

# THE FLORIDA TARP NET

*Background on behalf of the Florida Tarp Net  
Industry*

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## DESCRIPTON OF THE TARPAULIN NET

### **Net specifications:**

The net is composed of commercial grade tarpaulin type canvas up to 450 yards in length and 40 feet in depth with less than 500 square feet of 1 inch mesh sewn into the tarpaulin net in various locations to allow water to leave the net when pursed to the boat. Only defined species of fish can be harvested with this type of gear.

There are 500 square feet of 1" stretched mesh sewn into net, (about as much mesh as contained in a large cast net) mostly at the top in 2 foot sections by 50 feet length in order to let water pass through the net as much as possible. 500 square of webbing is all that is allowed. If more webbing were used, particularly in the middle and bottom of the tarp net, it would operate easier and could be retrieved faster while at the same time keeping the bycatch to an absolute minimum.

The tarp net cannot be used in rough waters and at this point in time not in water much deeper than 20 feet. It is very inefficient piece of gear as far as catching the baitfish but is very efficient in bycatch prevention.

The tarp net is set by deploying the net in a circle around the targeted fish. After the fish are encircled a tom weight.<sup>1</sup> is dropped to the bottom. The ends of the net are brought together at the side of the harvest vessel. Then the bottom line is pulled through rings at the bottom of the net to draw in the net until both ends are at the tom weight. The fish are then bailed aboard the harvesting vessel with a bailing net capable of lifting 200/300 pounds per bail.

Vessel Specification is as follows for current fishery:

- Boat size 40'/50' - 300 hp up to 67' - 600 hp

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<sup>1</sup> Tom weight is a very heavy piece of metal that has a half hoop piece through which one end of the bottom line is attached so that the bottom line can be drawn through rings to purse the net closed.

## SPECIES AND GEOGRAPHICAL AREA WHERE TARP NET IS AUTHORIZED

### Florida Marine Fisheries Commission Rule<sup>2</sup>

46-50.002 Tarp Purse Seine Pilot Program for Certain Counties: Baitfish Annual Season

#### Harvest Limits:

(1) This rule shall govern the harvest of the following baitfish species in the region comprised by **Wakulla, Franklin, Gulf, Bay, Okaloosa, and Walton** Counties:

- a) Anchovy (Family Engraulidae).
- b) Blue runner (*Caranx crysos*).
- c) Atlantic thread herring (*Opisthonema oglinum*).
- d) Ladyfish (*Elops saurus*).
- e) Chub mackerel (*Scomber japonicus*).
- f) Menhaden (Genus *Brevoortia*).
- g) Spanish sardines (*Sardinella aurita*).
- h) Round scad (*Decapterus punctatus*).
- i) Little tunny (*Euthynnus alletteratus*).

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<sup>2</sup> <http://www.dep.state.fl.us/mfc/fmfc46.htm>

## QUOTAS AUTHORIZED FOR EACH SPECIES

(3) Annual Commercial Season Harvest Limits for the Region.--<sup>3</sup>

(a) The annual season commercial harvest limits in the region for the species listed in subsection (1) are as follows:

1. Anchovy - 85,000 pounds.
2. Blue runner - 508,000 pounds.
3. Thread herring - 308,000 pounds.
4. Ladyfish - 2,088,000 pounds.
5. Chub mackerel - 72,000 pounds.
6. Menhaden - 2,415,000 pounds.
7. Spanish sardines - 943,000 pounds.
8. Round scad - 999,000 pounds.
9. Little tunny - 392,000 pounds.

(b) The total commercial harvest of any one of these species for the region during a particular season shall consist of those fish commercially harvested by all forms of gear from waters of the counties of the region and adjacent Exclusive Economic Zone (EEZ) waters, based on projections from official statistics collected and maintained by the Department of Environmental Protection pursuant to Florida's Marine Fisheries Information System. The count shall begin with those fish commercially harvested on and after July 1 of each year and continue until June 30 of the following year or until the harvest limit prescribed in paragraph (a) of this subsection is reached, whichever occurs first.

