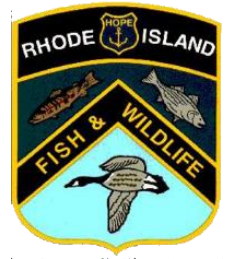




RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
DIVISION OF FISH & WILDLIFE / MARINE FISHERIES
Three Fort Wetherill Road
Jamestown, Rhode Island 02835



Atlantic States Marine Fisheries Commission Lobster Conservation Management Team Area 2

The LCMT 2 met on June 7, 2017 in Providence, Rhode Island. There were ten members of the fishing industry in attendance, as well as representatives from the State Marine Fisheries agencies of Rhode Island and Massachusetts.

At the May meeting of the Atlantic States Marine Fisheries Commission, the Lobster Management Board chose a 5% increase in egg production for the Southern New England Lobster Stock as part of Addendum XXV. At this time it is the responsibility of the LCMT's for each management area to submit proposals to the Commission on how the lobster conservation management area will achieve this increase in egg production.

The following is a summary of the LCMT for Area 2 on the above issue.

Issue 1. Egg Production Target

What should the target increase in egg production be for this addendum?

Option: 5% increase in egg production as proposed by the Lobster Management Board

Unanimous LCMT support

Issue 2. Management Tools

What management tools can be used to achieve the target increase in egg production?

Option A: Gauge size changes, season closures, and trap reductions used independently as proposed by the Lobster Management Board

Unanimous LCMT support

Issue 3. Recreational Fishery

What measures must the recreational fishery abide by this Addendum?

Option C: Recreational fishery must abide by gauge size changes as proposed by the Lobster Management Board

Unanimous LCMT support

Issue 4. Season Closures

How should season closures be implemented given lobster is jointly managed with Jonah crab?

Option B: No Possession of Lobsters While Fishing

Sub-Option II: Most Restrictive Rule Does Not Apply as proposed by the Lobster Management Board

Unanimous LCMT support

Issue 5. Standardized Regulations

Should regulations be standardized across LCMAs?

Option A: Regulations not uniform across LCMAs as proposed by the Lobster Management Board

Unanimous LCMT support

Issue 6. Implementation in LCMA 3

How should regulations be implemented in LCMA 3 given it spans both the SNE and GOM/GBK stock?

Abstention by LCMT 2 on this issue.

Reasoning: The LCMT for Area 2 does not wish to provide guidance on management action in any LCMA other than Area 2.

Issue 7. De Minimis

Do de minimis states have to implement the management measures in this Addendum?

Abstention by LCMT 2 on this issue.

Reasoning: The LCMT for Area 2 does not wish to provide guidance on management action in any LCMA other than Area 2.

Summary: The LCMT for Lobster Conservation Management Area 2 proposes to use the current trap reduction plan as the sole management tool to achieve the 5% increase in egg production.

Unanimous LCMT support

Attendance:

Jason McNamee, Chief RI Marine Fisheries

Scott Olszewski, RI Marine Fisheries

Conor McManus, RI Marine Fisheries

Dan McKiernan, Mass DMF, Associate Director

Jarrett Drake, LCMT 2 Mass

Grant Moore, LCMT 3 Mass

Greg Mataronas, LCMT 2 RI

Tom Tomkiewicz, LCMT2 Mass

Lanny Dellinger, LCMT 2 RI, Chair

Al Eagles, LCMT 2 RI

John Moniz, Area 2 Mass

Eric Moniz, Area 2 Mass

Richard Allen

Roy Campanale, LCMT 3 RI

June 15, 2017

Megan Ware
Fishery Management Plan Coordinator
1050 N. Highland St, Suite 200 A-N
Arlington, VA 22201

Dear Megan,

The Area 3 Lobster Conservation Management Team met on June 14, 2017 in person at the MADMF office in New Bedford, MA and via conference call.

The following LCMT members were in attendance: Grant Moore – Chair, Peter Brown, Marc Palombo, and Roy Campanale (phone). The following additional Area 3 lobstermen were in attendance: Dick Allen (representing Shafmaster Fishing). The following support staff were in attendance: David Borden – Atlantic Offshore Lobstermen’s Assn. (AOLA) and ASMFC, Dan McKiernan – MA Division of Marine Fisheries (MADMF) and ASMFC, Tracy Pugh – MADMF and ASMFC’s Lobster Technical Committee (phone), Heidi Henninger – AOLA (phone).

