



April 23, 2018

Chair Bo Rivard  
Florida Fish and Wildlife Conservation Commission  
Farris Bryant Building  
620 S. Meridian St.  
Tallahassee, FL 32399-1600

Dear Commissioner Rivard:

Having reviewed the Florida Fish and Wildlife Commission's (FWC) "Goliath Grouper Review and Discussion" Presentation and Memo produced for presentation on April 26, 2018, I am writing to express our concerns regarding the possible lifting of the current moratorium on harvesting these animals, as well as the FWC Staff suggestions for allowing a "limited harvest" of these animals.

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, more than 300 business members in Florida, and represents the interests of diving manufacturers, diver training organizations, the diving-related magazines and media, diving retailers and dive travel & dive charter operators. DEMA's mission is to bring businesses together to grow the diving industry worldwide, and our goals include promoting recreational scuba diving and snorkeling, while protecting the underwater environment.

DEMA is aware of the lead role FWC took in recent attempts to assess the stock of Goliath Grouper and we applaud FWC for these efforts. 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.

As you know, in 2016 the results of the Commission's stock assessment were rejected by a group of independent scientists for use in management of the stocks of Goliath Grouper in federal waters, pointing to the fact that, "the results were not deemed suitable primarily because of missing information needed to generate an accurate 'model' of the fishery."

The many challenges to assessing this species, as outlined in several FWC presentations (including the current April 26, 2018 FWC presentation), point to the need for further study prior to opening this species to harvest of any kind. Therefore, as we have previously, DEMA continues to favor the following:

1. Maintaining the current harvesting status of the goliath grouper in Florida; that is, harvest and possession should be prohibited.

2. FWC 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 and should reject any recommendations to collect data while using a “limited harvest” of these fish. In fact, the notes for the current FWC Staff presentation make it clear that such a “limited harvest” will serve no valid data collection purpose, stating; **“It is important to note that any data gathered from a limited harvest will not result in accepted stock assessment” and warn that such a limited harvest raises “concerns about consumption...because of high levels of mercury in large goliath.”** A limited harvest seems to serve no useful or valid purpose, except, perhaps the possible ‘opportunity’ of harvest for a small group of fishers. Included in the April 26, 2018 FWC Staff presentation are other possible means of conducting such data collection, requiring no harvest.
3. FWC or NOAA (or another appropriate agency or scientific organization) should conduct additional research on the age of these creatures, such that any future assessment would have more validity.
4. FWC should review its current regulations to determine if protections for Goliath Grouper could be implemented commensurate with the reasonable protections afforded Manatees.

DEMA’s position is taken in recognition of FWC’s own list of assessment challenges and the previous scientific community conclusion that information needed to generate an accurate model of the fishery is missing. Without solid scientific evidence of recovery, it appears that the Goliath Grouper remains vulnerable to overfishing due to (among several reasons) late maturity, slow growth and being subject to large scale mortality.

As the Commission is also aware, over the last twenty-eight 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, a protected species that also has considerable ecotourism value. If harvesting is allowed without verified stock assessments, we believe Goliath Grouper could easily be thrown back to species extinction.

In addition to concern regarding the stocks of these fish, DEMA also relies on the opinions of divers and dive-related businesses regarding the current harvesting status of goliath grouper. In a July 2017 DEMA survey of divers and dive professionals, more than 69% indicated their desire to maintain the current moratorium on harvesting the goliath grouper. Among those located in Florida, 64% indicated a desire to maintain the moratorium, while among those traveling to Florida to dive and see the goliath grouper while diving (bringing tourist and tax revenue to the state) the number rose to more than 77%.

With the results of studies included in FWC’s Presentation dated April 26, 2018 indicating the presence of high levels of mercury in the flesh of Goliath and with a high economic value for live Goliath Grouper among divers, especially those from outside of Florida who are willing to pay \$336.00 to see these fish (as compared to a maximum of \$79 for fishers to harvest a Goliath

Grouper), it seems most appropriate economically and scientifically to maintain the moratorium on the Goliath Grouper harvest.

DEMA strongly recommends maintaining the current prohibition on harvesting the goliath grouper, and strongly urges the Commission to reject the suggested "limited harvest" of these animals, such limited harvest seeming to serve no useful purpose.

Thank you for your careful consideration of this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Ingram", with a stylized flourish at the end.

Tom Ingram  
President and CEO

cc: Governor Rick Scott  
Eric Sutton, Executive Director, Florida Fish & Wildlife Conservation Commission  
Bob L. Harris, Esq., Tallahassee  
DEMA Board of Directors