 and refers to its earlier remarks on the Addendum. We do reiterate that 3 ¼" is still the smallest gauge size in effect in the plan and that there is no conservation rationale to banning the importation of lobsters from Canada. NALA wants to take this opportunity to encourage the ASMFC to find another conservation solution for lobster that does not have the specter of negative trade impacts. If the ASMFC does indeed delay the gauge increase, NALA encourages the ASMFC to use the time to develop and adopt an alternative conservation measure.

NALA thanks the ASMFC for its thoughtful consideration of its requested actions. NALA stands ready to assist the ASMFC in creating robust conservation measures for the lobster fishery, while preserving traditional trade patterns.

Sincerely,

Drew Minkiewicz
Attorney for NALA

