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January 29, 2025

Mr. Dave Donaldson, Executive Director
Gulf States Marine Fisheries Commission
2404 Government Street
Ocean Springs, MS 39564

RE: Standards for Recreational Fishing Surveys and Data

Dear Mr. Donaldson:

Ocean Conservancy¹ offers the following comments to the Gulf States Marine Fisheries Commission (GSMFC) in support of the development and implementation of survey and data collection standards and a regional centralized data warehouse.

As a first step, **Ocean Conservancy encourages alignment on terminology surrounding development of “standards”** as there appears to be ongoing miscommunication on the distinction between “performance standards” and “technical specifications.” Looking to recent literature, we suggest defining performance standards as guidance that promotes data quality and statistical rigor and which ensures alignment of the overarching purpose of performance objectives, while remaining sufficiently flexible to accommodate state-specific data collection programs.² Technical specifications, on the other hand, relate to specific data elements and processes that would inform data warehouse development. Both are needed to ensure the execution of high quality data collection and management programs and development of a functional database that supports those programs.

Second, **Ocean Conservancy supports implementation of the National Recreational Fishing Survey and Data Standards (“Standards”)³, which were developed by NOAA Fisheries Office of Science and Technology (OST), as a minimum level of performance standards to be achieved**, noting that a peer-review is underway by the National Academies of Sciences⁴ and will be conducted by the Fisheries Data

¹ Ocean Conservancy envisions a healthier ocean, protected by a more just world. We are working to protect the ocean from today’s greatest global challenges and, together with our partners, we create evidence-based solutions for a healthy ocean and the wildlife and communities that depend on it.

² Melissa Garren, Forrest Lewis, Laura Sanchez, Daniella Spina, Annie Brett. How performance standards could support innovation and technology-compatible fisheries management frameworks in the U.S. Marine Policy. Volume 131. 2021. Available at: <https://doi.org/10.1016/j.marpol.2021.104631>

³ Recreational Fishing Survey and Data Standards. Available at: <https://www.fisheries.noaa.gov/recreational-fishing-data/recreational-fishing-survey-and-data-standards>

⁴ Peer Review of the Marine Recreational Information Program Data Standards. Available at: <https://www.nationalacademies.org/our-work/peer-review-of-the-marine-recreational-information-program-data-standards>

Governance Committee.⁵ Proposed revisions or additions may be recommended as a result of these reviews.

Based on our initial assessment of the current supplemental data collection programs (“State Surveys”) in the Gulf, most of them either adhere to or are actively working toward achieving these standards (see *enclosure*) as a condition of the Marine Recreational Information Program (MRIP).⁶ We welcome any corrections or additions to our initial assessment of achievement of the standards by current programs. Adhering to the standards promotes consistency, ensures transparency, and enhances data quality, which provides state fishery managers and stakeholders with a reasonable level of assurance that their reported data will be used in the fishery management process. Further, **Ocean Conservancy encourages the GSMFC and workshop participants to identify what hinders current data collection programs from meeting the baseline MRIP standards and identify pathways to achieve those standards to ensure expedited certification, transition planning, and long-term survey funding.**

Specifically, Standards 1-6 focus on survey methodology *documentation*, and are crucial to ensuring long-term viability, robustness, and adaptability for data collection programs over time. Standard 7 relates to data access and information management, how each state will functionally share their data, and is the only standard that prescribes “technical specifications.” **It is Standard 7: Access and Information Management, that seems to be the issue of greatest interest and direct relevance to development of the GSMFC FIN data warehouse** Specifically, discussions around Standard 7 should focus on data elements that relate to data warehouse development (e.g., survey data, key statistics, publication schedule, aggregation) and the limiting factors for inclusion currently. As mentioned, many of the state programs already meet or are in the process of achieving these standards. Therefore, **Ocean Conservancy supports implementation of Standards 1-6 by all recreational fishery data collection surveys. Ocean Conservancy encourages a robust discussion and consideration of “technical specifications” which would be *additive* to Standard 7**, to enable and support the development of a centralized database⁷ and calibration metrics,⁸⁹ to promote transparency and understanding of how the data relate to management, and to streamline integration of state data into the stock assessment.

