

# Amendment 46 to the Fishery Management Plan for the Snapper Grouper Fishery of the South Atlantic Region

## Discussion Document Snapper Grouper Recreational Permitting and Reporting Advisory Panel August 2023

**Note:** Words that are [underlined and in blue font](#) provide a link to other documents.

## Background

Amendment 46 to the Snapper Grouper Fishery Management Plan was previously developed in the first half of 2018 and was approved for scoping at the June 2018 South Atlantic Fishery Management Council (Council) meeting. Due to time constraints over the Council's workplan and the need to obtain more information on potential approaches for private recreational data gathering, the amendment was never scoped. From 2018 through 2020 staff focused instead on piloting the MyFishCount mobile app and portal. Other related efforts have also been underway, notably the convening of the Joint Council Workgroup on Section 102 of the Modernizing Recreational Fisheries Management Act of 2018 (Modern Fish Act), the Private Recreational Reporting Workgroup (workgroup), and subsequently the Snapper Grouper Recreational Permitting and Reporting AP (AP). The summary reports and recommendations from these groups can be found on the Council's website under the following links:

- Joint Council Workgroup on Section 102 of the Modern Fish Act (click [HERE](#))
- Private Recreational Reporting Working Group recommendations (click [HERE](#))
- Private Recreational Permitting AP ([Meeting 1](#), [Meeting 2](#), [Meeting 3](#))

## **The Council's 2016-2020 Vision Blueprint for the Snapper Grouper Fishery, previous amendments, and existing requirements**

The 2016-2020 Vision Blueprint for the Snapper Grouper Fishery (Vision Blueprint) was approved in December 2015 and was intended to inform management of the Snapper Grouper fishery through 2020. The Vision Blueprint was also intended to serve as a “living document” to help guide future management, building on stakeholder input. The Vision Blueprint is organized into four strategic goal areas: (1) Science, (2) Management, (3) Communication, and (4) Governance. Each goal area has a set of objectives, strategies, and actions. The potential actions in Amendment 46 correspond to different objectives and strategies in the Vision Blueprint.

Since the Council began development of the Vision Blueprint, fishermen have expressed concern with the estimates of recreational catch resulting from the Marine Recreational Information Program (MRIP). Stakeholders have been requesting that the Council explore a recreational stamp or permit for snapper grouper fishing. This recommendation has also been put forth by the Council's Snapper Grouper Advisory Panel numerous times. Permits have been implemented for the federal for-hire component of the recreational sector and the commercial sector for the Snapper Grouper, Dolphin Wahoo, and Coastal Migratory Pelagic fisheries in part to improve estimates of effort or catch in the South Atlantic region. However, these requirements do not cover the private recreational component.

Currently, a coastal recreational fishing license, issued through the states, is required for private recreational anglers as part of the 2007 Magnuson-Stevens Fishery Conservation and Management Act Reauthorization to improve estimates of catch and effort. There have been other federal and state efforts to further refine information gathered on the private recreational component of the recreational sector, such as the [Atlantic Highly Migratory Species Angling Permit](#) and [Large Pelagics Survey](#) that covers highly migratory species in the Atlantic and the [Private Recreational Tilefish Permit](#) in the Mid-Atlantic and New England regions. The state of Florida has also developed the [State Reef Fish Survey](#) where anglers intending to fish for 13 species of snappers, groupers, jacks, triggerfish, or hogfish from a private vessel must obtain an State Reef Fish Angler designation.

### **Recent Council actions in 2022 and 2023**

At their March 2022 meeting, the Council reviewed background information, recommendations from the workgroup, and directed staff to assemble candidates for an ad hoc AP to be selected in June 2022. The Council then reviewed recommendations from the first meeting of the AP at its September 2022 meeting. At the December 2022 meeting, the Council narrowed the scope of the amendment to focus on development of a permit for the private component of the recreational sector and creation of an education component. Additionally, the Council approved the amendment for scoping which was held in January and February 2023. The Council further refined options within the amendment at their March and June 2023 meetings.

**Private recreational reporting was removed from further consideration in Amendment 46 at the December 2022 meeting.** While reporting may be considered at a later date, the Council expressed interest in timely implementation of the amendment as well as the notable potential

benefits of implementing a permit which may include better identifying the universe of private anglers or vessels targeting snapper grouper species and enhancing the ability to collect recreational effort and catch data within existing programs such as the Marine Recreational Information Program (MRIP).

