



Atlantic States Marine Fisheries Commission

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MEMORANDUM

February 1, 2013

To: American Eel Management Board
From: Law Enforcement Committee
Subject: Draft Addendum III Enforcement Considerations

At the October 2012 meeting of the Atlantic States Marine Fisheries Commission, the Law Enforcement Committee (LEC) reviewed and discussed possible management strategies for reducing harvest of American eel as outlined in Draft Addendum III. We offer the following comments on management strategies for various life stages and welcome the opportunity for additional input to this addendum.

Glass Eel Harvest

The LEC supports including all of the options in the document for public comment. The LEC has discussed some of the harvest and enforcement issues related to glass eels during its last two meetings. A significant amount of illegal harvest of glass eels continues outside the two states where harvest is currently allowed, and illegally harvested eels are being possessed and shipped via those two states. State and federal enforcement agencies are tasked to thwart the illegal harvest and export with reduced staff and resources. Given the monetary value of glass eels and the ability to move illegally harvested eels via legal shipments, enforcement agencies do not have, and are unlikely to obtain the resources necessary to effectively monitor and control a limited glass eel harvest. LEC members are sensitive to the economic value associated with the current glass eel fishery in Maine and South Carolina where harvest is allowed. However we are convinced that the circumstances of this fishery do not permit adequate enforcement control.

Yellow/Silver Eel Harvest

The LEC cautions that minimum or maximum size requirements for live-harvested yellow eels are cumbersome for fishermen and enforcement officers to apply in the field. However despite the difficulty, these regulations are enforceable and minimum-size regulations are already well established for this fishery. The substitution of girth measurement as a replacement or proxy for length is not recommended. The use of gear specifications relating to eel pot mesh size to control harvest of undersized animals is acceptable, but should be applied in concert with minimum size requirements. This would allow officers in the field to monitor and ensure compliance with minimum size standards through all phases of the fishery.

The LEC appreciates the opportunity to provide advice regarding future management options for the American eel fishery.