

# Modifications to South Atlantic For-hire Reporting

**Decision Document, December 2024** 

# **Background**

The Southeast For-Hire Integrated Electronic Reporting (SEFHIER) Program was launched in 2021 with the implementation of the Comprehensive For-Hire Electronic Reporting Amendment (SAFMC 2020). The amendment put in place or modified reporting requirements for federally permitted charter vessels and headboats in the snapper grouper (SG), dolphin wahoo (DW), and coastal migratory pelagics (mackerels; CMP) fisheries. Reporting requirements through SEFHIER were effective for charter/for-hire vessels in January 2021.

In the Comprehensive For-Hire Electronic Reporting Amendment, the following statement is provided explaining why the Council and the National Marine Fisheries Service (NMFS) considered taking action:

"The intent of this amendment is to improve the timeliness and accuracy of catch data. Accurate fisheries information about catch, effort, and discards is important to fulfill the management obligations of the South Atlantic Council and NMFS. Reliable and complete fishery data are critical to stock assessment and management evaluations. While the forhire component of the recreational sector harvests a substantial proportion of the annual catch limit (ACL) for some South Atlantic Council managed fish species, such as cobia,

dolphin, and wahoo, current data collection programs for charter vessels do not provide catch information on a timely enough basis for the South Atlantic Council to respond to developments in these fisheries. In addition, the survey-based method used to currently estimate catch by charter vessels may not always provide reasonably accurate and reliable information for many South Atlantic Council managed species, especially those with low catches and low ACLs. The current survey-based methods are particularly imprecise for those snapper grouper species that are only rarely encountered by fishery participants."

The purpose and need statements of the Comprehensive For-Hire Electronic Reporting Amendment are as follows:

"The **purpose** is to increase the accuracy and timeliness of landings, discards, effort and socioeconomic data of federally permitted for-hire vessels participating in the South Atlantic managed fisheries.

The **need** is to improve charter vessel and headboat fishery data used for management and to improve monitoring and compliance of federally permitted for-hire vessels in the South Atlantic managed fisheries."

Additional information on the intended outcomes of the Comprehensive For-Hire Electronic Reporting Amendment and recommendations of the related technical sub-committee were provided to the South Atlantic Fishery Management Council (Council) at their <u>September 2024 meeting</u>.

# Recent Gulf of Mexico Fishery Management Council and NMFS Atlantic Highly Migratory Species Action

The Gulf of Mexico Fishery Management Council (Gulf Council) is currently working on an amendment to re-implement for-hire electronic reporting after the United States Court of Appeals for the Fifth Circuit set aside the Gulf's SEFHIER final rule in February 2023. This amendment includes actions that would establish the frequency and mechanism for data reporting from charter vessels, modify the existing reporting requirements for headboats, establish trip notification and effort reporting requirements, and establish reporting of economic data. The Gulf Council most recently reviewed their for-hire reporting amendment at their November 2024 meeting and a summary of their recent discussion is included in their Data Collection Committee Report the Appendix. The Gulf Council's amendment is tentatively scheduled to be approved for public hearings in April 2025 and approved for secretarial review in June 2025.

Additionally, NMFS Atlantic Highly Migratory Species (HMS) has published a <u>proposed rule</u> that would modify and/or expand reporting requirements for HMS, including reporting by commercial, for-hire, private recreational vessel owners, and dealers. In relation to for-hire reporting, HMS has selected preferred alternatives that would require electronic reporting for all trips regardless of whether fish were caught, include reporting of all species caught (including non-HMS) and fishing location, and monthly no-fishing reports. Reporting would be required

within 24 hours of the end of the trip. Vessels would also be required to report trip-level cost and earnings information, and if selected, report additional annual expenditure information via an annual survey. A summary presentation of the HMS proposed rule will be provided at the Council's December 2024 meeting.