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<sup>3</sup> <http://www.dep.state.fl.us/mfc/fmfc46.htm>

## HISTORICAL BACKGROUND

During the Florida constitutional amendment process, it was stated on many occasions by the proponents of Amendment 3, which would **limit marine net fishing**, that the intent of the amendment was indeed to limit marine net fishing, not prohibit it. Also during the debate, the proponents repeatedly stated the commercial fishermen were smart and innovative and would figure out a way to survive and still obey the law prohibiting the use of **gillnets** in state waters and other nets with more than **500 square feet of open mesh** in the inshore and nearshore waters as defined by the constitutional amendment .

Following the adoption of Amendment 3, litigation concerning how to measure a shrimp net was finally determined by the Florida Supreme Court.

As the final result of that litigation, the Florida Supreme Court states on page 5 of their Opinion , “*WE AGREE WITH THE TRIAL COURT THAT IN THE CONTEXT OF THE AMENDMENT’S STATED PURPOSE, WHICH IS TO LIMIT RATHER THAN PROHIBIT SHRIMP TRAWL FISHING, EVIDENCE OF THE NETS COMMERCIAL VIABILITY IS RELEVANT.*” Further on page 5 and continuing on page 6 the Florida Supreme Court adds that, “*WE HOLD THAT BOTH THE EVIDENCE OF RAW STOCK USED TO CONSTRUCT THE GOLDEN-CRUM NET AND THE EVIDENCE OF COMMERCIAL VIABILITY ARE RELEVANT AND WERE PROPERLY CONSIDERED BY THE COURT. ACCORDINGLY, WE AFFIRM THE JUDGMENT OF THE CIRCUIT COURT, ETC.*”

The point made by the Supreme Court is harvesting of fish is to be done with nets that are commercially viable. The Florida Supreme Court made two clear statements on this one issue in their Unanimous decision.

## PREVIOUS CONCERNS OF FMFC

*(Block Quotation represents segments of FMFC Staff Report on Tarp Seines prior to Legislation)*

### A. Background and overview

*Solid or tightly woven tarpaulins constructed of plastic, canvas, nylon, or other materials - some up to 700 yards long and some used in conjunction with standard mesh nets of no more than 500 square feet - are being used to harvest fish in Florida waters. This gear is being used both as a pursing gear and as a haul seine. The use of these devices is a response to the 500 square foot net limitation placed in the Constitution by Florida voters in 1984.*

*Gear that staff has observed (650 yards in length) is capable of encircling an area of approximately nine acres. Testimony before the Commission has indicated that similar gear of 800 yards (45' deep) has been constructed. It is anticipated that there will be a rapid evolution of these devices, particularly during the coming roe mullet season (October - January).*

As things turned out, there was no expansion of the tarp net and no mullet or other species of popular food fish have been harvested.

*It is entirely possible that improvements in the efficiency of this new gear type will allow it to mimic the action of traditional nets, and combined with increasing gear lengths and depths could produce fishing sets with efficiencies equal to or greater than the 600 yard gill nets previously allowed in the inshore fishery.*

As things turned out it was found to be impossible to mimic the action of traditional purse seines. The physics of wind and motion place the tarp net in a category of being very Inefficient but usable.

*There would be definite financial benefits to such action. Harvests and markets for resources as bait and food would be expanded beyond the expected potential of the netting restrictions placed into the Constitution. It is likely that the financial benefits would mostly accrue to large scale fishing ventures, possibly to the competitive detriment of the many small scale harvesters who are attempting to utilize cast nets and legal seines to supply local markets with fresh seafood.*

As things turned out there has been no conflict with anyone selling fresh seafood to local markets.

*"Tarp-seines" have none of the size selectivity characteristics of traditional gill nets. A set made on a school of fish cannot select only the larger, mature fish which have had an opportunity to spawn. Small juveniles of the same species will be taken, killed, and either utilized or discarded. Increased fishing mortality on previously protected juvenile mullet or Spanish mackerel will have significant impacts on stock biomass, spawning potential, and future yield.*

As things turned out the tarp seines have been taking larger fish and there has been a minimum bycatch associated with this clean piece of gear.

