



THE SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

Modifications to South Atlantic For-hire Reporting

Decision Document, September 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 for-hire 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 are provided in the table below.

Table 1. Summary of intended outcomes of the Comprehensive For-Hire Reporting Amendment (SAFMC 2020).

Intended outcome	Has it been achieved?
Improve timeliness and accuracy of catch data.	No. Per the letter sent to the Council at the June 2024 meeting, the data being collected through the SEFHIER program is not deemed useful for management and thus the timeliness or accuracy of catch data have not improved.
Require e-reporting for all federally permitted vessels, regardless of where fishing occurred.	Yes. Implemented with the Comprehensive For-Hire Reporting Amendment.
Work with NMFS to address validation, accountability, and calibration with existing survey methods.	No. In the previously referred to letter, NMFS has stated concerns over non-compliance and lack of validation of for-hire logbook data.
Exempt the South Atlantic reporting requirement if vessels with multiple permits are required to meet reporting requirements that are more stringent in other regions.	Yes and no. This exemption was applicable for permitted vessels in the Gulf of Mexico. The economic portion of the reporting requirement has drawn in many DW or CMP permitted vessels fishing in the Mid-Atlantic or New England (i.e. GARFO) region and has been a major point of contention. From some aspects, the GARFO reporting requirements are as stringent; however, they do not have the same economic or no-fishing reporting, thus their reporting requirements are considered less stringent.

Table 2. Recommendations of the technical sub-committee for the Comprehensive For-Hire Reporting Amendment (SAFMC 2020).

Recommendation	Has it been accomplished?
Logbook data collected via authorized platform, e.g., web, tablet, phone, or vessel monitoring system (VMS) application.	Yes, e-TRIPS mobile and VESL. NMFS has not approved e-TRIPS online. SEFHIER is developing own reporting app.
Data submitted to ACCSP or Gulf Fisheries Information Network (GulfFIN).	Yes, for the ACCSP portion.
Data integrated by ACCSP or GulfFIN into single composite data set.	Yes, for the ACCSP portion.
Composite data set distributed to appropriate agencies for analyses and use, and made available to the public via ACCSP.	Yes and no. Datasets are available through ACCSP but not being used for management by NMFS.
NMFS and/or ACCSP/GulfFIN develop a compliance tracking procedure that balances timeliness with available staff and funding resources.	Yes and no. Per discussions at the December 2023 Council meeting, a tracking procedure has been developed by NMFS but results differ considerably from SCDNR for the state of SC. Unclear which procedure is most accurately tracking compliance.
NMFS use validation methods developed in the Gulf of Mexico logbook pilot study and the MRIP/South Carolina validation project as a basis to ensure that the actual logbook report is validated and standardized validation methodologies are employed among regions.	No, NMFS has not worked to validate the logbook in South Carolina or the SA Region. There was a validation effort in the Gulf of Mexico.
Dual survey methods (existing MRIP and new mandatory reporting) maintained for no less than 3 years, and no management advice expected from the new method during the first year.	Yes. MRIP sampling is in place and will be for the foreseeable future. For-hire logbook rule effective since January 4, 2021, with data still being collected.
NMFS require and maintain a comprehensive permit/email database of participants.	Yes, this is required information for all federally permitted for-hire vessels issued a permit by SERO.
NFMS include procedures for expanding estimates for non-reporting	No. Presumably this would occur after compliance is sufficient for NMFS' approval and validation has been completed. Likely a long timeline.
NMFS allow multiple authorized applications or devices that can transmit data from sea to report data as long as they meet required data and transferability standards.	Either not applicable for the SA Region in relation to VMS or yes, logbook data can be transmitted via a mobile device as long as there is cell service.
Explore ways to determine the impact of state permitted vessels on landings of federally managed species, and pursue a long-term strategy of including the entire fleet, federal and non-federally permitted, in the reporting program.	Unknown if this effort was undertaken.

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 August 2024 meeting and a summary of their recent discussion is included in their Data Collection Committee Report in Appendix 1.

Additionally, [NMFS Atlantic Highly Migratory Species](#) (HMS) has published a [proposed rule](#) 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.

Recent South Atlantic Fishery Management Council Action

The South Atlantic Fishery Management Council (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 [feedback](#) 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.

