

## Reef Fish Amendment 36 – IFQ Modifications

### Summary of Written Comments

- The entire IFQ system needs to be revamped and the shares redistributed.
- Incorporate a provision that allows historical red snapper fishermen who received no shares to acquire shares.
- Expand eligibility requirements for any new shareholders to prohibit a shareholder to sell, trade, or lease any portion of their shares and give current participants up to three years to stop all trading, selling, or leasing any portion of their shares.
- If shares are not actively fished for 12 months, shares will not be transferable or leased, and shareholders who do not actively fish for 18 months will lose their shares.
- If a shareholder is not fishing allocation should not be leased, sold, or transferred.
- Inactive accounts should be redistributed via a lottery system for all interested parties to apply.
- Inactive accounts should be closed if not active for 18 months from the last activity.
- New entrants should be defined as someone who has never established an IFQ account.
- Future quota increases should be redistributed, with a large portion going to new entrants and small shareholders via a lottery system.
- Eliminate the commercial red snapper size limit and let every fish count.
- Commercial fishermen should use larger hooks, and fewer hooks on multiple hook rigs.
- Video monitoring should be implemented to enforce the full retention provision.
- Non-permitted IFQ accounts and Reef Fish Permit accounts should have the same cap.
- Shareholders with multiple vessels should proportion their shares among the vessels to level the playing field.
- Allocation cap should not be larger than the equivalent share cap
- Establish use-it or lose-it provisions
- Consider placing restrictions on the sale of IFQ allocations and shares
- Consider adopting a roll-over provision for unused IFQ allocation
- Consider adopting a lease-to-own provision.
- Fleet owners should be required to fish on their fleet.
- Fishermen should be required to fish no less than 75% of their IFQ to maintain possession of their corresponding shares.
- Oppose a lease-to-own provision.