

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

Decision Document  
June 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](#) and [Meeting 2](#))

### **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 this meeting, the Council approved the following vision statement and identified the subsequent list of additional questions for the AP to consider.

**Vision Statement:** A permit for the private recreational sector of the South Atlantic Snapper Grouper fishery will facilitate the collection, validation, and analysis of harvest and discard data to improve the catch and effort estimates used for fisheries science and management decision-making.

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 2023 meeting.

**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).

## Draft actions in this amendment

- Permit related actions (Draft Actions 1 through 5)
  1. Establish a private recreational permit in the snapper grouper fishery
  2. Specify the species that will be covered
  3. Specify what area the permit will cover (EEZ versus state waters)
  4. Specify the length of time that a permit will remain valid
  5. Establish a mechanism for states to opt out of federal permit requirement
- Education component related actions (Draft Actions 6 through 9)
  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

- Review AP feedback and recommendations.
- Approve Purpose and Need statements for inclusion in the amendment.
- Provide guidance on actions and alternatives for further development in the amendment.
- Approve actions for inclusion in the amendment.

## 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.
<b>June 2023</b>	<b>Review amendment and AP comments.</b>
<i>September 2023*</i>	<i>Review amendment and preliminary analyses</i>
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.

\* To allow for better development of actions, analysis, and amendment document, suggest adding one additional review of the amendment before considering approval for public hearings.

## Draft Purpose and Need statements

The *purpose* is to develop a recreational permitting system that would better identify the universe of private anglers or vessels targeting South Atlantic snapper grouper species and would 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 education on best fishing practices and 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.

### Committee Action:

- REVIEW AND APPROVE THE PURPOSE AND NEED STATEMENTS.
- **DRAFT MOTION:** APPROVE THE PURPOSE AND NEED STATEMENTS FOR INCLUSION IN AMENDMENT 46.

## Draft Actions

### *Permit-related actions (DRAFT Actions 1-5)*

*Committee guidance from the March 2023 meeting:*

- *Restructure permit-related actions to separately cover permit type, species, and fishing location.*

### **DRAFT 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 private recreational permit requirement in the snapper grouper fishery and determine whether the permit will be issued to an individual angler or a vessel.

**Table 1.** Summary table for **Draft Action 1:**

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 vessel when fishing for snapper grouper species in the South Atlantic region.
Alternative 2	<b><u>Any vessel</u></b> participating in the private angler component of the snapper grouper fishery.
Alternative 3	<b><u>Any private angler on board a vessel</u></b> participating in the private angler component of the snapper grouper fishery.
Alternative 4	<b><u>At least one angler on board a vessel</u></b> participating in the private angler component of the snapper grouper fishery.
Alternative 5	<b><u>Any private angler</u></b> participating in the snapper grouper fishery, regardless of where fishing occurs.

## AP Comments and Recommendations:

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

### Vessel vs. angler based permit:

- 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.
- 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 choosing whether there is an than angler or vessel based.
- Consideration of shore anglers: The snapper grouper fishery is mostly vessel based, with some exceptions such as gray snapper, especially in South Florida. Vessel based would allow improving estimates for private vessel mode, but not impact shore mode.
  - Coming up with a recommendation for inclusion or exclusion of shore based-anglers may also include a discussion of discards. Need further information:
    - Is shore mode estimate a concern for the species covered by permit?
    - If so, is the magnitude sufficient to justify shore permit requirement?
    - Are we dissatisfied with estimates from MRIP for shore mode?
  - All modes could be covered, possibly by different programs or approaches if permit applied. Discards will likely remain self-reported.
- 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 inshore fish, etc.).
- *Alternative 4 is problematic – it may not result in complete identification of the universe of participants since it would not cover every vessel nor every angler. This would result in coverage complications from vessel or angler estimation approaches.*
  - *Not advisable from a technical perspective.*

### 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.*

The following feedback and recommendations were provided by the Snapper Grouper AP at their April 2023 meeting:

MOTION: THE SNAPPER GROUPE AP RECOMMENDS A VESSEL-BASED RATHER THAN AN INDIVIDUAL ANGLER-BASED PERMIT BE REQUIRED FOR THE PRIVATE COMPONENT OF THE RECREATIONAL SECTOR IN AMENDMENT 46.