The Area 3 Lobster Conservation Management Team offers the following Addendum XXV management plan by consensus:

Area 3 will complete a 25% trap allocation reduction as approved in Addendum XVIII. Trap reductions of 5% per annum were taken in fishing years 2016 and 2017. As currently scheduled, there will be three more years (2018, 2019, 2020) of 5% annual reductions. The Technical Committee’s analysis indicates that these trap reductions will exceed the 5% increased egg production target (Addendum XXV for Public Comment, page 17).

Related to the concern that this trap reduction plan, in combination with transferability, does not effectively remove active effort, we note that there are complexities with multi-area permits, the market for traps, and operational constraints that all serve to draw down the amount of potential fishing effort inherent in shelved permits and traps. The Rhode Island Lobstermen’s Association’s Addendum XXV comment letter provide a series of insightful examples.

Further, we strongly urge NOAA Fisheries to complete their Addendum XXI rulemaking, to align the federal trap cap with the ASMFC’s plan. The federal cap is currently static, whereas the ASMFC’s plan reduces the maximum permit and ownership trap caps annually. For further description, we have attached a letter that the Atlantic Offshore Lobstermen’s Association submitted to NOAA NMFS GARFO on this issue.

The LCMT also discussed the provisions approved at the last Board meeting and resolved by consensus the following:

Issue 1 – Target Increase in Egg Production: The LCMT supports the Board’s decision to pursue a 5% increase in egg production.

Issue 2 – Management Tools: As noted in our April comments, the LCMT continues to support “Option A, Management Tools Can Be Used Independently”. This option allows for much needed management flexibility to craft area specific plans that will meet the goals of this Addendum.

Issue 3 – Recreational Fishery: The LCMT does not have a preference on this issue.

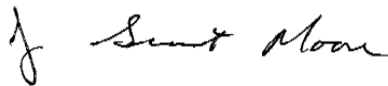
Issue 4 – Season Closures: The LCMT supports Option B with Sub-Option B, No Possession of Lobsters while fishing, most restrictive rule does not apply, with the addition of a bycatch allowance in the trap fisheries of 100 lobsters per day/500 lobsters per trip by count. This will create equitability between the trap and mobile gear fisheries.

Issue 5 – Uniform Regulations: As noted in our April comments, the LCMT continues to support “Option A, Regulations Are Not Uniform Across LCMA3s”.

Issue 6 – Implementation of Management Measures in LCMA 3: As noted in our April comments, the LCMT continues to support “Option A: Maintain LCMA 3 as a Single Area (Status Quo)”.

Issue 7 - Management Action in De Minimis States: The LCMT does not have a preference on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Grant Moore". The signature is fluid and cursive, with a large initial "J" and a stylized "M".

J. Grant Moore
LCMT Area 3 Chair



ATLANTIC OFFSHORE LOBSTERMEN'S ASSOCIATION

Grant Moore, President
exec@offshorelobster.org

David Borden, Executive Director
dborden@offshorelobster.org

23 Nelson St Dover, NH 03820 | P: 603-828-9342 | www.offshorelobster.org | heidi@offshorelobster.org

January 13, 2017

John Bullard
Regional Administrator
NOAA NMFS GARFO
55 Great Republic Drive
Gloucester, MA 01930

Dear John,

I'm writing as representative of the Atlantic Offshore Lobstermen's Association to urge NOAA NMFS GARFO to promulgate rules in response to the American lobster trap reduction provisions approved by the Atlantic States Marine Fisheries Commission in 2013 (ASMFC, Addenda XXI and XXII). In particular, the Agency's inaction on the LCMA 3 trap cap is resulting in traps being fished in Area 3 in excess of what the Commission intended. This is counter to the best interests of the lobster resource, especially in overfished Southern New England. It also harms protected species and marine mammals, as it results in more vertical lines being set in Area 3.

In terms of the history of this issue, the LCMA 3's trap transfer program and 5-year trap reduction strategy were approved by the Commission via a series of Addenda, the last being in 2013, and implemented in Fishing Year (FY) 2016. According to ASMFC's plan, the Area's trap cap should be reduced 5% each year in concert with allocation reductions. The Commission's plan proscribes the following annual active trap caps: 1900, 1805, 1715, 1629, 1548, for FYs 2016 to 2020, respectively. The federal cap is currently static at 1945 traps.