# **Recent South Atlantic Fishery Management Council Action**

The Council has received periodic updates on the SEFHIER Program since its implementation, most recently in December 2023 and March 2024. The presentations summarized information to date on the number of vessels that are complying with reporting requirements in the South Atlantic region and other statistics. Overall compliance is low compared to what was observed the Gulf of Mexico. Hence, the Council initiated discussion on ways to improve compliance, strengthen reporting requirements, and explore data validation, with the goal of utilizing the information collected in future management decisions.

At the June 2024 meeting, the Council received <u>feedback</u> from the NOAA Fisheries Southeast Regional Office and Southeast Fisheries Science Center that data being collected through the SEFHIER program and for-hire logbook cannot be used for management due to low compliance and lack of validation. Recommendations in this letter include:

- Require logbook submission prior to offload of catch,
- A dockside intercept survey to estimate mis-reporting and non-reporting,
- Require declaration/pre-landing combination submission prior to a trip,
- Require landing only at approved listed landing locations, and
- Require weekly did not fish reports when fishing does not occur within the for-hire sector.

The Council also reviewed potential measures that could be taken to improve the SEFHIER Program. The Council passed the following motion providing guidance on how to move forward.

**MOTION:** START A SEFHIER IMPROVEMENT AMENDMENT CONSIDERING THE ACCSP FOR-HIRE METHODOLOGY TECHNICAL REVIEW AS INFORMATION BECOMES AVAILABLE.

- FOCUS ON INCORPORATING ACTIONS THAT CAN BE TAKEN IN THE NEAR-TERM WITHOUT AN AMENDMENT, INCLUDING ADDITIONAL OUTREACH.
- CONSIDER ACTIONS AND ALTERNATIVES BEING CONSIDERED BY THE GULF COUNCIL.
- CONSIDER ACTIONS TO MODIFY REPORTING FREQUENCY, HAIL IN, HAIL OUT, LANDING LOCATIONS, NO FISHING REPORTS, AND VALIDATION SURVEYS.

At the September 2024 meeting, the Council reviewed background information on the amendment, provided guidance on the purpose and need statements as well as the actions, and

<u>requested additional information</u> from NOAA Fisheries. Additionally, the Council's Social and Economic Panel (SEP) and Scientific and Statistical Committee (SSC) met in October 2024 to provide guidance to the Council on the amendment. This information will be provided to the Council at the December 2024 meeting.

# **Objectives for this Meeting (December 2024)**

- Review information provided by the SEP, SSC, and NOAA Fisheries.
- Review timing of amendment development.
- Review the updated draft Purpose and Need statements.
- Review list of potential actions and range of alternatives.
- Specify timing of first review by the newly formed For-Hire Reporting AP.
- Consider whether to approve the amendment for scoping.

# **Tentative Amendment Timing**

September 2024	Review potential measures to include in the amendment.			
December 2024	Review measures in amendment. Approve for scoping?			
Winter 2024	Obtain feedback from For-Hire Reporting AP (or after scoping?).			
March 2025	Review scoping comments, approve actions and alternatives.			
Spring 2025	Obtain feedback from advisory panels.			
June 2025	Update amendment.			
September 2025	Update amendment.			
December 2025	Approve for public hearings.			
Winter 2026	Conduct public hearings.			
March 2026	Review public hearing comments and approve all actions.			
June 2026	Consider approval for formal review.			
2027/2028	Regulation changes become effective.			

# **Draft Purpose and Need Statements**

**Purpose:** The *purpose* of this amendment is to make modifications to the Southeast For-Hire Integrated Electronic Reporting Program to improve the accuracy, precision, and timeliness of landings, discards, fishing effort, and economic data for the for-hire component of the recreational sector of the snapper grouper, coastal migratory pelagics, and dolphin wahoo fisheries.

**Need:** The need for this amendment is to improve compliance, adjust reporting requirements, and allow for data validation so the information collected can be used in managing the fisheries for snapper grouper, coastal migratory pelagics, and dolphin wahoo.

#### **COUNCIL ACTION**

NO ACTION NEEDED.