## Actions in this amendment

- Permit related actions (Actions 1 through 4)
  1. Establish a private recreational permit in the snapper grouper fishery
  2. Specify the species that will be covered
  3. Specify the length of time that a permit will remain valid
  4. Establish a mechanism for states to opt out of federal permit requirement
- Education component related actions (Actions 5 through 8)
  6. Establish an education component
  7. Specify whether the component will be mandatory or voluntary
  8. Specify the timing of implementation
  9. Specify the length of time that an education component will remain valid

## Objectives for this meeting

- Gather feedback on actions and alternatives being considered in the amendment.
- Provide recommendations for the Council to consider as Amendment 46 continues to be developed.

## Tentative amendment timing

✓ December 2022	Reviewed options paper and approved amendment for scoping.
✓ Winter 2023	Conducted scoping.
✓ March 2023	Review scoping comments and provide guidance on the amendment.
✓ April/May 2023	Gather initial feedback from the Permit and Reporting AP and Snapper Grouper AP.
✓ June 2023	Review amendment and AP comments.
August 15, 2023	Permit and Reporting AP meeting
<b>September 2023</b>	<b>Review amendment and preliminary analyses</b>
December 2023	Review modifications to the amendment, select preferred alternatives, and approve for public hearings.
Winter 2023/24	Conduct public hearings. Gather detailed feedback from the APs.
March 2024	Review amendment, public hearing comments, and AP comments.
June 2024	Review final draft of amendment and consider approval for formal review.
2025/2026 (TBD)	Regulation changes effective.

## Purpose and Need

The purpose is to develop a recreational permitting system that will better identify the universe of private anglers or vessels targeting South Atlantic snapper grouper species and will enhance the ability to collect recreational effort and catch data. Also work to promote best recreational fishing practices through education.

The need for the amendment is to improve the quality of effort and catch data for the private component of the recreational sector that targets South Atlantic snapper grouper species, while minimizing, to the extent practicable, adverse social and economic effects. Also improve education on best fishing practices.

## Actions in the amendment

### *Permit-related actions (Actions 1-4)*

#### **Action 1. Establish a private recreational snapper grouper permit to fish for, harvest, or possess snapper grouper species in the South Atlantic region**

**Purpose of the Action:** This action is necessary to establish a federal private recreational permit requirement in the snapper grouper fishery and determine whether the permit will be issued to a vessel or an individual angler.

Alternative	A federal private recreational permit would be required for:
Alternative 1 (No Action)	A federal permit is not required for a private angler or private vessel when fishing for snapper grouper species in the South Atlantic exclusive economic zone (EEZ).
Alternative 2	<u>All private vessels</u> participating in the private recreational component of the snapper grouper fishery in the South Atlantic EEZ.
Alternative 3	<u>All private anglers</u> participating in the private recreational component of the snapper grouper fishery in the South Atlantic EEZ.

#### **Discussion:**

- The Council received guidance that a federal permit can only be required for anglers or vessel that fish in the EEZ. Thus excluding shore-based anglers and vessels or anglers that only fish in state waters.
  - This led to the removal of the action that covered federal vs. state waters as well as the alternative that referred to fishing activity in state waters (i.e. inclusive of shore anglers).
- The Council also took note of the AP's previous recommendation to remove an alternative that would have required at least one angler on a vessel to have a permit.

#### **Previous AP Comments and Recommendations:**

*The following feedback and recommendations were provided by the Snapper Grouper Recreational Permitting and Reporting AP at the May 2023 meeting:*

