



## SEA WATCH INTERNATIONAL, LTD.

8978 GLEBE PARK DRIVE, EASTON, MD 21601-7004  
MAIN 410-822-7500 • FAX 410-820-5260

November 20, 2012

**VIA TELECOPIER -  
CONFIRMATION BY MAIL**

John K. Bullard, Regional Administrator  
National Marine Fisheries Service  
Northeast Regional Office  
55 Great Republic Drive  
Gloucester, MA 01930

ATTN: Jason Berthiaume

Re: Comments on the Collection of Information Requirements for the  
Proposed Reopening of the GB Closed Area

Dear Mr. Bullard:

These comments are in response to the Federal Register notice dated October 22, 2012 regarding proposed requirements for information collection in connection with surf clam harvesting on Georges Bank.

Sea Watch International, Ltd. is a substantial processor of surf clam shellstock, and over the past three years Sea Watch has been processing the Georges Bank shellstock harvested by certain vessels fishing under Experimental Fishing Permits.

Based upon that experience, and upon our understanding of the proposed reporting requirements, we do not believe that the methods of collection proposed will impose any hard ship or other substantial burden on the surf clam fishing/processing industry, or on the general public. We believe that the reporting requirements reasonably serve the purpose of effectuating the safety measures incorporated into the protocol that must be utilized in connection with harvesting shellstock on Georges Bank.

In fact, we believe there will be significantly less burden upon the industry generally than that which is projected by the notice. The time burdens outlined in the notice are based upon the assumption that 47 vessels presently are harvesting surf clams and ocean quahogs, and therefore would be eligible to fish on Georges Bank. In reality, however, only approximately four to six vessels in the industry are of the necessary size and carrying capacity to make the long trips, sometimes in uncertain weather, required for harvesting on GB. Because the actual number of vessels fishing on GB likely will amount to no more than 20% of the entire fleet, we believe that the

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November 20, 2012

Page 2

published notice overstates the actual likely time for reporting by a factor of four or five.

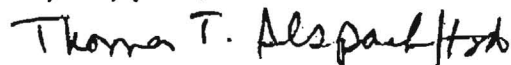
Similarly, although Sea Watch is not in a position to comment with experience upon the paperwork burdens of the respective states, we believe that the projection indicating 11 states will be engaged in such reporting overstates what realistically may be expected. Because of proximity to GB, only several New England states realistically could provide ports for the unloading of GB shellstock, and based upon the current location of available dockage and processing facilities, it is likely that this will occur only in Rhode Island and Massachusetts, and perhaps Maine. Therefore, only several states, and not 11 will contribute to the total amount of time required to meet state obligations for data collection.

The opening of GB is critical to the surf clam industry, since approximately half of the resource is located in that area. Because it has been unfished for so long, harvesting on GB is extremely efficient and, as a result, the availability of that shellstock offers significant financial opportunities for the industry. Moreover, by redirecting fishing effort to GB, some relief is afforded other areas within the EEZ, in northern New Jersey and elsewhere, where fishing has been concentrated over the last two decades.

For all of these reasons Sea Watch concludes that proposed data collection and reporting requirements will impose an extremely minimal burden upon the industry and the public, and should not serve as an impediment to the prompt reopening of GB for harvesting by licensed surf clam vessels.

Thank you for considering these comments.

Very truly yours,



Thomas T. Alspach, General Counsel  
Sea Watch International, Ltd.

TTA/tsd