

Amendment 46 to the Fishery Management Plan for the Snapper Grouper Fishery of the South Atlantic Region

Draft Options Paper
November 2022

Note: Words that are [underlined and in blue font](#) provide a link to other documents.

Background

At the December 2021 South Atlantic Fishery Management Council (Council) meeting, the Snapper Grouper Committee requested that Amendment 46 to the Fishery Management Plan (FMP) for the Snapper Grouper Fishery of the South Atlantic Region (Snapper Grouper FMP) be added to the agenda for discussion in March 2022. Amendment 46 was previously developed in the first half of 2018 and was approved for scoping at the June 2018 Council meeting. Due to time constraints over the Council's workplan and the need to obtain more information on potential approaches for private recreational data gathering, the amendment was never scoped. From 2018 through 2020 staff focused instead on piloting the MyFishCount mobile app and portal. Other related efforts have also been underway, notably the convening of the Private Recreational Reporting Workgroup (workgroup) and subsequently the Snapper Grouper Recreational Permitting and Reporting AP (AP). The briefing materials and summary reports for these meetings can be found on the [Council's website](#).

The Council's 2016-2020 Vision Blueprint for the Snapper Grouper Fishery, previous amendments, and existing requirements

The 2016-2020 Vision Blueprint for the Snapper Grouper Fishery (Vision Blueprint) was approved in December 2015 and was intended to inform management of the snapper grouper fishery through 2020. The Vision Blueprint was also intended to serve as a "living document" to help guide future management, build on stakeholder input and how the Council envisions future management of the fishery, guide the development of new amendments that address priority objectives and strategies, and illustrate actions that could be developed through the regular amendment process. The Vision Blueprint is organized into four strategic goal areas: (1) Science, (2) Management, (3) Communication, and (4) Governance. Each goal area has a set of

objectives, strategies, and actions. The potential actions in Amendment 46 correspond to different objectives and strategies in the Vision Blueprint.

During Vision Meetings and scoping of Amendment 43 to the Snapper Grouper FMP (catch limits for red snapper), several fishermen expressed concern with the estimates of catch resulting from the Marine Recreational Information Program (MRIP). Some fishermen requested exploring a recreational stamp or permit for snapper grouper fishing and to improve recreational estimates by requiring recreational fishermen to report their catch. This recommendation has also been put forth by the Council's Snapper Grouper Advisory Panel numerous times. Permits and reporting requirements have been implemented for the federal for-hire component of the recreational sector and the commercial sector for the snapper grouper, dolphin wahoo, and coastal migratory pelagic fisheries to improve estimates of effort or catch in the South Atlantic region. However, these requirements do not cover the private recreational component.

Currently, a coastal recreational fishing license, issued through the states, is required for private recreational anglers as part of the 2007 Magnuson-Stevens Fishery Conservation and Management Act reauthorization to improve estimates of catch and effort. There have been other federal and state efforts to further refine information gathered on the private recreational component of the recreational sector, such as the [Large Pelagics Survey](#) that covers highly migratory species and the [Private Recreational Tilefish Permit](#) in the Mid-Atlantic and New England regions. The state of Florida has also developed the [State Reef Fish Survey](#) where anglers intending to fish for certain species of snappers, groupers, jacks, triggerfish, or hogfish from a private vessel must obtain an State Reef Fish Angler designation.

Recent Council actions in 2022

At their March 2022 meeting, the Council reviewed background information, recommendations from the workgroup, and directed staff to assemble candidates for an ad hoc AP to be selected in June 2022. The Council then reviewed recommendations from the first meeting of the AP at its September 2022 meeting. At this meeting, the Council approved the following vision statement and identified the subsequent list of additional questions for the AP to consider.

Vision Statement: A permit for the private recreational sector of the South Atlantic Snapper Grouper fishery will facilitate the collection, validation, and analysis of harvest and discard data to improve the catch and effort estimates used for fisheries science and management decision-making.

Objectives for this meeting

- Provide recommendations, items for further consideration, and responses to the Council's discussion questions and statements.

