



**UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric
Administration**

National Marine Fisheries Service
Southeast Fisheries Science Center
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May 30, 2024

John Carmichael
Executive Director
South Atlantic Fishery Management Council (SAFMC)

Dear Dr. Carmichael:

This is in response to SAFMC's April 17, 2024, request to "provide a letter documenting why SEFHIER is inadequate for catch monitoring and explaining how or if data collected through SEFHIER could be used for other management purposes (e.g., landings and effort trends, description of fishing effort and location economics of the charter fishery, landings per trip, seasonality of catch, bag limit analysis)."

NOAA Fisheries' position on use of SEFHIER data is addressed in the attached February 21, 2018, memo from Cisco Werner to Roy Crabtree. Of significance is the statement, "The information reported by the vessels would not be considered useful for official estimates of catch and effort from the for-hire fishery until the approach is certified as statistically valid by MRIP." Dr. Werner also notes, "a primary concern is that vessels are not required to report before offloading, and therefore catch cannot be independently validated. Incorporating independent validation of the electronic vessel reports would improve the usefulness of the catch information for estimation."

Although we are in year three of the South Atlantic SEFHIER program, and most constituents are now familiar with the reporting requirements, the program compliance remains low (<50%) and there remains no independent validation component to estimate mis- or non-reporting. Therefore, NOAA Fisheries' concerns have not changed, go beyond just the catch and effort information, and extend to any use of the information for science or management. Given the lack of any independent validation that would allow us to evaluate the representativeness of the data or determine the size and direction of any biases, NOAA Fisheries would only consider the information submitted under this program as qualitative in nature and does not represent the best scientific information available.

Once an independent validation estimation component is in place for SEFHIER, the agency will follow the Marine Recreational Information Program (MRIP) transition process ([NMFS Procedure 04-114-01](#)) to certify the design. The MRIP design certification process is described in [NMFS Procedure 04-114-02](#). The document outlines all the steps in the certification process, the necessary design documentation, terms of reference for the technical review, and the approval process. The MRIP transition process

requires benchmarking, calibration model development, re-estimation of historical catch statistics, and incorporation of the new estimates into stock assessments, economic analyses, and management action.

Given the desire for reliable information from SEFHIER to support fishery management, the SEFSC and SERO will work with the SAFMC to determine what changes to the program are needed to produce estimates that meet the NOAA Fisheries requirements to the same or greater degree than the statistics provided by the surveys being replaced. At this time the agency recommends the following: logbook submission prior to offload of catch, dockside intercept survey to estimate mis- and non-reporting, declaration/pre-landing combination submission prior to a trip, require landings only at approved listed landing locations, and weekly did not fish reports when fishing does not occur within the for-hire sector.

Lastly, the Gulf of Mexico (Gulf) SEFHIER program has been added as a discussion topic in the Gulf MRIP Transition plan to work towards incorporating the SEFHIER data into management and stock assessment actions. We strongly encourage collaboration between the SAFMC and Gulf of Mexico Fishery Management Council to build a unified SEFHIER program throughout the Southeast. If the programs use a similar design, the survey certification can be accomplished through the Gulf MRIP Transition plan. Differences in the implementation of a survey design in each region (e.g., sampling frame, compliance, data quality, etc.) may result in different calibrated estimates based on the magnitude of implementation differences. The calibrated estimates would be based on the benchmarking period. ACCSP is also developing a potential methodology to utilize logbooks and the MRIP survey, and we encourage further discussion between all parties.

We look forward to receiving your thoughts on the above.

Sincerely,



John F. Walter for Clay Porch

Clay E. Porch, Ph.D.
Director, Southeast Fisheries Science Center (SEFSC)

Andrew J. Strelcheck
Regional Administrator, Southeast Regional Office (SERO)

cc: John McGovern, Chip Collier, John Walter, David Gloeckner, Shannon Calay, Larry Massey