# **Potential Draft Actions and Alternatives**

#### 1. Modify Reporting Frequency of Fishing Trips for For-Hire Vessels

**Purpose of Action:** Increase reporting frequency to improve monitoring and enforcement and increase the quality of reported data. This action would apply to vessels with a valid charter/headboat permit, regardless of whether they participate in the Southeast Region Headboat Survey, as the reporting frequency is currently the same for both headboats and charter vessels.

Alternative 1 (No Action). The owner or operator of a charter vessel for which a charter vessel/headboat permit for snapper grouper, coastal migratory pelagics, or dolphin wahoo has been issued, must record all fish harvested and discarded, for each trip, and submit an electronic fishing report weekly (on Tuesday following each previous reporting week of Monday through Sunday) via NMFS-approved software. If the owner or operator has been issued a Federal permit that requires more restrictive reporting requirements, those more restrictive regulations apply.

**Alternative 2.** Require that the owner or operator of a charter vessel or headboat with a valid charter vessel/headboat permit for snapper grouper species, coastal migratory pelagics, dolphin, or wahoo submit trip, catch, and effort information **for each trip** via NMFS approved electronic software.

**Sub-alternative 2a.** An electronic logbook form must be submitted within <u>30 minutes of arriving at the dock</u>, regardless of whether fish are harvested on a trip.

**DRAFT Sub-alternative 2b.** An electronic logbook form must be submitted within <u>1</u> hour of arriving at the dock, regardless of whether fish are harvested on a trip. **Sub-alternative 2c.** If fish are harvested during the trip, electronic reporting is required prior to offloading fish. If no fish are retained on a for-hire fishing trip, an electronic logbook form must be submitted within 30 minutes of arriving at the dock.

**DRAFT Sub-alternative 2d.** If fish are harvested during the trip, electronic reporting is required <u>prior to offloading fish</u>. If no fish are retained on a for-hire fishing trip, an electronic logbook form must be submitted within <u>1 hour of arriving at the dock</u>.

**Alternative 3.** Require that the owner or operator of a charter vessel or headboat with a valid charter vessel/headboat permit for snapper grouper species, coastal migratory pelagics, dolphin, or wahoo submit trip, catch, and effort information **for each trip daily** via NMFS approved electronic software.

**Sub-alternative 3a.** Electronic reporting is not required prior to offloading fish. **Sub-alternative 3b.** If fish are harvested during the trip, electronic reporting is required prior to offloading fish.

#### **Council Guidance in September 2024**

- Add consideration of requiring reporting within one hour of completion of a trip.
- When the amendment goes for scoping, feedback on the appropriate timeframe for reporting after a trip has ended.
- At a future meeting, provide information on the timing of reporting requirements for other relevant programs.

#### **Discussion**

- **Alternative 1 (No Action)** would maintain the current trip level reporting with a weekly submittal deadline for trip reports.
- Alternative 2 would require that reporting occur at the end of each trip.
  - Under Sub-alternative 2a, reporting would need to be completed within 30 minutes of arriving at the dock. There would be no requirement of reporting before offloading.
    - **Sub-alternative 2b** is similar to **2a**, however reporting would need to be completed within **1 hour** of arriving at the dock. There would be no requirement of reporting before offloading.
  - Under Sub-alternative 2c, if fish are harvested on a trip, then reporting
    would need to occur before those fish are offloaded. If fish are not
    harvested, then reporting would need to occur within 30 minutes of arriving
    at the dock.
    - **Sub-alternative 2d**, is similar to **2c**; however, if fish are not harvested, then reporting would need to occur within **1 hour** of arriving at the dock.
- Alternative 3 would require that all trip reports be submitted daily.
  - Under **Sub-alternative 3a**, there would be no requirement of reporting before offloading, regardless of whether fish were harvested on a trip.
  - Under **Sub-alternative 3b**, if fish are harvested on a trip, then reporting would need to occur before those fish are offloaded.
- With some exceptions, **Alternatives 2** and **3** reflect similar measures that are being considered by the Gulf Council (i.e., trip level or daily reporting as well as a reporting requirement before offloading fish).
  - o In relation to **Sub-alternative 2b** and **2d**, the Gulf Council is not considering submittal of trip reports within an hour of arriving at the dock. Only a 30-minute provision is being considered.
- **Table 1** shows a summary comparison of relevant existing and developing reporting requirements that may affect South Atlantic permitted for-hire vessels.

