MEMORANDUM

To: Florida Fish and Wildlife Conservation Commissioners
From: George Warthen, Director, Hunting and Game Management
Date: September 28, 2022
Subject: Proposed Final Rule – Alligator Meat Regulations

Purpose: Obtain approval of proposed final rule amendments that add labeling alternatives for packaged alligator meat and clarify rule language.

Why: The proposed rule amendments are part of a programmatic review of the Alligator Management Program, and the proposed changes are intended to improve bulk alligator meat processing operations.

Top Points:
1) The use of a unique lot number in lieu of specific Convention on International Trade in Endangered Species (CITES) tag numbers on alligator meat packages will provide flexibility for bulk processing of alligator meat while maintaining existing strict traceability requirements.
2) Each unique lot number will be linked to specific CITES tag numbers associated with legally acquired alligator carcasses and parts.
3) A new definitions subsection provides clarification on the terms “alligator meat” and “processing alligator meat,” which are used throughout the current rule.
4) Input from stakeholders indicated strong support of the proposed rule changes.

Affected Parties: Licensed alligator processors, contracted nuisance alligator trappers, private lands alligator management program permittees, and licensed alligator farmers

Summary: The current rule requires each package of processed alligator meat be labeled with the CITES tag number(s) from which the legally acquired alligator meat was taken. The proposed alternative labeling option would allow the use of a unique lot number in lieu of a CITES tag number(s). The FWC would require documentation of lot numbers and corresponding CITES tag numbers be kept on site and available for inspection. The alternative labeling option is especially beneficial for processing large batches of alligator meat because meat from multiple alligators can be mixed while processing, and currently, rule requires each CITES tag number be used on the processed alligator meat package label. This program improvement provides needed flexibility over the current labeling requirement by allowing a traceable lot number to be used when labeling bulk processed meat into smaller packages for sale. Staff solicited feedback from the affected parties through a targeted commenting tool. Among respondents, 89% were supportive or neutral to the proposed change. The terms “alligator meat” and “processing alligator meat” used in the context of preparing alligator for consumption are not currently defined in rule. The ambiguity of those terms has led to confusion among licensees and staff. A short definitions subsection has been added to clarify these terms, and the already-specified definition for “tamper-proof package” has been relocated to this new subsection and termed “tamper-evident package.”

The Alligator Technical Assistance Group (external stakeholders) and Alligator Management Standing Team (FWC staff) support the proposed final rule amendments.

Staff Recommendation: Approval to advertise the proposed final rule and file for adoption without further hearing, unless requested.

Staff Contact and/or Presenter: George Warthen, Director, Hunting and Game Management
Brooke Talley, Ph.D. (Presenter), Division of Hunting and Game Management

Affected Rule: 68A-25.052 F.A.C.