

Bob Mahood, Executive Director
South Atlantic Fishery Management Council (SAFMC)
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Monday August 20, 2012

Re: SAFMC Generic Dealer Amendment
Email To: JointDealerAmendPHComments@safmc.net

To: Bob Mahood,

PROBLEM Twice per month reporting has proved to be inadequate, contributing to quota overages in multiple fisheries. Additionally, dealers are not required to submit the federal dealer permit number with the report, leading to an inability to track compliance for late or non-reporting. This has also contributed to quota overages. These overages may result in a deduction of the overage from the following season's quota, which may result in lost revenue as well a longer rebuilding period for some stocks if the quota is routinely exceeded.

In addition to quota overages, annual catch limits (ACLs) are being exceeded with the current reporting requirements. For stocks with small ACLs the reporting frequency of twice per month may lead to exceeding ACLs.

RECOMMENDED ACTIONS I would recommend to require dealers to report weekly .

I would recommend that when the projected landings are 75% of quota then you require dealers to report daily.

I would recommend that you require Federal dealers to submit their federal dealer permit number when reporting on the state electronic system.

I would recommend that you penalize dealers who report late with a late fine.

In my opinion with these changes the current reporting system could be massaged into an adequate, timely and enforceable system. **Alternative 1:** No Action – Do not modify the current six federal dealer permits. Dealer permits are currently required to purchase species in the following fishery management plans:

- Atlantic Dolphin-Wahoo
- Gulf of Mexico Reef Fish
- South Atlantic Golden Crab
- South Atlantic Rock Shrimp
- South Atlantic Snapper Grouper (excluding wreckfish)
- South Atlantic Wreckfish

The current permits with the recommended changes above will work to correct the late reporting problem. The money saved by not creating a new generic universal dealer permit should be used in gathering at sea data collection for stock assessments.

Thank you

Jimmy Hull

Hull's Seafood Inc.,

Dealer permit # 1042