APPROVED BY AP (UNANIMOUS)

ADDITIONAL CONTEXT FOR MOTION:

RECOMMEND ALTERNATIVE 2 IN ACTION 1.

General Comments:

- A vessel-based permit would help identify the universe of participants and is consistent with existing federal permits issued in the Southeast.
  - The vessel owner is typically the one taking people out fishing and the responsible party for the trip.
- The logistics of implementing a vessel based permit program would likely be easier than an angler-based permit due to fewer permits that would need to be issued.

**IPT Comments:**

- Regarding **Alternative 5**, the Council and NMFS can have the authority to cover fisheries taking place for federally managed species in state waters (i.e. shore and man-made modes or private vessels fishing in state waters) but would need very good rationale for including this fishing activity.
- Does the Council want to consider other permitting options such as permitting by gear type?

**Committee Action:**

- CONSIDER AP INPUT AND IPT COMMENTS.
- PROVIDE GUIDANCE ON THE ACTION AND RANGE OF ALTERNATIVES TO FURTHER DEVELOP.
  - Does the Committee want to keep **Alternative 4**?

**DRAFT Action 2. Specify the Council-managed 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.

**Table 2.** Summary table for **Draft Action 2.**

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 vessel when fishing for snapper grouper species in the South Atlantic region.
Alternative 2	<u>Any species</u> in the snapper grouper fishery management unit.
Alternative 3	<u>Any assessed species</u> in the snapper grouper fishery management unit for which recreational harvest is allowed.
Alternative 4	Any species that is <u>covered by the Florida State Reef Fish Survey</u> .
Alternative 5	Any species in the <u>deepwater complex</u> .
Alternative 6	Any species in the <u>shallow water grouper complex</u> .

**Discussion:**

- The Committee provided guidance at the March 2023 meeting to include options for other species, including those included in the Florida State Reef Fish Survey, assessed species, and deepwater species options.
- The Committee has the option to select multiple alternatives as preferred to capture different groups of species.
- **Alternatives 2 through 6** address the species would be covered by the permit (**Table 3**).
  - **Alternative 2** would cover all snapper grouper species found within the management unit (55 species).
  - **Alternative 3** would cover the currently assessed species for which harvest is allowed (15 species).
  - **Alternative 4** would cover the species that fall under the Florida State Reef Fish Angler Designation (13 species).
  - **Alternative 5** would cover species in the deepwater complex (6 species).
  - **Alternative 6** would cover species in the shallow water grouper complex (10 species).

**Table 3.** Species found within the snapper grouper fishery management unit.

Species	Assessed	FL SRFS	DW	SWG	Species	Assessed	FL SRFS	DW	SWG
Black grouper	X	X		X	Misty Grouper			X	
Black sea bass	X				Sand Tilefish			X	
Blueline Tilefish	X				Queen Snapper			X	
Gag	X	X		X	Blackfin Snapper			X	
Golden tilefish	X				Gray Snapper				

Greater amberjack	X	X			Lane Snapper				
Hogfish	X	X			Cubera Snapper				
Mutton Snapper	X	X			White Grunt				
Red grouper	X	X		X	Sailor's Choice				
Red porgy	X				Tomtate				
Red snapper	X	X			Margate				
Snowy grouper	X				Atlantic Spadefish				
Vermilion snapper	X	X			Bar Jack				
Wreckfish	X				Speckled hind				
Yellowtail Snapper	X	X			Warsaw grouper				
Gray Triggerfish		X			Goliath Grouper				
Almaco Jack		X			Nassau Grouper				
Banded Rudderfish		X			Cottonwick				
Lesser Amberjack		X			Ocean Triggerfish				
Scamp				X	Jolthead Porgy				
Red Hind				X	Knobbed Porgy				
Rock Hind				X	Saucereye Porgy				
Yellowmouth Grouper				X	Scup				
Yellowfin Grouper				X	Whitebone Porgy				
Coney				X	Longspine Porgy				
Graysby				X	Rock Sea Bass				
Yellowedge Grouper			X		Bank Sea Bass				
Silk Snapper			X						

Assessed = species is assessed and recreational harvest 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.