### Vessel vs. angler based permit:

- In choosing a permit type, need to ensure that it does not raise a challenge to the use, application, or inclusion into existing surveys (such as MRIP or FL SRFS).
- Vessel based permitting is somewhat preferred for the intercept survey under MRIP as it has advantages:
  - Potentially less error prone than targeting all anglers;
  - Vessels have existing registration ID;
  - Anglers are surveyed now but are linked by vessels.
- However, angler based permitting can also be incorporated into MRIP.
- Vessel may not provide the ‘census’ of the angler universe. Still require estimation to determine number of anglers.
- Vessel permit integration into FES –
  - Simplest, fastest, first step from status quo - If a permit has address information associated with it, MRIP can use that to flag or designate in FES frame. Then FES can stratify its frame to create a dedicated sample targeted to households associated with permits. Will require some design changes.
    - Could lead to FES questionnaire changes by adding specific reef fish questions; may trigger APAIS changes as well.
  - Benefit is the additional stratification of the sample to focus on snapper grouper participants – gains in precision and a reduction in bias to the extent this group of permitted anglers are different than other general population (those who don’t fish, only fish inshore, etc.).
- *Choosing a consistent approach (vessel or angler) will enable consistency of methods across the region – such an approach will eliminate an extra variable in the estimation process and will increase likelihood of a permit being useful. Consistency across the region is a stronger preference than choosing whether the permit is angler or vessel based.*

### Permit recommendation:

- Struggling to separate permit questions from survey approaches to formulate a recommendation. Need further information.
  - May need a clear statement on how survey would be applied to each permit option included in amendment and how that would be enough to focus on vessel vs angler. Work with AP members to address MRIP aspects (given Council has moved away from a dedicated, separate reporting component).
  - Need details of how a survey will use the various permit options to improve estimates – while actions focus on permit, they are not independent from survey since improved catch and effort estimates is the goal.
  - Need further discussion of intended use of a permit to come up with recommendation:
    - If integrated into a new survey, then vessel based may be preferred.
    - If integrated into existing survey and licensing framework, then angler based may be preferred.
  - Also difficult to recommend a permit type without knowing which species will be included and whether shore mode may be of interest.
    - *Consider discussion of shore based catches, integration into a survey, and species selection at a future AP meeting to help formulate recommendations on Action 1.*

Previous AP discussion:

- **Potential cons of a vessel-based permit:**
  - Documented vessels: U.S. Coast Guard documented vessels could be challenging to integrate with state registration framework. Would need additional work to make sure permitted vessels could be identified correctly in the field.
  - Regional utility: The Gulf of Mexico Region (GOM) has been focused on individual state-based permits. If the South Atlantic is a vessel-based permit, could be challenging.
  - Shore mode: The shore-based component may not be negligible for some Snapper Grouper species (gray snapper effort, gag grouper discards, etc.) and permit related improvements would be left out of a vessel-based permit.
  
- **Potential pros of a vessel-based permit:**
  - Less error prone: Easy to identify a vessel and whether there is a permit in place than an individual permit (i.e., a lower potential for non-sampling errors).
  - Integration into existing sampling: A vessel-based permit can be used to determine angler trips.
  - Administrative burden: Vessel-based permits could lead to lower administrative burden due to the lower number of permits that would need to be issued (vs. individual).
  - Survey design: Helps with survey design and validation.
    - Easier to write down vessel ID that is easily visible rather than require asking for individual permit number or paperwork.
    - A vessel permit doesn't create an impediment to integrate with other programs (such as MRIP).
    - Accuracy is improved by a vessel permit and may streamline questionnaire during interview if intercepted (ability to interview one representative for vessel or all anglers at once).
  - Consistency: Consistent with existing permits issued by SERO for commercial and for-hire vessels.

**AP Discussion Questions:**

**Integration into the MRIP survey and sampling framework**

- 1) Please discuss any additional details of how MRIP could integrate information from a vessel-based permit into the existing MRIP survey and sampling framework to improve catch and effort estimates for snapper grouper species.
  - a) What if a new survey and sampling framework could be developed? How would a vessel-based survey be integrated into a new survey and sampling framework targeted towards snapper grouper species?
  - b) What might this new sampling framework look like? Who would be the “main players” and what would be their roles (i.e. MRIP? ACCSP? State agencies?)
  
- 2) As a follow up to Question 1, please discuss any additional details of how an angler-based permit would differ in how it was integrated into the existing MRIP survey and sampling framework.
  - a) Would there be benefits compared to a vessel-based survey?

- b) What if a new survey and sampling framework could be developed? Are there different ways that an angler-based permit would be integrated into a new survey and sampling framework targeted towards snapper grouper species?

