



SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

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June 30, 2014

Dr. Roy Crabtree, Regional Administrator
NOAA Fisheries, Southeast Region
263 13th Avenue South
St. Petersburg, FL 33701

Dear Roy:

The Council is very interested in working with NMFS in drafting the Regional Implementation Plan for Electronic Monitoring (EM) and Reporting (ER). Mel Bell and Gregg Waugh have been named to represent the Council on the EM/ER implementation plan committee.

As you are aware, the Council received a presentation from Dr. Andy Strelcheck at the June 2014 meeting and reviewed your letter dated May 9th, 2014. In general, the Council is fully supportive of moving forward with electronic reporting immediately. In fact, a number of recent amendments have or will implement mandatory, weekly electronic reporting in the headboat fishery and for federal dealers. The Council is working on an amendment to apply the same reporting requirements on charterboats as recently implemented for headboats. The Council's reporting priorities and objectives are included in **Attachment 1**. In addition, the Council's current position on the Regional Plan is:

1. Make it clear that Electronic Technology refers to electronic reporting and electronic monitoring and not just electronic monitoring.
2. The South Atlantic Council is focused on electronic reporting at this time.
3. Reporting should link databases with common elements (e.g., water body codes).
4. Agency does not need to build everything but should focus on developing the standards; third party vendors should be involved from the start.
5. Amount of data from video monitoring is very large and costly; compare costs for observer versus electronic monitoring. The project by Scott Baker may provide some comparison.
6. The Regional Implementation Plan should be considered a living document and change as we move forward.

Given the Council's recent experience discussing VMS in the snapper grouper fishery, the dire economic condition of many of our commercial fisheries, and the number of small vessels (e.g., 14-16 foot open skiffs) in some of our fisheries, the Council is much more cautious about moving forward with electronic monitoring. However, recognizing that some activity will take place concerning EM, the Council's EM priorities and objectives are included in **Attachment 1**.

The Council also discussed the 12 questions posed in your letter. Responses are included in **Attachment 2**.

The Council looks forward to developing the implementation plan in a cooperative fashion with a draft plan to be presented to the Data Committee during the September 15-19, 2014 meeting in Charleston. Having a Council and staff member participating in the development of the regional plan will help ensure the Council's views are addressed. The Council plans to provide significant comments at the September meeting and anticipates receiving a presentation on the final report at our December 1-5, 2014 meeting in New Bern, NC.

The South Atlantic Council has worked continuously to improve data from our fisheries so that stock assessments and impact analyses can be conducted using the best data available. We intend to continue working on this in the future as indicated by the reporting items in **Attachment 1**.

On behalf of the Council, we would like to thank you and your staff for the opportunity to participate in drafting this Regional Implementation Plan. If you require any additional information, please do not hesitate to contact Gregg or me.

Sincerely,



Robert K. Mahood
Executive Director

Enclosures

cc: SAFMC Members and Staff
Monica Smit-Brunello
Phil Steele, Jack McGovern, and Andy Strelcheck
Bonnie Ponwith, Theo Brainerd and Tom Jamir

