

Summary of Scoping Session Comments on Amendment 51 to the Snapper Grouper Fishery Management Plan

(Based on comments received from January 18, 2022 through February 4, 2022)

Below is a summary of comments that were submitted electronically and received during the three scoping webinars held of February 1st, 2nd, and 3rd. Comments provided during the webinars (n=6) are included in this document. Online comments (n=11) are available to view in full at: <https://safmc.wufoo.com/reports/snapper-grouper-amendment-53-comment-report/>.

Online Respondent Characteristics:

State	Number of Respondents ¹
North Carolina	5
Florida	3
South Carolina	0
Georgia	1
Gulf of Mexico (FL, LA, TX)	1
Other	0

Affiliation (SA Region Only)	Number of Respondents ^{1,2}
Private Recreational	3
For-Hire	0
Commercial	6
Non-Gov't Organization	0
Wholesale/Dealer/Retail	2
Other	0

¹Includes online respondents and individuals that provided state and sector affiliation.

²Some respondents chose more than one affiliation.

Revise the Sector Allocations (Action 2)

- Two commenters were opposed to reallocations which resulted in a higher allocation to the recreational sector.
- One of these commenters expressed concern over increasing discards with reduce catch levels especially as fishermen continue to target blueline tilefish.

Reduce the Commercial Trip Limit (Action 3)

- Nine comments opposed a reduction in the commercial trip limit, noting that a trip limit under 200 lbs would not be worth the trip to depths where snowy are caught. One commenter also noted that snowy grouper is a common target for the commercial sector when shallow water grouper is closed.
 - This commenter expressed earlier season closures were preferable to trip limit reductions.
- One comment suggested commercial trip limits with step downs to avoid complete closures, which will help reduce discards.

Establish a Commercial Spawning Season Closure (Action 4)

- One comment was in favor of closing the commercial fishery during peak spawning months, while another suggested modifying the season to correspond with seasons of similar deepwater species and shorten if required.

- One comment was opposed to any commercial management modifications.
- One comment suggested creating new artificial reef habitat in appropriate areas.

Recreational Accountability Measures (Action 6)

- One commenter stressed the importance of recreational accountability measures for the recreational snowy fishery.

Additional Suggestions

- Two comments were received that suggested gear restrictions that could reduce dead discards, particularly when fishing for other deepwater species at the same time as snowy grouper.
- One commenter felt that the recreational bag limit should be increased since the fishery is often catching more than one at a time. The commenter noted that when releasing the additional fish, even when using a descending device, they see a lot of predation and being able to retain the fish would eliminate waste.
 - A 1 fish/person/day limit was suggested.
- two commenters acknowledged a need for greater recreational oversight, suggesting the Council establish a recreational permit.

SCOPING WEBINAR COMMENTS PERTAINING TO AMENDMENT 53

FEBRUARY 1, 2022

(Portion of comment pertaining to snowy is highlighted)

ALBERTO SOLADNO: I'll try not to be too long. I pretty much cosign everything that Jason had to say, but I'll breathe it out so you got it coming out of another mouth. I'm the owner/operator of a commercial spearfishing business and snapper grouper unlimited permit holder. I've been making a living doing this for the last 12 years, and I know the landings of gags are really low personally. My gag landings have been consistent every year. I haven't seen any changes in mine, but I know overall the landings are less. I think a lot of it has to do with less effort putting into targeting them, but either way, they make up 20% of my landings and income every year so restrictions of shutting spearfishing for them would really impact me and my crew in a really devastating way. So, I reviewed your SEDAR's 71 stock assessment and, from what I saw, 11.8% the commercial landings were taken; spearfishing which is such a small number and especially compared to the large number of dead discards in that data; so, it seems like more gags were killed and wasted through dead discards than were actually landed and sold and utilized spearfishing. The other thing from your data you can see, and I know from gutting tens of thousands of gags, that all of those fish under 24", they're all females; egg producing females that are being wasted in that way. Overall, just spearfishing is just the cleanest fishery in existence, produces virtually no bycatch, no dead discards, and in the South Atlantic snapper grouper fishery, it represents a really small percentage of the gag landed. A ban on it, gags in the South Atlantic is not going to produce any benefit to the stock numbers, and it's not going to produce any of the dead discards of the small females that we actually need in circulation to bring back the stocks; and it's just going to be devastating to the few people that have families that depend on spearfishing for them along with all the fisheries that we participate in the South Atlantic. It's just the cleanest method of fishing in existence especially compared to all the other methods that are being used out there. There should be efforts to make more of the fisheries based on spearfishing. A reduction of landings is necessary. The only logical and fair approach is just to reduce the landings and ACLs, lower some trip limits, and like everything Jason said, I don't support any of the other ideas. The only thing that might benefit the fishery is just to lower trip limits and ACLs. One thing that I've talked about for years that no one has brought up, it's not going to benefit the gag fishery, but placing a cap on the number of dive boats that are participating in the commercial snapper grouper spearfishing fishery, especially this year with the hogfish being shut down. It only takes a couple more dive boats in the game to really mess with that, the ACLs. However, it has nothing to do with gag but that's something that I would support is putting an endorsement just like what was done on the sea bass trapping and the golden tilefish longlining. Just to cap off the amount of boats at whatever we're at