### **Compatibility with state efforts**

- 3) Would a federal private recreational snapper grouper permit requirement conflict with or potentially compromise the existing Florida state reef fish survey (SRFS) and sampling efforts?
  - a) What if there's both a federal permit requirement and a state reef fish angler designation requirement (i.e., no option for states to "opt out" of the federal permit)?
  - b) What if the federal permit is a vessel-based permit, which differs from the current SRFS requirement (i.e. required for anglers fishing onboard vessels)?

### **Funding options**

- 4) A private recreational permit will take initial as well as ongoing funding to develop and operate. Does the AP have any recommendations for potential fundings sources that could be considered?

### **Likelihood of use in MRIP**

- 5) Does the AP have any comments on the likelihood that MRIP will integrate the permit information into the existing or new survey and sampling frameworks to improve recreational data estimates?

### **Recommendation**

- 6) Does the AP have a recommendation for the Council to consider on **Action 1** in addition to the previous recommendation for choosing a consistent approach across the region?
- 7) Is there any additional information that you would like to relay to the Council regarding the permit type?

## Action 2. Specify the species that would be covered by a private recreational snapper grouper permit

**Purpose of the Action:** This action would specify the species that would be covered by a private recreational permit requirement in the snapper grouper fishery.

Alternative	A federal private recreational permit would be required to fish for, harvest, or possess the following species:
Alternative 1 (No Action)	A federal permit is not required for a private angler or private vessel when fishing for snapper grouper species in the South Atlantic exclusive economic zone (EEZ).
Alternative 2	<b>Any species</b> in the snapper grouper fishery management unit.
Alternative 3	<b>Any assessed species</b> in the snapper grouper fishery management unit for which recreational harvest is allowed.
Alternative 4	Any species that is <b>covered by the Florida State Reef Fish Survey</b> .
Alternative 5	Any species in the <b>deepwater complex</b> .
Alternative 6	Any species with a <b>size or bag limit</b> .

### Discussion:

- The full list of species within the snapper grouper fishery management unit is provided in **Table 1**.

**Table 1.** Species found within the snapper grouper fishery management unit.

Species	Assessed	FL SRFS	DW	Size or Bag	Species	Assessed	FL SRFS	DW	Size or Bag
Black grouper	X	X		X	Misty Grouper			X	X
Black sea bass	X			X	Sand Tilefish			X	X
Blueline Tilefish	X			X	Queen Snapper			X	X
Gag	X	X		X	Blackfin Snapper			X	X
Golden tilefish	X			X	Gray Snapper				X
Greater amberjack	X	X		X	Lane Snapper				X
Hogfish	X	X		X	Cubera Snapper				X
Mutton Snapper	X	X		X	White Grunt				X
Red grouper	X	X		X	Sailor's Choice				X
Red porgy	X			X	Margate				X
Red snapper	X	X		X	Atlantic Spadefish				X
Snowy grouper	X			X	Bar Jack				X
Vermilion snapper	X	X		X	Jolthead Porgy				X
Wreckfish	X			X	Knobbed Porgy				X
Yellowtail Snapper	X	X		X	Saucereye Porgy				X
Scamp	X			X	Scup				X
Yellowmouth Grouper	X			X	Whitebone Porgy				X
Banded Rudderfish		X		X	Speckled hind				



Lesser Amberjack		X		X	Warsaw grouper				
Gray Triggerfish		X		X	Goliath Grouper				
Almaco Jack		X		X	Nassau Grouper				
Rock Hind				X	Cottonwick				
Red Hind				X	Ocean Triggerfish				
Yellowfin Grouper				X	Longspine Porgy				
Coney				X	Rock Sea Bass				
Graysby				X	Bank Sea Bass				
Yellowedge Grouper			X	X	Tomtate				
Silk Snapper			X	X					

Assessed = species is assessed and recreational harvest in the EEZ is currently allowed for at least part of the year.

FLSRFS = species is covered by the Florida State Reef Fish Survey.

DW = species is part of the deepwater complex.

Size or Bag = species is open to harvest for at least part of the year and has a size or bag limit. This includes species that are part of an aggregate limit.

