



August 15, 2025

Trish Murphey
Chairman
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201, North Charleston, SC 29405

Dear Chair Murphey and Members of the Council,

On April 17, President Trump issued his Executive Order for “Restoring American Seafood Competitiveness.” On behalf of the American Sportfishing Association, Coastal Conservation Association, and Congressional Sportsmen’s Foundation, we appreciate the opportunity to provide comments to the South Atlantic Fishery Management Council (Council) on implementation of this Executive Order for consideration by the Council, US Secretary of Commerce, and NOAA Fisheries.

While much of the Executive Order pertains specifically to commercial fishing and seafood trade, many of the policies and priorities apply to United States marine fisheries more broadly, including recreational fisheries, such as addressing overregulation, ensuring access, improving fisheries management and science, and modernizing data collection. Recreational fishing is a significant source of seafood for millions of Americans who consume their own catch, and the South Atlantic is the top region in the nation for marine recreational fishing trips, covering nearly one-third of all trips¹. Landings of South Atlantic snapper grouper, dolphin wahoo, and coastal migratory pelagics are dominated by the recreational sector and a major source of fresh, local seafood for South Atlantic anglers. Recreational fishing provides economic benefits to South Atlantic coastal communities, for-hire operations, tackle shops, and other shore-side support businesses, as well as many American businesses throughout the nation that manufacture or sell recreational fishing equipment. In the South Atlantic, recreational fishing is an economic powerhouse that supports 27,000 jobs and \$3.54 billion annually in recreational trip expenditures. In contrast, commercial harvest in the South Atlantic supports 9,200 jobs and roughly \$535 million in sales.

¹ https://www.fisherycouncils.org/s/SouthAtlanticFisheriesInfographic_2025.pdf

Below, we provide responses to questions posed to the public by the Council to gather feedback on this Executive Order.

Reducing Burdens and Increasing Productivity

1. What would a “strong and competitive American seafood industry” look like to you?

A strong and competitive American seafood industry recognizes the economic, social, and cultural value of recreational fishing (both as a source of seafood and recreation). Too often, the sportfishing industry is an afterthought and saddled with antiquated, commercial-focused, management plans and inaccurate data. Recreational fishing has a considerable financial stake in the success and stability of marine fisheries and deserves due credit for our role in conservation, sustainability, and contribution to the nation’s gross domestic product (GDP).

2. What specific challenges do you face as a commercial, for-hire, or recreational fisherman in the South Atlantic region that management action could help alleviate?

For years, resources and funding devoted to fisheries data collection, assessments, and management in the South Atlantic region have lagged behind other regions. Despite the economic importance of recreational fishing in the South Atlantic, federal fisheries science in this region is chronically under-funded, and most fisheries are not assessed or are considered data poor. Lack of reliable data about recreational fisheries presents a significant challenge, particularly relative to estimates of released fish caught by recreational anglers.

Access to marine fisheries is an important variable in ensuring communities have a thriving recreational fishing economy. A lack of quality data is limiting fishing opportunities because managers build precaution into regulations to account for data uncertainty. Increasingly complex models with limited or very poor data to support those models increases uncertainty and the application of buffers. Examples where poor data are limiting access include South Atlantic Red Snapper, which has been limited to one- or two-day recreational seasons even though the stock assessment shows the population to be at record levels of biomass. It is important to re-envision the fisheries management process to ensure sufficient and accurate data is collected on recreationally important fisheries and assessment models are tailored for the information available in order to avoid highly precautionary management approaches that unnecessarily stifle fishing opportunities.

Shark depredation is also an issue that has become increasingly common across the South Atlantic. Although management of sharks does not fall under the purview of the Council, shark depredation has negative impacts on both fishermen and Council-managed species that are lost to depredation.

3. Are there specific fishery management measures that are hurting your ability to participate in South Atlantic fisheries? Are there other factors preventing you from competing in the current market?