**Table 1.** Summary of existing and developing for-hire reporting frequency and did not fish reports requirements for the South Atlantic (SA), Southeast (SE) Headboat Survey, Gulf of Mexico (GOM), Greater Atlantic Region (GARFO) Vessel Trip Report (VTR), and Highly Migratory Species (HMS).

Topic	SA SEFHIER and SE Headboat Survey	Draft GOM SEFHIER	GARFO VTR	HMS Proposed
Trip Reporting Frequency	Weekly.	Prior to offload of catch, within 30 minutes of completion of the trip, or each trip daily.	Generally 48 hours after entering port. For recreational tilefish: 24 hours after end of trip.	24 hours after end of trip.
Did Not Fish	Weekly. No more than 30 days in	Monthly.	Not required.	Monthly. No limit how far
Reports	advance.	1.10111111	1.0010quired.	in advance.

Source: Information and concept based on HMS presentation to the Gulf of Mexico Fishery Management Council November 6, 2024. <a href="https://gulfcouncil.org/wp-content/uploads/F-4a-eReporting-Proposed-Rule-GMFMC-Presentation\_10.28.pdf">https://gulfcouncil.org/wp-content/uploads/F-4a-eReporting-Proposed-Rule-GMFMC-Presentation\_10.28.pdf</a>.

#### **COUNCIL ACTION**

- DISCUSS THE DRAFT ACTION AND RANGE OF ALTERNATIVES.
  - CONSIDER WHETHER TO RETAIN SUB-ALTERNATIVES THAT WERE INCLUDED IN ACCORDANCE WITH THE COUNCIL'S GUIDANCE AT THE SEPTEMBER 2024 MEETING.

# 2. Require Trip Notification for For-Hire Vessels

**Purpose of Action:** This action would require federally permitted charter/headboat vessels to provide a notification to NMFS declaring the intent to initiate a for-hire or fishing trip, return from a for-hire or fishing trip, or both. This action would improve estimates of effort by providing a validation process that is not in place with the current MRIP survey (for charter vessels) or Southeast Regional Headboat Survey. This action would also alert law enforcement officers in advance of a trip thus improving their ability to address non-reporting or late reporting.

Alternative 1 (No Action). There are currently no trip notification requirements for federally permitted charter/headboat vessels participating in the snapper grouper, coastal migratory pelagics, or dolphin wahoo fisheries.

**Alternative 2.** Require that the owner or operator of a charter vessel or headboat issued a valid charter vessel/headboat federal permit for snapper grouper, coastal migratory pelagics, or dolphin wahoo submit a trip declaration for trips that will be engaging in any type of for-hire fishing or:

**DRAFT Sub-alternative 2a.** Bait fishing.

**DRAFT Sub-alternative 2b.** Private recreational fishing.

**DRAFT Sub-alternative 2c.** Commercial fishing (applicable for properly permitted vessels).

**DRAFT Sub-alternative 2d.** Other for-hire activity.

# **Council Guidance in September 2024**

- Task the IPT to clarify the intent of the action and that **Alternatives 2** and **3** would apply to dually permitted vessels (commercial and for-hire).
  - o Re-word and simplify the text of the alternatives.
  - o Add sub-alternatives that would specify what activities other than for-hire fishing would require reporting and a trip notification.
- Provide information on what would happen if a for-hire trip changed to a commercial trip.

