



August 1, 2025

Mr. John Carmichael
Executive Director
SAFMC
4055 Faber Place Drive, Suite 201.
N. Charleston, SC 29405

Subject: Comments on Snapper-Grouper Amendment 60 – Permit Requirements and Fishing Efficiencies

Dear John:

I am writing on behalf of the Southeastern Fisheries Association (SFA), which represents commercial seafood harvesters, processors, wholesale and retail markets, restaurants, transportation providers, and consumers across the Southeastern United States. Our association is based in Panama City, Florida. A significant number of our members operate in the South Atlantic jurisdiction, commercially harvesting snapper and grouper and other species. We respectfully submit the following comments on the proposed amendment.

SFA members have long advocated for the elimination of the current two-for-one snapper-grouper permit requirement. I have consistently reinforced this position at every Council meeting I have attended since becoming Executive Director. While the original intent of this measure may have been to reduce capacity in the commercial fishery, that need no longer exists.

As documented by fishery statistics and stakeholder feedback, the commercial snapper-grouper sector has been in decline for many years due to a range of challenges. These include fishery closures, excessively restricted seasons and limited access, loss of working waterfronts, expanded closed fishing areas, overly restrictive NOAA/NMFS regulations, burdensome U.S. Coast Guard requirements, rising operational costs, difficulty recruiting qualified crew, and the aging workforce with limited interest from new entrants.

Prospective new participants in the fishery are understandably discouraged from investing in vessels and equipment when faced with the requirement to purchase two permits—only to retire one—in order to fish. Contrary to popular belief, commercial fishing is not a romanticized life at sea; it is a physically demanding profession that often keeps families apart, whether at sea or in the boatyard. Given these hardships, we urge the Council to eliminate the two-for-one permit requirement and reinstate a single-permit system.

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We also fully support allowing vessels with multiple species permits—using different gear types as required for each fishery—to harvest different species on a single trip. This is a practical and enforceable approach. Once the trip limit is reached for one species and gear type, that gear can be stowed and replaced with the gear permitted for another species. This change would improve operational efficiency, reduce costs, increase profitability, and align with the goals of Presidential Executive Order 14276 to strengthen the American seafood industry. Moreover, removing the restriction to target only one species per trip supports the objectives of Presidential Executive Order 14192 by eliminating unnecessarily burdensome regulations.

Additionally, we support allowing the retention of incidentally caught species when targeting a primary species. This would increase yield, reduce discards, and minimize discard mortality. We further support implementing low trip limits at the start of the season, followed by gradual increases as the season progresses. This approach would help manage quotas more effectively, extend the fishing season, and improve overall productivity and efficiency.

Thank you for considering our comments. These proposed changes would directly support the commercial seafood industry, help restore American fisheries, and reduce unnecessary regulatory burdens while promoting sustainable fishing practices.

Should you need more information please contact me.

Thank you,

Capt. Bob Zales, II
Executive Director

