



Mid-Atlantic Fishery Management Council

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Michael P. Luisi, Chairman | P. Weston Townsend, Vice Chairman

Christopher M. Moore, Ph.D., Executive Director

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Andy Strelcheck
Acting Regional Administrator
Southeast Regional Office
National Marine Fisheries Service
263 13th Avenue South
St. Petersburg, FL 33701-5505

Dear Andy:

The Mid-Atlantic Council is concerned about the new reporting requirements related to the South Atlantic Fishery Management Council's (SAFMC) 2017 For-hire Reporting Amendment that were implemented by SERO beginning January 4, 2021. As you know, these new reporting requirements impacted not only SERO for-hire permit holders but also GARFO for-hire permit holders who were already required to report electronically. Although a single report via eTrips mobile can accommodate the requirements for each region, four additional reporting fields are required under the SERO permits including socioeconomic questions related to trip fees, fuel usage, and prices.

Mid-Atlantic Council members and stakeholders are concerned that the addition of these questions increases reporting burden and possibility of inaccurate data. For example, a captain who does not easily know the amount of fuel used or the price of fuel may file an inaccurate report to meet their reporting deadline. In addition, the lack of clarity regarding the utility of these questions as well as the lack of stakeholder support is undermining the support for electronic data collection and our relationship with these constituents.

According to the [Final Rule](#), economic data are being collected from charter vessels to enhance the ability of the South Atlantic Council and NMFS to estimate the economic impacts and values specific to charter vessels and support research efforts aimed at increasing net benefits to these stakeholders as well as the U.S. economy. Instead of a regulatory requirement, an alternative might be to make the answers to these questions voluntary combined with increased outreach to indicate their importance and promote participation. Completeness and accuracy of data are the foundations for gathering quality data and the Mid-Atlantic Council is concerned that these few additional fields will not only result in dubious information for those data elements but jeopardize the quality of the other data as well.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "C Moore".

Christopher M. Moore, Ph.D.
Executive Director

Cc: M. Luisi, P. Townsend, J. Carmichael, T. Nies, K. Coutre