

Chapter VIII @02 D. Tagging once no longer submerged- we have always tagged at the end of harvest. The Mahogany industry harvests in deep water off shore usually 12 hours or more a day; but they tend to their catch by rinsing it down with open area water from where they are fishing through out the day. The time matrix change would put them out of compliance any time the temp. was over 81 degrees, in their peek season, when their product is safe. Industry would be OK with the time matrix change if the tagging was after harvest.

Requirements for harvesters

(3) I also noticed all vessels needing MSD which I thought we changed in Mexico-If memory serves me correctly; we said vessels used for transportation were not required to have MSD. I will explain why... many many harvesters use canoes to get from one area to the harvest area and back. In an effort to be un-restrictive buckets with lids could be used as a MSD. Harvesting Soft Shell Clams you catch can vary dramatically from one day to the next, from one area to another, if the harvester did not bring enough equipment, in all things practical, the bucket dedicated to MSD is now filled with clams. I worry this would be more of a public health risk for the industry.

Transportation

@.01

You could not put clams in the trunk of your car- but what about a truck with a cap? In the hot months you would likely have to remove it or ice product from harvest area to dealer- very unpractical- a harvester working a Maine tide that got ice before hand would have water when they were ready to transport and they don't meet at or come into centralized locations for docking like fishing vessels do. They would need a refrigerated truck to harvest shellfish which is more expense than many make a year.

.04

I just don't understand getting a conveyance pre-chilled. You open the doors to load product and all your cold air is gone. Especially in the Northeast- we are colder than we are warm.