

Summary Report
Snapper Grouper Recreational Permitting and Reporting
Technical Advisory Panel
Meeting 2: November 21, 2022

The South Atlantic Fishery Management Council's Snapper Grouper Recreational Permitting and Reporting Technical Advisory Panel (AP) convened via webinar on November 21, 2022.

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

1. Election of Chair and Vice-Chair

The AP nominated and elected Luiz Barbieri to serve as Chair and Amy Dukes to serve as Vice-Chair.

2. Council Guidance and Questions: Draft Options Paper for Snapper Grouper Amendment 46

After reviewing background information on recent Council actions related to Snapper Grouper Amendment 46, including the Council's vision statement and requested feedback, the AP worked through a series of discussion questions, providing the following comments and recommendations for the Council's consideration:

***AP recommendations are *italicized* and highlighted.**

Implementing a permit requirement:

- 1) **Improving estimates: How can a permit without a reporting requirement potentially be integrated into the existing MRIP sampling framework and the Florida State Reef Fish Survey to improve the accuracy of landings and discards estimates?**

Marine Recreational Information Program (MRIP):

- Could potentially be incorporated into existing sampling framework.
- Existing capture/recapture programs rely on attempted census (non-probability reporting). A permit would replace an attempted census with a non-probability sample for the private vessel mode.
 - Would have contact information from the permit. This could be integrated with other contact information databases.
 - Would likely lead to increased precision and improvements in overall recreational catch estimates.
 - On “back-end” of sampling, improvements could be made as well.
 - Since anglers respond to surveying at a different rate, could improve “non-response” adjustment.
 - If permit holders are taking more or different trips, have different response rates, etc.- creating different stratum would still lead to improvements in private vessel

level effort and catch estimates. If effort estimates are improved, then precision of catch estimates will improve as well.

- The enhancement in catch estimates is unknown. It is tough to quantify the magnitude of such immediate improvements ahead of implementing a permit.
 - In longer-term a permit, could lead to systematic improvements.
 - If able to identify vessels in the field- could create estimation domain for permitted vessels as well as the intercept survey.
 - Still improving catch estimates overall, but wouldn't necessarily be just for reef fish.
- Benefits would be some gain in precision and this would be a gain in precision across the board for private boat estimates. Likely to be modest.
 - Added benefits would be opportunities for improvement that it creates. Like “putting the foundation in place.”
 - There will be value in the longer term from implementing a permit regardless of whether staying within existing surveying or sampling designs or ultimately ends up with a specialized program.
 - How big is the universe going to be? Once known, can get a better idea of potential improvements.

Florida State Reef Fish Survey:

- Current survey is angler based. The survey is stratified based on state vessel registration information to match the database of angler permits.
 - If vessel registration number is tied to a vessel-based permit, it could be readily integrated into the existing FL state-based survey.
 - Could use vessel registration number in field to identify angler party that is or is not in database.
 - This information could be used to help generate an effort estimate.

Notes on the HMS Large Pelagics Survey (LPS): What does LPS resolve?

- Generally about 30% turnover with HMS permits in terms of angling category.
- Permit information is used as a frame in the LPS (including “late” renewals or purchases) and typically prior year permits would be retained into the second frame of sampling.
 - Helps samplers with determining whether vessels are “on or off” frame for sampling.
- LPS does have a separate telephone survey to estimate effort by permit holders.
- HMS permits not used in the Fishing Effort Survey (FES).

2) **Vessel vs Individual: Discuss the pros and cons of a vessel permit versus an individual permit.**

- *It was noted that a vessel-based permit is recommended by the AP. See recommendations from the August 2022 meeting for details.*
- **Potential cons of a vessel-based permit:**
 - Vessel registration number needs to be tied to permit to incorporate into existing FL State Reef Fish Survey framework.
 - 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. However, this issue is likely to

mainly apply to charter vessels and would likely not be prevalent among private vessels.

- The Gulf of Mexico Region (GOM) has been focused on individual state-based permits:
 - Whether future GOM regional permits will be vessel or angler based is still undecided, but if individual it could be challenging to apply information across regions if the South Atlantic is a vessel-based permit.
- 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.
- Is the number of vessels going to be high enough to offset cost of implementing permit?
 - It was noted that any potential fees collected would not go directly towards the program.
- **Potential pros of a vessel-based permit:**
 - Less error prone 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).
 - A vessel-based permit can be used to determine angler trips.
 - Vessel-based permits could lead to lower administrative burden due to the lower number of permits that would need to be issued (vs individual).
 - See additional notes from the August 2022 meeting.

