

**Summary Report**  
**Snapper Grouper Recreational Permitting and Reporting**  
**Technical Advisory Panel**  
Meeting 5: April 9, 2024

The South Atlantic Fishery Management Council's Snapper Grouper Recreational Permitting and Reporting Technical Advisory Panel (AP) convened via webinar on April 9, 2024.

AP members approved the agenda for the meeting. There was no public comment offered.

**1. Comment on potential Council actions in Snapper Grouper Amendment 46 (Private Recreational Permitting)**

After reviewing background information on recent Council actions related to Snapper Grouper Amendment 46, the AP reviewed actions in the amendment, providing the following comments and recommendations for the Council's consideration:

**Action 1. Establish a private recreational permit requirement in the Fishery Management Plan for the Snapper Grouper Fishery of the South Atlantic Region**

**RECOMMENDATION: The AP continues to recommend that a vessel-based permit would be superior to an angler-based permit from a technical perspective, logistical perspective, and for survey design. The net benefits to any subsequent improvements in private recreational catch and effort estimates from a vessel-based permit are likely going to be greater than those resulting from an angler-based permit.**

**RECOMMENDATION: The Council should consider addressing exemptions for a private recreational permit.**

- Add language to the alternative or to the amendment document regarding expected exemptions or lack thereof.
- If the intent is that there are going to be exceptions, who is going to be exempt and what is the potential size of the group that is exempt?
  - What characteristics constitute whether an angler or vessel would need to get the permit?
- The fewer exemptions, the fewer adjustments/corrections that will need to be made. Ideally, there would be no exemptions but that is not likely going to be the case for an angler-based permit. Need to consider the impacts of exemptions on quality of effort and catch information that can be collected or estimated by an angler-based permit.

Angler-based versus vessel-based permits:

- If the permit were vessel-based, it would create a gap in the information collected regarding the participants on the vessel. Such participant level information would be harder to obtain.

- If the permit were vessel-based, it may not fit as well with the intent of the education component since presumably the wider the exposure of the education materials, the better.
- The existing recommendation for a vessel-based permit is still preferable, even when paired with an education requirement. If there is an education requirement, that would still be relevant to the permit holder regardless of whether the permit is angler-based or vessel-based.
  - Regardless of the permit type, compliance is going to require a lot of outreach to get to a level of compliance that is acceptable.
- If the permit is angler-based, it could be used to cover individuals fishing from shore if states become involved via the exemption to federal requirements in Action 5. This opens up other dimensions and challenges for permitting and sampling.
  - May not be able to expect every shore angler to obtain the permit so it could be challenging to implement covering shore mode with this permit.
  - As noted previously, the Council doesn't have the authority to require this permit for shore-based anglers. The federal permit is just for fishing in the EEZ.
- States conducting Access Point Angler Intercept Survey (APAIS) surveying do not currently ask about licenses. Would need to reframe questionnaires to capture whether an angler has the angler-based snapper grouper permit.
  - Can be a touchy subject as it gives the perception that dockside samplers are determining whether an angler is legally fishing. Need to make it clear that this sort of determination is left up to law enforcement officers and not samplers.
- Vessel ID is already a component of APAIS. Thus, a vessel-based permit would not be an impediment to integrate into existing sampling programs and could be verified with existing APAIS related surveying.

Exemptions for permitting:

- It is not uncommon for angler-based permitting or licensing systems to have multiple exemptions (e.g., seniors, military, youth, etc.) and to not be issued on an annual basis (e.g. lifetime fishing license). The Council may want to consider re-phrasing “all private anglers” in **Preferred Alternative 3** to reflect exemptions and specify whether there is the intent to provide exemptions that are common occurrences for saltwater fishing licenses.
- A vessel-based permit likely avoids exemptions, particularly those that traditionally are granted for angler-based licenses.
- If the Council chooses to proceed with an angler-based permit, the fewer exemptions made the better, since fewer adjustment or correction factors will need to be applied.
  - Subsequent actions from federal or state management agencies will be needed to consider how to account for exemptions as well as whether changes to the dockside survey or how it is conducted are necessary.
- There is always going to be under-coverage for any permit and there will need to be a way to account for that eventually using correction factors.
- In Florida, there are exemptions for the state saltwater fishing license but requirements for a State Reef Fish Angler designation closes the loop on many of those exemptions.

The endorsement still does not cover anglers under 16 years old. During intercept surveys, anglers are asked whether they have the State Reef Fish Angler designation which helps with determining non-coverage correction factors.

- Exemptions may create a notable difference in how subsequent surveying is conducted and will need to be considered. NC, SC, and GA conduct a standard APAIS survey and have similar exemptions in place for saltwater fishing licenses. Need to make sure sampling and resulting recreational data are compatible across the South Atlantic Region.

Rental vessels, boat club vessels, and circumstances where a vessel owner may not be present on a vessel:

- Boat clubs and rental vessels may not be a notable issue in relation to vessel-based permitting as many of these vessels are likely operating inshore or nearshore waters rather than the EEZ.
- Effort from these vessels directed specifically towards snapper grouper species in the EEZ is likely going to be a very small percentage of overall private recreational effort.
- The vessel owner not being present on a vessel is a situation that not only exists for boat club vessels, but could also potentially apply to any vessel.