right now. Other than that, for the gag that's the only comments I have, but for the snowy grouper, the fishery I do participate in, in the winter, when shallow grouper is closed and changing the trip limit to anything less than 200 pounds would just stop me from participating in the fishery at all. I would rather see the overall landing, the ACLs, the split seasons lowered and have the seasons just shut down so that I could still at least go out and participate in it for a portion of the year. Otherwise, it's just a fishery that I won't even go out and do. Thanks for listening to me.

MITCHELL MCCONNELL: I'm a recreational rod and reel fisherman out of Edisto Beach, South Carolina. I'm going to start off with the snowies. I haven't really had much experience with Snowies. I don't know if they're overfished or not. I understand you do your data questions, but I would hate to see the snowy grouper fishery closed to recreational fishermen. I know it's already pretty compact for the amount of time a year you can harvest it as a recreational fisherman. I would be in favor of buying tags or maybe a stamp to target snowies so that way you guys can control the amount of snowies a recreational fisherman can harvest. What I would also hate to see is the commercial side get their poundage cut in half for snowy groupers. I've got friends that commercial fish for them, and they are already saying the amount of money they're making is being hurt especially due to tackle going up, bait going up, fuel costs going up. A lot of them are making a lot less money than they were just a little while ago thanks to inflation. So, the tilefish, I'm all in favor of raising the tile limits. I've just started in the last two years exploring the golden tiles out there off of South Carolina and pretty much every time I've been, we've limited out in a few minutes. Now, maybe it's just my area. Maybe different areas are different. I don't know since there is a lot of them. Now for the gags, I agree with a lot of the folks that said spearfishing pretty much there is no bycatch, and I can definitely agree with that because they can pick and choose their fish underwater what they want to shoot. I think everyone, in terms of spearfishing, made a good point. As a recreational guy, I'm okay with reducing them. I don't see a whole lot of gags any more off of Edisto Beach. Now, I'm not sure if it's cuz of sharks, cuz I fish in less than 100 feet of water most of the time. When I'm bottom fishing off of Edisto, I don't see a whole lot of gags, but I do see a ton of American Red Snapper and I've seen a reduction in black sea bass cuz of that. There were times where we used to go out and catch dozens and dozens and dozens of black sea bass when the limits I think were around 7 to 10 per person. We could limit out in about 2 or 3 hours. Now it's kind of hard to get a limit of black sea bass with all the ARs off our coast. I think that is pretty much it for me.

FEBRUARY 2, 2022

MARTHA GUYAS: I am with the American Sportfishing Association. Just a couple of big picture comments for your all tonight. Covering snowy grouper, golden and gag. Because we have gotten new assessments for those and changes, the quotas are necessary because those new assessments are new assessments for those and changes to quotas are

necessary and those new assessments are using FES, and that's being used to monitor recreational effort. As the Council is moving forward and updating quotas, they should also convert the allocations for those species into FES units to match up with the quotas. So, in other words, use the current formulas to recalculate allocations and then implement the conversion at the same time the quotas are updated based on MRIP FES. So, just a general comment, we support the Council automating conversions of allocations from MRIP's CHTS currency to MRIP FES as they go through this process to update quotas based MRIP FES, just in general so that status quo in terms of who catches what is maintained as catch levels are updated; and then, if the Council wants to go through a allocation review process using the decision tree that is under development, then they would have time to do that and carefully consider if and how to reallocate how this changes fish and maybe watch it. I don't have a lot of specific recommendations for management measures and recognize there's a lot of moving parts right now in terms of the Council looking at ways to improve our recreational data and looking at ways to reduce dead discards, the MSA workgroup that is also in the background, and all of this is likely going to feed into management of snapper grouper at some point.