### Previous AP Comments and Recommendations:

*The following feedback and recommendations were provided by the Snapper Grouper Recreational Permitting and Reporting AP at the May 2023 meeting:*

- No clear reason for picking one alternative over or another. Each has pros and cons. The species choice may also be impacted by the vessel vs angler permit type as well as the survey choices into which the permit is integrated.
- Only choosing assessed species (**Alternative 3**) today may preclude better data for stocks requiring a future assessment.
  - However, assessed species would be very beneficial to management.
- Including tilefish would promote constancy with the Mid-Atlantic region.
- Exceedingly rare species may still require reporting to get acceptable catch and effort estimates.
- Limiting species will result in missing some individuals from “the universe” that the permit is intended to identify. Especially when considering discards:
  - Florida is experiencing this to some extent now (e.g., grunt fishermen releasing red snapper). – Argues for larger and more inclusive species list given that many species are often caught together or on the same trip.
- When choosing species consider regulatory burden and potential future requirements:
  - If staying with a survey based approach, then be more inclusive of species or include all species.
  - If considering reporting in the future, then potentially limit the species that are included to limit regulatory burden.

### AP Discussion Questions:

#### Species covered by the permit versus subsequent survey and sampling efforts

- 1) Would it be problematic if there is a difference between the species covered by the permit and the species where additional survey or sampling efforts are directed? In other words, could the list of species covered by the permit be fairly broad and then subsequent survey or sampling efforts targeted towards “priority species” within that list? Or, would it be better for the permit and subsequent sampling efforts to be the same or nearly the same?

**Compatibility with state efforts**

- 2) Would a federal private recreational snapper grouper permit requirement conflict with or potentially compromise the existing SRFS and sampling efforts?
  - a) What if the species covered by the federal permit differ from the 13 species covered by SRFS?

**Recommendation**

- 3) Does the AP have a recommendation for the Council to consider on **Action 2**?
- 4) Is there any additional information that you would like to relay to the Council regarding the species covered?

### Action 3. Specify the effective term of a private recreational snapper grouper permit

**Purpose of the Action:** This action is necessary to specify the length of time that a private recreational permit would remain valid.

Alternative	A federal private recreational snapper grouper permit would:
Alternative 1 (No Action)	A federal permit is not required for a private angler or private vessel when fishing for snapper grouper species in the South Atlantic exclusive economic zone (EEZ).
Alternative 2	Remain valid <b>for the calendar year.</b>
Alternative 3	Remain valid <b>for one year from issuance.</b>
Alternative 4	Expire on <b>the date of birth for the permit holder.</b>

#### Discussion:

- This action was added at the last Council meeting in response to the IPT’s recommendation. Since then, the IPT has further discussed the action and will likely recommend that the Council consider removing the action and defer to NMFS on the effective term of a permit to allow the agency flexibility in setting up a federal private recreational permit program.
  - This recommendation would be put forth with the understanding that the permit would remain valid for no longer than one year.

#### Permitting and Reporting AP Comments and Recommendations:

*The following feedback and recommendations were provided by the Snapper Grouper Recreational Permitting and Reporting AP at the May 2023 meeting:*

- *Reiterated previous recommendations for annual renewal or issuance terms.*
  - *Technical recommendation to make sure that the sampling frame and contact information is regularly updated.*

#### Previous AP discussions

- *It was noted that annual renewal is recommended by the AP. See recommendations from the August 2022 meeting for details.*
- *Timing: There is general support for renewal on a calendar year basis (i.e. all permits expire on the same date rather than 365 days after being issued). The intent is to target integration with the Fishing Effort Survey (FES).*
- *Need a robust quality control mechanism at the time of renewal to keep vessel and permit holder information up to date. This process needs to be mandatory and cannot be skipped over during permit renewal.*
- If a permit is vessel based- would need to build in a mechanism to recognize vessels that leave the fishery to remove permits that are not active.
  - I.e. for vessels that are sold.
- Consider whether spacing out permit renewals is an additional administrative burden, particularly for SERO.
  - Consider administrative burden in developing the permit renewal process.

- Vessel permits could lead to lower administrative burden due to lower number of permits that need to be issued (vs individual).
- Other considerations: If there is a permit, then there is an audience. Could add a survey even if not intercepted.
  - Consider a survey before renewal to determine whether the permit was used in the previous calendar year.

### **AP Discussion Questions:**

#### **General**

- 1) Does the AP have comments on the Council's initial range of alternatives?
- 2) Does the AP have comments on deferring to NMFS for the effective term of a permit, with the understanding that permits would remain valid for no longer than one year?