The Area 3 LCMT proposed the trap reduction plan outlined in Addenda XVIII, XXI and XXII specifically because it would remove all latent effort and afford those left in the industry an even playing field, with everyone fishing close to the same number of traps after consolidation. Business plans were made and permits and traps purchased with the 1548 ending trap cap in mind, however the higher federal cap allows those with means, to make additional trap purchases. There are not enough traps available under a higher trap cap scenario to realize the equity envisioned in the ASMFC plan and the traps still available are selling at rates 50-70% more than in years' past. The Agency's inaction on the trap cap provisions has undermined the equitability designed into the ASMFC Addenda, has caused confusion amongst many in the industry, and has allowed more traps in the water.

For example, multiplying the difference between federal and interstate trap caps by the number of Area 3 permit holders, there is the potential for ~6,000 extra traps in Area 3 this fishing year. Since the transfer process has already commenced for FY 2017, we can take this calculation one year further, which results in ~18,500 extra traps allowed because of the higher federal cap. Of course,

only a portion of Area 3 permits are active, and not all permit holders have the means to purchase and transfer traps, but enough do to make this a real concern.

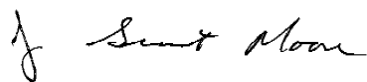
I also have concerns that the lack of federal action on this issue could be further delayed into 2018 or 2019, if combined into one rulemaking process with Addendum XXV. I note that the agenda for the ASMFC winter meeting includes discussion of initiation of a new data collection Addendum, which might also require changes in the federal program. These delays cause a major disconnect between State and Federal rules and are not in the best interest of the SNE lobster resource.

Not only does this delay in rulemaking cause conservation concerns with the SNE lobster stock, there are also logistical and economic concerns. How, for instance, will your Agency reconcile the disparate trap caps? I assume NOAA will not take traps in excess of the ASMFC cap away from permit holders. I suggest that GARFO set up a dialog with ASMFC and Area 3 permit holders on the development of a strategy to reconcile these differences and do so as soon as possible, in order to take advantage of the remaining years of scheduled trap cuts.

In conclusion, I implore you to correct the trap cap disparity before FY 2018 transfer applications are accepted. If not, your agency won't be able to address the active trap cap until FY 2019, at which point the federal cap will be 1945 and the ASMFC cap will be 1629. The Agency will also have the added complication of combining this rulemaking with Addendum XXV and, possibly, Addendum XXVI.

Thank you for consideration of the Association's concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Grant Moore". The signature is fluid and cursive, with the first letter of each word being capitalized and prominent.

J. Grant Moore
President

cc Robert Beal, ASMFC



NEW JERSEY DIVISION OF
Fish and Wildlife

P.O. Box 400

Trenton, NJ 08625-0400

David Chanda, Director



**Department of
Environmental
Conservation**

Division of Marine Resources

205 N. Belle Mead Rd, Suite 1

East Setauket, NY 11733

James Gilmore, Director

To: American Lobster Technical Committee
From: Peter Clark (NJF&W) and Kim McKown (NYDEC)
Date: June 23, 2017
Subject: Lobster Conservation Management Team 4 Proposal for Addendum XXV

Addendum XXV of the ASMFC Lobster Fishery Management Plan was developed in response to record low abundance of the Southern New England (SNE) lobster stock and the concern that it is experiencing recruitment failure. The goal of the Addendum is to increase egg production of the SNE lobster stock by 5%. The increase in egg production can be achieved through one or more of the following management tools which must be implemented by January 2018.

1. **Gauge size change:** Increase the minimum size above 3 3/8 "and/or decrease the maximum size below 5 1/4 ".
2. **Trap reductions:** Decrease in the number of traps. Table 12 of the Addendum is based on the relationship of actively fished traps and egg production.
3. **Season closures:** During the season closure lobsters cannot be possessed on board or landed. Lobster traps may remain in the water and Jonah crab and whelk may be harvested. The most restrictive rule does not apply to season closures. Table 13 of the Addendum contains information on the increase in egg production resulting from quarterly season closures.