I. REPORTING

1. Dealer reporting – weekly electronic reporting will be fully implemented in August 2014. There are still delays in having weekly updated landings available to the public for their use in planning trips. Solution would be to have the raw weekly data fed to ACCSP and made available to the public via the ACCSP website. The “official” numbers would continue to be the numbers on the NMFS website but this would provide more timely and useful updates to the public. Include more specific catch location information into the reporting requirements.
2. Headboat reporting – weekly electronic reporting is fully implemented. The goal is to have monthly landings available on the NMFS website that would make the data more useful for the public. It would be more helpful if the landings were updated weekly to better track recreational landings and to make the landings available to the public for their use in planning trips. Solution would be to have the raw weekly data fed to ACCSP and made available to the public via the ACCSP website. The “official” numbers would continue to be the numbers on the NMFS website but this would provide more timely and useful updates to the public. Include more specific catch location information into the reporting requirements.
3. Charterboat reporting – the Council intends to apply the same reporting requirements that currently exist for headboats to charterboats. The intent would be that the data follow the same route and timing as shown above for headboats. Include more specific catch location information into the reporting requirements.
4. Commercial logbook reporting – report electronically with same one button submittal as shown in #5 below. Include more specific catch location information into the reporting requirements.
5. Simplification of reporting – dealer, headboat, and charterboat reporting should allow the individual to hit one button to simultaneously send the data to the state, ACCSP, and NMFS.
6. Explore logbook reporting for the private recreational sector.
7. Explore having a sample of vessels by sector provide real--time by-catch reporting (e.g., video monitoring, onboard electronic logbook).
8. Develop electronic reporting with significant stakeholder involvement in development of entire system.
9. Use cellphone and tablet based system in addition to computer based system.
10. Ensure data set interoperability between ER, EM, and other data.
11. Need to separate for-hire reporting from private recreational angling.
12. Develop system to have fishermen fill out one report per trip; the needed information then goes to those who need it. No multiple system, multiple device electronic reporting.

II. MONITORING

1. Rock shrimp – the industry has expressed a willingness to work cooperatively with scientists on documenting their fishery:
 - a. Explore methods for the industry to provide catch information by trawl to be linked to the VMS data. This would document the industry’s production by area that would be very helpful in area-based management. Investigate possible use of environmental monitoring (CTDs) on trawls to link fishing effort and catch with environmental conditions to provide a better understanding of catch associated with habitat and environment.
2. Golden crab – the industry has expressed a willingness to work cooperatively with scientists on documenting their fishery:
 - a. Explore placing “electronic pingers” on traps to document where the gear is fishing. This information would be compared to where the vessel is located (perhaps with VMS or some other way to provide vessel location) to better understand how this fishery operates.
 - b. Explore methods for the industry to provide catch information by trap haul to be linked to the trap location data. This would document the industry’s production by area that would be very helpful in area- based management.
 - c. Investigate possible use of environmental monitoring (CTDs) on traps trawl to link fishing effort and catch with environmental conditions to provide a better understanding of catch associated with habitat and environment.
3. Black sea bass traps – explore placing “electronic pingers” on traps and explore use of VMS or some other way to provide vessel location to better understand how this fishery operates. This would be very helpful in documenting potential interactions with endangered/threatened species.
4. Snapper grouper longline vessels – explore placing “electronic pingers” on longlines and explore use of VMS or some other way to provide vessel location to better understand how this fishery operates. This would be very helpful in documenting when/where fishing to help with quota monitoring and any potential interactions with endangered/threatened species.
5. Royal red shrimp & Calico scallops – both of these fisheries use trawl gear that are subject to the Council’s HAPC gear limitations and prohibition on possession of coral even though they are not included in any FMP.
 - a. Explore placing “electronic pingers” on royal red shrimp trawls to document where the gear is fishing. This information would be compared to where the vessel is located (perhaps with VMS or some other way to provide vessel location) to better understand how these fisheries operate.
 - b. Explore methods for these industries to provide catch information by trawl to be linked to the trap location data. This would document the industry’s production by area that would be very helpful in area-based management.
 - c. Explore use of hydraulic pressure transducers to indicate when the hydraulic equipment (trawl and anchor winches, etc.) are operating.
6. Explore providing vessels conducting fishery independent surveys, technology (fixed system, AUV, ROV, CTDs, etc.) to conduct benthic mapping, acoustic monitoring, collection of oceanographic data.
7. Explore providing vessels of opportunity (including commercial and recreational fishing vessels), technology to conduct benthic mapping.