The following guidance was provided at the AP's August 2022 meeting:

- **Permit Type:** *Recommend a vessel rather than individual permit since it helps reduce "the universe" of how many permits will need to be issued.*
 - 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.
 - Consistent with existing permits issued by SERO for commercial and for-hire vessels.
 - 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).

3) **Regional Utility:** How can a permit be developed for potential use in other regions (Gulf of Mexico or Mid-Atlantic) to ensure consistency and standardizations?

- **There is a need for coordination and ongoing communication with SERO, GARFO, and the State of Florida on the permit requirements, timelines, and information sharing.**
 - Information sharing goes beyond MRIP. Sharing with the states, other regions, and other programs is important to ensure regional utility of a permit.
 - Need to share information in an ongoing fashion. There is so much going on across three different regions and it seems like each region is trending

strategically in different directions regarding permitting requirements, reporting, etc.

- MRIP implementation teams are an important consideration in development of a permit and sharing of information.
- When developing a permit, consider whether a permit is fully compatible with existing frameworks or if there needs to be supplemental survey efforts or other changes to better integrate a new permit and information that can be collected.
- Questions for potential future consideration:
 - Is a recognition of a link to the national saltwater angler registry a component of sharing across regions?
 - Limiting the scope to Snapper Grouper: is this constraining to potential improvements in data vs a more universal private vessel permit and perspective that could look across regions?
 - Specialized vs universal utility
 - When balancing desire of knowledge of SG fishery vs broader federal waters perspective, idea of a permit for fishing in federal waters may be more applicable in the long-term vs a SG permit as an initial step.
 - What is a tolerable target of uncertainty or what level of precision are trying to be achieve?
 - How much catch is in state vs federal waters? What part of the fishery does this permit actually pertain to?
 - What is the proportion of accuracy improvement using any of the varying approaches?

4) **Renewal: What are the desirable terms and frequency of permit renewal?**

- *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).*
 - Renewal for the LPS was on a calendar year basis: typically saw many anglers renewing or first time purchasing closer to time of first trip than at the beginning of the year.
 - This behavior may dilute the beneficial effect of calendar year renewal.
 - If the permit database can be operationalized on a timely basis, then may mitigate this angler behavior.
 - Speed in getting database into the right hands to create a sample frame is very important.
 - From a constituent standpoint, an annual renewal date could be helpful to know and remember when a permit expires.
 - In South Carolina: Renewal timing changing from a calendar year to a moving 365 day renewal date from purchase led to an increase in expired licenses/permits.
 - Annual expiration gains the ability to see who is getting the permit. Is the population stable? Changing?

- States provide saltwater license data every 2-month wave, so there is some merit to making sure renewal terms are annual but they could be rolling similar to how state saltwater license renewals operate.
- *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.

The following guidance was provided at the AP's August 2022 meeting:

- *Recommend annual renewal requirement to purge inaccurate or inactive vessel information.*

5) **Fee: Does charging a nominal fee effectively reduce oversubscription? What sort of information may be available on the topic?**

Potential pros of charging a fee:

- Charging a nominal fee would not eliminate oversubscription. But the extent to which it does make a difference could still be valuable.
 - Example from NY- created free saltwater angler registry. Since it was free, not given much of a priority for enforcement due to lack of success in upholding violations in court. Overall chilling effect on enforcement and compliance. Also negatively impacted the sampling frame.
- Make efforts to reduce oversubscription as much as reasonably possible, including consideration of a fee.
 - HMS and existing SERO permits are in the range of \$25.
- In Florida- there is a potential issue with a free permit. If there is no charge, the vendor is not prompted to ask whether the customer wants the permit. If a fee is administered, then the vendor will ask if the customer wants a given permit.
- There is always going to be some level of oversubscription.
 - In North Carolina: Estuarine gillnet permit- found that some fishermen had gotten the permit "just in case" but did not necessarily intend to use it. There are other state permits where this applies as well.

- The problem (from a survey perspective) is when people who never intend to fish for something are unknowingly/unwillingly issued the permit, because the survey is not salient to them.
- If a small fee is administered, then it may make potential permit holders think whether they would actually use a permit.
- If setting the framework for reporting or future permits in other fisheries, then the incremental personal administrative burden is already decreased as other species are added.

Potential cons of charging a fee:

- A fee may lower oversubscription but may increase under-coverage from those who should have permit that do not. Have to balance the two things (i.e. need to make some effort to obtain the permit, but not so much that people will risk doing without it when they should get it).
- Fees collected from a federal permit go to the general treasury unless specifically directed otherwise. The funds collected do not necessarily come back to fund or support the federal permit program, fisheries management, or the region.
- There is an existing association of permit or stamp fees with supporting conservation which encourages some people to get the permit even if they have no intent to use it. Examples include the Florida snook stamp or federal duck stamp.
 - Fees may not be effective at discouraging all people that do not need or intend to use a permit, but is a deterrent.
 - Such motivated individuals are probably likely to participate in a survey, so determining fishing participation may be relatively easy or likely.