Tentative amendment timing

December 2022	Review options paper and approve amendment for scoping (?)
Winter 2023	Conduct scoping sessions
March 2023	Review scoping comments
June 2023	Review amendment and preliminary analysis.
September 2023	Review modifications to the amendment, select preferred alternatives, and approve for public hearings.
Fall 2023	Conduct public hearings
December 2023	Review public hearing comments and provide guidance.
March 2024	Review final draft amendment and consider approval for formal review.
2024/2025	Regulation changes effective.

Options for Proposed Actions

1. Establish a Private Recreational Snapper Grouper Permit to Fish For, Harvest, or Possess Snapper Grouper Species in the South Atlantic Region

Discussion:

- At their December 2022 meeting, the Council will be developing a range of options that they want to explore in Amendment 46 and potentially send out for scoping regarding a permit. As part of their discussion they may be deciding whether to consider topics such as:
 - A private recreational permit for vessels only? Anglers only? Anglers fishing from vessels only? Anglers and vessels?
 - Which species should be covered? All SG species? A sub-set of SG species?
 - Should a fee be considered for the permit?
 - Include an education certificate to go along with or substitute for the permitting process?
 - As part of improving education and outreach on best fishing practices and reducing post-release mortality, the Council could consider implementing an education requirement to obtain a permit or using such a requirement in place of a permit.
- Federal permits with reporting requirements are currently in place for the commercial and for-hire components of the snapper grouper fishery.
- Recreational anglers in other regions are required to obtain additional federal permits and endorsements in some circumstances. Endorsements or permits (issued to a vessel) are required in:
 - The Mid-Atlantic Region for blueline and golden tilefish
 - Halibut in Alaska
 - Specific areas in the Pacific Islands
 - Species managed by the NMFS Highly Migratory Species (HMS) Division. Highly migratory species include certain species of tunas, swordfish, billfishes, and sharks.
- All of the examples in **Table 1** are issued for a vessel.

Table 1. Recreational permits and endorsements issued by NMFS regional offices or HMS Division.

Region/Division	Permit	Endorsement
Greater Atlantic Regional Fisheries Office	Tilefish	
Alaska Regional Office	Subsistence Halibut	
Pacific Islands Regional Office	Area Specific*	
Highly Migratory Species Division	HMS	Shark

*Permits include: Main Hawaiian Islands non-commercial Bottomfish, Northern Mariana Islands Bottomfish, Pacific Remote Island Areas Bottomfish, Pacific Remote Islands Areas Pelagic Troll and Handline, and Special Coral Reef Ecosystem Fishing permits, and Western and Central Pacific Convention Area Endorsement.

- Each state in the South Atlantic region has specific requirements for certain gear types, methods, or possession of certain species.
 - In Florida, there is an additional designation or stamp to fish for or possess certain reef fish species, snook, and spiny lobster and a tag to harvest tarpon.
 - The Saltwater Information Permit is a free permit added to the freshwater fishing license in Georgia.
 - The Recreational Commercial Gear License is an additional license required to use limited amounts of commercial gear in North Carolina.
 - In South Carolina, a separate license is required to bait for shrimp.
- All of the examples in **Table 2** are issued to an individual.

Table 2. State issued permit, licenses, stamps, and tags in the South Atlantic region in addition to a coastal or freshwater recreational fishing license.

State	Permit	License	Designation or Stamp	Tag
Florida			Reef Fish, Snook, Spiny Lobster	Tarpon
Georgia	Saltwater Information Permit			
North Carolina		Recreational Commercial Gear		
South Carolina		Shrimp Baiting		

- A private recreational permit could be used to better refine the sampling unit for fishermen that target snapper grouper species and provide targeted outreach to that audience.
- During the Vision process for the Snapper Grouper FMP, stakeholders suggested requiring permitting for the private recreational sector. Similar feedback has been received from the Snapper Grouper AP as well as in public comments to the Council in recent years.
- A permit would help identify the universe of anglers or private vessels that are fishing for snapper grouper species and could help improve estimates of snapper grouper effort and harvest potentially without substantially increasing sampling effort in MRIP (although additional targeted survey efforts or biological samples might be needed).

Discussion topics for the AP on permitting:

- 1) **Improving estimates:** How can a permit without a reporting requirement potentially be integrated into the existing MRIP sampling framework and the Florida State Reef Fish Survey to improve the accuracy of landings and discards estimates?
- 2) **Vessel vs Individual:** Discuss the pros and cons of a vessel permit versus an individual permit.

