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Mário Rui Rilho Pinho  
Regional Secretary for Sea and Fishing  
Rua Cônsul Dabney - Colónia Alemã  
Apartado 140  
9901-014 Horta



Rui Martins  
Regional Director for Sea Affairs  
Rua D. Pedro IV, nº 29  
9900-111 Horta

Dear Sirs,

On behalf of the Guy Harvey Foundation (GHF), a nonprofit ocean research and education organization established by renowned marine wildlife artist and biologist, Dr. Guy Harvey, I am writing in regards to the proposed Marine Protected Area (MPA) expansion around the Azores.

In addition to the GHF, Dr. Harvey also established the Guy Harvey Research Institute (GHRI) at Nova Southeastern University in 1999 in Ft. Lauderdale, Florida, USA. The GHRI is a worldwide leader in pelagic fish research that provides the scientific information necessary to understand, conserve, and effectively manage the world's marine fishes and their ecosystems. The GHRI is one of only a handful of private organizations dedicated exclusively to the science-based conservation of marine fish populations and biodiversity.

The GHF is a proud proponent of MPAs and understand their value in protecting critical ocean habitat. And while there is a wide range of MPA management strategies with varying restrictions, research has demonstrated that catch-and-release sportfishing can be enjoyed in MPAs with very limited impact on the resource while providing significant economic benefits.

The Azores are fortunate to be a premier marlin fishing destination, drawing anglers from all over the world for a chance to catch and release large blue marlin. 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.

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 <sup>1,2</sup>. This demonstrates that catch and release is a viable management option that permits fishing while protecting parental biomass.

In addition to the high survivability of billfish (marlin, sailfish, spearfish, etc.) during catch-and-release fishing, further research conducted by the GHRI using custom designed accelerometer tags proves that blue marlin return normal swimming and feeding behavior in an average of 8.9 hours after being caught and released properly<sup>3</sup>. This combined research highlights the minimal impact that anglers have on the fish that they greatly respect.

This respect and awe that anglers have for the large blue marlin found in the waters of the Azores leads to a pursuit that is unmatched by other ecotourism activities. Fish of this size are found only in few places around the world. This is a reason recreational anglers from all over the world travel to the Azores for a chance to encounter one of these magnificent animals. Big game fishing can be an expensive pursuit, drawing high-net-worth individuals to the activity, resulting in recreational marlin fishing generating far greater economic value than other ecotourism activities.

A 2022 study on Azorean ecotourism officially recognized marlin fishing as an ecotourism activity and reported big game anglers contributed over €5,000,000 annually to the local economy. 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 Azorean communities <sup>4</sup>.

For these reasons, the GHF respectfully suggests that the Azores should 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).

Research continues to prove the minimal impact that catch-and-release fishing for marlin has on an ecosystem. Combined with the significant economic benefits for the region, it is in the Azores' best interest to continue allowing recreational fishing for billfish in a MPA management plan.

Thank you for your consideration.

Sincerely,



Greg Jacoski  
Executive Director, Research and Advocacy  
Guy Harvey Foundation  
Greg@GuyHarveyFoundation.org

<sup>1</sup>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.

<sup>2</sup>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.

<sup>3</sup>Logan, R.K., J.J. Vaudo, C.G. Lowe, B.M. Wetherbee and M.S. Shivji. 2022. High-resolution post-release behavior and recovery periods of two highly prized recreational sportfish: the blue marlin and sailfish. *ICES Journal of Marine Science*, fsac137, 79(7):2055–2068.

<sup>4</sup>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.