SWG = species is part of the shallow water grouper complex.

### AP Comments and Recommendations:

The following feedback and recommendations were provided by the Snapper Grouper Recreational Permitting and Reporting AP at their 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.

The following feedback and recommendations were provided by the Snapper Grouper AP at their April 2023 meeting:

MOTION: RECOMMEND THAT THE COUNCIL SELECTS ALTERNATIVE 2 (ALL SPECIES WITHIN THE SNAPPER GROUPE COMPLEX).

APPROVED BY AP (UNANIMOUS)

General Comments:

- While it could help to match the Florida State Reef Fish Survey species for consistency, some important snapper grouper species are not included in that list so it would be advisable to go with all species within the complex to be comprehensive regionally.
- Choosing all species in the snapper grouper complex could make it easier for permit holders to comply with the permit requirement since they would not need to remember which of the species fall under the permit and which ones do not.

**IPT Comments:**

- A recreational permit that does not encompass all species may be difficult to enforce.
- If **Alternative 3** is selected, the Council may need to continue amending the list as species are assessed (i.e., recently with scamp and yellowmouth grouper), if there are complications with an assessed species (i.e., an assessment gets rejected indefinitely), or if there is a new harvest prohibition on an assessed species.
- Consider the applicability of the Florida State Reef Fish Angler Designation (**Alternative 4**) to the South Atlantic region as a whole.
  - The list of species may work well for most of Florida but leaves out several noteworthy species in the South Atlantic region such as the deepwater species (particularly snowy grouper, blueline tilefish, and golden tilefish) where there are known existing data deficiencies. Black sea bass, which supports important fisheries in the region, is left out as well.

**Committee Action:**

- CONSIDER AP INPUT AND IPT COMMENTS.
- PROVIDE GUIDANCE ON THE ACTION AND RANGE OF ALTERNATIVES TO FURTHER DEVELOP.

**DRAFT Action 3. Specify the area where a private recreational snapper grouper permit would be required to fish for, harvest, or possess snapper grouper species in the South Atlantic Region**

**Purpose of the Action:** This action would specify the area where a private recreational snapper grouper permit would be required to fish for, harvest, or possess snapper grouper species.

**Table 4.** Summary table for **Draft Action 3.**

Alternative	A federal private recreational snapper grouper permit would be required to:
Alternative 1 (No Action)	A federal permit is not required for a private angler or vessel when fishing for snapper grouper species in the South Atlantic region.
Alternative 2	Fish for, harvest, or possess applicable snapper grouper species from <b><u>the South Atlantic exclusive economic zone (EEZ).</u></b>
Alternative 3	Fish for, harvest, or possess applicable snapper grouper species from <b><u>the South Atlantic exclusive economic zone and state waters.</u></b>

**AP Comments and Recommendations:**

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

- Same comment as species list – to cover the universe of participants, the utility of the permit will benefit from covering all areas.
- The growing concern over discards also contributes to support for being more inclusive in the permit.
- More coverage will allow for better outreach and education as well.
- Need further information – Can a federal permit be required in state waters for anglers or vessels that do not fish for snapper grouper species in the EEZ?
  - So far, with robust rationale, the guidance has been that the Council can extend permit requirement into state waters for federally managed species.
  - What about those only fishing in state waters? What would be the federal mechanism to require a permit?

The following feedback and recommendations were provided by the Snapper Grouper AP at their April 2023 meeting:

Recommendations:

- There was no support for **Alternative 1 (No Action)**
- Some support for **Alternative 2** (8 in support)
- Some support for **Alternative 3** (6 in support)

General Comments:

- Some members felt that the permit should only cover fishing activity in the EEZ.
  - Covering state waters may lead to kickback from some states in the Southeast.

- Others felt that state waters should also be covered, as there is notable fishing activity, particularly in South Florida, that occurs for some species.
  - It was noted that some species may be kept from state waters even when closed in federal waters due to differing regulations.
  - Covering state waters would help better identify the full universe of participants. Permitting efforts should be more inclusive than less.
  - Including both state and federal waters could be less confusing to constituents and make compliance with a permit requirement easier.

