



# SOUTHEASTERN FISHERIES ASSOCIATION

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Dear Madam Chairman,

Years ago when Pew Charity started banging on the commercial fishing industry, they conducted an experiment with swordfish, a Highly Migratory Species (HMS). They paid for a PR program entitled 'Give the swordfish a break' even though the swordfish didn't need a break. Swordfish were sustainably managed. Pew learned how an anti-commercial fishing campaign would work if they used the national press and had a big budget. They poisoned millions of minds with their propaganda.

Swordfish, sharks and Bluefin tuna make up some of the HMS species Pew and others use to paint the domestic commercial fishermen as the 'bad guys'. The commercial fishermen who come under HMS management have handcuffs, shackles and observers because they catch and sell HMS species. Most of these unnecessary regulations could be changed if it wasn't for NOAA's policies. This brings me to the purpose of this note.

We believe hundreds of thousands of pounds of HMS species are being sold and not reported by vessels who fish within the general category. We understand there are over 6,000 permits to catch AND SELL HMS species, but we cannot find any statistics on number of vessels and pounds of HMS species landed and sold including tournament caught Bluefin tuna. We are especially concerned about the histamine risk to consumers if the fish are not handled under the HACCP regulations. (21CFR123)

Our members licensed to harvest and sell HMS species must file contemporaneous records, be monitored and have a current USCG certificate that the vessel is compliant. How many of the 6,000+ vessels in the general category

that fish for a wide variety of species are certified by the USCG? We believe half of the vessels fishing are not compliant with the USCG. We need to find out how many are not certified. These non-certified vessels should not be allowed to fish commercially until they are compliant. This is asking for nothing more than equal protection under the law.

We are not in good standing with NOAA Fisheries at the moment. I doubt we could get meaningful data from them, but the South Atlantic Fishery Management Council comes under the purview of NOAA so maybe they will tell you how much HMS fish is being sold from boats that are not certified by the USCG.

We know this is controversial, but now is the time to bring the subject up as the new administration strives to protect American jobs instead of depending on imported seafood products to feed the people.

Have a great meeting and please bring this up at the HMS Advisory Committee. If I had the time and money I would drive to NC for the meeting, but that's a long way to go for three minutes of testimony before the Council.

Thank you for your honest efforts to ungame the system.

Bob

PS: BAM IS KILLING OUR FISHING INDUSTRY

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