



ENVIRONMENTAL DEFENSE

finding the ways that work

September 08, 2009

Mr. Duane Harris, Chairman
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Re: Proposed Measures in Snapper Grouper Amendment 17A to Address Overfishing of Red Snapper

Dear Mr. Harris,

The fisheries in the South Atlantic are struggling with overfishing, overcapacity and declining profitability. Fishermen now face frustrating regulations meant to end overfishing of red snapper, but which would add to the complicated suite of regulations already adopted for other species in the Snapper Grouper Fishery Management Unit, and would drastically cut catches of most of those species. These regulations seem unlikely to achieve conservation goals, and be onerous on fishermen, while missing better opportunities to improve the industry's ecological and economic performance.

The measures proposed in Amendment 17A (17A) are unlikely to be effective in meeting red snapper total mortality goals, and fall short of establishing a long-term strategy to keep the fishery healthy. We recommend that a collaborative approach to develop a comprehensive solution to the mid-shelf snapper grouper complex be initiated through the appropriate Council processes, including appropriate Advisory Panels and Committees, and involving council staff, fishermen, and other stakeholders. Specifically, the South Atlantic Fishery Management Council (Council) should:

- Create permanent area closures based on the best available science that reflect the potential to enhance long-term production of snapper grouper species, that are of greatest utility to stakeholders, and are most easily enforced. The large closures as currently proposed seem a step backwards from ecosystem-based management because they are based on commercial landings reported in logbook grids. This design will inevitably cause fishermen to shift effort and fish extremely hard outside of the protected area, in both shallower water and to the north and south. Smaller fish will be hit harder in the shallower water; total mortality could climb significantly. It is likely that the proposed closures will fail to reach mortality reduction targets, and therefore will not meet the requirements of National Standard 1. Biologically-based area closures that are more successful at growing the stock and cause less hardship on fishermen, tied to sectoral quotas, are a more sensible option.

- Create regulations that are consistent for all gears. Measures proposed in 17A prohibit harvest of snapper grouper species (except for black sea bass and golden tilefish) in the closed areas unless harvested using spearfishing gear. This would result in a shift in effort to this gear type, a method of fishing for snapper grouper species that is on the rise and already represents a significant amount of snapper grouper landings. By implementing regulations that allow the harvest of species using only a few types of gears and are not consistent across gear types, effort shift will likely hinder any progress towards a total mortality goal.
- Require implementation of a Vessel Monitoring System (VMS) on all commercial and recreational snapper grouper fisheries. VMS is a critical component of any area closure, and will aid in the efficacy of any new regulations. As a multi-function tool, however, VMS can help address a variety of complex regulatory issues and provide temporal and spatial management solutions. More importantly, VMS is necessary to build an effective overall compliance and information management system to support electronic logbooks, capture observer data, and capable of delivering real-time scientific data.
- Make the design and implementation of a comprehensive multi-species Limited Access Privilege Program (LAPP) for the commercial snapper grouper fishery a top priority. Paired with biologically-based closures and VMS, a LAPP can end overfishing, prevent waste, preserve jobs and help the Council comply with ACL/AM requirements. The red snapper fishery in the Gulf of Mexico has seen success from a similar program. As a first step, a control date should be established that will notify snapper grouper fishermen that future landings may not count as part of the historical catch when a LAPP program is implemented.

Fine-tuning existing regulations in an attempt to further limit effort will not create a healthy snapper grouper fishery in the South Atlantic. Innovative and proven management measures like LAPPs are now needed to rebuild a vital commercial fishing industry and sustainable fisheries for all. The recommendations in this letter can help managers, industry, and others to move away from conflict and the threat of shutting down fisheries, and instead work towards compromise and solutions that can foster healthy fisheries, communities and ocean ecosystems.

Thank you for your consideration of our recommendations on this important issue. Please contact us at 919-881-2601 if you have any questions or wish to discuss any aspect of this letter.

Sincerely,

Eileen W. Dougherty
Fisheries Project Manager



Sarah Hagedorn Bowman
Marine Scientist

Cc: Kate Quigley, SAFMC Fishery Economist
Cc: Gregg Waugh, SAFMC Deputy Executive Director