#### **Recommendation**

- 3) Does the AP have a recommendation for the Council to consider on **Action 3**?
- 4) Are there any changes to previous comments or recommendations of the AP or additional information that you would like to relay to the Council?

**Action 4. Establish mechanism that would allow a state to opt out of a federal private recreational snapper grouper permit to fish for, harvest, or possess snapper grouper species in the South Atlantic region**

**Purpose of the Action:** This action would establish a mechanism that would allow a state to opt out of the federal private recreational permit requirement, provided that the state implements equivalent measures.

<b>Alternative</b>	<b>A state could opt out of a federal private recreational snapper grouper permit requirement provided that the state implements equivalent measures that at a minimum includes:</b>
Alternative 1 (No Action)	A federal permit is not required for a private angler or private vessel when fishing for snapper grouper species in the South Atlantic exclusive economic zone (EEZ).
Sub-alternative 2a	<b><u>The same entities</u></b> from the federal permit requirement. (As selected in Action 1).
Sub-alternative 2b	<b><u>The same snapper grouper species</u></b> from the federal permit requirement. (As selected in Action 2)
Sub-alternative 2c	<b><u>The state permit would remain valid for the same period of time</u></b> as the federal permit requirement . (As selected in Action 3)

**Discussion:**

- This action was added at the June Council meeting. It is necessary if the Council wants to create an option for states to opt out of the federal permit requirement.
- Congress specifically allowed a state exemption (i.e. opt out) under the recreational fisheries registry program under MSA section 401(g) (National Saltwater Angler Registry). That kind of exemption is not contained under the MSA section that the Council would use to require a recreational fishing permit, MSA section 303(b). The MSA allows the Council to require a permit for a fishery the Council manages, and in part requires the "permit to be obtained from, and fees paid to, the Secretary...." MSA 303(b)(1).
- It is still being worked out whether the Council has the authority to do develop an option for a state to opt out of the federal permit requirement and what details would need to be worked out. For example:
  - Are there other alternatives, actions, or decision points that need to be added?
  - How would a state-issued permit fit within this requirement? How would a state permit system be equivalent to a federal permit?
    - For example, could Florida issue this permit and it would allow the permitted entity to fish in federal waters off Florida for snapper grouper species.
    - What about jurisdictional issues: What if that permitted entity fishes off Georgia in the EEZ? Would they be covered?

**Previous AP Comments and Recommendations:**

*The following feedback and recommendations have been provided by the Snapper Grouper Recreational Permitting and Reporting AP at the April 2023 meeting:*

Discussion of federal permit:

- Clarified prior recommendation for a federal permit and potential addition of state opt out option with the following discussion on further consideration of state based permit.
  - NC noted support for federal option – also state legislature currently supporting some permits & possibly reporting for state managed species.
  - SC – would also require legislative action for state permit.
  - States are concerned about resources – costs, personnel, time, legislative attention for implementing permits.
  - Would need further Council discussion on federal vs state approaches to provide recommendations. The ability to opt out of the system would require criteria, conditions, and a mechanism.
  - AP reiterated the purpose of the permit is improved catch and effort estimates.

**AP Discussion Questions:**

**Compatibility across the region**

- 1) If some but not all states develop a private snapper grouper permitting requirement, this would likely bring in additional fishery participants under the state-based permit compared to the federal-only permit. Thus additional private anglers or vessels in some states would need to get a permit, while those in other states may not if they do not fish in federal waters. Would this lead to difficulty in comparison of effort and catch estimates across the region? If so, is the AP concerned about this potential issue?

**Recommendation**

- 2) Does the AP have a recommendation for the Council to consider on **Action 4**?

## *Education component-related actions (Actions 5-8)*

### **Action 5. Establish an education component in the private recreational portion of the snapper grouper fishery**

**Purpose of the Action:** This action is necessary to establish an education component for private recreational anglers fishing for or targeting snapper grouper species in the South Atlantic exclusive economic zone.

<b>Alternative</b>	<b>Education component</b>
Alternative 1 (No Action)	There is not an education component for private recreational anglers who fish for, harvest, or possess snapper grouper species in the South Atlantic exclusive economic zone (EEZ).
Alternative 2	Establish an education component for private recreational anglers who fish for, harvest, or possess snapper grouper species in the South Atlantic EEZ.