#### **D. Staff Recommendations**

*The uncertainties regarding the potential effects of this new gear type make it necessary to address the issue in a timely fashion. The Commission should consider the available information on potential biological, economic, and social implications of allowing this gear type and determine, consistent with its statutory charge, whether or not this gear has a place in Florida's fishing future. The Commission should attempt to expedite its decision. As long as no decision is reached, the new gear types will be used and cast nets and seine harvesters will feel a need to "scale-up" if they believe they will have to compete with the more efficient gear. This scaling-up will be expensive.*

*If ultimately the gear was deemed inappropriate, but this decision was significantly delayed, the funds spent to build and use the "tarp-seines" would probably be lost with little opportunity to amortize the investment through increased individual harvest levels. The Commission should attempt a thorough and complete review of the available facts and information while attempting to reach a resolution of this issue as quickly as possible.*

*Rules and statutes which prohibit stop netting, i.e. the practice of closing creek mouths, bays, etc. with nets and capturing fish as the tide falls, may not apply to "tarp-seines" as long as the mesh portion alone does not completely block off a waterway. Although the current one hour soak time applies to the mesh nets, it does not apply to the non-mesh portion of a combination net and would apply not at all if there is no mesh in the configuration.*

As it turned out, none of these stated fears materialized. The baitfish has been localized for decades in Northwest Florida and the availability of fresh processed bait has been a boon to the recreational fishing industry through hundreds of bait houses around the state.

*The Marine Patrol and the Division of Marine Resources (DEP) have recommended that this gear not be allowed to develop. They cite enforcement difficulties and potential environmental and habitat impacts which could occur incidental to the deployment of many plastic (or other) solid fishing devices in state waters. This gear will have a high potential for loss given its susceptibility to wind and tidal extremes. Such loss could be of entire gears, or parts and pieces of gear torn by wind, water, and fish.*

As it turned out, not a single square inch of tarp has been lost and because the gear operates in plain view of everyone near shore, the enforcement is very easy and inexpensive. There is no night fishing and the number of permits is very low and easily identifiable.

*The loss of plastic tarp material into the environment would have negative environmental consequences. For this reason, the Commission's regulations specifically prohibit dumping used monofilament fishing line into coastal waters. There are likely safety factors to take into account. Particularly, the implications of requiring divers to tend this unpredictable gear might warrant consideration, although it is likely that federal OSHA and Coast Guard regulations would apply to this class of workers.*

As things turned out as previously mentioned, not one square inch of tarp net was lost in the environment. Not one square inch. No other fishing gear, recreational or commercial, can make that statement.

*The Commission, serving as stewards of the resource in the interest of all the people of this state, may deem this expression to be relevant information. The current status of marine resources is now, in part, a function of the gear reductions imparted through the effect of amendment 3. Increases above current harvest levels are increases above the new baseline standard for stock abundance. There exists no requirement for the Commission to allow harvest levels to increase towards levels which existed prior to the amendment.*

There exists no requirement for the Commission not to allow increased harvest for the good of the state and nation. In fact, money has been appropriated under the tarp net program for the development of models that can be utilized to assess baitfish stocks in the entire Gulf of Mexico.

***Staff recommends that all nets and net-type gear fished within the inshore and nearshore waters as defined in Article X, Section 16 be limited to a total of 500 square feet of surface area regardless of construction or material.***

As things turned out after the Florida Supreme Court ruling on the 500 mesh measurement of a shrimp trawl, the 500 square feet provision is for mesh. The tarp seine being used in Northwest Florida meets the legal definition of a legal net in Florida.

Additionally, a \$50,000 bond per net is required and has been posted for all 7 nets.

