



# SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

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Duane Harris, Chairman  
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December 17, 2008

William Michaels  
NOAA Fisheries Service  
Office of Science and Technology  
1315 East-West Highway, F/ST4  
Silver Spring, MD 20910

RE: National Standard 2 Advanced Notice of Proposed Rulemaking (0648-AW62)

Dear Mr. Michaels:

The South Atlantic Fishery Management Council is pleased to provide the following comments:

- The South Atlantic Council has supported Secretarial (NMFS) development of SAFE reports in the past and continues that support today. We believe development of SAFE reports should be a Secretarial responsibility, with the Councils assisting in the development as agreed to and specified in a Regional Operating Agreement, Memorandum of Understanding or some other joint agreement between the Council, Regional Office and Science Center;
- It is critical that the Councils be provided with annual SAFE reports to meet the new requirements of the RMSA;
- We fully support including the recommendations that are provided by the Scientific and Statistical Committee in the SAFE report based on their new responsibilities as specified in the RMSA;
- SAFE reports should also include (reference) the information in the latest stock assessment for the species addressed, presented in a format conducive to use by the Councils for making management decisions;
- All data provided in the SAFE reports should be updated annually;
- The SAFE report should determine when the only science, stock assessment or other information available to the Councils is of such a poor quality that it should not be considered the "best science available". In other words, there should be minimum standards developed to determine what constitutes "best science available" for a Council to use in making management decisions;
- National Standard 2 should be flexible in addressing how each Council establishes its stock assessment and peer review processes and how these processes are integrated into the function of the SSC.

Thank you for the opportunity to comment on such an important item. If you have any questions or require any clarification, please contact me or Bob Mahood.

Sincerely,

Duane Harris  
Chairman

cc: Council Members and Staff  
Bonnie Ponwith  
Monica Smit-Brunello  
Phil Steele