#### **Permitting and Reporting AP Comments and Recommendations:**

The following feedback and recommendations have been provided by the Snapper Grouper Recreational Permitting and Reporting AP:

*From the April 2023 meeting:*

- What will the education requirement encompass (video, written test, online course, etc.) – not addressed yet.
- Recognize details need to be worked out and will need to review once the program details are determined – AP satisfied with status at this point with actions and range of alternatives.
- *Reiterated support for education component.*

*From previous meetings:*

**Education Requirement: Weigh in on efficacy of an education certification as a proxy for a permit. Discuss mandatory versus voluntary measures.**

- *An education requirement or certification may not be necessary or required on an annual basis, thus such a requirement would not be an adequate substitute for a permit.*
  - There would still need some readily available way to identify anglers in the field that took the education training. For both compliance and validation as well as sampling purposes.
- There are many other opportunities to learn best fishing practices.
  - People signing up for permit may already have best fishing practices in place or are knowledgeable of such practices.
- *An education requirement would pair well with a permit, potentially in the initial issuance or renewal process.*
  - Such a requirement would provide an opportunity to educate anglers on best fishing practices, what species are within SG complex, species ID, descending devices, etc.
  - Education could include information on why the permit exists and importance of data collection.

- An education requirement could help deter oversubscription.
- If a permit is vessel based, the details need to be specified regarding who must obtain the education certificate.
  - Vessel owner? Vessel operator? At least one person onboard a permitted vessel?

### **Action 6. Specify whether an education component in the private recreational portion of the snapper grouper fishery would be mandatory or voluntary**

**Purpose of the Action:** This action would specify whether an education component would be mandatory or voluntary for private recreational permit holders fishing for or targeting snapper grouper species in the South Atlantic exclusive economic zone.

<b>Alternative</b>	<b>An education component would be:</b>
Alternative 1 (No Action)	There is not an education component for private recreational permit holders to fish for, harvest, or possess snapper grouper species in the South Atlantic exclusive economic zone (EEZ).
Alternative 2	<b><u>Mandatory</u></b> for all private recreational permit holders to fish for, harvest, or possess snapper grouper species in the South Atlantic EEZ.
Alternative 3	<b><u>Voluntary</u></b> for all private recreational permit holders to fish for, harvest, or possess snapper grouper species in the South Atlantic EEZ.

### **Action 7. Specify the timing of implementation for an education component in the private recreational portion of the snapper grouper fishery**

**Purpose of the Action:** This action would specify the timing of when an education component would become effective for private recreational anglers fishing for or targeting snapper grouper species in the South Atlantic exclusive economic zone.

<b>Alternative</b>	<b>An education component would be:</b>
Alternative 1 (No Action)	There is not an education component for private recreational anglers to fish for, harvest, or possess snapper grouper species in the South Atlantic exclusive economic zone.
Alternative 2	<b><u>Implemented immediately</u></b> when a private recreational permit is established.
Alternative 3	<b><u>Delayed until a later date</u></b> after a private recreational permit has been established. (Note: Council would need to specify length of delay).



**Action 8. Specify the timing of education component requirements for the private recreational portion of the snapper grouper fishery in the South Atlantic region**

**Purpose of the Action:** This action is necessary to establish the timing of the education component for the private recreational permit in the snapper grouper fishery.

<b>Alternative</b>	<b>A education component would need to be completed:</b>
Alternative 1 (No Action)	There is not a required education component for private recreational anglers to fish for, harvest, or possess snapper grouper species in the South Atlantic exclusive economic zone.
Alternative 2	<u><b>Each calendar year.</b></u>
Alternative 3	<u><b>Upon each issuance</b></u> of a federal private recreational permit.
Alternative 4	<u><b>Every other year upon issuance</b></u> of a federal private recreational permit.
Alternative 5	<u><b>Upon initial issuance</b></u> of a federal private recreational permit.

**AP Discussion Questions:**

- 1) Does the AP have additional comments on the Council’s range of alternatives for establishing an education component, mandatory or voluntary measures, timing of implementation, or how long the education component would remain valid?
  
- 2) Are there any changes to previous comments or recommendations of the AP that you would like to relay to the Council?