Measures that limit or reduce access to healthy South Atlantic fisheries hurt participation. Recent proposed regulations that would limit fishing and boating in South Atlantic waters (Snapper Grouper Amendment 59 and NOAA's proposed vessel speed restrictions) would have severely and unnecessarily restricted access to South Atlantic fisheries and devastated the recreational fishing industry. Fortunately, neither of those were implemented.

4. How could regulations be modified to provide more opportunity for small-scale or new fishermen to participate in South Atlantic fisheries?

Regulations that promote conservation while allowing fishing and harvesting opportunities for new and returning recreational fishermen, regardless of whether they are fishing from a private or for-hire vessel, are critical. Actions that limit entry reduce opportunities for small-scale or new for-hire operators to participate in South Atlantic fisheries and provide fewer options for anglers who don't own vessels. Because the universe of licensed anglers is fluid, with a significant amount of 'churn' from year to year (i.e., loss of existing anglers and entry of new anglers), limited access privilege programs (LAPP) that may work to optimize harvest in commercial fisheries are not a good fit for the recreational sector. Furthermore, in every U.S. fishery where a LAPP has been implemented, the fleet size has contracted and opportunities for new entrants have been nonexistent.

While not a regulatory action, encouraging youth participation in fishing and conservation is another well-established strategy for providing opportunities for the next generation of anglers. 86% of anglers go fishing before the age of 12. Children's exposure to recreational fishing is the first step in developing a lifelong appreciation for conservation and marine stewardship. Outreach and education activities that are inclusive of youth can help improve fishing and conservation opportunities for anglers today and for the future. NMFS is the only federal natural resource management agency without a program to encourage youth recreational fishing.

Innovative Science and Management

1. How do you recommend the South Atlantic Council balance environmental protection with economic growth in commercial and recreational fisheries?

Vibrant recreational fisheries, and in turn the recreational fishing industry, are dependent on abundant stocks and healthy fishery habitats to support them.

Regulations for recreational fishing in the South Atlantic should consider ways to maximize both fishing and harvest opportunities while supporting sustainable fisheries. Unlike commercial fishing operations, which derive value from pounds harvested and efficiency of

harvest, Council managed species are valued by recreational anglers both as harvest (i.e., snapper grouper, dolphin, wahoo) and catch and release (i.e., mackerels) targets. For recreational anglers, value is gained from opportunities to fish and harvest (depending on the trip) and inefficiency of trips.

While environmental implications are thoroughly analyzed and discussed when the Council considers action on fisheries issues, economic implications are far less understood and discussed. Unfortunately, economic analyses of regulations proposed by federal fishery management councils or NOAA do not consider anglers or the recreational fishing industry beyond generally data-poor estimates of impacts to the for-hire component of the industry. This impedes the Council's ability to meet the requirements of National Standards 1 and 2. NMFS should collect the necessary information to provide the Council with reliable estimates of economic implications for the recreational sector relative to any fishery management decision.

Healthy fish habitats, including nursery areas outside of the council's jurisdiction, are essential for sustainable fisheries. Artificial reefs are an important conservation tool that can enhance and replace degrading natural structures such as coral reefs, and increase habitat connectivity and metapopulation ecological benefits for species with high reef affinity. Artificial reefs enhance access for anglers, commercial fishermen, and recreational divers while relieving pressure on natural reefs. There are several examples in the South Atlantic where artificial structures have been placed to provide biological benefits to Council-managed species (i.e., reef darts off Palm Beach County). The Council and NMFS should support and prioritize strategic placement of artificial structures in South Atlantic federal waters for the benefit of South Atlantic fisheries.

2. Which regulations support sustainability and profitability and need to remain in place, and which regulations should be reconsidered?

Descending device requirements for snapper grouper anglers should remain in place, and efforts to educate the fishing public on proper use and benefits of this gear should be continued. This is especially important given NOAA and the Council's focus on ways to reduce discard mortality in fisheries like red snapper and black sea bass. As the recreational fishing community has become more familiar with the use of descending devices to address barotrauma, angler support for their use has increased significantly.