The following guidance was provided at the AP's August 2022 meeting:

- **Permit Type:** *Recommend a vessel rather than individual permit since it helps reduce “the universe” of how many permits will need to be issued.*
 - Helps with survey design and validation.
 - Easier to write down vessel ID that is easily visible rather than require asking for individual permit number or paperwork.
 - Consistent with existing permits issued by SERO for commercial and for-hire vessels.
 - A vessel permit doesn't create an impediment to integrate with other programs (such as MRIP).
 - Accuracy is improved by a vessel permit and may streamline questionnaire during interview if intercepted (ability to interview one representative for vessel or all anglers at once).
- 3) **Regional Utility:** How can a permit be developed for potential use in other regions (Gulf of Mexico or Mid-Atlantic) to ensure consistency and standardizations?

- 4) **Renewal:** What are the desirable terms and frequency of permit renewal?

The following guidance was provided at the AP's August 2022 meeting:

- *Recommend annual renewal requirement to purge inaccurate or inactive vessel information.*
- 5) **Fee:** Does charging a nominal fee effectively reduce oversubscription? What sort of information may be available on the topic?

The following guidance was provided at the AP's August 2022 meeting:

- “Over-subscription” could be an issue (i.e. vessels or individuals obtain a permit without the intent to use it). To address this some sort of barrier or burden could be associated with obtaining the permit.
 - Consider evaluation of charging a fee to obtain a permit.
 - At what level would it be a barrier to entry and where could it be beneficial?
 - Simply the requirement of setting up an account and entering information to get permit (i.e. burden and time) may be enough of a barrier to get the permit and mitigate the “oversubscription” issue. Only those that intend to use the permit would go through the trouble to get it.
- 6) **Education:** Weigh in on efficacy of an education certification as a proxy for a permit.
 - a. Discuss mandatory versus voluntary measures.

2. Implement Reporting Requirements for Private Recreational Anglers or Vessels

Discussion:

- At their December 2022 meeting, the Council will also be developing the range of options that they want to explore in Amendment 46 and potentially send out for scoping regarding reporting. As part of their discussion they may be deciding whether to consider:
 - A reporting requirement associated with a private recreational permit.
 - Mandatory vs voluntary reporting?
 - Implement a reporting requirement immediately or phase in at a later date once a permit is in place?
 - Cover all species or a sub-set of species?
- Electronic reporting requirements are currently in place for headboats and charter boats operating in the snapper grouper fishery.
- Requiring reporting could improve data on the private angler component of the recreational sector especially when landings are confined to a short time period, infrequently sampled, or are rare events.
- For many species in the snapper grouper complex, there are few intercepts for individual species. Electronic data reporting systems can be developed to allow anglers to report varying levels of information.
- Reporting can be targeted for a specific species or group of species.
 - Example: GARFO Private Recreational Tilefish Permit requires electronic vessel trip report (eVTR) within 24 hours of returning to port for all trips that either targeted or retained golden or blueline tilefish.

Discussion topics for the AP on implementing reporting:

1) **Necessity**: Would there be utility in implementing a permit without a reporting requirement?

The following guidance was provided at the AP's August 2022 meeting:

- It is possible that a permit may not accomplish much without being linked to a reporting requirement.
- Having a permit in place would be helpful to get a handle on “the universe” of anglers or vessels that a reporting requirement would be covering.
- In a “perfect world,” if resource and outreach concerns were off the table:
 - Getting permit in place and established first would be a reasonable approach. Could be integrated into existing sampling of private recreational anglers. This would also help with future outreach and demonstrate compliance rates. Get to a stable place with permit and help inform design decisions with reporting.
 - Could avoid growing pains seen in other programs where permitting and reporting were all rolled out at once and required adapting to issues on the fly.
 - Small scale pilot study could help determine “full scale” costs and potential barriers to overcome.

- 2) **Validation:** What are the considerations for implementing a reporting requirement that can be validated?

- 3) **Mandatory vs Voluntary:** Discuss the pros and cons of a mandatory versus a voluntary reporting requirement.