

SSC Comments on RA 12

Regulatory Amendment 12 was provided to the SSC for comment via email. A formal review of the document by the SSC was not feasible due to the abbreviated schedule of this action. Comments received by the SSC are provided in this document.

Comment provided by John Boreman:

I reviewed that materials you sent out relative to Regulatory Amendment 12 to the Snapper-Grouper FMP. The projections for tilefish seem to be in order, but my chief concern is the assumption of 0% implementation uncertainty in the projections, especially in light of the statement that an overage in the fishery is likely to occur.

I would advise the council to set the ACL lower than the ABC to account for the likely overage. Without an estimate of management uncertainty in 2012, perhaps setting the 2012 ACL to *status quo* (the 2011 ABC) would be the most appropriate approach. An alternative would be to average the overages in the fishery for the past five years and reduce the ACL from the ABC by that amount.

No other comments were received.