

Florida Keys Commercial Fishermen's Association

(Formerly Monroe County Commercial Fishermen, Inc.)

P.O. Box 501404, Marathon, FL 33050

Phone: 305-743-0294 Cell: 305-619-0039

Email: fkcfa1@hotmail.com

South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, South Carolina 29405

To Whom It May Concern:

On behalf of the Florida Keys Commercial Fishermen's Association (FKCFA) I am contacting the South Atlantic Fishery Management Council (SAFMC) to address the scoping document for the Caribbean, Gulf of Mexico, and South Atlantic Councils amendment to address the importation of spiny lobster products that do not meet US conservation standards. Firstly, we would like to thank the councils for addressing this controversial issue. For several years now, NOAA law enforcement has seen many cases of undersized imports. Unfortunately, much of the public does not understand that the small lobsters they purchase now will destroy the viability of local commercial harvests in the future.

I have been contacted by several FKCFA members who have concerns regarding the "tail weight" importation issue. FKCFA believes that the measurement of imported lobsters should be a measurement taken by tail length, not by tail weight. Processors throughout Florida can easily demonstrate that the processed weight of a lobster tail does not always correspond with its length. This is fundamentally due to the organisms inherent and variable morphology and/or stages of development (molt). On these grounds, FKCFA suggests that length be the controlling factor in the importation of lobster tails.

In addition to controlling imports by a single measurement parameter, NOAA should also consider synchronizing the GMFMC/SAFMC regulations with Florida Fish and Wildlife Conservation Commission (FWC) tail length requirements. FKCFA believes that the application of a dual requirement (length and/or weight) is bound to confuse industry and state/federal law enforcement protocol. I should also note that the Caribbean Fishery Management Council has rejected a minimum weight limit because of difficulty of weighing spiny lobsters at sea.

As our commercial lobster season comes to a close, the deleterious effects of importing undersized lobster are very clear. In the last 10 years, landings of spiny lobster have been reduced by 30%. Coincidentally, 90% of lobster that we import (much of which is undersized) comes from countries that lie in close proximity to Florida's Gulf coast. It is obvious that ill-equipped law enforcement and criminal practices throughout the Caribbean and South America are choking off the rebuilding capacity of our fishery.

In conclusion, FKCFA believes that "approach 1" in section 3 of the scoping document is the most suitable direction for the councils to take. FKCFA's suggestions come from people who have worked in the seafood industry for many years and are qualified to make suggestions for your staff's consideration.

Sincerely,

Scott E. Zimmerman, M.Sc
Executive Director