



Letter of Support for Louisiana Shrimp Association in Regards to NOAA's Proposed TED Rule (NOAA-NMFS-2016-0151)

The Mississippi Commercial Fishermen Union; a representative of United States commercial fishing interests in the Gulf of Mexico and surrounding state territorial waters, supports Louisiana Shrimp Association's opposition to NOAA's proposed turtle excluder device (TEDs) regulations that would require all shrimp vessels to use TEDs regardless of vessel size or consideration of economic impact.

The Louisiana Shrimp Association (LSA) has drafted and presented a "Sea Turtle Environmental Impact Statement" in which Mississippi Commercial Fishermen Union has reviewed. In this document LSA puts forth multiple, legitimate concerns and reasons for opposing the proposed TED rules. Notably, according to NOAA's own data, sea turtle populations are at record highs under the current regulatory scheme and therefore no change in regulations should be made at this time. Also, LSA presents compelling evidence that TEDs can cause significant injury to sea turtles when they hit the metal grates at a high rate of speed; therefore, requiring all shrimp vessels to use TEDs could result in increased sea turtle mortality.

The most egregious reason for opposition to NOAA's proposed TED rule the Mississippi Commercial Fishermen Union shares with LSA is the adverse economic impact it would have on the American shrimp industry. Licensed shrimp vessels in the United States are at the lowest levels they have been in over 30 years and the industry is already on the brink of collapse from burdensome regulations and excessive imports. Further regulation could have a downhill domino effect on the entire industry affecting not just shrimp harvesters but dealers, processors, and consumers, as well, from a severe decrease in production. The cost of implementation of this proposed rule is also grossly underestimated. Not

only would harvesters be required to buy or build TEDs; in some instances they would have to replace their entire nets and have it specially fitted to accommodate a TED. Furthermore, on some smaller vessels that use a smaller size net; the proposed required TED dimensions simply would not fit in the net or would slow the boat to a point that it would be unable to viably fish. Thousand of jobs would be lost if shrimp vessels failed to comply with the rule and would ultimately be forced out of business. A large volume of shrimp boats would end up for sale and likely glut the market with unusable boats resulting in decreased overall value, further impacting the shrimp industry.

Sincerely,

A handwritten signature in blue ink that reads "Ryan Bradley". The signature is written in a cursive, flowing style.

Ryan Bradley- Director
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