Regional Implementation Plan Questions & South Atlantic Council Responses

- 1. What are your Council's primary objectives for increasing the use of EM/ER? What benefits do you see from expanded use of EM/ER?**
 - a) ER - Improve timeliness, accuracy, efficiency and usefulness of fishery dependent data; leads to better products, outcomes and management applications from use of data
 - b) ER - Provide alternative/additional methodologies for data input requested by fishermen; enhanced participation in reporting, improved perception and buy-in from fishermen/dealers/industries in data collection (all sectors)
 - c) ER – Improved public accessibility to up to date, accurate, reliable data; better accountability, buy-in from public yielding enhanced public participation
 - d) ER – Simplification of reporting system for for-hire and commercial fishermen/dealers feeding into state, ACCSP and NMFS databases; accuracy and consistency in databases
 - e) EM/ER – Improved documentation of by-catch in some commercial fisheries where feasible (video, electronic logbooks); better quantification of by-catch, better assessments
 - f) EM – Improved documentation of gear/effort with linked position data associated with some fisheries; better understanding of fishing practices and possible impacts

- 2. Where do you see the greatest deficiencies or limitations with existing commercial and recreational data collection programs in your region and how can EM/ER help resolve those deficiencies?**
 - a) Lack of timeliness, accuracy and usefulness of recreational private boat angler data
 - b) Lack of timeliness/accuracy of landings, effort, and catch/release data in for-hire sector fisheries
 - c) Continually exceeding commercial and/or recreational ACLs in some fisheries
 - d) Duplication of efforts, redundancies in programs, and lost efficiencies in using limited available funding and resources to collect commercial and recreational data
 - e) Redundancy in reporting requirements, multiple databases and systems (NMFS/ACCSP/HMS/States), and lack of a consolidated picture of landings/fisheries
 - f) Issues with data accuracy and timeliness across many fisheries and all sectors

- 3. Which fisheries managed by your Council are suitable for electronic reporting? (Please identify all fisheries, as well as any specific sectors [commercial, for-hire, private] and/or gear types suitable for electronic reporting)**
 - a) Snapper-Grouper (commercial, for-hire, private boat)
 - b) CMP (commercial, for-hire, private boat)
 - c) Dolphin/Wahoo (commercial, for-hire, private boat)
 - d) Golden Crab (commercial)
 - e) Rock Shrimp (commercial)
 - f) Electronic dealer reporting for all commercial fisheries

4. **Based on the list of fisheries identified in question #3, rank each fishery in priority order of most likely to least likely to need electronic reporting. What factors are most important when prioritizing electronic monitoring fishery needs?**
 - a) Rock Shrimp (commercial)
 - b) CMP (commercial, for-hire, private boat)
 - c) Snapper-Grouper (commercial, for-hire, private boat)
 - d) Golden Crab (commercial)
 - e) Dolphin/Wahoo (commercial, for-hire, private boat)
 - f) Prioritization factors – filling critical data gaps; improving data timeliness and accuracy; inadequate alternatives exist; costs must be realistic and manageable (potentially shared?)

5. **Which fisheries managed by your Council are suitable for electronic monitoring (i.e., video camera systems)? (Please identify all fisheries, as well as any specific sectors [commercial, for-hire, private] and/or gear types suitable for electronic monitoring)**
 - a) Golden crab (commercial); gear location (pingers) and catch data differentiated from actual vessel location (tied to VMS/GPS/other technology), but tied for purposes of a trip documentation
 - b) Rock Shrimp (commercial); VMS in use now. Link catch data to VMS input? Document location-specific by-catch with cameras?
 - c) Snapper-Grouper (commercial; for-hire); cameras to document catch and by-catch?
 - d) Black sea bass pot fishery; trap location (pingers)/vessel location (VMS) to avoid sensitive areas related to whale migration if necessary?
 - e) Royal red, calico scallop, jellyball trawl net fisheries (by-catch, effort location-VMS, possibly cameras to document by-catch)?

