

February 15, 2011

Commissioner Rodney Barreto
Chair
Florida Fish and Wildlife Conservation Commission
620 South Meridian Street
Tallahassee, FL 32399-1600

Dear Commissioner Barreto:

The Diving Equipment and Marketing Association (DEMA) is the international trade association for the recreational scuba diving and snorkeling industry. DEMA has more than 1,400 business members worldwide, and represents the interests of diving manufacturers, diver training organizations, the diving-related magazines and media, diving retailers and dive travel and dive charter operators. DEMA's mission is to promote the sustained growth of recreational scuba diving and snorkeling while protecting the underwater environment.

Having reviewed the "Goliath Grouper Review and Discussion" produced by the FWCC for presentation on February 23, 2011, I am writing to express our concerns regarding the possible lifting of the current moratorium on harvesting these animals.

DEMA applauds the Florida Fish and Wildlife Conservation Commission (FWCC) for its recent stock re-assessment of the goliath grouper. DEMA supports such periodic stock assessments when they include sound scientific inquiry and input from all user groups affected by any change in the current harvesting status. With regard to the possible outcomes from this most recent study, DEMA favors the following:

1. Maintaining the current harvesting status of the goliath grouper in Florida; that is, harvest and possession should be prohibited.
2. FWCC or NOAA (or another appropriate agency or scientific organization) should undertake a more thorough stock assessment of the goliath grouper that satisfies the need for accurate scientific data on stocks of these fish.

DEMA's position is taken in recognition of FWCC's own appraisal, which indicates there are data gaps preventing the use of detailed assessment methods in the recent study, and which indicates that many unverified assumptions were used in the study. Without solid scientific evidence of recovery, it appears that the goliath grouper remains vulnerable to overfishing due to (among several reasons) late maturity and slow growth.



As the Commission is also aware, over the last twenty years during which harvesting was prohibited, goliath grouper have become extremely popular hosts to underwater habitats and are mentioned frequently by visiting/tourist divers who greatly enjoy watching these remarkable creatures roam the ocean floor. The goliath grouper's size, visibility, low birth rate and slow movement seem to trace another of Florida's truly majestic waterborne creatures- the manatee, and could easily be thrown back to species extinction if harvesting were allowed without verified stock assessments.

In addition to concern regarding the stocks of these fish, DEMA is also concerned with the opinions of dive-related businesses regarding the current harvesting status of goliath grouper. With FWCC's study indicating that 49% of dive centers favor continuing protection at this time, and only 25% of dive centers indicating that allowing the harvest of goliath grouper would help their business, DEMA strongly recommends maintaining the current prohibition on harvesting.

Thank you for your careful consideration of this issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Ingram', with a long, sweeping horizontal line extending to the right.

Tom Ingram
Executive Director

cc: Mark Robson, FWCC Staff, Tallahassee
Bob L. Harris, Esq., Tallahassee
DEMA Board of Directors