

HB 512

Environment and Transportation Committee

My name is Rachel Dean. I serve as the Secretary for the Calvert County Watermen's Association, and I own Patuxent River Seafood. We are harvesters and dealers of seafood.

House Bill 512 is not transparent; it does not allow for full consideration. The bill gives the Department of Natural Resources the authority to mandate that seafood dealers, packers, and harvesters submit reports electronically, but it never uses the words electronic reporting. Consider the language of the bill. It removes the word "forms" (paper copies) and replaces it with "in accordance with regulations adopted by the Secretary." Why remove the word "form" in the law? Why is the change necessary? It is not, and the intention of "in accordance with the regulations adopted by the Secretary" is not clear. I can only assume its intention is to give the Department of Natural Resources the authority to mandate electronic reporting while circumventing the opportunity for stakeholders to weigh in.

Reporting electronically is cumbersome for harvesters who are not connected to electronic devices throughout the course of their workday. Harvester's jobs do not put them behind a computer. Water and electronics do not mix. Further, cellular service is spotty at best in most areas of the lower Bay and even areas near Baltimore. Harvesters will be unfairly penalized if they are cited for not electronically reporting.

If the Department wants 100% reporting compliance—a lofty goal in any profession—electronic reporting mandates will not accomplish that "goal." It *will* make the Department's job easier (no data entry)—while putting an unneeded burden on packers, dealers, and harvesters. Even the IRS still accepts paper filings.

Please give an unfavorable report on this bill—citing lack of transparency in the language of the bill that would allow for full consideration of the possible hardships for dealers, packers, and harvesters.