



# SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

4055 FABER PLACE DRIVE, SUITE 201  
NORTH CHARLESTON, SOUTH CAROLINA 29405

TEL 843/571-4366 FAX 843/769-4520

Toll Free 866-723-6210

Email: [safmc@safmc.net](mailto:safmc@safmc.net)

Web site: [www.safmc.net](http://www.safmc.net)

Ben Hartig, Chair  
Dr. Michelle Duval, Vice Chair

Robert K. Mahood, Executive Director  
Gregg T. Waugh, Deputy Executive Director

December 18, 2014

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

Dear Roy:

The Council is very appreciative of the opportunity to work with NMFS in drafting the Regional Implementation Plan for Electronic Monitoring (EM) and Reporting (ER). Mel Bell and Gregg Waugh represented the Council on the EM/ER Regional Implementation Plan Committee. We would like to commend you and your staff, Dr. Andy Strelcheck in particular, for doing such an excellent job preparing the draft plan, sharing it with Mel and Gregg, incorporating many of our suggestions thus far, and for presenting the draft to our Council during the December 2014 meeting.

In general, the Council is fully supportive of moving forward with the Regional Implementation Plan and we offer the following additional suggested edits/modifications to strengthen the plan. Additionally, we are including the Council's reporting priorities and objectives (**Attachment 1**) provided in our original letter as these support many of our suggestions. The Council's suggestions are as follows:

1. Cost sharing by industry – Since reliable long-term funding will be critical in the implementation and success of any future use of EM/ER, discussion of this possible avenue of funding is important and should be mentioned very early in the front section of the report. The details on estimated costs should be completed prior to the document going out for public comments.
2. Archival data storage – The data collected is very important and the document should describe how these data will be stored and handled for future use.
3. ACCSP – ACCSP is a very important partner in fishery data collection, warehousing and dissemination along the entire east coast. Wherever the plan discusses working with partners, evaluating progress, etc., ACCSP should be listed as a partner (e.g., pages 6 and 19). The Council requests that data collected should flow to ACCSP first, with the appropriate QA/QC processes in place, and then all affected partners can pull the data for their own use. As noted in our attached priorities and objectives, the Council requests that a process be developed whereby quota monitoring from dealers, headboats, and charterboats could be done on a daily basis using “unofficial/preliminary” data. NMFS would then pull the data from ACCSP and perform their additional QA/QC/expansion steps and continue to produce the “official” numbers that are used to track quotas. This will make the process more timely and more transparent.

4. Data elements versus platform – The Agency does not need to build everything from scratch, but should focus particularly on developing the standards for the necessary data elements to be acquired; third party vendors with expertise in software development and data collection system design should be involved from the start.
5. Clarify in the Plan that recreational fisheries are also included for consideration of future use of appropriate EM/ER tools and processes.
6. Figure 2, SERO/SEFSC – should add “4. Timeliness of data availability.” as a priority.
7. Figure 3 – Insufficient regulations – the Council recommends replacing this with “Lack of communication & cooperation among partners”. It is critical that we all be honest about the challenges we face so that we can all work together to find solutions. Regulations will be implemented through existing processes as necessary if/when it is determined that specific EM/ER systems should be put in place.
8. The plan should discuss what happens when electronic reporting does not work due to technical problems (e.g., how can dealers/fishermen report until the problems are fixed?).
9. The Regional Implementation Plan should be considered a living document and change as we move forward.

Given the Council’s recent experience discussing VMS as a possible management tool 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 wants to reiterate that it is much more cautious about moving forward with electronic monitoring at this time compared to electronic reporting. However, recognizing that some activity will take place concerning EM, the Council’s EM priorities and objectives are included in **Attachment 1**.

The Council looks forward to working with NMFS and our partners (States, Commissions, and ACCSP) to complete and implement the Regional Implementation Plan in a cooperative fashion. 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, I 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,



Ben Hartig  
Chairman

Letter Hartig to Crabtree 12/18/14

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.