The quota for each individual species of fish allowed by this rule have never been exceeded and in fact we believe that quota for only chub mackerel in 1998 and ladyfish in 1999 was reached. The current landings are at least 50% below historical averages which seems to satisfy the constitutional mandate of limiting marine fishing.

Finally, there have been no fishery violations or citations written pertaining to the utilization of the tarp net.

**Florida Department of  
ENVIRONMENTAL PROTECTION**

**Memorandum**

Date: Jan 12, 1998

To: Tom Sminkey, Associate Research Scientist, FMRI  
Joe O'Hop, Research Administrator II, FMRI  
Frank S. Kennedy, Research Administrator III, FMRI  
Jorge Laguna, Marine Fisheries Commission  
Dewey Destin, Destin Bait

From: Jeff Trew, Research Staff

Subject: Tarpaulin Fishing Gear

In 1996 commercial fishermen in Destin, Panama City and Port St. Joe began using a tarpaulin fishing gear as an alternative to the net purse seine which had been outlawed by the net ban. In May, 1997, I was instructed by Joe O'Hop (Research Administrator II, FMRI) to observe the fishing operations. I will refer to the vessels as the Tarp Boats.

The procedure used by the Tarp Boats is very similar to the traditional purse seines. The boats let out approximately 1,000 feet of gear while circling a school of fish. A heavy lead weight with attached purse lines is placed on the bottom and the lines are pulled in slowly with hydraulic power. The trap is manhandled by the crew. The allowed 500 square feet of net is strategically used. Some net is at the top of the tarp to let water pass through. When nearly all the tarp is on board, the fish are in a net bag. The fish are then scooped out with a large dip net. Due to water resistance it takes an average of 2 hours to retrieve the gear. It takes another hour to get the fish on board. Use of the tarp gear requires better weather than was necessary with nets. Conditions of wind, seas or currents, which were still tolerable to the net purse seines, shut down the operation. It is also necessary for the tarp boats to stay in shallower water than before, 15 to 20 feet is the maximum depth they can use the gear efficiently.

I had been taking length frequency data on occasion for years at Destin Bait and Raffield Fisheries for the Trip Interview program (TIP). The data is shared with the NMFS. I never placed as much emphasis on the bait fishery as on other fisheries for the obvious reasons that the fish tend to all be about the same size and are short lived. The purpose this time was to

get out on the boats and observe bycatch in addition to taking length data. I considered going out on the Panama City boats and Gene Raffield has allowed me on his boats in the past. Due to time and budget considerations I decided to go once a week with the Destin Tarp boats. Although one would not expect the catches to be much different from the old purse seines I believe this is the first time that a biologist or representative of the state has made thorough observations of fishing with this gear type.

Dewey Destin and everyone associated with Destin Bait were always cooperative. There were never attempts to hinder my view or discourage me from going out. I have no reason to think their habits were different because of my presence. All sets were made within 10 miles of the Destin Jetties (East Pass) in depths of 6 to 15 feet. I went out on the "Nina" which always accompanied the "Cameron Leigh".

The catch from this boat was always put on the "Nina". The catch from the "Miss Cleo" was usually put on the "Nina". Approximately 250 pounds of fish at a time was dropped from a dip net onto the open deck. The fish would spread out making it possible to get a good view of the contents. I always watched up close and I never missed a scoop. I was looking for sport or food fish, such as flounder, redfish, pompano, bluefish, cobia, Spanish mackerel, king mackerel, mullet, trout and whiting. I also noted trash fish such as rays, robin fish, catfish and small flatfish from the genus *etropus*. I have to refer to the bycatch as what I saw rather than a total bycatch but I don't think I missed much. I don't think I failed to see large fish or significant amounts of smaller fish.