The options in the tables of Addendum XXV are based on increase in egg production ranging from 20% to 60%. At the spring 2017 the Lobster Board chose a target increase of 5%, which is considerably less than the options in the Addendum. Most of the management options developed for Addendum XXV are much larger than 5%. This made it challenging to develop a proposal which didn't exceed the 5% increase in egg production goal of the Addendum.

The Lobster Conservation Management Team (LCMT) 4 met on May 18, 2017 in Belmar, New Jersey to determine management measures for compliance with Addendum XXV.

Trap Reduction

The LCMT 4 proposes to implement a 10% decrease in Lobster Conservation Management Area (LCMA) 4 trap allocation for New Jersey and New York permit holders. A proportional relationship was used to determine the proportion of traps that would need to be decreased to achieve a 5% increase in eggs based on the recent year's information included in Table 12 of the relationship

between trap reductions and egg production (Table 1).

Table 1. Proportional determination of trap reduction which would achieve a 5% increase in egg production.

Years	Trap Reduction	Egg Production
recent (1999-2013)	25%	13.10%
Proportion	10%	5%

LCMA 4 lobstermen state that the active lobstermen are fishing their full trap allocations, so a 10% decrease in allocation should decrease actively fished pots by a similar amount. The number of NJ and NY lobstermen who have been actively fishing has been relatively stable since 2012 (13 – 21 for NJ and 9 – 13 for NY). Trap allocations and the number of traps fished have also been fairly stable over the same time period (Table 2). A 10% decrease in trap allocation will decrease traps in NJ to 32,861 and in NY to 34,034.

Table 2. Lobster Permits and LCMA 4 Trap Tags

NY

Year	All NY Lobster - Resident	All NY Lobster NonResident		# NY Permits w LCMA 4 trap allocation	NY LCMA 4 trap allocation		# LCMA active trap permit holder	# NY LCMA 4 traps fished	% Allocation Actively Fished
2012	27	334		94	39,700		13	10,783	27%
2013	23	326		91	38,525		8	7,890	20%
2014	20	309		90	38,515		9	11,221	29%
2015	18	293		87	38,165		12	9,966	26%
2016	18	280		83	37,815		9	8,842	23%
10% decrease					34,034				

CT

Year	All NJ Federal Lobster Permits			# NJ Boats w LCMA 4 trap allocation	NJ LCMA 4 trap allocation		# LCMA active boat permits	# NJ LCMA 4 traps fished	% Allocation Actively Fished
2012	199			42	47,326		21	17,905	38%
2013	184			38	41,636		14	13,540	33%
2014	188			35	40,236		16	15,518	39%
2015	188			33	37,596		13	13,158	35%
2016	48			32	36,512		15	13,773	38%
10% decrease					32,861				

Maryland-Delaware-Virginia
Lobster Conservation Management Team
LCMA5

Chair-Sonny Gwin
Townsend

Vice-Chair-Wes

June 15, 2017

Dear Ms. Megan Ware,

Thank you for providing the options for meeting Addendum XXV egg production requirements to the LCMT. Please ensure this letter is received by the ASMFC American Lobster Board.

We conducted the second official meeting of the Lobster Conservation Management Team (LCMT) for LCMA5 to address Addendum XXV on June 7, 2017. We are proposing to use the 88 mm -133 mm gauge change to meet the requirement in LCMA 5.

Thank you.

Sincerely,

Sonny Gwin

Sonny Gwin



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**



To: American Lobster Technical Committee
From: Kim McKown, NY DEC
Colleen Giannini, CT DEEP
Date: June 16, 2017
RE: Lobster Conservation Management Area 6 Compliance Proposal for Addendum XXV

Addendum XXV to the Fishery Management Plan for American Lobster calls for a 5% increase in egg production for the Southern New England lobster stock to address continued stock decline while preserving a functional portion of the lobster fishery. The Addendum lists three compliance options that can be implemented by all LCMAs within the Southern New England (SNE) stock area, namely 2, 3, 4, 5, and 6. One or more of these options are to be implemented effective January 2018.

- a. **Gauge Size Changes:** Increases in the minimum legal size (currently 3 3/8" in LCMA6) or decreases in the maximum legal size (currently 5 1/4" for LCMA6);
- b. **Trap Reductions:** Decrease in the number of actively fished traps;
- c. **Closed season:** Each LCMA could choose one of four quarterly closed seasons to achieve the 5% increase in egg production. For the purposes of meeting the criteria of this option, landings are directly equated to exploitation of non-egg bearing females and recoupment is not considered.