The following discussion focuses on the latter two bullet points of this motion that require an amendment to the snapper grouper, dolphin wahoo, and coastal migratory pelagics FMPs. Actions that may be taken at any time, given adequate resources, and without an amendment include improving outreach, increasing enforcement, and increasing monitoring. The details of each item are included in Appendix 2.

Objectives for this Meeting (September 2024)

- Review timing of amendment development.
- Review the 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.

Tentative Amendment Timing

September 2024	Review potential measures to include in the amendment.
Fall 2024	Obtain feedback from For-Hire Reporting AP (or after scoping?).
December 2024	Approve for 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, and fishing effort 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.

Committee Action

- REVIEW DRAFT PURPOSE AND NEED STATEMENTS AND MODIFY AS 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 30 minutes of arriving at the dock, regardless of whether fish are harvested on a trip.

Sub-alternative 2b. 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.

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 2a. Electronic reporting is not required prior to offloading fish.

Sub-alternative 2b. If fish are harvested during the trip, electronic reporting is required prior to offloading fish.

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.
- Under **Sub-alternative 2b**, 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.
- **Alternative 3** would require that all trip reports be submitted daily.
 - Under **Sub-alternative 2a**, there would be no requirement of reporting before offloading, regardless of whether fish were harvested on a trip.
 - Under **Sub-alternative 2b**, if fish are harvested on a trip, then reporting would need to occur before those fish are offloaded.
- **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).

COMMITTEE ACTION

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

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 phone survey (charter vessels) and SRHS (headboats). 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 (including departure and landing location) for trips that will be engaging in **any type of fishing or for-hire activity**. Fishing activity would include commercial, for-hire, and private recreational fishing activities, as well as trips fishing for bait. A for-hire activity would include any activity with paying passengers on board the vessel.

Alternative 3. 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 (including departure and landing location) for trips that will be engaging in **any type of fishing activity**. Fishing activity would include commercial, for-hire, and private recreational fishing activities, as well as trips fishing for bait.

Discussion

- Currently there is no trip notification or landing location requirement for federally permitted charter/headboat vessels (**Alternative 1 (No Action)**).
- **Alternative 2** would implement a trip notification requirement that also includes the planned landing location of a vessel when the vessel is being used for any sort of fishing trip (commercial, for-hire, private, or bait fishing) or chartered activity with paying customers such as sunset or dolphin watching cruises.
- **Alternative 3** would implement a trip notification requirement that also includes the planned landing location of a vessel whenever the vessel is being used for any type of fishing activity (commercial, for-hire, private, or bait fishing).
- **Alternatives 2 and 3** reflect similar measures that are being considered by the Gulf Council.

COMMITTEE ACTION

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

- DOES THE COUNCIL WANT TO CONSIDER A TRIP NOTIFICATION REQUIREMENT FOR ALL FISHING ACTIVITY? ALL FISHING AND FOR-HIRE ACTIVITY?
 - SHOULD COMMERCIAL, PRIVATE USE, AND BAIT TRIPS BE INCLUDED?
- DOES THE COUNCIL WANT TO CONSIDER THE REQUIREMENT THAT FOR-HIRE OPERATORS NOTIFY NMFS OF THE INTENT TO INITIATE A FOR-HIRE OR FISHING TRIP, RETURN FROM A FOR-HIRE OR FISHING TRIP, OR BOTH?
- DOES THE COUNCIL WANT TO CONSIDER THE REQUIREMENT THAT FOR-HIRE OPERATORS NOTIFY NMFS OF THE DEPARTURE LOCATION, LANDING LOCATION, OR BOTH?

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.

Alternative 2. ?

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** and other potential alternatives would presumably mandate charter or headboat vessels to offload clients or harvested catch at pre-approved landing locations that are readily accessible by an authorized law enforcement officer or survey technician.
- While recent permit information is not available due to issues and ongoing updates with the SERO permits system, in 2020 there were 2,458 vessels with a South Atlantic Snapper Grouper, Coastal Migratory Pelagic, or Dolphin Wahoo for-hire permit. 343 of these vessels (or 14%) indicated a home port in the Gulf of Mexico region.
- In 2020 there were 294 South Atlantic permitted for-hire vessels that had a home port in the Mid-Atlantic or New England regions. This represented approximately 12% of all South Atlantic permitted vessels.
 - If pursued by the Council, this action could be particularly difficult to implement from a compliance and logistics standpoint for vessels fishing in the Mid-Atlantic and New England regions.
 - The Council will eventually need to specify if these vessels will need to land at approved locations and how the out-of-region landing locations will be approved.