The bycatch was usually negligible. I never saw a redfish, trout, mullet, cobia or king mackerel. I saw 3 pompano one day and they were released in lively condition. A small sea turtle was inside the tarp once and a swimmer got it to the other side unharmed. Bluefish, whiting and flounder were occasionally seen in very small numbers. Spanish mackerel sometimes swim with ladyfish and cigar minnows. Sometimes the captain will not set his gear or open the set after it has been made due to the presence of these fish. Due to water resistance the crews of the tarp boats have trouble keeping the tarps all the way up to the surface all the way around. Spanish mackerel seem to be more adept than ladyfish and especially cigar minnows at escaping. However, once confined, the Spanish mackerel will die because like other members of the tuna and mackerel family they have to keep swimming in order for the gills to function. On one occasion (Oct. 30) approximately 200 pounds of Spanish mackerel were caught. Over 20,000 pounds of ladyfish were landed that day making for a bycatch of 1%. All other days the numbers of Spanish mackerel were small or not present.

There are no seagrass beds in the areas where Tarp Boats from Destin were fishing.

If observations of the tarp Boats are called for next year I would suggest concentrating more on the operations in Panama City and Port St. Joe. It might be worthwhile to go out on the Destin Tarp Boats in the Spring if they are able to get an earlier start in 1998.

The next part of this report is a very brief summary of every day I went out on the "Nina". The bycatch is noted. The totals are estimates made by the captain of the "Nina". Time gaps of longer than a week are due to bad weather and shutdowns due to legal and political issues.

**May 21**

Cameron Leigh left dock at 8:00, returned at 2:00. One et, 16,000 pounds of ladyfish and 600 pounds of blue runner. TIP #49117. **Bycatch, 25 Spanish mackerel and 5 bluefish.** No other bycatch. A green turtle, about 18 inches long was seen within the set. A Swimmer released it unharmed. TIP #49117.

### **June 4**

Cameron Leigh left dock at 6:15. Strike at 6:45. Set opened up because too many Spanish mackerel mixed in with cigar minnows. No other fish concentrations found. Returned to dock at 11:45.

### **June 6**

It appeared too windy early in the morning. I arrived at dock at 6:10. I missed the Miss Cleo by 5 minutes.

### **June 7**

Cameron Leigh left at 6:45, returned at 7:45. Too rough.

### **June 16**

Left at 6:00, Cameron Leigh made 1 strike. 750 lbs. Cigar minnows, 50 lbs of Spanish sardines. TIP # 49129. **No bycatch.**

Miss Cleo made 1 strike. 1200 lbs. Cigar minnows and 25 lbs. of ladyfish. TIP # 49130. **Bycatch, 4 burrfish (C.shoepfi), 1 puffer Spheroides sp., 2 small Gulf flounder, 3 small flatfish Etropus sp.** Returned at 1:00.

### **July 3**

Miss Cleo and Cameron Leigh left at 6:00. At 9:00 Cleo made strike. 1500 lbs. Cigar minnows, 150 lbs., blue runners, 100 lbs. Spanish sardines, 50 lbs. little tuna TIP # 49146. **No bycatch.** Returned at 12:00.

### **July 11**

Cameron Leigh left dock at 6:30. Returned at 12:00

9,500 lbs. Of Spanish sardines, 1500 lbs. Of cigar minnows, handful of blue runners. TIP # 49152. **Bycatch, 1 whiting seen released, 1 burrfish.**

### **July 25**

Left dock at 6:45, returned at 10:00. Neither Miss Cleo or Cameron Leigh made strike.

### **July 26**

Left dock at 6:00. Nina followed Miss Cleo. Back at 10:00. No strike.

### **July 31**

Miss Cleo went to jetties at 6:00 and returned. Too rough.

### **August 14**

Cameron Leigh and Miss Cleo left dock at 6:15. Miss Cleo back early with engine trouble. Cameron Leigh made strike at 8:00. 7,000 lbs. Of Spanish sardines, 1,000 lbs. of thread herring. A few cigar minnows and a few very small little tunny mixed in. TIP # 49168. Returned at 12:00. **Bycatch, 2 blue crabs, 2 cowfish, 1 ocellated flounder released, 1 Gulf flounder released and 2 burrfish released.**

### **August 23**

Miss Cleo left dock at 6:15. Made strike at 7:30. Caught 2,000 of blue runners. Fish loaded onto Miss Cleo, I didn't see the catch. Cameron Leigh made strike. About 10,000 lbs. of blue runner, however, purse line broke. Only 1,800 lbs. landed. TIP # 49175. **Bycatch, 2 burrfish released and 1 small Gulf flounder.** 2 large flounders and 1 blue crab seen inside tarp before purse line broke. Miss Cleo made second strike in the afternoon, I didn't stay to watch. Arrived at dock on Nina at 2:00.