Finally, the development of a database supported by sufficient performance standards and technical specifications can allow for a semi-automated MRIP certification and reporting process and eventually allow for in-season optimization of quotas across the region. If additional standards are developed or

⁵ Fisheries Modernization Strategy. From Data to Decisions. 2023-2026 Implementation Plan. Available at: <https://repository.library.noaa.gov/view/noaa/66639>

⁶ NATIONAL MARINE FISHERIES SERVICE PROCEDURE 04-114-02. Guidance and Procedures for the MRIP Certification Process. Available at: <https://media.fisheries.noaa.gov/dam-migration/04-114-02.pdf> Page 10.

⁷ Red Snapper Data Improvements Under the Inflation Reduction Act. Updated December 4, 2024. Available at: <https://www.fisheries.noaa.gov/climate/red-snapper-data-improvements-under-inflation-reduction-act>

⁸ Project 3.1: Finding comparable components within state surveys and MRIP. Gulf States Survey Transition Research Plan. September 24, 2024. Available at: <https://www.fisheries.noaa.gov/s3//2024-09/Gulf-Transition-Research-Plan-2024-508-compliant-9.6.24.pdf>

⁹ Project 3.2: Collect side-by-side data for additional benchmarking in states where multiple programs do not exist. Gulf States Survey Transition Research Plan. September 24, 2024. Available at: <https://www.fisheries.noaa.gov/s3//2024-09/Gulf-Transition-Research-Plan-2024-508-compliant-9.6.24.pdf>

proposed, Ocean Conservancy recommends GSMFC include a robust public review process before they are incorporated.

Again, we welcome your feedback and input on our initial assessment of adherence to the MRIP standards by current state data collection programs and we thank you for your continued work on these issues. We value the efforts of the Commission, agencies, and staff throughout the region and look forward to supporting these important endeavors. Please contact us with any questions or concerns.

Sincerely,

Catherine Bruger
Manager, Fish Conservation

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Scientist, Fish Conservation

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ENCLOSURE - Recreational Fishing Survey and Data Standards Documentation Checklist

CC – Gregg Bray (Gulf States Commission); Mr. Andy Strelcheck (SERO); Russ Dunn (SERO); Dr. Clay Porch (SEFSC); Dave Gloeckner (SEFSC); Dr. Evan Howell (OST); Dr. Richard Cody (OST); Dr. Katherine Papacostas (OST); Lauren Dolinger Few (OST); Dr. Carrie Simmons (GMFMC)

Recreational Fishing Survey and Data Standards Documentation Checklist

State recreational fishing surveys and data collection programs,¹ which are included in the national Marine Recreational Information Program (MRIP), should adhere to the [Recreational Fishing Survey and Data Standards](#) (“Standards”)² as required by the Certification Procedural Directive.³ While many of the Gulf States have data collection programs that largely achieve the MRIP Standards, it is unclear whether and where there are challenges or barriers to meeting these standards. Ocean Conservancy has developed an initial checklist for each of the state recreational fishing surveys that describes the extent to which each program, to our knowledge, is consistent with the Standards and where more work needs to be done, and we welcome any corrections or additions to the checklist.

¹ Recreational Fishing Surveys. Available at: <https://www.fisheries.noaa.gov/recreational-fishing-data/recreational-fishing-surveys>

² Recreational Fishing Survey and Data Standards. Available at: <https://www.fisheries.noaa.gov/recreational-fishing-data/recreational-fishing-survey-and-data-standards>