But just a couple of thoughts. For blueline, thanks Mike and Dewey for the info on recreational landings. I was thinking that might have been the case but also just wanted to flag that, remember the ex-Florida change; their regulations last year to be consistent with the recreational regulations in federal waters and so, theoretically, that should be addressing any overages that might have been attributed to what was coming out of Florida. So, just something to keep in the back of your mind. I guess, related to blueline and following up on Dewey's comments, you got to consider what is driving the trends in these fisheries and changes in the way fish are being caught. For a lot of these fisheries, it seems like there are definitely some geographic shifts going on and so, what might have worked in the past, may not work now or in the future. Fish are just showing up different places than they were before. So, I think it is important to understand some of the trends that have been occurring recently. On gag, the Gulf Council is going through similar struggles with the gulf stock so it might be good to keep track of what they're discussing for rebuilding gag on their side even though they are not a far along in the process. So, they met last week and discussed a couple of options like slot limits just briefly. That might make sense if sex ratio is a factor in why gag is in bad shape. That might help potentially protect males from harvest, but I think the Council would need to weigh how that would affect the level of dead discards for both commercial and recreational on the Atlantic side. So, any- way, I will stop talking. I look forward to listening to future Council discussions on these issues and hope to see you all in Jekyll Island next month. Thanks so much.

JACK COX: I want to speak primarily on Amendment 53, the gags. I have, in the Morehead City, North Carolina, area, I've actively fish on gag groupers since 1983; about 40 years of my life, I have participated in the fishery commercially. I will tell you, it's

disheartening to see what has happened to that fishery. It's a combination of a lot of things. There's been a lot of pressure on that fish. When I was catching gags back in the 80s, that fish was worth \$1.25 to \$1.75 a pound. Today that fish is worth \$8.00 pound, especially price. There is certainly a bounty put on that fish and that fishery is in deep trouble. I think it was SEDAR 71, we were seeing problems 8 years ago that the fishery was overfished. I don't know why we've taken so long to get in a position to try to recover the fishery but, speaking in my area, in my neck of the woods, I personally hate to say this but we're going to have to do something almost like we did for red snapper to get this fishery back on its feet. We need to have a little bit of bycatch in the fishery to continue to collect data on the fishery, but this fishery in my region can be nothing more than a bycatch fishery to even try to rebuild it. The Council took a very soft position on rebuilding the red grouper. We don't see many in that fishery; the gags thankfully we do see a lot of small fish so I think we could rebuild probably quicker than we could with the red grouper. It's in trouble and it's not going to be easy, and it's going to take a while to rebuild it. Quite a while. It took us a long time to rebuild red snapper. One of the things that concerns me, we have an overwhelming amount of recreational fishermen in this fishery now. We have no idea who the participants are and how many there are. The first thing the Council has got to do is to figure out who are the participants in the fishery so we can figure out how to manage it. I'm picking sides here – Both sides are going to roll their sleeves up to rebuild it. I would like my kids to see; I don't think anybody will see the fishery that I saw in the 80s in this fishery where you could go out and catch 5 or 600 pound of gags in a half a day in 70/80 feet of water. I would like to think that we could but it's going to take a lot of work, but I'd love to see us at least get half-way back to those levels.

Then I want to touch just a minute on snowies. The snowies are certainly not what they were in the 80s. It takes a lot of effort now to catch a limit of snowies. There again, I'm talking about Morehead City, North Carolina there is a lot of effort, grouper prices are the highest I have ever seen. I can't believe what people are paying for grouper and the continued amount of effort put on them, and we're not going to do any better the next year because here we are going to give ourselves another, what, year and a half before we get regulations put in place on these fisheries which is sad because I think the fishery is in such a state that we should have emergency action. I've been in the fishery for 40 years, and I continue to make a living on it. I've got several commercial boats; I do my spearfishing. I agree with some of the comments the spearfishermen have said. A lot of the things they've said makes sense, but it's just going to take a lot of work. Our scamps are in trouble. More pressure. I can tell you what's going to happen—5 years from now, we're going to find ourselves in trouble with amberjacks because we're going to take pressure off one and put it on another fishery but thank you for my comments. Thanks.