COMMITTEE ACTION

- DISCUSS THE DRAFT ACTION AND WHETHER THE COUNCIL WOULD LIKE TO CONSIDER IT FOR SCOPING.
 - PROVIDE ADDITIONAL DETAILS ON WHAT THE COUNCIL WOULD LIKE TO SEE IN DEVELOPING ALTERNATIVES FOR THIS ACTION.
 - WOULD CMP AND DW PERMITTED VESSELS FISHING IN THE MID-ATLANTIC OR NEW ENGLAND REGIONS NEED TO LAND AT PREVIOUSLY APPROVED LANDING LOCATIONS?
 - REQUEST THAT NMFS PROVIDE INFORMATION ON HOW LANDING LOCATIONS WOULD BE APPROVED OR HOW THE LOCATIONS WERE PREVIOUSLY APPROVED IN THE GULF OF MEXICO?

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. If selected by the SEFSC, mandate participation in a validation survey for federally permitted charter/headboat vessels participating in the snapper grouper, coastal migratory pelagics, or dolphin wahoo fisheries.

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.

COMMITTEE ACTION

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

5. Other items?

Discussion

- **Did Not Fish (DNF) reports:** The [letter](#) from SERO 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.
 - The Gulf Council was not considering DNF reporting requirements but may consider these requirements in future versions of their for-hire reporting amendment.
 - HMS is considering a monthly DNF reporting requirement.
 - Conversely, a [recent white paper](#) developed by NMFS GARFO (Gouveia et al, May 2024) recommended against implementing (or re-implementing in the case of Vessel Trip Reports) DNF reports altogether. Specifically, the report notes “while the re-imposition of DNF reporting requirements may seem to offer potential benefits in terms of compliance monitoring and data integrity, these perceived benefits are far outweighed by the costs, and present significant challenges for industry stakeholders and NMFS.”
 - *Does the Council still want to consider changes to DNF reports considering that weekly submission is currently required?*
 - *If so, what kind of changes are envisioned?*
- **Changes to the economic component of the logbook:** The Gulf Council is considering an action that may implement a random sampling design rather than a census for the economic component of the for-hire reporting requirement. The range being considered by the Gulf Council is 10% to 33% of for-hire trips that would be sampled.
 - *Does the Council want to consider an action that would potentially implement a random sampling design for the economic component of the for-hire logbook?*
- **Other items:** *Are there additional items or topics that the Council would like staff to explore ahead of planned approval for scoping at the December 2024 meeting?*
- **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)?*

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

Data Collection Committee Report August 19, 2024 Ed Walker, Vice-Chair

The Committee adopted the agenda after including a discussion on the Southeast Regional Office (SERO) permit database under Other Business (**Tab F, No. 1**) and approved the minutes (**Tab F, No. 2**) of the June 2024 meeting.

Discussion on For-hire Data Collection Program (Tab F, Nos. 4, 4a, and 4b)

Discussion of the methodology for trip validation

Council staff provided a presentation reviewing two potential approaches for trip validation in the new for-hire data collection program. One technical method would include the use of a Vessel Monitoring System (VMS) or some combination of VMS with a geofence. A non-technical approach would require several components to satisfy this requirement including submitting a logbook before offloading catch, dockside intercepts, a combination of trip declaration/pre-landing notification, landing fish at approved landing locations, and “did not fish” reports.

A Committee member asked NOAA General Counsel whether a technical validation method using VMS would be legally defensible given the previous lawsuit decision. General Counsel responded that because the technical validation options require the collection of continuous location data they would be difficult to justify given the privacy concerns and given that there is a non-technical approach that appears viable. Several Committee members stated that the non-technical approach would be preferable to VMS but acknowledged that funding limitations may make this option difficult to operationalize. The Committee agreed that exploring collaboration with the state for-hire surveys would be ideal to help any potential financial shortfalls and avoid interruptions in sampling effort.

A Committee member asked about the status of the for-hire data collection program in the South Atlantic. The South Atlantic Fishery Management Council liaison stated they were reviewing their program. A Committee member replied that coordination between the two Councils would be beneficial as for-hire data collection is being developed in both regions. Council staff added that staff from both Councils are in frequent communication and are exchanging regular updates on the progress of the two programs.