#### **Discussion**

- Currently there are no trip notification requirements for South Atlantic federally permitted charter/headboat vessels (**Alternative 1 (No Action)**).
- Alternative 2 would implement a trip notification requirement that may include the initiation of a trip, return from a trip, and the planned landing location of a vessel when the vessel is being used for any sort of for-hire fishing activity.
  - O The sub-alternatives specify other activities that would require a trip notification including bait, private, or commercial fishing or chartered activity with paying customers such as sunset or dolphin watching cruises.
  - o **Alternative 3** (only requiring trip notification when engaged in a fishing activity) Is not included since it is now covered by the sub-alternatives of **Alternative 2**.

- Alternative 2 differs from what is currently being considered by the Gulf Council, since that Council is only considering options that would require trip reporting for any type of fishing activity or for-hire activity or just for any type of fishing activity. In other words, there are no sub-alternatives that would exempt notification requirements for trips only including bait, private, or commercial fishing.
  - The trip notification measures may also vary between charter vessels and headboat vessels in the Gulf Council's amendment.

#### COUNCIL ACTION

- DISCUSS THE DRAFT ACTION AND RANGE OF ALTERNATIVES.
  - o CONSIDER WHETHER TO RETAIN SUB-ALTERNATIVES THAT WERE INCLUDED IN ACCORDANCE WITH THE COUNCIL'S GUIDANCE AT THE SEPTEMBER 2024 MEETING.

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# 3. Establish Approved Landing Locations for For-Hire Vessels

**Purpose of Action:** Establishing approved landing locations for offload support the ability of the agency to enforce and monitor compliance with reporting and conduct a validation survey.

**Alternative 1 (No Action).** There is no requirement for federally permitted charter or headboat vessels to offload clients or harvested catch at pre-approved landing locations.

**DRAFT Alternative 2.** Require that a charter vessel or headboat issued a valid charter vessel/headboat federal permit for snapper grouper, coastal migratory pelagics, or dolphin wahoo only land at pre-approved locations.

#### **Council Guidance in September 2024**

- Provide information on the approval process for landing locations.
  - o How was it previously carried out in the Gulf of Mexico?
  - o How would private landing locations be approved?
  - o How would this approval process operate for permitted vessels in the GARFO region?
  - How important is this action in relation to validation? Why are pre-approved landing locations necessary and how are they useful?

#### **Discussion**

- Currently there is no measure in place that would mandate charter or headboat vessels to
  offload clients or harvested catch at pre-approved landing locations (Alternative 1 (No
  Action)).
- Alternative 2 would mandate charter or headboat vessels offload clients or harvested catch at pre-approved landing locations that are readily accessible by an authorized law enforcement officer or survey technician.
- It is expected that a similar measure will be considered by the Gulf Council.

#### **COUNCIL ACTION**

DISCUSS THE DRAFT ACTION AND RANGE OF ALTERNATIVES.

#### 4. Require Participation in a Validation Survey

**Purpose of Action:** Independent validation of the electronic vessel reports would improve the usefulness of the catch information for estimation. A validation survey, in addition to requiring that catch be reported prior to offloading as proposed under Action 2, would meet the SEFSC's requirements for data obtained through SEFHIER to be used in management decisions.

**Alternative 1** (**No Action**). There is no mandatory participation in a validation survey for federally permitted charter/headboat vessels participating in the snapper grouper, coastal migratory pelagics, or dolphin wahoo fisheries.

**Alternative 2.** Mandate participation in a validation survey for federally permitted charter/headboat vessels participating in the snapper grouper, coastal migratory pelagics, or dolphin wahoo fisheries.

#### **Council Guidance in September 2024**

- For **Alternative 2**, clarify that all permit holders would be required to participate in a validation survey.
- Provide an example of how a validation survey would be administered, what percentage of
  permitted vessels would need to be sampled, and information on how validation was
  completed previously in the Gulf of Mexico.
  - o Would a validation survey be the responsibility of the boat owner or the permit holder?

#### **Discussion**

- Currently there is no measure in place that would mandate participation in a validation survey (**Alternative 1 (No Action)**). While such a survey could take place, for-hire captains can refuse to participate in the survey.
- **Alternative 2** would make participation in a validation survey mandatory for federally permitted charter/headboat vessel owners or operators if selected to participate in the survey.