³ NATIONAL MARINE FISHERIES SERVICE PROCEDURE 04-114-02. Guidance and Procedures for the MRIP Certification Process. Available at: <https://media.fisheries.noaa.gov/dam-migration/04-114-02.pdf> Page 10. *“Pursuant to the MRIP Data Standard, once a certified survey is implemented, the survey administrator will be required to submit an annual report within three months of the conclusion of each survey year. Annual reports must provide an overview of data collection procedures, including questionnaires, data collection schedules, and sample sizes, as well as response rates and key survey estimates within the survey year. These annual reports will be primarily used to ensure that certified surveys are adhering to MRIP standards, but will also be reviewed to ensure that the survey design is being implemented as it was certified. If an annual report contains evidence that a certified survey is being implemented with edits to the design that were not part of its certification, or that survey design assumptions are being violated, a review will be triggered to determine if the survey should maintain its certified status and continue to receive funding, as well as if the statistics derived from the survey data should continue to be eligible for use in stock assessments and management actions. Further, if it is apparent that the survey may no longer fully meet the Terms of Reference from its pre-certification review for any reason, such a review will likewise be triggered.”*

Standard	Detail	Supplemental Survey					Role of GulfFIN Centralized Warehouse
		AL – Snapper Check	FL – SRFS	LA – LA Creel	MS – Tails n’ Scales	TX – TX Creel	
Standard 1: Survey Concepts and Justification	1.1: Planning	Met - 11/2/2021	Met – 10/5/2018	Met – 11/2/21	In progress - 9/28/23	Does not exist	A centralized warehouse could support a clearinghouse for survey documentation and Gulf States could partner in ensuring adherence to standards.
	1.2: Paperwork Reduction Act Compliance	<i>Each state varies with respect to this standard according to state regulations</i>					
Standard 2: Survey Design	2.1: Sampling	Met - 11/2/2021	Met – 11/2/21	Met – 11/2/21	In progress - 9/28/23		
	2.2: Data Collection						
	2.3: Estimation						
	2.4: Evaluation						
Standard 3: Data Quality	3.1: Processing, Editing, and Quality Control	Included in Certification Packet	Included in Certification Packet	Included in Certification Packet	Included in Certification Packet		
	3.2: Quality Assurance						
Standard 4: Transition Planning Per Policy Directive 04-114-01		Gulf State Transition Plan initially released: October 12, 2022 Gulf Transition Research Plan (September 24, 2024)					Clear identification of transition needs can be used to prioritize funding in both Transition and Implementation Plans.
Standard 5: Review Procedures	5.1: Certification Per Policy Directive 04-114	Conditionally Certified – June 25, 2018	Certified – October 5, 2018	Certified – December 21, 2017	Certified - June 15, 2018	Does not exist	Including meta and micro data and methodologies and formulas will eliminate back and forth of data and methodology exchanges.
	5.2: Annual Reporting	Unknown	Unknown	2022: Met – 3/16/2023 2023: Met – 11/27/2024	Unknown		

	5.3: Peer Review. Peer-Review Procedures have been implemented for FES/APAIS.	<i>Unknown.</i>	<i>Unknown</i>	<i>Unknown</i>	<i>Unknown</i>	<i>Unknown</i>	Clear identification of areas that do not adhere to standards and can be used to prioritize funding.
Standard 6: Process Improvement	6.1: Process Improvement Plan	<i>Should be included in annual reports.</i>					Clear identification of proposed changes can be used to prioritize funding in both Transition and Implementation Plans.
	6.2: Unplanned Modifications	<i>Should be in annual report (e.g., hurricane reduces sampling). Scale of modifications could trigger re-certification, program is supposed to submit a letter.</i>					
Standard 7: Access and Information Management	7.1: Microdata	<i>Unknown</i>	<i>Unknown</i>	Available online: LA Creel Data Query Louisiana Department of Wildlife and Fisheries	<i>Unknown</i>	<i>Unknown</i>	Can publish data as they become available to support meeting the standard. Convert to consistent data currencies for ACL comparisons
	7.2: Estimates	<i>Unknown</i>	<i>Unknown</i>	Includes PSEs and warnings (Standard 7.2.2)	<i>Unknown</i>		
	7.3: File Formats	<i>Unknown</i>	<i>Unknown</i>	<i>Unknown</i>	<i>Unknown</i>		
	7.4: Attribute Values and Formats	<i>Unknown</i>	<i>Unknown</i>	<i>Unknown</i>	<i>Unknown</i>		
	7.5: Information Management	<i>Unknown</i>	<i>Unknown</i>	<i>Unknown</i>	<i>Unknown</i>		