



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southeast Regional Office
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Dear Chris and Thomas,

Thank you for your letters regarding the reporting requirements for the Southeast For-Hire Integrated Electronic Reporting Program (For-Hire Reporting Program). I appreciate the feedback on the additional southeast permit-specific data elements that were incorporated into the Atlantic Coastal Cooperative Statistic Program's (ACCSP) eTrips electronic reporting application. The regulations implemented for permit holders in the charter vessel/headboat Atlantic dolphin wahoo fishery, Atlantic coastal migratory pelagic fishery, and South Atlantic snapper grouper fishery, are requirements of the permit that apply regardless of where the permit holder fishes.

Regarding your concern over the collection of socioeconomic data, the Magnuson-Stevens Fishery Conservation Act (MSA) and the National Environmental Policy Act (NEPA) require NOAA Fisheries to assess the social and economic impacts of management actions. Although some economic data has been comprehensively collected by NOAA Fisheries for the commercial sector (price and revenue) and for headboats (fuel cost), the economic data that was collected from charter vessels historically was episodic and often based on small sample sizes. Further, that economic data was often outdated when socioeconomic analyses were needed for management and regulatory actions. Through the For-Hire Reporting Program, the detailed economic data entered by fishermen in real time through the additional questions added to the eTrips application will enhance the ability of NOAA Fisheries and the fishery management councils to understand potential impacts of proposed management and regulatory change(s) on the for-hire sector (e.g., changing bag limits, area closures, etc.). These data will also allow us to better monitor the economic health of the industry over time. In addition, the economic information will help fishery managers and scientists assess the value of the for-hire sector that will allow for economic recovery in the event of a fishery disaster. Fisheries economists will use these data in their cost-benefit and economic impact analyses for actions and amendments that propose regulatory changes. These data will always be used in a confidential manner. The information can also be used to inform quota allocation decisions, fisheries research, and disaster recovery damage assessments.



During the development of the For-hire Reporting Amendment, the South Atlantic Fishery Management Council (South Atlantic Council) identified all of the data elements to be included and determined that the collection of economic information was essential to the For-Hire Reporting Program.

The NOAA Fisheries' Southeast Regional Office (SERO) and Greater Atlantic Regional Fisheries Office (GARFO) staff identified approximately 300 permit holders that have both GARFO and SERO permits. These permit holders would be required to submit electronic logbook reports to both GARFO and SERO. However, in an effort to reduce possible duplication, ease the reporting burden on permit holders, and create a one-stop reporting platform, staffs from SERO, GARFO, and NOAA Fisheries' Highly Migratory Species Division (HMS) worked with the ACCSP staff to modify an existing reporting application (eTrips) to recognize these multi-region permit holders.

The eTrips application is able to determine which questions the permit holder should see and answer, based on the existing reporting requirements for SERO, GARFO and HMS. If the permit holder has a SERO permit, the eTrips form will include the required four socio-economic questions: fuel price per gallon, amount of fuel used, charter fee, and number of paying passengers. These questions *only apply* when a person has a SERO vessel permit. GARFO permit holders who do not have a SERO permit would not see these additional four socio-economic questions. In addition, eTrips also includes additional data element questions related to HMS (e.g., fight time, estimated weight, hook size, etc.) when any of six HMS species are landed (bluefin tuna, blue marlin, white marlin, roundscale spearfish, sailfish, and swordfish).

The For-Hire Reporting Program is a new data collection process for NOAA Fisheries SERO, and we know that modifications to the program may be needed to fine-tune the program in the future. However, the South Atlantic Council will need to review and recommend any changes to the structure of the program, including changes to the data elements. At their September 2021 meeting, the South Atlantic Council will receive an update on the For-Hire Reporting Program and plans to discuss the concerns you have outlined in your letters.

Sincerely,

Andrew J. Strelcheck
Acting Regional Administrator