



Just say “NO” to longlines and
drift gill nets

Turtle Island Restoration Network
June 14, 2015

EFP does NOT meet legal requirements

FMP allows for EFPs where “fishing practices that are new to a fishery and not otherwise allowed under an FMP.”

- Drift gillnets in the PLCA is not new gear
- Longlines have been tested and rejected, repeatedly, especially under the ESA.

EFP Permits are not for environmentally unsound experiments

Federal Regulations say that proposals may be rejected if

- “the permit would detrimentally affect the well-being of the stock of any ... threatened or endangered species....”

—50 CFR 600.745(b)(3)(iii) (A)



Drift Gillnets have no place in the PLCA

Review:

Drift gillnets are generally among the worst in the world

| Percentile | 20% | 40% | 60% | 80% | 100% |
|------------------------|-------|--------|--------|--------|--------|
| Range of discard rates | 0-14% | 14-27% | 27-40% | 41-61% | 62-96% |

Kelleher, K. (2005). *FAO Fisheries Technical Paper. No. 470*

California Drift Gill Net Fishery discard rate: 64%

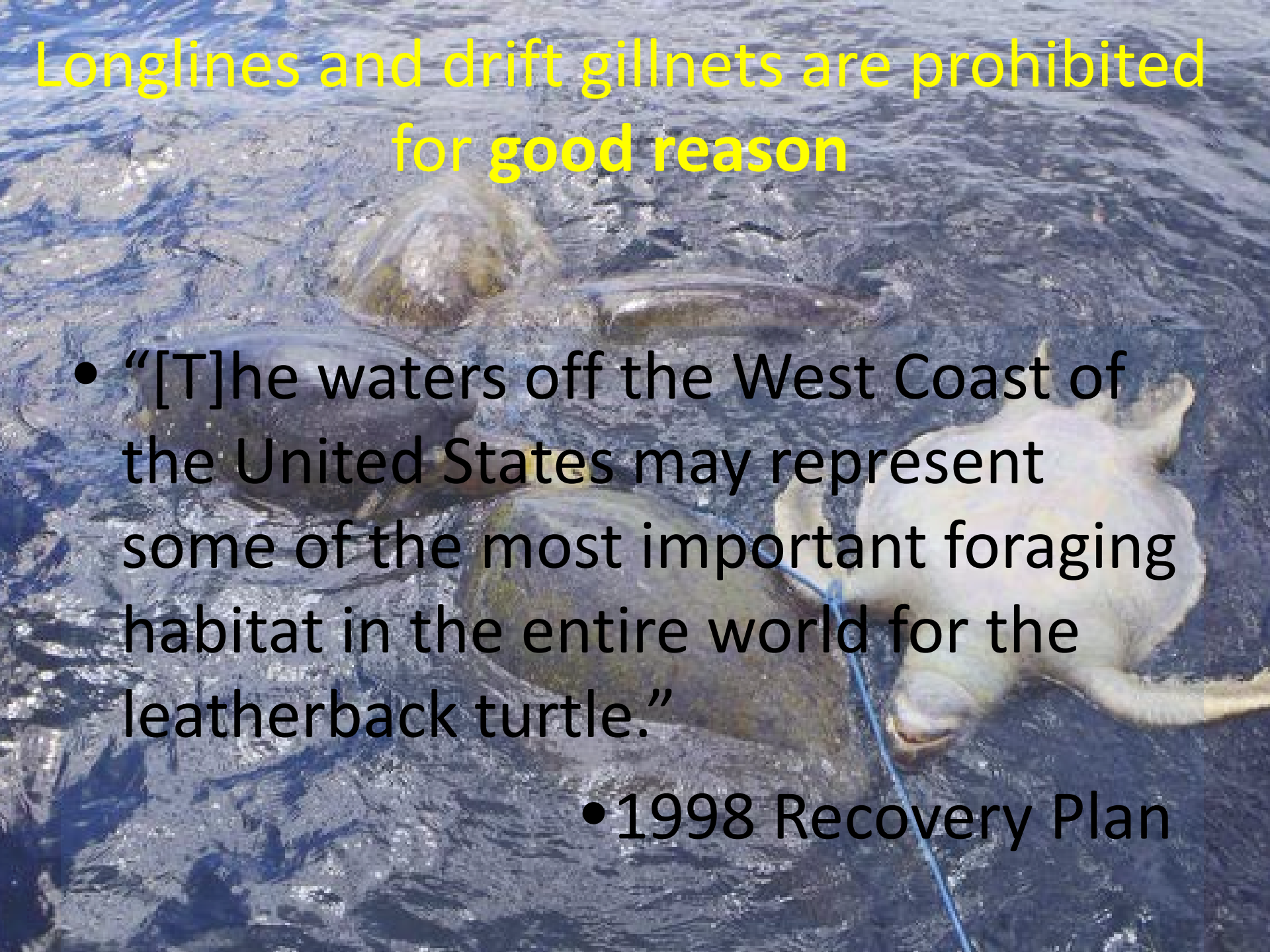
PLCA: fifteen vulnerable species threatened



Longlines and drift gillnets are prohibited for good reason

- “[T]he waters off the West Coast of the United States may represent some of the most important foraging habitat in the entire world for the leatherback turtle.”

- 1998 Recovery Plan



No need for this experiment

| Species | Estimated Deaths Before PLCA (pre 2001) | Estimated Deaths After PLCA (2001) |
|---------------|-----------------------------------------------|------------------------------------------|
| Leatherbacks | 112 | 6 |
| Loggerheads | 25 | 3 |
| Turtle (unid) | 15 | * |
| Green Turtle | 7 | |
| TOTAL | 159 | 9 |

No TESTING in the PLCA

- Must show a >95% reductions in ES take, bycatch
- No rational basis to test unspecified measures inside PLCA
- Test EcoCast outside PLCA first



Longlines are a PROVEN failure

*Hawai'i shallow set long lines
comparable to the world's dirtiest fisheries:*

| Longline Fishery | Turtle take per 10,000 hooks |
|------------------|------------------------------|
| Hawai'i | 0.19 |
| China | 0.25 |
| Taiwan | 0.24 |
| East Australia | 0.25 |

- Bartram, Kaneko, and Kucey-Nakamura (2010, Sea turtle bycatch to fish catch ratios for differentiating Hawaii longline-caught seafood products. Marine Policy 34:145-157



This EFP is likely to take at least three endangered sea turtles

THIS EFP PROPOSES:

| |
|-------------------------------|
| 2 BOATS |
| 60 SETS PER BOAT |
| 1,200 HOOKS PER SET |
| 144,000 Hooks total |
| 0.19 Turtles per 10,000 hooks |

Expected take = minimum 2.74 turtles.

- Expect take to be higher in PLCA than in Hawai'i

100% observer coverage funded by industry

- **With high bycatch expected, must have 100% coverage.**
- **Let the Industry pay for this, not the U.S. Taxpayers**

NMFS said No, California said No

- NMFS
 - No longlining in EEZ: 50 C.F.R. § 223.206(d)(9)
- California
 - Longlines banned
 - 14 C.C.R. § 107.12
 - Fish and Game Code § 9028

What do we get for killing turtles?

- No rigorous data
- No clear plans for modifications to test
- Another test of proven failed gear



Just say NO

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