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Rui Martins
Regional Director for Sea Affairs
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Dear Sirs,

My name is Jason Schratwieser, and I serve as President of the International Game Fish Association (IGFA). Founded in 1939, the IGFA is a nonprofit organization dedicated to the conservation of game fish and the promotion of responsible, ethical angling through science, education, rulemaking, record keeping, and recognition of angling achievement. Today, we represent members in 127 countries worldwide.

The IGFA greatly values the Azores' reputation as one of the world's most remarkable destinations for big game fishing and marine biodiversity. We are aware of the Regional Government's important efforts to enhance marine conservation through new marine protected areas (MPAs), and we respect the commitment to safeguarding biodiversity and benthic habitats for future generations.

In this context, we would like to share some perspectives based on our scientific work with billfish and our long-standing collaborations with governments, researchers, and conservation bodies worldwide. Building on this history and guided by its founding motto — *"For Ethical Sport and Productive Science"* — the IGFA has uniquely bridged the gap between recreational angling and marine science. Our global network of anglers, scientists, and policymakers enables us to address pressing challenges facing fish populations and their habitats with credibility and effectiveness. In 2021, we became the first recreational fishing organization accredited by the United Nations Environment Programme (UNEP), further strengthening our ability to represent anglers at the global level.

Billfish research and conservation are central to our mission. The IGFA has:

- Established the world's largest billfish satellite-tagging program through the [IGFA Great Marlin Race](#).

- Secured passage of the [U.S. Billfish Conservation Act](#), which prohibits the importation and sale of billfish in the continental U.S.
- Led the World Bank-funded [Caribbean Billfish Project](#) (2015–2018).
- Co-chaired and convened leading scientists at the [6th and 7th International Billfish Symposia](#).
- Provided expert advice to decision-making bodies such as [ICCAT](#), [IUCN Tuna and Billfish Specialist Group](#), and [NOAA's Highly Migratory Species Advisory Panel](#).

I am writing regarding proposed marine protected areas (MPAs) on Azorean seamounts, which may affect recreational anglers' access to the marlin fishery. The IGFA recognizes and supports the Regional Government's commitment to protecting biodiversity and benthic habitats. At the same time, we believe that, with appropriate management, recreational marlin fishing can coexist with these important conservation objectives.

Recreational marlin fishing involves trolling lures or bait at the surface. Gear does not interact with benthic habitats, nor does it pose a threat to seamount biodiversity. Moreover, marlin are highly migratory. Data from our satellite-tagging program show that blue marlin can travel nearly 5,000 nautical miles in 120 days. While marlin aggregate seasonally around Azorean seamounts, their residency is brief — days to weeks — due to migratory behavior and seasonal habitat suitability. Thus, restricting access to small-scale MPAs is unlikely to produce measurable conservation benefits for the Atlantic blue marlin stock, which is managed internationally under a 1,670-ton total allowable catch ^{1 2}.

Marlin fishing has also evolved into a predominantly catch-and-release practice. Studies consistently demonstrate post-release survival rates of 86% or higher for billfish, with one study showing 92–100% survival for recreationally caught blue marlin, depending on hook type ^{3 4}. This demonstrates that catch and release is a viable management option that permits fishing while protecting parental biomass.

¹ Kitchell, J. F., Martell, S. J., Walters, C. J., Jensen, O. P., Kaplan, I. C., Watters, J., ... & Boggs, C. H. (2006). Billfishes in an ecosystem context. *Bulletin of Marine Science*, 79(3), 669-682.

² Kaplan, David M., et al. "Pelagic MPAs: the devil is in the details." *Trends in ecology & evolution* 25.2 (2010): 62-63.

³ Musyl, M. K., Moyes, C. D., Brill, R. W., Mourato, B. L., West, A., McNaughton, L. M., ... & Sun, C. L. (2015). Postrelease mortality in istiophorid billfish. *Canadian Journal of Fisheries and Aquatic Sciences*, 72(4), 538-556.

⁴ Graves, J. E., & Horodysky, A. Z. (2010). Asymmetric conservation benefits of circle hooks in multispecies billfish recreational fisheries: a synthesis of hook performance and analysis of blue marlin (*Makaira nigricans*) postrelease survival. *Fishery Bulletin*, 108(4), 433.

Equally important are the economic and social benefits. Recreational billfishing generates far greater economic value than commercial harvest in many regions^{5 6 7}. For example, in Australia the net commercial value of striped marlin was estimated at \$0.7–1.3 million, while the recreational value ranged from \$14.9–32.4 million — with most fish released⁸. In Portugal, ICCAT data show 47 tons of blue marlin landed in 2023, worth approximately €235,000 at average wholesale price. By contrast, a 2022 study on Azorean ecotourism reported big game anglers contributed over €5,000,000 annually to the local economy⁹.

The value of recreational fishing in the Azores where 99% of fish are released is more than **21 times greater** than the value of Portugal's commercial blue marlin harvest.

This same 2022 study recognized marlin fishing as an ecotourism activity in the Azores. Compared to whale watchers and divers, big game anglers spend more than twice as much per trip (€7,301 on average), and one-third (the highest of any tourism category) return to the Azores for future visits. This represents a sustainable, high-value tourism market that benefits local communities.

For these reasons, the IGFA respectfully suggests that the Azores could consider building on its strong conservation record by developing a **well-regulated, economically viable recreational marlin fishery** that complements — rather than conflicts with — existing environmental objectives. Drawing on international examples, management approaches might include allowing surface trolling for pelagic species while continuing to prohibit bottom fishing in order to protect benthic habitats. A tailored framework could also consider measures such as:

- Appropriately-based license fees for resident and visiting anglers,
- Access fees for seamount fisheries,
- Mandatory use of circle hooks with natural bait, and
- Limited harvest provisions (e.g., for world record purposes).

⁵ Southwick, R., Nelson, R., Lachman, R., & Dreyfus, J. (2013). Sportfishing in Panama: size, economic impacts and market potential. *Fort Lauderdale, FL: The Billfish Foundation*.

⁶ Southwick, R., Nelson, R., & Arian, J. A. (2010). The economic contributions of anglers to the Los Cabos economy: quantifying value in a sustainable fishery. *Interdisciplinary Environmental Review*, 11(1), 69-89.

⁷ Gentner, B. (2016). The value of billfish resources to both commercial and recreational sectors in the Caribbean.

⁸ https://www.dpi.nsw.gov.au/_data/assets/pdf_file/0006/151944/stripped-marlin-report.pdf

⁹ Ressurreição, A., Cardigos, F., Giacomello, E., Leite, N., Oliveira, F., Kaiser, M. J., ... & Santos, R. S. (2022). The value of marine ecotourism for an European outermost region. *Ocean & Coastal Management*, 222, 106129.

Such measures would both safeguard biodiversity and ensure that the Azores continues to benefit from sustainable, high-value ecotourism. Conversely, closing seamounts to marlin anglers would eliminate this important economic activity without delivering meaningful conservation gains.

We also recognize the important contributions of the University of the Azores and the Department of Oceanography and Fisheries (DOP), whose research provides essential guidance for sustainable management in the region. Our objectives align closely with those of the Regional Government: conserving marine biodiversity while supporting opportunities for local communities. Beyond fisheries management, IGFA also supports educational initiatives to foster the next generation of responsible anglers and marine stewards — an area we would be pleased to explore in partnership with local institutions.

The IGFA would be pleased to share its experience and collaborate with regional institutions and stakeholders, should the Government consider such input useful in balancing conservation objectives with the continued recognition of the Azores' reputation as a premier destination for big game fishing.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Schratwieser', with a stylized, flowing script.

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