### **August 28**

Cameron Leigh and Miss Cleo left dock at 6:15. Cameron Leigh made strike at 10:00. 1200 lbs. of blue runners and 600 lbs of ladyfish. TIP # 49180. Returned to dock at 2:00. **Bycatch 5 burrfish, 1 ocellated flounder, 5 whiting (Menticurphus sp.) 1 Spanish mackerel.**

### **September 13**

Miss Cleo and Cameron Leigh left dock at 6:15 and 6:45. No fish. No strike. Returned at 10:00.

### **September 19**

Miss Cleo and Cameron Leigh left dock at 6:15 and 6:45. Miss Cleo made strike, returned to dock at 10:30. 3,000 lbs. Spanish sardines and 3,000 lbs. cigar minnows. TIP # 49197 **Bycatch, 20 hardhead catfish, 4 ocellated flounder.**

### **September 27**

No strike, No fish found, returned to dock at 10:30.

### **October 3**

Too rough.

### **October 22**

Left dock at 6:30. Cameron Leigh made strike at 8:00. 22,000 lbs. of ladyfish. Returned at 12:00. TIP # 49215. **Bycatch, 18 Spanish mackerel seen, 1 hardhead catfish, 1 ocellated flounder, 1 Atlantic ray, 1 cow nose ray.**

### **October 30**

Left dock at 6:30, 1 strike by Cameron Leigh at 9:00. Returned to dock at 12:30 with 23,000 lbs. ladyfish. TIP # 49220. **Bycatch approximatley 200 lbs. Spanish mackerel, 3 pompano (released lively) 2 ocellated flounder, 1 hardhead catfish, 1 Atlantic ray, 1 cow nose ray.**

### **November 5**

Left at 7:15, Miss Cleo left at 6:00. Both returned to dock at 10:00. Miss Cleo made strike at 7:15, unloaded onto Nina. 2,700 pounds round herring (smelt) 200 lbs., cigar minnows, 100 lbs. Spansih sardines. TIP # 49228. **Bycatch, 3 hardhead catfish, 1 Atlantic ray, 2 small Gulf flounder, 1 robin fish.**

### **November 11**

Arrived at dock at 6:00. Spotter plane found nothing. Season about over. Last trip.

My credentials are as follows: B.S. in Marine Biology from the University of West Florida, followed by a 1 month course with the NMFS in Seattle to become certified as a Fisheries Observer where I received formal training in taking data from large mixed catches. I spent 3 months in the Bering Sea as the NMFS representative on a 300 foot trawler. I have been the Commercial Port Sampler for the FMRI in the Florida Panhandle since March of 1993 and I have made well over 200 trips on the vessel "Fireball" for the FMRI Fisheries Independent Monitoring Program. I have completed class work and field work for my Masters Degree and I am writing a thesis.

## PROPOSED RESEARCH

In addition to the work plan developed by the Florida Marine Research Institute, the industry has initiated a process to have the baitfish fishery certified as a sustainable and environmentally compatible activity. We have taken steps to begin the process as can be seen by the following correspondence.

“Subj: A Reply about Certification  
Date: 01/10/2000 1:50:11 PM Eastern Standard Time  
From: cchaffee@pacbell.net (Chet Chaffee)  
To: BOBFISH@aol.com (Bob Jones)

Bob:

I will start at the beginning. Pardon me if I am being too mundane and wordy. I just want you to have the information you need to move the discussion forward if that is what you would like to do.