**Action 2. Specify the species for which a private recreational snapper grouper permit would be required**

- The Council's preferred alternative is aligned with recommendations from all APs; therefore the AP did not further discuss the existing recommendation.
- Regarding improving estimates of catch specifically for deepwater species:
  - The permit by itself (i.e. no subsequent reporting or targeted sampling) would provide a modest improvement at best in terms of precision on the recreational effort estimate. Making the sampling more efficient (e.g., additional dockside sampling or a dedicated deepwater species sampling program) would likely be needed to notably improve estimates for these species.
  - However, there are alternative estimation approaches using data-aggregation that are being explored. The permit could provide an auxiliary data source that could improve this modeling approach, but this would need to be further evaluated.
  - Deepwater species would lend themselves very well to a specialized sampling framework since they are almost all caught within the EEZ. For the effort component, a specialized survey would be feasible. The harder part would be addressing how to improve the intercept survey for these species (e.g., specific sites and times of year to target places where those species are being landed).
  - As encounters become more and more rare, specialized surveys would be needed. A census program (i.e. mandatory reporting) would be needed if species are exceedingly rare and may not work out if species aren't being targeted.

**Action 3. Establish an education component in conjunction with a private recreational snapper grouper permit**

**AND**

**Action 4. Specify the timing of the education component requirement for the private recreational snapper grouper permit**

- If no reporting requirement is implemented, it is still of value to inform people of the importance of participating in the dockside or mail-based survey.
  - How it is useful and helpful for fisheries management.
- Outreach efforts and education materials should explain why this permit is being established. State the benefits of the permit in terms of data collection so permit holders understand the purpose and what could be gained by anglers as well as managers.
- All information on the list that the Council compiled in March 2024 is relevant but is a lot of information. HMS has a compliance guide that the public can download. Something similar to that strategy may be helpful to consider so the education course is not too long.
  - Regardless of the timing for implementation of the education component, it may be useful to also consider a compliance guide. This may also help allay some of the concerns regarding whether every angler on the vessel will have the pertinent info if the permit ends up being vessel-based.
- For **Action 3, Alternative 2** – the wording is a bit confusing in relation to “required before initial issuance”. Consider clarifying and revising this language. Perhaps “the education component would be required *with initial issuance...*”

**Action 5. Establish an exemption to the federal private recreational snapper grouper permit requirement based on permitting by the states**

**RECOMMENDATION: The AP would like to add Sub-Alternative 2d to the existing recommendation. The new AP recommendation will be to recommend Alternative 2, Sub-alternatives 2a, 2b, 2c, and 2d in Action 5.**

**RECOMMENDATION: Since the AP has provided a series of recommendations over several meetings, the AP suggests including a summary of the recommendations after each action with the most recent recommendations at the beginning.**

- Suggest using a text box to highlight the AP’s recommendations that have been consistent throughout development of this amendment and to highlight newer recommendations.

**MRIP certification**

- MRIP certification applies to data collection or survey design including estimation procedures. Certification is not directly applicable to a permit as a stand-alone component. The MRIP certification process is not geared towards determining whether permits are compatible.

- Timeline – Certification is an iterative process that involves back and forth of documents, terms of reference for certification review, technical review (also an iterative process involving meetings to present design approach to review panel or consultants), review panel report, opportunity to respond to areas of concern identified in the report, formal approval and ultimate sign off by chief science advisory for the agency. The whole process can take years or can be less than one year depending on how many iterations of the review process are needed and how quickly the participants can supply information to address issues as they come up. Initiation is done by the requesting program through Office of Science and Technology staff and funneled through the Fisheries Information Network. Documentation is a key component.
  - Link for additional information: [CLICK HERE](#)
- If a program has already been certified, it doesn't mean that it cannot be changed to promote consistency across the region.

#### Other aspects of Action 5:

- The question was posed: What could be the consequences of different sampling frames/species that could compromise certification or potential validity for use in management? e.g., the Florida State Reef Fish Survey (SRFS) doesn't include black sea bass.
  - The Council needs to determine the permit's intended utility. Is it for the entire complex?
  - States are starting to look at changing or implementing programs of their own but they may also want to rely on a federal permit to help guide these decisions as they relate specifically to snapper grouper species.
- Another question was posed: What if the Council goes with vessel-based permit and current state programs (i.e., SRFS) are angler-based? How can this be reconciled? What does "equivalent" mean? The same applies to the species covered by the permit.
  - Ideally, non-sampling error should be minimized, and it is hard to know how much of a difference there would be between vessel- and angler-based permits across the region.
  - SRFS shouldn't necessarily be the limiting factor for a larger program that would benefit the whole region. While the details and appetite for extensive change would need to be further discussed internally, it is possible that Florida could adjust the existing SRFS program to some extent if needed.
    - A vessel-based permit could potentially lead to improvements to SRFS sampling and decrease regulatory burden on anglers. It would be a challenge to update the program but potentially feasible depending on resources.
  - Consider a new sub-alternative or add documentation in the amendment to capture that existing programs could be adjusted to meet the federal permitting guidelines.
  - If it is the Council's intent that the species would not need to line up exactly with the species chosen in Action 2, this needs to be clarified in regard to selection of **Sub-alternative 2a**.

## **Other Business**

There were no items under other business.

### **Advisory Panel Members present**

Luiz Barbieri, FL FWC, Chair  
Amy Dukes, SC DNR, Vice-Chair  
John Foster, NMFS/S&T/MRIP  
Kathy Knowlton, GA DNR  
Kai Lorenzen, SSC and UF  
Jeffrey Moore, NC DMF  
Bev Sauls, FL FWC