



## Southern Shrimp Alliance

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July 29, 2025

TO: Allie Iberle,  
Fishery Scientist - Shrimp Fishery Lead

John Carmichael,  
Executive Director

FROM: John Williams, Executive Director  
Southern Shrimp Alliance

RE: Coral Amendment 11/ Shrimp Amendment 12

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Thank you for the opportunity to provide the following comments on behalf of the Southern Shrimp Alliance (SSA) regarding Coral Amendment 11/ Shrimp Amendment 12 in which we strongly recommend that the Council take Final Action to adopt Preferred Alternative 2 and to submit that Alternative to the Secretary for approval pursuant to section 304(a) of the Magnuson-Stevens Act (MSA).

Founded in 2002, SSA's membership is comprised of many small, family-owned businesses in the shrimp fisheries and associated shoreside enterprises at the core of the economies and cultures of coastal communities in all eight warm-water shrimp producing states from North Carolina to Texas. This includes rock shrimp fishermen and associated shoreside business and communities that are directly affected by this action.

**Coral Amendment 8** SSA first calls the Council's attention to the comments regarding Coral Amendment 8 that were filed on July 21, 2014, by 257 rock shrimp fishing vessel owners, captains

and crew, rock shrimp processors, dealers, distributors, retailers and consumers, industry representatives and various other small business owners and workers providing goods and services to the South Atlantic rock shrimp fishery in support of retaining the rock shrimp fishery's access to certain historically valuable shrimp fishing areas where rock shrimp fisherman documented the absence of coral. These comments provided extensive legal analyses including with respect to the Amendment's lack of consistency with the National Environmental Policy Act (NEPA), the MSA, including its National Standards, and other applicable law. The following excerpt from those comments provides today, as they did then, a clear insight into this community's commitment to balance coral conservation with its own legitimate and statutorily protected economic interests consistent with core policies and mandates set forth in the MSA, NEPA and other applicable law.

*"The South Atlantic shrimp industry is committed to coral protection in concept and in practice. The fishery employs state of the art WinPlotTM technology to precisely and continuously monitor the position of its nets to target soft substrate shrimp habitat and to avoid coral structure and hard substrate coral habitat. Further, there is a strong economic disincentive for shrimp fishermen to allow their gear to interact with and be damaged by coral, and to fish on unproductive hard substrate habitats. Therefore, by definition, any contemporary WinPlotTM record of a rock shrimp trawl track confirms the absence of coral and coral habitat. Although the threat of shrimp fishing activity to coral is extremely small to nonexistent, the industry supports reasonable measures to protect coral that are based on sound science, are consistent with the law and that achieve an appropriate balance between legitimate coral protection objectives and the economy of our industry and fishery dependent communities."*

SSA requests that those comments be included in the record of decision of this action which can be found here: : <https://www.regulations.gov/comment/NOAA-NMFS-2014-0065-0035>

**Coral Amendment 10** The comments filed on June 24, 2022, by SSA regarding Coral Amendment 10 further documented the admission by federal and state scientists and fishery managers of the errors underlying this closure of this SFAA in Coral Amendment 8, as well as the intent and broad support of the Council and SERO to correct those errors. Included in SSA's comments and set forth here again is the final paragraph of what was in section 5.1.7 of the Council's Amendment 10 document at that time making the clear its definitive conclusions in support of restoring access to the area. (now see p. 67 of the Council's final Coral Amendment 10 document here: <https://safmc.net/documents/coral-amendment-10/>)

#### *"5.1.7 South Atlantic Council's Conclusion*

*The South Atlantic Council concluded that Preferred Alternative 2 is the best alternative to help achieve optimum yield in the rock shrimp portion of the South Atlantic shrimp fishery while balancing the concerns over protection for nearby important habitat. The South Atlantic Council expects Preferred Alternative 2 to increase economic and social benefits to rock shrimp fishermen by increasing access to a very specific and historic rock shrimp fishing area along the southern*