FEBRUARY 3, 2022

JASON WESTMORE: Hello; thank you everybody. I don't know if that many of you know that I up in the recent years switched most of my operations over to hook-and-line and longlining and really no diving anymore. I own and manage multiple vessels so I have been speaking with my captains and crew. Most of them, for one reason or another, can't attend this webinar; either they're offshore working or the technology or the knowledge is beyond their abilities. So, after speaking with all the boats and coming to some agreements about all the amendments, I have some of their comments. For Amendment 51, snowy grouper, we do not support reducing the commercial trip limit for snowies. Basically, all of my boats would choose not to participate in a targeted snowy fishery with less than a 200-pound trip limit. Economically, it's just not feasible and there's not other types of fishing they are trying to do at the same time to really justify it. Maybe some of the boats that are using buoy gear to go after tile would still catch some snowies and stuff, but they're not going to go snowy fishing if it's less than 200 pounds. But, they would be open to modifying the seasons, especially to correspond with similar deepwater species. and that requires the shorter seasons to still keep the trip limit at 200 pounds, they would support that. More importantly, all of them mentioned we need to work on stopping poaching and have some form of accountability for the recreational sector when it comes to all forms of deepwater fishing. For most of the region, deepwater grouper and tilefishing has really been out of reach of your average recreational angler. But now with modern advancements, pretty much everybody as the high-end equipment and the technology to go harvest or attempt to harvest these fish. There needs to be a way to significantly limit the season. Have some type of accountability and then just follow up on what the recreational sector does when it's coming to deep water. Once again, minimize those dead discards from the recreational sector.

For Amendment 52, my boats out fishing right now; I didn't go this trip. We support increasing the total allowable catch on golden tilefish for sure. We would like to make sure that any increase of the ACL retains the current allocation among user groups. Once again, I mentioned this the other day, but I do believe that all users of the longline group should get together to discuss this fishery. We need to work on improving the economic value of the fish we harvest, and we also need to work on improving the safety for our fishermen. I believe there needs to be a very limited season and accountability measures for the recreational sector and Amendment 52 as well. You've got to take all those deepwater species into account.

For Amendment 53, we all pretty much even my boats that bandit fish and do all kinds of other fishery, agree with all of these points here. We need to support in creating ways to protect these fish; they're not doing well. We definitely got to protect the spawning aggregations, but we're not in support of creating a slot limit or maximum size for gag groupers. We feel that would lead to too many dead discards. We're not in support of restricting or removing

spear gear during the rebuilding plan or at all in the future. We are in support of possibly reducing trip limits and possibly reducing the fishing season as long as the changes to the fishing season align with similar species because everything we do we want to reduce discard mortality and just minimize waste and maximum economic benefits for the commercial sector. I went back and reviewed my personal records from when I was pretty much full-time spearfishing and hook-and-line fishing mostly out of Georgetown and Murrells Inlet. All of the trips, that I unloaded, our fish were pretty much all measured by the biologists; they took ear bone samples every time we landed. I can't remember one time they didn't show up. The same thing in Mayport; maybe they don't come up every trip, but most of the time we have somebody in Mayport. So, when using spear gear, we typically harvested 12 to 18 pounds gag grouper out of Carolina and when I run bandit trips today or in the past, I'd say we fish a little bit deeper, typically beyond 200 foot; sometimes significantly deeper. Our average gag is well over 20 pounds, sometimes in the 30 pounds. You can go back inshore and fish for them but when we bandit fished, we would typically fish deeper because we're gag fishing as a targeted species at that time. If we're trying to catch them while we are red snapper fishing or beeline fishing, we might be back inshore but gag fishing, we'll go deeper if the current allows. I rig all my boats, no matter the fishery, for maximum efficiency and reduced bycatch. I think any fisherman that's been doing this for a long time and truly understands the patterns and habits of these fish can and will harvest that fish. So, if you invest in the right equipment and you modernize your vessel and you're dedicated to the fishery, you're not going not harvest the fish that's out in that ocean. If that hook-and-line fishermen asked to push out to 500 or do whatever he has to do, he's going to go do it. You're going to see bandit boats that have been bandit fishing for years fishing with buoy gear now because they figured out how to use buoy gear, and now they're out deeper than they were going with their bandits and that kind of stuff.