Recreational red snapper regulations are in severe need of revision. After 15 years of an essentially closed fishery (with very limited "mini-seasons"), the stock is no longer overfished (nearly 20 years ahead of schedule) or undergoing overfishing. A new approach that allows for reasonable harvest access for the recreational fishery, is tailored to local needs, and turns would-be dead discards into landings is past due. We support state-led data collection and management as the pathway to improving data collection and management of this fishery.

The Council should also reconsider regulations for species that are included in fishery management plans but are not actively assessed or managed by the Council. Many of these stocks are data poor, which means the catch limits and regulations in place for these species may not be based on current or best available science and are not evaluated for effectiveness. Reducing the number of species managed would streamline regulations and reduce stock assessment costs while allowing the Council to focus on the primary fisheries in the region. In some cases, designating species as “ecosystem component” fisheries may be appropriate.

3. Are there parts of the seafood industry (fishermen, crew, processors, distributors) that management needs to consider more when looking at regulatory measures?

The needs of the recreational fishing industry, including equipment manufacturing and sales, as well as shore-side support businesses such as tackle shops, boat dealers and repair shops, marinas and other businesses that provide goods and services for recreational anglers should be considered. This sector provides significant economic contributions to South Atlantic coastal communities and our nation more broadly. Unlike in the commercial sector, where economic impact is derived from pounds of fish harvested, much of the economic benefits from the recreational fishing industry are derived from angler spending for anticipated or planned fishing trips (i.e., before anglers leave the dock). In other words, the recreational industry and anglers need opportunities to fish and harvest. This makes regulatory proposals that severely limit or ban recreational fishing a significant challenge that results in economic hardship for the recreational fishing industry and South Atlantic coastal communities.

From a practical standpoint, regulatory changes by the SAFMC can affect recreational fishing and boating industry supply chains (production, distribution, and sales to anglers) and the ability of anglers to access needed fishing equipment and supplies at tackle and marine retailers. However, the impacts to these supporting businesses are not currently considered by NMFS or the Council when data uncertainty leads to additional access limitations.

4. Are there specific policies or permitting processes that you would like to see improved or simplified?

The Modern Fish Act established and encouraged alternatives to federal fisheries management approaches, including harvest control rules that account for variability and uncertainty in NOAA’s recreational harvest data and allow flexible management. This shift in management is progressing slowly because it goes against decades of traditional fisheries management where a theoretical annual catch limit, typically in pounds, is projected before the season based on past catch histories that often do not represent the current status of the stock. Implementation of alternative management approaches like harvest control rules tailored to the characteristics of recreational fisheries that incorporate more real time indices of stock abundance could substantially improve management.

5. What types of scientific research or data (updated stock assessments, habitat data, etc.) would be most helpful for your fishing activities?

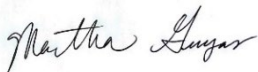
The Marine Recreational Information Program (MRIP) has routinely been shown to be highly inaccurate, including a recent study that found the program overestimates recreational catch by 30-40%. This has led to inaccurate stock assessments, lower quotas, and shortened seasons, a notable one being the 2024 one-day red snapper season in the South Atlantic. We recommend a fundamental shift in the program that relies more heavily on state-led data collection systems where supported by state agencies and interstate commissions, such as those that are currently being used in the Gulf of Mexico and the West Coast. Recreational data enhancements can improve data available for assessments and management decisions, which would benefit all users, not just the recreational sector.

6. What would make it easier for you to contribute data or knowledge to science efforts?

Data collection efforts should be designed with facility of use by the end user (i.e., anglers) in mind. Efforts must also be made to educate anglers on how data they provide will benefit not only stock assessments, data quality, and management, but also access to their fisheries. This is critical to angler buy-in and rebuilding trust with the fishing community. As previously mentioned, we support state-led data collection as a pathway to improving recreational fisheries data.

Again, thank you for the opportunity to provide feedback on the Executive Order for “Restoring American Seafood Competitiveness.” We look forward to continuing work with the Council to support conservation and sound management of South Atlantic fisheries.

Sincerely,



Martha Guyas
American Sportfishing Association



Ted Venker
Coastal Conservation Association



Chris Horton
Congressional Sportsmen’s Foundation