**IPT Comments:**

- Regarding **Alternative 3**, the Council and NMFS can have the authority to cover fisheries taking place for federally managed species in state waters (i.e. shore and man-made modes or private vessels fishing in state waters) but would need very robust rationale for including this fishing activity.

**Committee Action:**

- CONSIDER AP INPUT AND IPT COMMENTS.
- PROVIDE GUIDANCE ON THE RANGE OF ALTERNATIVES TO FURTHER DEVELOP.

**DRAFT Action 4. Specify how long a private recreational snapper grouper permit to fish for, harvest, or possess snapper grouper species in the South Atlantic region would remain valid**

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

**Table 5.** Summary table for **Draft Action 4.**

<b>Alternative</b>	<b>A federal private recreational snapper grouper permit would remain valid for:</b>
Alternative 1 (No Action)	A federal permit is not required for a private angler or vessel when fishing for snapper grouper species in the South Atlantic region.
Alternative 2	One calendar year.
Alternative 3	Two calendar years.
Alternative 4?	Other time period?

**Discussion:**

- The Council may want to specify the length of time that a permit would remain valid.
- Since the private recreational permit will be open access, it would not be numbered or carried over after it expires. As such, the amount of time that a permit would remain valid is discussed while a “renewal” term is not.

## AP Comments and Recommendations:

The following feedback and recommendations were provided by the Snapper Grouper Recreational Permitting and Reporting AP at their August 2022 and November 2022 meetings. This guidance was reiterated at their May 2023 meeting:

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

- *It was noted that annual renewal is recommended by the AP in August 2022. This was reiterated in November 2022 and May 2023. It is a technical recommendation to make sure that the sampling frame and contact information is regularly updated.*
- **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).*
  - 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.

### **IPT Comments:**

- The IPT recommended adding an action to clarify how long a permit would remain valid.

### **Committee Action:**

- CONSIDER AP INPUT AND IPT COMMENTS.
- PROVIDE GUIDANCE ON THE RANGE OF ALTERNATIVES TO FURTHER DEVELOP.

**DRAFT Action 5. 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.

**Alternative 1 (No Action).** A federal permit is not required for a private angler or vessel when fishing for, harvesting, or possessing snapper grouper species in the South Atlantic region.

**Table 6.** Summary table for **Draft Action 5.**

<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 vessel when fishing for snapper grouper species in the South Atlantic region.
Sub-alternative 2a	<b><u>The same permit type</u></b> as 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 same areas covered</u></b> by the federal permit requirement. (As selected in Action 3)
Sub-alternative 2d	<b><u>The same permitting timeframe</u></b> as the federal permit requirement. (As selected in Action 4)

**AP Comments and Recommendations:**

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

- Clarified prior recommendation for a federal permit and potential of 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 system would require criteria, conditions, and mechanism.
  - AP reiterated the purpose of the permit is improved catch and effort estimates.

**IPT Comments:**

- The mechanism that would allow anglers or vessel in certain states to opt out of a federal permit requirement would need to be specified in an action.

**Committee Action:**

- CONSIDER AP INPUT AND IPT COMMENTS.
- PROVIDE GUIDANCE ON THE RANGE OF ALTERNATIVES TO FURTHER DEVELOP.

***Education component-related actions (DRAFT Actions 6-8)***

Committee guidance from the March 2023 meeting:

- *Restructure education component-related actions to separately cover establishing an education component, mandatory versus voluntary measures, and the timing of implementation.*

**DRAFT Action 6. Establish an education component requirement 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 an education component for private recreational anglers fishing for or targeting snapper grouper species in the South Atlantic region.

**Table 7.** Summary table for **Draft Action 6.**

<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 region.
Alternative 2	<b><u>Establish an education component</u></b> for private recreational anglers who fish for, harvest, or possess snapper grouper species in the South Atlantic region.

**AP Comments and Recommendations:**

The following feedback and recommendations were provided by the Snapper Grouper Recreational Permitting and Reporting AP at their August 202 meeting. This guidance was reiterated at their May 2023 meeting:

**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?

The following feedback and recommendations were provided by the Snapper Grouper AP at their April 2023 meeting:

Recommendations:

- Strong support for developing an education component as soon as possible.