1. First there is the MSC. For general information you can go to the MSC web site ([www.msc.org](http://www.msc.org)) and read about the initiative. The web site contains a lot of good information on who started the initiative, who now supports it, who is working in it, etc. If you have direct questions about the MSC, the best people to contact are either the Accreditation Officer - Peter Scott, or the Fisheries Officer - Jonathan Peacey (011-44-171-350-4000)

2. There is Scientific Certification Systems, Inc. This is the accredited certification body that I work for in doing fisheries certifications. The SCS web site has more information at your convenience ([www.scs1.com](http://www.scs1.com)).

3. MSC certification is a voluntary program. Only fisheries seeking certification need apply. The MSC is not out looking at fisheries. The program works by Fisheries applying for certification through an accredited certification body (i.e. SCS) and asking the certification body to conduct an evaluation of the fishery for compliance with MSC Principles and Criteria (these can be found at the MSC web site). To reach this objective, an evaluation team needs to be assembled to independently review/audit the management and operations of the fishery. As a result, there are costs. Since this is a voluntary program, the costs are borne by the fishery, so there must be an available budget.

5. The costs of certification vary considerably due to the available data, the size of the fisheries, and the level of controversy about the management of the fishery. There are 3 phases in a certification that costs can be attributed to:

**A. Pre-Assessment** - this is the first step to any certification.

The Pre-assessment provides 2 things:

- a) an overview of the fishery management issues that would be important in a certification of the fishery, and a discussion of the pluses and minuses with regard to going forward for a complete certification.
- b) A budget estimate for a complete certification so the client (fishery) and the certifier can discuss the benefits of going forward. There is no way to know the costs of a complete certification outright. Until some information is gathered and some interviews conducted, any estimate of costs would be ill-conceived. The costs to complete a Pre-Assessment can be anywhere from \$2500 up depending on the issues outlined above. If a fishery is interested and asks us to bid, we can do so.

**B. A Complete Assessment** - this is the phase where the complete fishery is assessed.

The costs are outlined in and contingent upon the issues raised in the pre-assessment. There is no way to know without the pre-assessment legwork. In this phase an assessment team is assembled to conduct the work. The team will consist of between 2-5 people depending on the needs of the project. Team members are selected by the certification body in consultation with the fishery and select stakeholders (i.e. government agencies, industry groups, etc.).

**C. Peer Review** - once a completed report is available and agreed upon by the certification body and the client, it goes out to peer review by anywhere from 2 - 4 peer reviewers. On a small, non-controversial fishery I would expect 2 peer reviewers at most. The costs for this are the costs of the peer reviewers time and the costs of the evaluation team's time in answering the peer reviewer's comments. Peer reviewers can run between \$1000 to \$2500 for the job. The costs for the evaluation team to answer questions is dependent on the comments, but this can be as low as Zero cost if there are no significant comments. The reason we are careful in our selection of team members is to keep the costs of this step very low and to avoid any problems in awarding the certification and having it received well in the public domain.

Trying not to have this message get too long, I will stop at this point. I trust that if you have questions, and I know there will be some, you will let me know and we can continue the dialogue. Also, if you think that a face to face meeting is necessary at some point, I am sure we can arrange it. I am on occasion out in your neck of the woods and would be happy to come by. For example, I am in New Orleans at the beginning of Feb. giving a talk on Feb. 5 at the Aquaculture America 2000 Conference.

I look forward to hearing from you.”

## **REQUEST TO THE FLORIDA FISH & WILDLIFE CONSERVATION COMMISSION**

1. That the current rule in effect, 46-50.002 Tarp Purse Seine Pilot Program for Certain Counties: Baitfish Annual Season, be extended for three additional years in order that current biological research underway at the Florida Marine Research Institute can be completed, analyzed and presented to the FAWCC.
2. That Southeastern Fisheries Association, in conjunction with the tarp seine industry proceed in their efforts to have an international independent group of scientists examine this fishery and report to FAWCC on their results.
3. That the individual species quotas currently established in the rule remain the same.