*portion of the eastern boundary of the northern extension of the OHAPC, while maintaining protection of the Oculina deep-water coral ecosystem. The South Atlantic Council determined that the preferred alternative also best meets the objectives of the Fishery Management Plan for the Coral, Coral Reefs and Live/Hard Bottom Habitat of the South Atlantic Region, as amended, while complying with the requirements of the Magnuson-Stevens Act and other applicable law.”*

Yet, when submitted for Secretarial approval, Amendment 10 was disapproved for reasons that remain unclear. The agency’s publicly stated reasons were that the Amendment “*does not adequately demonstrate how a decision to open the area to rock shrimp fishing is consistent with Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) requirements related to essential fish habitat and bycatch, and the goals and objectives of the Coral Fishery Management Plan.*” It remains SSA’s view today that these reasons given by the agency for disapproving Coral Amendment 10 were not supported by the science, law or other elements of the record of decision. Clearly the Council and the SERO felt the same way in 2022.

SSA requests that its comments on Coral Amendment 10 be included in the record of decision of this action which can be found here: <https://www.regulations.gov/comment/NOAA-NMFS-2021-0126-0034>

**Coral Amendment 11/Shrimp Amendment 12** Effective fishery management – the management of both natural resources and those Americans that use them - is founded on the use of ‘best scientific information available’ as set forth in MSA National Standard 2. According to the Council’s request for public comments background information, the “***mapping studies conducted by the SEFSC in 2022 and the NOAA Ship Nancy Foster in 2025 did not note the presence of live, standing dead, or coral rubble within the proposed SFAA***”. This finally and unequivocally represents the best scientific information available consistent with the MSA National Standard 2 mandate. As has been asserted by the rock shrimp fishery for many, many years, there is no coral in the proposed SFAA under Preferred Alternative 2.

Further, that background clearly concludes that Preferred Alternative 2 provides a sufficient and effective buffer for protecting Oculina located to the west of the SFAA. Together, the science and the conservative approach taken with such buffer should compel the Council to adopt, and the agency to approve and implement, the SFAA set forth in Preferred Alternative 2.

Again, SSA strongly requests the Council to take final action to adopt Preferred Alternative 2, as it did in 2022. Consistent with the Amendment’s Purpose and Need, the management approach taken by this Alternative strikes a scientifically and operationally sound balance for achieving coral conservation objectives and providing access to historically important fishing grounds consistent with the MSA National Standard 1 mandate to achieve Optimum Yield.

**Executive Order Restoring America's Seafood Competitiveness** Further, as the Council is well aware, American shrimp fisheries are facing unprecedented economic stress due to a range of external and regulatory factors including especially the impacts of illegal and unfairly trade shrimp imports on U.S. market prices. Restoring access to the SFAA will serve to address this economic crisis consistent with the following principals and directives of the President's Executive Order Restoring America's Seafood Competitiveness:  
<https://www.whitehouse.gov/presidential-actions/2025/04/restoring-american-seafood-competitiveness/>

Specifically, we call your attention to Sec. 4(a)(i) of the Executive Order as follows here:

*(i) The Secretary of Commerce shall request that each Regional Fishery Management Council, within 180 days of the date of this order, provide the Secretary of Commerce with updates to their recommendations submitted pursuant to Executive Order 13921, to reduce burdens on domestic fishing and to increase production. Building upon the earlier goals, identified actions should **stabilize markets, improve access, enhance economic profitability, and prevent closures.** The Regional Fishery Management Councils will commit to a work plan and a schedule for implementation to ensure these actions are prioritized.*

In conclusion, for more than 10 years the rock shrimp fishery has been denied access to historically valuable fishing grounds for reasons that were neither supported by the science or the law. Consistent with the President directive, it is high time for the Council to finally put an end to this travesty during this time of the industry's economic crisis.

Sincere thanks for your consideration –

John Williams,



Executive Director