



THE SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

Modifications to South Atlantic For-hire Reporting September 2024



Overview



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 - Purpose and Need
 - Summary and evaluation of intended outcomes
 - Summary and evaluation of technical sub-committee recommendations
- Recent Council actions
 - Gulf of Mexico Fishery Management Council and HMS
 - South Atlantic Fishery Management Council
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 - Objectives for this meeting and timeline
 - Draft Purpose and Need, draft actions
 - Questions for the Council on how to move forward



Background

- Southeast For-Hire Integrated Electronic Reporting (SEFHIER) Program was launched with the implementation of the Comprehensive For-Hire Electronic Reporting Amendment.
 - Covered the Snapper Grouper, Coastal Migratory Pelagic, and Dolphin Wahoo FMPs.
 - Regulations effective January 2021.
- Purpose and Need statements:
 - “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.”



Summary of intended outcomes

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.

Summary of technical committee recommendations



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.

Summary of technical committee recommendations (continued)



Recommendation	Has it been accomplished?
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 Council Action

- Currently working on a for-hire reporting amendment.
 - Replace their previous reporting rule after it was set aside by the United States Court of Appeals for the Fifth Circuit 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 (“hail in-hail out”), and
 - Establish reporting of economic data.
 - Exploring a sampling rather than census approach for the economic component.



Recent HMS Action

- NMFS Atlantic Highly Migratory Species (HMS) has published a proposed rule that would modify or expand reporting requirements, including reporting by commercial, for-hire, private recreational vessel owners, and dealers.
- In relation to for-hire reporting, the proposed rule would require:
 - Electronic reporting for all trips regardless of whether fish were caught.
 - Reporting of all species caught (including non-HMS) and fishing location.
 - Reporting within 24 hours of the end of each trip.
 - Monthly no-fishing reports.
- Would require trip-level reporting of costs and earnings.
 - If selected, also report additional annual expenditure information via an annual survey.

NMFS Guidance



- June 2024, the NMFS SERO and SEFSC noted that for-hire logbook data cannot be used for management due to low compliance and lack of validation.
- Recommendations included:
 - 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.



Recent South Atlantic Council Action

- June 2024 meeting, the Council passed a motion to start an amendment that:
 - Focuses on incorporating actions that can be taken in the near-term without an amendment, including additional outreach.
 - Considers actions and alternatives being considered by the Gulf council.
 - Considers actions to modify reporting frequency, hail in, hail out, landing locations, no fishing reports, and validation surveys.

Measures that can be taken without an amendment



- **Improve Outreach**
 - Increase and improve outreach efforts.
- **Increase Enforcement**
 - Increase law enforcement officer presence on the water or dockside.
 - Better enforce harvest prohibition and ability to renew permits if delinquent on reporting.
- **Increase Monitoring**
 - Require observers
 - Increase dockside sampling
 - Administer a validation survey
- All are dependent upon prioritization of initiatives by NMFS and availability of resources (funding and personnel).

Questions?

- Coming up in the discussion:
 - Objectives for this meeting and timeline
 - Draft Purpose and Need statements
 - Draft actions
 - Questions for the Council on how to move forward
- Any questions before jumping to the decision document?