The option tables presented in Addendum XXV were developed in anticipation that the target increase in egg production would range from 20% to 60%. The target increase adopted by the Board was 5%, a value considerably lower than anticipated and outside the range of most of the egg production increases specified in tables 11, 12, and 13 in the main document and Tables 1 and 2 in Appendix 5. This presented a challenge in developing measures that did not grossly and unnecessarily exceed the 5% threshold.

LCMA 6 Compliance Proposal

Based on comments received at three public meetings (two in Connecticut and one in New York), and two meetings of the Area 6 Lobster Conservation Management Team (LCMT 6), two options are proposed below.

Option 1: Status Quo. The LCMT 6 had lengthy discussion surrounding the substantial decrease in effort and landings already observed in LCMA6. The team feels strongly that any additional restrictions would jeopardize the continued operation and the future of the commercial lobster fishery in Long Island Sound. The team feels the continued issue of latency in LCMA6 needs to be addressed and would like to develop and implement measures to further reduce the number of latent traps (Appendix 1).

Option 2: This option combines a decrease in the current maximum legal size from 5 ¾" (133mm) to 4 17/32" (115mm) (option A) in combination with an institution of nine Sunday closures in July and August (option C) and are being proposed to achieve a total 5.3% increase in egg production.

Reduction in the maximum legal length in LCMA 6.

The benefit of a decrease in the maximum size to 4 17/32" (115mm) was taken from Table 2 of Appendix 5 in Addendum XXV. Table 2 indicates the resultant increase in egg production at a given minimum legal length for a series of 10mm maximum length intervals. Selecting the current minimum legal size of 86mm (3 3/8") in LCMA 6 from the table, a decrease in the current maximum size from 133 (5 ¼") to 115m (4 17/32") achieved an increase of 1% in egg production. This reduction in the maximum size provides permanent protection from harvest.

Institution of Sunday closures in June and July in LCMA 6.

The institution of Sunday closures in July and August is in addition to the current season closure in place in LCMA 6 from September 8 through November 28.

Although there was some discussion of extending the current season closure on the front and/or back end, the strongest support emerged for closing harvest on Sundays in July and August. The team felt strongly that restricting any level of harvest during the summer months allows additional time for females to extrude eggs, protecting them from harvest. They also felt the additional soak time would allow lobsters to continue to exit traps through the escape vents, protecting them from harvest and the additional stress of being hauled to the surface.

The effect of Sunday closures was calculated using the monthly pattern for commercial (all gear types) landings reported for Connecticut and New York from LCMA 6 (Table 1) between 2013 and 2015. This time period was selected as the fishery has adjusted to the current fall closure (Sept 8 through November 28) which began in 2013. The monthly proportion of LCMA6 landings from 2013-2015 was used to determine the benefit to egg production (Table 2).

Table 1. Monthly and Total Area 6 Commercial) Landings (pounds) for New York and Connecticut, 2013-2015. Commercial data taken from SAFIS.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
CT 2013 - 2015 sum	14,868	7,762	7,153	12,704	39,469	56,109	102,804	81,438	8,550	0	4,492	29,029	364,377
NY 2013 - 2015 sum	1,425	539	108	2,233	4,440	10,465	17,653	16,139	3,023	0	1,740	8,715	66,479
Totals	16,293	8,301	7,261	14,937	43,909	66,574	120,457	97,577	11,573	0	6,232	37,744	430,857

Table 2. Proportion of Total Landings for Area 6 by Month, 2013 - 2015.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
LMA6 2013 - 2015 prop	0.04	0.02	0.02	0.03	0.10	0.15	0.28	0.23	0.03	0.00	0.01	0.09	1.00

The quarterly proportion of legal sized (86mm – 133mm) non egg-bearing females observed from 2001-2016 was calculated using a combination of CT and NY sea sampling data, NY port and market sampling data and NMFS observer data from NY for LCMA6. Monthly sample sizes of marketable females were sparse in some years, therefore quarterly proportions were computed (Table 3).

Table 3. Quarterly proportion of legal non egg-bearing females for Area 6, 2001-2016.