#### **COUNCIL ACTION**

• DISCUSS THE DRAFT ACTION AND RANGE OF ALTERNATIVES.

### 5. Revise Reporting of Economic Data for Charter Vessels

**Purpose of Action:** Reporting of economic information on the charter fee, fuel usage, and fuel price for each for-hire fishing trip is already required for each for-hire fishing trip taken by South Atlantic permitted charter vessels. This action may implement a stratified random sampling design that would require reporting of economic information from some, but not all South Atlantic permitted charter vessels. Charter vessels that would need to report economic information would change annually. Note that this action does not apply to vessels that participate in the NMFS Southeast Regional Headboat Survey.

**Alternative 1 (No Action).** Federally permitted charter vessels with a valid charter vessel permit for snapper grouper species, coastal migratory pelagics, dolphin, or wahoo are required to economic information for each for-hire fishing trip.

Alternative 2. Require federally permitted charter vessels with a valid charter vessel permit for snapper grouper species, coastal migratory pelagics, dolphin, or wahoo to submit economic information for each for-hire fishing trip only if selected. Annually, a stratified random sampling design of permitted vessels will be used for selecting vessels that are required to report economic data. The Southeast Fisheries Science Center will determine the strata (based on previous years' data and minimum sample sizes by strata) sufficient for providing scientific and management advice.

#### **Council Guidance in September 2024**

- Further consider whether a sampling approach may be appropriate.
  - o Noted that it could improve compliance since this has been a controversial aspect of the for-hire logbook.
- Provide further information on what other relevant programs require or are considering and what would be the potential tradeoffs of moving from a census to sampling approach.
  - o Would like to encourage consistency.

#### **Discussion**

- Currently South Atlantic permitted charter vessels must provide charter fee, fuel usage, and fuel price for each for-hire fishing trip (**Alternative 1 (No Action)**). This is a census-based approach to data collection.
- Alternative 2 would maintain the reporting requirement of economic information for charter vessels, but not all permitted vessels would be required to submit economic information each year. A stratified random sampling design of permitted vessels would be used for selecting vessels that are required to report economic data, and the vessels reporting would change annually.
  - o A similar alternative is being considered by the Gulf Council.

#### COUNCIL ACTION

• DISCUSS THE DRAFT ACTION, RANGE OF ALTERNATIVES, AND WHETHER THE COUNCIL WOULD LIKE TO CONSIDER IT FOR SCOPING.

#### 6. Other items?

#### **Discussion**

- **Did Not Fish (DNF) reports:** The <u>letter from SERO</u> and the SEFSC mentions the need for weekly submission of DNF reports. The Council's motion from the June 2024 meeting also mentions considering DNF reports in this amendment. A DNF requirement is already in place where vessels must submit DNF reports by Tuesday following a fishing week and up to 30 days in advance.
- **For-Hire Reporting AP:** The affected APs (Snapper Grouper, Mackerel Cobia, and Dolphin Wahoo) are scheduled to meet in the Spring 2025 and can review the amendment. The Council will also be approving appointments for a new For-Hire Reporting AP at this meeting.
  - Does the Council want this new AP to first meet prior to scoping or after the amendment has been approved for scoping (i.e., similar timing as the other APs)?

#### **COUNCIL ACTION**

- PROVIDE GUIDANCE ON:
  - o WHETHER FURTHER DISCUSSION OF DID NOT FISH REPORTS IS NEEDED.
  - THE PREFERED TIMING FOR THE FIRST MEETING OF THE FOR-HIRE REPORTING AP.
- CONSIDER WHETHER TO APPROVE THE AMENDMENT FOR SCOPING.

# Appendix 1. Gulf of Mexico Fishery Management Council Data Collection Committee Report, November 2024

#### Data Collection Committee Report November 6, 2024 Ed Walker, Chair

The Committee adopted the agenda (**Tab F, No. 1**) and approved the minutes (**Tab F, No. 2**) of the August 2024 meeting.