6. **Based on the list of fisheries identified in question #4, rank each fishery in priority order of most likely to least likely to need electronic monitoring. What factors are most important when prioritizing electronic monitoring fishery needs?**
 - a) Rock Shrimp (commercial); documentation of location-specific effort/catch and by-catch
 - b) Golden crab (commercial); documentation of gear placement versus vessel location
 - c) Snapper-Grouper (commercial; for-hire); documentation of catch and by-catch
 - d) Black sea bass pot fishery; documentation of locations of gear and proximity to whales
 - e) Trawl net fisheries possibly near HAPC or possibly interacting with protected species; documentation of areas where gear used and/or interactions with protected species

7. **What are the major challenges (e.g., costs, regulations, constituent opposition, infrastructure, etc.) hindering implementation of electronic monitoring and reporting in your region? How can these challenges be overcome?**
 - a) NMFS/ACCSP inability to develop single reporting system; cooperation/direction
 - b) High costs of implementation; cost sharing with industry necessary but difficult
 - c) SA Region industries/fishermen capable of cost-sharing
 - d) Opposition to requirements of EM; education/outreach

- 8. Are there regulatory changes needed in your region that currently preclude you from implementing EM/ER? If yes, what regulatory changes are needed?**
- a) Requirements for specific fisheries or sectors would be based on FMP Amendments
 - b) Facilitation of system to allow for voluntary (optional) use of some ER/EM possible
- 9. What factors (ease of use, costs to the government, costs to industry, accuracy, timeliness, other factors, etc.) are most important for requiring electronic technologies for monitoring or reporting?**
- a) Clear, realistic improvements in data timeliness/accuracy/quality possible
 - b) Very specific objectives identified and achievable
 - c) Simplicity of implementation, operation, and enforceability where necessary
 - d) Affordability to fisheries/industry (with industry cost-sharing possible)
 - e) Practicality and affordability to manage long term (data collection through data use)
- 10. Does your Council have a policy on the use of vessel monitoring systems (VMS)? Electronic camera systems? In what instances is it appropriate or not appropriate to require VMS or onboard electronic camera systems?**
- a) No Council policy exists for use of VMS or cameras
 - b) VMS only used in Rock Shrimp fishery now
 - c) No cameras required anywhere now
 - d) VMS and/or cameras should be required only when objectives are clear and obtainable, and benefits of implementation outweigh the costs; costs should not be overly burdensome on fisheries/industries, but industry cost sharing may be necessary in some cases for application of these technologies; all costs for long term use should be understood up front; buy-in and commitment to support for the long haul must be there
- 11. What factors should NMFS consider when evaluating EM/ER implementation progress? What does your Council view as successful implementation of EM/ER?**
- a) Is it really needed and practical; can off the shelf technologies be employed
 - b) Established objectives for improvements in data collection are being met
 - c) Documentation of all costs (at every level) is in place
 - d) Council measures of success could be seen in better adherence to ACLs, better data to support more accurate stock assessments, and fisheries/industries better engaged and willingly participating in and supporting these data collection efforts

12. What other recommendations and input would you like to provide to NMFS for consideration in the regional implementation plan?

In the SA Region, the focus and interest should remain initially on potentially beneficial implementation of ER, particularly for those fisheries/sectors where clear improvements to data collection, data timelines, data accuracy, and data application can be achieved. Should particularly concentrate on areas where the fisheries, public, industries, etc. can see the benefits and have actually expressed interest in using ER to improve processes and outcomes. Objectives for implementation should be very clear. All parties involved in the potential use of any ETs should be at the table from the start to ensure whatever is developed has the best chance for success. Appropriate off-the-shelf technologies and outside vendors should be used whenever possible to save on costs and improve efficiency. Few existing fisheries in the SA Region may be able to cost-share in ET implementation to the degree that is experienced in other regions. Emphasis must be placed on reducing data reporting/collection/storage programmatic overlap and complexity. Benefits from ER/EM efforts must be maximized through careful, coordinated use of limited funding to support implemented programs and processes.