



New England Fishery Management Council

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John F. Quinn, J.D., Ph.D., *Chairman* | Thomas A. Nies, *Executive Director*

June 25, 2021

Mr. John Carmichael
Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Dear John:

This letter is in regard to the new reporting requirements implemented in January 2021 through the Southeast For-Hire Electronic Reporting Program that apply to all for-hire permit holders issued by the NOAA Fisheries Southeast Regional Office. While we are strong advocates for timely reporting and fishery dependent data programs, we have concerns about the additional data fields that are now required for dolphin/wahoo permit holders.

As you are aware, for-hire vessels with dolphin/wahoo permits are found throughout the New England and Mid-Atlantic regions. As a result of the SERO reporting program, these vessels now must enter 12 additional data elements after each trip to meet the new requirements, regardless of whether they target and(or) catch dolphin/wahoo. It is unclear how these data from permit holders in the GARFO and SERO region will be used, particularly on trips that do not land dolphin/wahoo. We would like to request an explanation of how each of these new data elements, most of which are socio-economic in nature, are to be utilized in management moving forward.

It is not our intent to limit another Council's ability to collect the data they feel is necessary to manage their fisheries; however, our concern is that without continued work to improve reporting tools and address inconsistencies in reporting requirements, reporting accuracy and compliance may suffer. As you may already be aware, the New England and Mid-Atlantic Fishery Management Councils have adopted electronic reporting in all fisheries under their jurisdiction. Most recently, starting in 2019, both Councils worked closely with the Greater Atlantic Regional Fisheries Office (GARFO) to develop a joint omnibus framework that will implement consistent electronic vessel trip reporting requirements for all commercial vessels in the Greater Atlantic Region in November 2021. Development of this action took careful consideration of the overlap of permit holders for species managed by the NEFMC and MAFMC as a way to ensure that eVTR requirements were consistent across the region and that measures were satisfactory in meeting the data needs for management, science, and enforcement for both Councils. We point to this example of coordination between Councils with the hope of starting a discussion around collaboratively developing ways to ease the reporting burden for fishermen across the Greater Atlantic and Southeast Regions.

Sincerely,

A handwritten signature in cursive script that reads "Thomas A. Nies".

Thomas A. Nies
Executive Director