General Comments:

- The education requirement could be modeled along the lines of what HMS requires for sharks.
- In the education materials, include links to encourage anglers to use existing reporting and regulation apps.
- Potentially consider implementing an education requirement that is valid for as long as a permit is maintained and up to date. If a permit lapses or a new permit is issued, the permit holder would need to go through the education requirement again.

**IPT Comments:**

- The Council will need to specify additional details of how they would like to develop an education component such as who will be developing the materials? What is the content? What will be the format (video? test?)? Etc.

**Committee Action:**

- CONSIDER AP INPUT AND IPT COMMENTS.
- PROVIDE GUIDANCE ON THE RANGE OF ALTERNATIVES TO FURTHER DEVELOP.

**DRAFT Action 7. Specify whether an education component in the private recreational portion of the snapper grouper fishery in the South Atlantic region 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 anglers fishing for or targeting snapper grouper species in the South Atlantic region.

**Table 8.** Summary table for **Draft Action 7.**

Alternative	An education component would be:
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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 region.
Alternative 2	<b><u>Mandatory</u></b> for all private recreational anglers to fish for, harvest, or possess snapper grouper species in the South Atlantic region.
Alternative 3	<b><u>Voluntary</u></b> for all private recreational anglers to fish for, harvest, or possess snapper grouper species in the South Atlantic region.

**AP Comments and Recommendations:**

The following feedback and recommendations were provided by the Snapper Grouper AP at their April 2023 meeting:

Recommendations:

- Recommend a new alternative that would immediately implement a mandatory education component to go along with a permit but to not delay implementation of a permit.
  - There was clarification that an education component still should move forward independently of permit if necessary.

**IPT Comments:**

- The Council is free to pursue its own voluntary education certification at any time, similar to how it has already developed an angler outreach and education program.
  - If required, then an education component and related actions will need to be included and analyzed in this amendment (**Actions 6 through 9**).
  - If voluntary, then actions and alternatives would not need to be included in this amendment. Voluntary measures could still be captured in the amendment document and discussed in an appendix.

**Committee Action:**

- CONSIDER AP INPUT AND IPT COMMENTS.
- PROVIDE GUIDANCE ON THE RANGE OF ALTERNATIVES TO FURTHER DEVELOP.

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

**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 region.

**Table 9.** Summary table for **Draft Action 8.**

Alternative	An education component would be:
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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 region.
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).

**AP Comments and Recommendations:**

The following feedback and recommendations have been provided by the Snapper Grouper AP at their April 2023 meeting:

Recommendations:

- Recommend a new alternative that would immediately implement a mandatory education component to go along with a permit but to not delay implementation of a permit.
  - There was clarification that an education component still should move forward independently of permit if necessary.

**Committee Action:**

- CONSIDER AP INPUT.
- PROVIDE GUIDANCE ON THE RANGE OF ALTERNATIVES TO FURTHER DEVELOP.

**DRAFT Action 9. 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.

**Table 10. Summary table for Draft Action 9.**

<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 region.
Alternative 2	<b><u>Each calendar year.</u></b>
Alternative 3	<b><u>Every other calendar year.</u></b>
Alternative 4	<b><u>One time</u></b> upon initial permit issuance.
Alternative 5?	Other time period?

**AP Comments and Recommendations:**

The following feedback and recommendations were provided by the Snapper Grouper AP at their April 2023 meeting:

General Comments:

- Potentially consider implementing an education requirement that is valid for as long as a permit is maintained and up to date. If a permit lapses or a new permit is issued, the permit holder would need to go through the education requirement again.

**IPT Comments:**

- The timing for how long the education component would be valid should be specified in an action.

**Committee Action:**

- CONSIDER AP INPUT AND IPT COMMENTS.
- PROVIDE GUIDANCE ON THE RANGE OF ALTERNATIVES TO FURTHER DEVELOP.

**Committee Action:**

- **DRAFT MOTION**: APPROVE THE ACTIONS AND ALTERNATIVES, AS MODIFIED, FOR INCLUSION IN AMENDMENT 46.