



SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

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February 9, 2014

Dr. Andrew Strelcheck
NOAA Fisheries, Southeast Region
Sustainable Fisheries Division
263 13th Avenue South
St. Petersburg, FL 33701-5505

Dear Andy:

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 for doing such an excellent job preparing the draft plan, sharing it with Mel and Gregg, and incorporating many of our suggestions provided informally and in our letter dated December 19, 2014.

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. The Council's suggestions are as follows:

1. Cost sharing by industry – Thanks for incorporating our previous comments. We are concerned that the public is not being made fully aware that there will be cost sharing and suggest this be mentioned earlier in the document (e.g., adding discussion to the end of the first paragraph on page 1). You could also add a new goal at the bottom of page 4 to read: 4) establishing effective partnerships with stakeholders that allow for consideration of using new, innovative and beneficial electronic technologies, as well as the means to fund their implementation, including industry cost sharing where appropriate. On page 26, under Funding sources, 2nd paragraph, 1st sentence: this refers to cost sharing with agency partners. Will this include the Councils? Last sentence of that paragraph should also refer to SAFMC rock shrimp. Also, the 2nd to last sentence of the 1st paragraph refers to a “reduced need for observer bycatch coverage” which is certainly not applicable to the South Atlantic. Perhaps this could be better expressed as the use of appropriate technologies possibly resulting in a requirement of fewer sea-days of actual manned observer time to acquire these important data.
2. Archival data storage – Thanks for incorporating our previous comments. This is addressed on pages 7 and 25 and we suggest clarifying the last bullet on page 27 to make it clear that Infrastructure support includes archival data storage.

3. ACCSP – Thanks for incorporating our previous comments. The discussions about ACCSP and GSMFC clarifies their roles and participation in this effort. Proper, efficient, and cost effective data flows should be a goal of this program. It would be very helpful to include a chart of the existing data flows, as this could help to highlight some of the redundancies mentioned on page 22 in the second paragraph.
4. Data elements versus platform – Thanks for incorporating our previous comments. An examination of existing costs and challenges in other regions would be beneficial as this effort continues to progress in the Southeast Region.
5. Clarify in the Plan that recreational fisheries are also included for consideration of future use of appropriate EM/ER tools and processes. Thanks for incorporating our previous comments; this is very thoroughly addressed.
6. Figure 2 (page 20), SERO/SEFSC – We had previously suggested adding a goal addressing timeliness as a priority. We suggest adding: “3. Improved data timeliness and availability for quota monitoring and stock assessments.” as a priority.
7. Figure 3 (page 21) – Thanks for incorporating our previous comment about communication. The Council is ready to propose the necessary regulations for reporting as they have done for commercial dealers and headboats and does not see this as a challenge.
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?). Thanks for incorporating our previous comment. It would be helpful to those reporting if it was clear that they could default to alternative reporting options (e.g. paper, fax, email, etc.) in the event the electronic system is not working.
9. The Regional Implementation Plan should be considered a living document and change as we move forward. Thanks for incorporating our previous comments.
10. Table 2, South Atlantic – Observers – Should add that they are required to carry an observer if selected by SEFSC. Same near bottom of page 15 and on page 16.
11. Table 4 (page 29), Gulf and S. Atl, Priority – Should read For-hire charterboat 3-logbooks since we already have headboats in place.
12. Table 4 (page 30), S. Atl, Wreckfish ITQ – What is shown for 2015, we have being addressed in 2016.
13. Page 31 – Should add GSMFC to the 2nd sentence.

Given the Council's recent experience carefully considering the use of 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 we are much more cautious about moving forward with electronic monitoring at this time compared to electronic reporting.

The Council looks forward to continuing the work 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 regulatory actions, stock assessments and impact analyses can be conducted using the best data available. We intend to continue working on this in the future.

On behalf of the Council, I would like to thank you and NMFS 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,

A handwritten signature in black ink, appearing to read "Ben Hartig". The signature is fluid and cursive, with a large loop at the end.

Ben Hartig
Chairman

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