

Overview Please take the follow input into consideration during For-Hire Reporting Improvement Plan discussion scheduled for June 10th 2025 SAFMC Council meeting.

“Purpose: The purpose of this amendment is to make modifications to the South Atlantic Southeast For-Hire Integrated Electronic Reporting Program and the Southeast Region Headboat Survey to improve the accuracy, precision, and timeliness of landings, discards, fishing effort, and economic data for South Atlantic permitted charter/headboat vessels participating in the snapper grouper, coastal migratory pelagics, and dolphin wahoo fisheries.”

“Need: The need for this amendment is to improve compliance 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”

Source: For-Hire Reporting Modifications; page 3; Decision Document June 2025

SRHS Evaluation: “Estimated trips for headboats are determined from port agent reports of vessel activity. The compliance rate in the Atlantic jumped from just under 50% in 2007 to 82% in 2008 when selection letters were mailed to vessels. Compliance has been above 95% since 2010 and above 99% since 2017”

Source: Attachment 6a: South Atlantic Headboats Report; June 2025

Key SRHS Takeaways

- Headboats are already fulfilling both the Purpose and Need in the proposed rule changes
- Therefore SRHS may fall outside the realm of both the Purpose and Need in this amendment
- Headboats have a near perfect compliance rate under current management measures
- Headboats are fulfilling data validation and information needs under current program that is utilized in management

“If it is not broke... Do not fix it...”

SEFHIER Thoughts

In order to address the issues of SEFHIER, I would encourage Council to begin clarifying some of these questions:

- Who is responsible for reporting? Is it the owner of the vessel, or the captain, or a crew member? Identify who is responsible.
- How does accurate and up to date federal permit data (Snapper Grouper, Dolphin Wahoo, CMP) in the for-hire sector effect compliance rates?
- Why compliance is so poor for vessels in SEFHIER program?
 - Is it that users *won't* report?
 - Lost trust in the system
 - Fishers feel the data will be “used against them”
 - Aren't educated in the important details of data collection / use in management
 - Little accountability or enforcement if failure to report
 - or —
 - Is it that users *can't* report?
 - Aren't equipped with technology means to do so
 - Mental or physical restrictions to complete electronic reports
 - Poor software makes trip reporting challenging, difficult, nearly impossible

Additional Thoughts

More regulation alone may not lead to better compliance.

Managers should look to education and outreach resources, paired with better enforcement.

We recognize that some parts of this amendment may be helpful and proactive, however some would be negative. Please see below for further explanation.

Draft Actions and Alternative Overview:

****Draft Action 1. Reporting Frequency and Timing***

Rationale: Often times, headboats are carrying many many more passengers than a “6 pack” for hire charter boat.

For my operation, it is common to run multiple trips a day during busy season — trip A returns at 12 noon and trip B departs at 1pm. We have a total of 1 hour to safely unload on average 50 passengers, distribute the catch, clean the catch, restock ice, restock bait, refuel (if needed) take out trash, clean the restrooms, clean the boat (sort of), fulfill souvenir orders, and check in our next trip of approx. 50 passengers, give safety speech and instruction, and safely load passengers onboard.

Enforcing a change in reporting frequency and/or timing has the potential to force our business to alter our operation and/or schedule entirely. It’s important for managers to recognize that the time in between trips is a critical time for captains to mingle with to with guests, answer questions, etc. which is a HUGE part of our angler satisfaction. Our customers are the most crucial of the success of our business; Replacing this important time with being forced to complete a trip report would not only be detrimental, but also unnecessary given the fact the current weekly time frame for the SRHS.

It’s unreasonable to make our guests stand around and wait to collect their hard earned catch, while we are filing a trip report. Angler satisfaction would plummet if this were the case.

Alternative 2 also may lead to forcing captains to complete electronic reporting on a smart phone or similar device while operating vessel with passengers onboard in effort to remain in compliance with the a.) prior to offloading 2.) 30 mins or 3.) 1 hour proposed time changes. This may be viewed as a possible violation of MSA National Standard 10—Safety of Life at Sea: “Conservation and management measures shall, to the extent practicable, promote the safety of human life at sea.”

Alternative 3 would effect our daily personal / family life. Our captain and crew leave the house around 4am, preform hard work in the sun all day long, and final returns home around 8pm, they have a very small window to see their kids before bedtime. Imagine spending the whole day at work, just to come home and have to prioritize staring at your smart phone or computer to complete a daily trip report over spending a few quality moments with your young children before bedtime. VESL is a generally user friendly software but it does still take 20-30 mins on average to properly complete each honest and accurate trip report for our headboat that ran 2 trips and carried over 100 passengers that day.

Please note this is input from the perspective of a headboat. Opinions and perspective may differ for smaller, 6-pack for hire charter boats.

Recommendation: Select Alternative 1 No Action for headboats in the SRHS.

****Draft Action 2. Require Trip Notification for For-Hire Vessels***

Rationale: SRHS have dedicated NOAA Port Agents in the South Atlantic. We have constant, 2-way communication (almost daily) with our Port Agent about our schedule and trips so he can meet and sample us at the dock. So, in a sense, headboats already informal trip notification in place. However, if our Port Agent were to be let go due to funding cuts, etc. we recognize the potential need to supplement this form of validation somehow.

Recommendation: Either Alternative 1 No Action, or Alternative 2 with Initiation of Trip Declaration only ... and made as simple as possible.

****Draft Action 3. Establish Approved Landing Locations for For-Hire Vessels***

Rationale: Headboats leave and return from same dock. This is a helpful tool in dockside intercepts and validation surveys.

Recommendation: Select Alternative 2

****Draft Action 4. Require Participation in a Validation and Estimation Survey***

Rationale: Validation is the most important aspect of the for-hire improvement amendment. Headboats already have validation incorporated into their survey

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

****Draft Action 5. Revise Reporting of Economic Data for Charter Vessels***

Rationale: We recognized the importance of generating economic value estimates for the for-hire industry. It's a valuable industry.

Recommendation: Alternative 1 No Action OR Alternative 2. Maintain the reporting requirement of economic information for charter vessels, but not all permitted vessels would be required to submit economic information each year.

Thank you for your time and consideration,
Haley Stephens