Amendment 20A is an attempt to keep the wreckfish train on track. The irony here is nothing in the past or in the immediate future threatens a derailment. For 18 years this fishery has been humming along smoothly, a paragon of how successfully a catch share program can work. It is touted by many, even the Monterey Bay Aquarium, as an excellent example of how to best manage fisheries for sustainability and profit. This amendment portends to salvage the wreckfish fishery after the SSC elected to cut the total allowable catch of wreckfish from 2 million pounds to 250,000 pounds annually.

After adjusting this new quota downward for whole weight v. gutted weight, 5% for recreational, and 5% for the appeals process, the quota will be capped for the commercial sector at an amount less than was caught in each of the last two years.

This 87% reduction would not necessarily wreck the train, just damage it, if this fishery was under an open quota system, but that is not the case. Each participant holds a percentage of the allowable quota and, depending on an individual's share holdings and fishing history, this drastic reduction in quota could put him completely out of business.

Recognizing the potential problem, Council elected to implement Amendment 20A, an unnecessary, immoral, if not illegal ruling. The seminal move by SSC underlies this attempt to correct a problem where one would maybe not exist but for the SSC not following Magnuson Stevens mandates to use the best scientific information available. An average of the last ten years of dubious catch history is not the best available science.

This proposed action by Council is a message conveyed to the fishing industry, contrary to that expressed by NOAA leadership when addressing the catch share programs. This reduction in quota and resulting amendment will answer negatively, from NOAA's perspective, the many questions of the fishermen concerning the efficacy of a system managed with catch shares.

When the actions taken don't follow the rhetoric certain elements of trust are eroded. When using uncertainty and the precautionary approach one should consider degree to mitigate unnecessary damage to the fishery especially in this case. The catch has been relatively flat for years and even if it increases next year before the stock assessment scheduled for 2013, there is no evidence that the economics and regulatory threats would support a significant increase in activity in this unstable changing climate.

One size does not now and never will fit all. This fishery should be managed as the entity it is and not as a member of the snapper/grouper complex. Wreckfish are a distinct population, at least in the North Atlantic and Mediterranean. Evidence shows movement between different North Atlantic geographic populations. There is science, both foreign and domestic, on the North Atlantic wreckfish and all of it should be consulted before setting a quota and implementing an amendment that totally changes the structure of this highly successful fishery.

The South Carolina Seafood Alliance funded research to collect available science on wreckfish and the results of this search was relayed to Council. The Alliance requests "no action" on 20A and that the ABC be set at no less than 750,000 pounds until the 2013 benchmark stock assessment is completed. We also request that SSC and the Council consult those in the system and near by who have done peer reviewed science on wreckfish on the Blake Plateau and other areas of the North Atlantic. One of the most knowledgeable scientists on this subject is only an, "excuse me Dr. Sedberry," away from you.

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