	Quarter			
	1	2	3	4
01 - 16 prop	0.40	0.44	0.58	0.35

Daily landings percentages of females were computed by dividing the monthly landings proportion by the number of days in the month and multiplying that product by the corresponding quarterly proportion of fishery dependent observations of legal non egg-bearing females. Entering the number of days in the month that would be closed then yielded the percent decrease in the landings, reasoning that a reduction in the harvest of non-egg bearing females is suitable proxy for an increase in egg production. The institution of Sunday closures in July and August is proposed (Table 4) gaining a 4.3% increase in egg production.

Table 4. Sunday closure days in June and July that achieve a 4.3% increase in egg production, based on a reduction in the total commercial female landings for Area 6.

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
days	31	28	31	30	31	30	31	31	30	31	30	31	365
%/day	0.000516	0.000286	0.000258	0.00044	0.001419	0.0022	0.005239	0.004303	0.00058	0	0.000117	0.001016	
days closed	0	0	0	0	0	0	5	4	0	0	0	0	9
% reduction	0	0	0	0	0	0	0.026194	0.017213	0	0	0	0	0.043406

The combination of the increase in egg production by the reduction of the maximum legal size to 4 17/32" (1%) and Sunday closures in July and August (4.3%) results in a calculated increase in egg production for LCMA 6 of 5.3%.

Overlap of Measures

Lobsters between 116 and 132 mm in size are being returned to the water throughout the year due to the implementation of the maximum size, so they need to be accounted for during the season closure to ensure they aren't double counted. To do this the percent increase from the change in the maximum size (1%) was multiplied by the percent increase from the season closure (4.341%) to estimate the percent overlap (0.043%). This value was subtracted from the sum of the maximum size and season closure percentages. The Final percentage increase in potential egg production is 5.297%.

Table 5. Accounting for overlap of management measures.

% Increase	
Max Size %	1.000%
Seasonal Closure %	4.341%
subtotal	5.341%
decrease due to overlap	0.043%
Final % increase	5.297%

The decrease in maximum gauge to 115 mm (4 17/32") will be implemented in both the commercial and recreational fisheries in LCMA 6. During the Sunday season closure in July and August, there will be no possession of lobsters by commercial permit holders while fishing. Lobster traps, as well as other gears which harvest lobster, may remain in the water during the season closure and Jonah crab and whelk

may be harvested during the closure period. The most restrictive rule does not apply to the closed season. In addition, the closed season may only apply to the commercial lobster fishery.

Appendix 1. Connecticut and New York LCMA 6 Lobster Effort

NY

Year	All NY Lobster - Resident	All NY Lobster NonResident		# Res Permits w LCMA 6 trap allocation	Res LCMA 6 trap allocation		# LCMA6 who ordered trap tags	# of LCMA 6 trap tags ordered		# LCMA active trap permit holder	# LCMA 6 traps fished	% Allocation Actively Fished
2008	384	30		236	184,019		133	94,051		52	39,825	22%
2009	375	30		222	170,298		119	85,439		38	29,501	17%
2010	360	30		216	166,419		106	69,129		42	34,617	21%
2011	344	28		192	151,008		74	44,665		38	29,645	20%
2012	334	27		184	130,062		65	31,840		30	9,936	8%
2013	326	23		181	127,652		53	22,554		23	12,024	9%
2014	309	20		167	117,924		NA*	NA*		14	8,075	7%
2015	293	18		159	111,108		44	14,401		21	11,148	10%
2016	280	18		155	110,208		51	15,973		29	9,132	8%

CT

Year	All CT Lobster - Resident	All CT Lobster NonResident		# Res Permits w LCMA 6 trap allocation	Res LCMA 6 trap allocation		# LCMA6 who ordered trap tags	# of LCMA 6 trap tags ordered		# LCMA active permit holder	# LCMA 6 traps fished	% Allocation Actively Fished
2008	228	34		471	301,430		173	99,728		162	56,355	19%
2009	220	26		461	293,910		160	83,883		139	63,824	22%
2010	206	26		456	296,970		147	83,846		129	53,516	18%
2011	180	19		452	296,220		124	60,434		98	39,518	13%
2012	161	14		451	296,800		103	47,807		94	29,353	10%
2013	142	12		453	294,200		83	37,625		70	19,165	7%
2014	131	9		451	293,480		71	31,040		63	19,000	6%
2015	143	17		448	290,030		84	44,940		71	21,660	7%
2016	184	35		179	124,898		95	46,238		83	30,188	24%

NA* - not available