The following guidance was provided at the AP’s August 2022 meeting:

- “Over-subscription” could be an issue (i.e. vessels or individuals obtain a permit without the intent to use it). To address this some sort of barrier or burden could be associated with obtaining the permit.
 - Consider evaluation of charging a fee to obtain a permit.
 - At what level would it be a barrier to entry and where could it be beneficial?
 - Simply the requirement of setting up an account and entering information to get permit (i.e. burden and time) may be enough of a barrier to get the permit and mitigate the “oversubscription” issue. Only those that intend to use the permit would go through the trouble to get it.

6) Education: 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?

Implementing a reporting requirement:

1) **Necessity: Would there be utility in implementing a permit without a reporting requirement?**

- *Yes, there would be considerable utility in implementing a permit without a reporting requirement. For details, see comments under the AP's earlier discussion under "Improving Estimates."*
- Per previous discussion at the August 2022 AP meeting – there is notable concern over the resources needed for administering a successful reporting requirement. A survey method would still be needed to measure reporting non-compliance, validate the accuracy of reporting, and accurately account for both. This would also require a large amount of resources to effectively enforce.
- There could be greater benefits from implementing a reporting requirement in the future rather than immediately. Putting a permit requirement in place builds the foundation for a future reporting requirement.
- *When developing a permit, there should be some sort of understanding that reporting requirements may be required in the future.*
 - Leave the door open to reporting in the future. This should also be made clear to constituents.
 - Need to have a clear path forward as far as what a permit will be used for immediately and in subsequent years. How it will be used for a survey or census design?
 - How the permit is going to be used will dictate what kind of permit is put in place.
 - If reporting will eventually be required, then a permit should be developed around that intention.

The following guidance was provided at the AP's August 2022 meeting:

- It is possible that a permit may not accomplish much without being linked to a reporting requirement.

- Having a permit in place would be helpful to get a handle on “the universe” of anglers or vessels that a reporting requirement would be covering.
- It was noted that it is important to have a clear vision for how a permit would be used before designing and implementing a permit.
- In a “perfect world,” if resource and outreach concerns were off the table:
 - Getting permit in place and established first would be a reasonable approach. Could be integrated into existing sampling of private recreational anglers. This would also help with future outreach and demonstrate compliance rates. Get to a stable place with permit and help inform design decisions with reporting.
 - Could avoid growing pains seen in other programs where permitting and reporting were all rolled out at once and required adapting to issues on the fly.
 - Small scale pilot study could help determine “full scale” costs and potential barriers to overcome.

2) **Validation: What are the considerations for implementing a reporting requirement that can be validated?**

- The AP was running short on meeting time for this portion of the discussion and this topic may be taken up again at a subsequent meeting.
- If a reporting requirement is implemented, it requires a great deal of additional resources to validate.
 - Compliance tracking is expensive from both a monetary and labor perspective.
 - By the time a validated process is in place, a survey may look like a better choice due to lower resources that are needed to build a functional program.
 - There is concern over not having adequate validation to get full utilization of a permit.
 - More useful to get permit in place and full benefits from such a permit rather than implement reporting at the same time which may compromise efforts to incur full benefits of the permit.
 - Need to consider what benefits may come from reporting that can reasonably be used in management.

3) **Mandatory vs Voluntary: Discuss the pros and cons of a mandatory versus a voluntary reporting requirement.**

- *Recommend some level of mandatory measures or framework to provide structure to reporting if implemented.*
 - There are different levels of what can be considered “voluntary” reporting. Purely voluntary reporting will likely get limited uptake. As such, it may not be useful for the purpose of estimating catches.
 - By “purely voluntary” the AP referred to self-selected individuals reporting (vs selected to report via a mail or telephone survey).
 - Voluntary probability based surveys can work. But if reporting is designed to be census based, then a mandatory requirement with adequate enforcement will be required to support that.
- Could survey sub-set of permit holders, but to get full benefits of reporting it would need be mandatory when selected to report.

- Whether reporting is a logbook or survey- Mandatory requirement would help maintain consistently high compliance with submitting information.
 - If mandatory, will need robust enforcement or such a requirement becomes de facto voluntary reporting over time due to poor compliance.

Other Business

There were no items under other business

Advisory Panel Members

Luiz Barbieri, FL FWC, Chair
Amy Dukes, SC DNR, Vice-Chair
John Foster, NMFS/S&T/MRIP
Kai Lorenzen, SSC
Brandi Salmon, NC DMF
Bev Sauls, FL FWC
Geoff White, ACCSP