The problems that we see in the gag fishery we think the Council should address, the biggest one, is depredation across all fisheries and then habitat loss and competition due to lionfish and red snapper we think are huge. What we're significantly concerned with, as fishermen that rely on this for our income, is the low recruitment numbers and the poor survival of early juvenile gags in our estuaries and in our nearshore habitats. We're mostly concerned about the high discard mortality, and that comes in part due to the low knowledge and a lack of effort from many fishermen. I'll be honest, including some of my own, to properly release bottom fish. I think the recreational sector is even

worse. Everybody who you tell to take your descending device in your boat, might pack it in your boat, but I bet less than 5% of the people are using it and, if they are using it, I bet they're using it improperly. The ones that do try to use it, I bet half the fish they send back get eaten by a shark. That's been our experience. We try really hard; and we get very upset if a fish doesn't make it. We do need to manage the gag fishery by protecting the spawning fish and reducing the overall fishing effort. I think everybody agrees with that. It's a tough,

tough job for the Council to do. I think it's really important to figure out to effectively reduce the recreational sector's fishing efforts so that when they're fishing, they're not killing species. You've got to shorten the seasons, maybe less overall fish per vessel, close all related species at the same time. I don't know what the right way to do it is, but if they go fishing 12 months a year and for a month here, a month there, they can keep a fish and kill all of the other fish, it just doesn't work. They've got to have directed targeted trips that reduce their overall effort because there are just too many recreational people joining for what our stocks can sustain. You can't take all the commercial fish away and give them to the recreational cuz then how's everybody going to eat? How are people going to go to work? We've been managed in the commercial sector for years; we've done everything we've been told especially like with snowies. My boats could go out there and put 10,000 pounds of snowies on board right now if you said you'd let me. I know where they're at, and we can go get them, but we're not allowed to. We've got 200 pounds, that's it. So, something's got to be done to monitor and control the recreational sector and minimize poaching and waste. I think we just have to do that to minimize release mortality and bycatch, especially what we saw with red snappers going to happen if we don't take that into account. If we put some bigger closures on gag and don't figure out how to reduce the effort, then we're going to kill so many gags by letting them go that nobody's going to be able to go fishing, and it's not going to work. So, my final point we would we should probably set aside some funds and a lot of Council time to educate fishermen, all fishermen; commercial fishermen, recreational fishermen on how to effectively release fish affected by barotrauma and then ways to minimize depredation. If you're anchored up on a spot, and you're catching fish after fish and the sharks are circling your boat and you drop that same fish back in the water, he's not making it down. Sometimes if you keep a 50-gallon live well on the back of the boat, sometimes you can throw a fish in there for a few minutes; maybe vent him first, move off the spot later and then throw them in the water. They get a better chance of making it. I'm not saying they're going to make it, but a better a chance. If you'll indulge me another minute, I spent many, many years chasing lionfish from the first time they showed up. I remember when there were none. I remember when I saw my first one. I remember when I got stung by my first one. I remember when I got stung by my tenth one. They're going about as strong as they ever were. The people that say they're not seeing as many, those would be in like nearshore areas off the coastal shelf of Florida where you have a really high effort by the FWC to try and manage and control these fish. They've done an amazing job reducing lionfish in those habitats. If you go and look carefully, you're still going to see pretty heavy recruitment; lots of little babies, just microscopic little babies. Then if you take your boat and get up there in near Morehead or Virginia or something like that, there's basketball size lionfish everywhere you want to go. Then if you get out there in deeper water, if you can figure out a way to harvest them, there's as many as you ever want. So, lionfish are a real, real problem. Their something we never talk about but, for years, I would gut anywhere from 1,200 to 2,000 pounds of lionfish per trip. The last couple of years I did it, we didn't gut them anymore. But, when I

was gutting them, you would not believe what was inside. Each and every lionfish might have 5-6 beliners, little baby cleaner fish; the stuff that they eat is unbelievable. It's the thing we never talk about that's probably the biggest problem. Myself, for one, I'll never be able to help catch them again. That's how I got bent real bad but there is plenty of guys out there doing it, and they need our support not us fighting against taking away of their livelihood when they're out there catching a 1,000 pounds of lionfish a trip, trying to keep the rest of us from losing our fishery to those invasive species. Thank you everybody for listening to me and thanks for everything you guys do. I know you're in a really tough spot, and I'd love to contribute more.

