



02/09/17

February 6, 2017

Mr. Michael Barnette
Southeast Regional Office, NMFS
263 13th Avenue South
St. Petersburg, FL 33701

RE: Proposed Rule on Turtle Excluder Devices in Inshore Trawls

Dear Mr. Barnette:

The American Shrimp Processors (ASPA) Association has members from Texas to North Carolina, with most located in the upper Gulf. According to the International Trade Commission (ITC), our members process more than seventy (70%) percent of all domestic warm water shrimp. Few groups or individuals have more at stake in the above referenced rule than do our members. In addition, processors serve as the bank for the domestic industry. It is processors who buy, process, and inventory raw product thus supplying the financial base for the entire industry. These multi-generational private businesses (vessels and processors) have a vested industry in the health of the shrimp industry and its environment.

The shrimp industry has a long history of concern for the environment and the turtle population. Unfortunately, some ENGO's seem preoccupied with blaming the shrimp industry for all problems with the turtle population. The data they present is unsupported by reliable data and fact. Because the shrimp industry is comprised almost entirely of individually-owned small businesses, it is an easy target for such ENGO's. Their data seems to blame all problems on the shrimp industry, while other data indicates that a much more complex set of issues are involved.

Given the complex set of issues involved, we oppose any rules that will focus singularly on the shrimp industry as a solution without addressing other turtle mortality issues. We suggest that NOAA-NMFS undertake a comprehensive analysis of the turtle population and its problems with a focus not only on mortality, but on population's dynamics and growth as well. We believe that this will provide a more comprehensive view of the issues. If after a comprehensive study of the total turtle population, it appears that the shrimp industry is the major problem, we will join in any effort to correct such issues.

Sincerely,

C. David Veal, Ph.D.