The Committee also discussed the progress of an electronic reporting program being developed by the Office of Atlantic Highly Migratory Species (HMS). The Committee asked several questions regarding the timeline of the HMS program and inquired how potential differences in program structures would affect participants with multiple permit types, such as Gulf reef fish, HMS, and Atlantic Charter/Headboat for snapper-grouper. The Committee suggested inviting HMS staff to provide an update on the development of their electronic reporting program at a future meeting.

A Committee member expressed an opposition to the use of “did not fish” reports and indicated that this extra requirement would be burdensome to the industry. Additionally, he expressed concern that a vessel operator may be penalized for forgetting to submit this extra report. Council staff stated it would be possible to explore the timing of “did not fish” reports to find an option that would limit reporting burden on program participants and report back to the Committee at the next meeting.

The Committee recommends and I so **move:** **To move forward with non-technical solutions for for-hire trip validation.**

Motion carried with no opposition.

Discussion of Draft Document

The Committee was presented the latest version of the draft document and reviewed the current document actions. For Action 4, which considers the collection of economic data, the Committee suggested modifications to the options under Alternative 3. Alternative 3 would implement a survey design for sampling program participants completing and submitting an economic survey. A Committee member expressed a desire to include an option for sampling up to 10% of trips. Another Committee asked if removing Action 4 and dedicating another document for this program component would be possible. Several Committee members advocated for leaving Action 4 within the document to provide guidance on the sampling design for economic data collection. The Committee decided to modify Action 4 Alternative 3 by adding one option and removing another:

The Committee recommends and I so **move:** In Action 4, to make an Option e.

Option e: Up to 10% of trips

Motion carried with 1 in opposition.

The Committee recommends and I so **move:** In Action 4, to remove Option a.

Option a: Up to 50% of trips

Motion carried with no opposition.

Council staff stated that, for the next revision of the document, an action outlining the non-technical approaches for trip validation as well as an action to review the program with some frequency (e.g. five years) would be included. In addition to exploring options for the timing of submitting “did not fish” reports, staff will also report back on options for what a program review would entail that may be most appropriate for the new program.

Other Business

SERO staff provided an update on issues related to the permit database. SERO staff have identified Reef Fish Amendment 59 and the shrimp vessel and effort monitoring program framework action as documents that rely on permit information for their development. SERO staff are working with contractors to develop a “snapshot” permits dataset that would provide the Council and

Interdisciplinary Planning Teams permits data through 2023 for use in amendments. By mid-September, SERO will report whether this “snapshot” solution is viable and if it will be available in time for staff to develop these documents for the November 2024 Council meeting. A Committee member noted that the updates in the permits office had resulted in more timely processing and encouraged SERO to continue working on improvements with the permits office.

Mr. Chair, this concludes my report.

Appendix 2. Measures not requiring an amendment that can be taken to improve compliance and increase utility of collected for-hire logbook data for use in management

The following summary points are largely taken from the information that was presented to the Council at the [June 2024 meeting](#). While additional resources would be necessary to accomplish these measures, no regulatory changes would be necessary. Thus, these measures could be put in place without a fishery management plan amendment.

- **Improve Outreach**
 - Increase Outreach: outreach can directly affect social norms. Improved outreach can effectively improve compliance with existing reporting requirements.
- **Increase Enforcement**
 - Increase law enforcement officers (LEO) and intercepts: An increase in LEOs at ports, boarding vessels, and taking enforcement action in general, would likely improve compliance (in terms of more real time, more accurate reporting). Pre-landing notifications or modified declarations (that include estimated return time) would increase the potential for LEO intercepts.
 - Enforce *50 CFR § 622.176 Recordkeeping and reporting (b)(4)* that automatically prohibits all harvest of permitted species for vessels that are delinquent in reporting.
 - Hold permit renewals: Permit application holds have been shown to lead to compliance (turning in outstanding reports) when permits come up for renewal. This is weakened with open access permits, as fishermen can create a new business to get a different permit. Gaining compliance at permit renewal means there is currently a lack of real-time data collection, which impedes in-season monitoring.
- **Increase Monitoring**
 - Require observers: Using stratified random sampling, vessels could be chosen for observer coverage. Observer coverage improves data quality as a verification measure for logbook fields, provides estimates for discards and discard mortality, and provides information on fish length.
 - Increase dockside sampling: Provides verification of landings and allows for biological samples to be taken for use in stock assessments.
 - Validation survey: Implement a validation survey that is not mandatory, similar to the work that was accomplished in the Gulf of Mexico.