

**Coastal Conservation Association
Comments on the
Gulf of Mexico Fishery Management Council
Gag/Red Grouper Amendment Scoping Document
(Reef Fish Amendment 32)**

The Coastal Conservation Association, representing more than 80,000 members in state chapters along the Gulf Coast, has major concerns about several aspects of Amendment 32 dealing with new regulations to end overfishing for gag grouper.

According to the results of last year's stock assessment developed by the National Marine Fisheries Service (NMFS), it appears that reductions in harvest on the order of 75 percent may be considered for this fishery. Additionally, at the last meeting of the Gulf of Mexico Fishery Management Council, the issue of allowing fish traps to be reintroduced into the commercial grouper fishery was added to the current round of public hearings as an alternative gear to reduce sea turtle mortality associated with bottom longline gear. CCA wants the fish trap issue removed from the amendment and destructive longline gear eliminated from the grouper fisheries

Fish traps were removed from the Gulf of Mexico in 2007 after years of controversy over their destructiveness and have also been outlawed in the Atlantic and state waters. This gear is "invisible" once deployed and ample evidence has been supplied by state and federal law enforcement agents to conclude that it is nearly impossible to observe the gear and enforce any escape gap or panel regulations. The traps have a high rate of loss and, once lost, they become ghost traps, filling with fish that die and attract other fish in a long-lasting cycle. The traps fish 24 hours a day and can out-compete other gears.

Further, the traps are not needed in the commercial fishery as a substitute for longline gear as ample effort exists in the vertical line (bandit or hook-and-line gear) sector to take the allowable catch. Allowing any use of fish traps in the Gulf will create conflicts and make it difficult to enforce their prohibition from state waters, the Florida Keys Marine Sanctuary and South Atlantic waters. There exists ample evidence of the destructive and uncontrollable nature of fish traps in the record of the Gulf Council's previous deliberations that resulted in the banning of this gear. Nothing has changed since that time and the use of this gear should not even be considered. CCA urges the Council and the NMFS to focus on alternatives that effectively reduce destructive commercial fishing effort to the greatest extent possible rather than searching for ways to perpetuate a marginal commercial fishery.

Regarding any proposed regulations to end overfishing of gag grouper, CCA requested five years ago that the Gulf Council develop formal allocations for grouper based on maximizing the value and benefits of this common property resource. The Council began an amendment to do this and formed committees to set standards for this issue. However, for the past two years no further action has been taken. Given the apparent necessity of future restrictions on gag harvest, we believe that it is absolutely necessary for the Council to finally include allocation of this resource in Amendment 32. The Gulf Council's Grouper IFQ program allocates and grants exclusive right of access to more than 65 percent of all the Gulf red and gag grouper to a limited number of commercial interests. The magnitude of this giveaway of a public fishery is unprecedented. NMFS must stop enacting programs which subsidize marginal commercial fisheries while strangling the much more valuable recreational grouper fisheries.

CCA will develop a formal position on new quotas, size limits, bag limits and seasons for gag in the coming months and will bring these ideas back to the public hearings on this amendment. In the meantime, CCA urges the Council to act responsibly and not risk destroying the very valuable economic benefits that flow into the Gulf states and this nation from recreational fishing for grouper and other reef fish.

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