#### Presentation on Highly Migratory Species Proposed Rule (Tab F, Nos. 4a-e)

Ms. Karyl Brewster-Geisz and Dr. Clifford Hutt (Atlantic Highly Migratory Species [HMS]) provided a presentation reviewing a proposed rule that would modify and expand HMS data collection programs for commercial, charter/for-hire, recreational, and dealer reporting. A Committee member asked where the data would be transmitted, and HMS staff responded that data would be sent to the Atlantic Coastal Cooperative Statistical Program (ACCSP) and then be made accessible to the Southeast Fishery Science Center (SEFSC). The Committee asked what would happen if a program participant held both an HMS and reef fish for-hire permit with differing reporting requirements. HMS staff responded that the permit holder would be held to the more stringent permit requirement. The HMS included a comparison between what has been proposed by HMS and what is being considered by the Gulf Council. Broadly, the timing of logbook and economic reporting differs between the two for-hire data collection programs.

A Committee member inquired about the attendance at the two virtual public hearings and HMS staff indicated that over a dozen stakeholders attended each meeting. They continued that the amount of public comment received so far was more than what they usually receive at this point in the proposed rule process. A Committee member asked the about the source of funding for the modifications and HMS staff responded that some funding was already available for some of the existing programs. However, funds for expanding HMS data collection programs was still an open question. A Committee member asked how non-compliance with the permit requirements in the for-hire sector would affect permit renewal. HMS stated that the HMS charter/for-hire permit was tied to the vessel, so it would not be possible to simply add an additional permit to avoid required reporting.

A Committee member asked about the sentiment of HMS program participants to the collection of economic data. HMS staff responded that they received comments from the commercial industry generally supporting the action but the for-hire industry had expressed hesitation on collection of those data. A Committee member asked about the consideration of fishermen burden in reporting discard information and that those data are often underreported. HMS staff responded that reporting 100% of discards is what is implemented for the commercial sector and requiring this of the for-hire sector would create consistency between the two reporting programs. Additionally, reporting dead discards is a requirement for the International Commission for the Conservation of Atlantic Tunas. Council staff took notes during the discussion and will generate a letter on the proposed rule to be submitted before the end of the public comment period (January 6, 2025).

#### Discussion on For-hire Data Collection Amendment (Tab F, No. 5)

Council staff presented revisions to the document and focused on modifications to Action 4 which considers collection of economic information within the new for-hire data collection amendment in the Gulf. Broadly, the sampling methodology would consider sampling a portion of participating vessels rather than trips. Operationalizing sampling by trip is problematic within the reporting application for several reasons including the Southeast Regional Office (SERO) not being able to know which trip had been selected. A Committee member suggested having a presentation outlining the costs associated with the various alternatives in Action 4 to help inform the discussion of selecting a preferred alternative.

#### Southeast Region Headboat Survey (Tab F, Nos. 6a and b)

Dr. Michelle Masi (SERO) presented the 2023 annual report for the Southeast Region Headboat Survey. A Committee member inquired whether name switching between gag and black grouper species was observed by program port samplers. Mr. Rob Cheshire (SEFSC) indicated that regional misnaming between the two grouper species did not appear as prevalent now as in the past, but he theorized it could be happening to some extent.

#### Marine Recreation Information Program (MRIP) Pilot Study Update (Tab F, No. 7)

Dr. Richard Cody (Office of Science and Technology) provided an update on progress of the 2024 Fishing Effort Survey (FES) pilot study, calibration and transition to one-month data collection waves, a FES non-response mitigation approach, and current program priorities. A Committee member asked about the approach for upweighting FES non-responses. Dr. Cody indicated that the Annual Report for FES, linked within the presentation, provided a comprehensive documentation of that methodology and suggested reviewing that report for more detailed information. A Committee member stated support for the ongoing collaborative work to compare recreational fishing estimates between data collection programs in Texas.

Mr. Chair, this concludes my report.