DEWEY HEMILRIGHT: It's been really interesting hearing everybody's comments tonight. I don't know much about gag grouper; I don't know nothing about spearfishing, but it's been very good to hear from folks that have experience on the water. My comments tonight are going to focus on blueline tilefish and finally the actions that the Council is taking that are long overdue. It has economically hurt particularly the commercial fishermen north of Cape Hatteras by their harvest of the recreational industry not being held to their catch of 50%. Also, I believe in and would hope in the future that we would also look at some way from the comments here that there will have to be a counting of the recreational catch. Until that happens, and it's not with MREP, until that happens, we are kind of failing at accounting for the catch, particularly to the deepwater species of the groupers, tile fish and different things like that because when I look at the opportunity here that might have to take place to reduce the snowy grouper bag limit, 200 pounds, I look at the four-month season that's allowed to be caught by the recreational industry and the size fish that are being caught. I believe hopefully the outcome of this amendment, particularly the blueline, will be that there will be a reduced, either bag limit or season, to constrain the catch and harvest of blueline tilefish; constrain that catch to hold them under their ACL and so they don't get a chance to fish the scientific uncertainty placed by the SSC. The next stock assessment is not until 2024 and probably any management decisions out of that will be at the earliest, late 2025 or 2026. Folks, fishermen north of Cape Hatteras, particularly commercials, don't have and have demonstrated with not only research but also with EFPs, that we don't catch the magnitude of other species, particularly blueline tilefish, are nothing. Also, there is no bycatch. After a season, you don't go to these areas to catch any other species so don't cohabitate or concurrent with snowy grouper. It would be very interesting for the Council or SERO to demonstrate where they think these cocurrent of species are. Just because fishermen go somewhere to catch a snowy grouper and go somewhere to catch a tilefish does not necessarily mean you catch them together. There are some places up and down the coast where you do catch them together, and I know the data shows that. I'm thankful that the Council finally has started since about April 15, 2020, of looking at doing something to make this a fair and equitable fishery. The 50 allocation has been long coming, it's well deserved and hopefully it will get done. Thank you.

RON SURRENCY: Thank you all for letting me talk here for a few minutes. I just want to kind of hit on; I don't want to talk about spearfishing. I think everybody who knows me knows it's been my livelihood my whole life; for 40 years. I want to kind of hit on what Dewey was talking about as far accountability measures for people who actually count the fish. I was talking with some friends of mine over the last couple of days and even last week, and they're net fishermen for Spanish mackerel. By North Carolina when we were over a 100% on the allocation and now, we're fishing on a 500- trip limit and if we go over by 1 pound, we get tagged by an FWC Officer down here. He wants to write us a ticket; it depends on how bad the officer that we have and the attitude he has on the day, or whatever, but we're facing a fine of some kind. Especially me as the owner/operator, I have a valuable permit. We are facing a hefty fine being in the commercial industry, but there is no accountability; I mean, what happens to the people if you count the fish and let this happen. I mean, there is nothing happens to them. That's another part of the process. I think there should be some type of accountability; is there a way to count the fish to prevent this from going over especially drastic like that or you know, cutting it short. I was listening to Dewey's comments. I remember talking to a couple of my friends, and it was a hot topic of the day. Also, I was also taking to the owner of my fish house at Safe Harbor Seafood today about Amendment 53 and the gag grouper, and his main comment was he's been there through fishing organizations fighting for fish that we can have, and he's like all they have done is take, take take for 50 plus years that he's been involved. We've never gotten anything back, so he wasn't in support, even though he admits that the grouper population along with everybody else believes, is in trouble. But, he's not in support of doing any kind of reduction on gag grouper; the trip limit or anything else. Then, on the snowies is the same thing. We're not in supporting any reduction on snowy grouper. I think a 200-pound trip limit is barely worth going to fish on that and really, you're out there trying to harvest fish, and you're having to step offshore in that deeper water just to catch those couple boxes to add to the trip to make the trip worthwhile, especially on longlines. That's all. Thank you all for your time and thank you for letting me make my comments.