

Gulf of Mexico Fishery Management Council Comments
Section 201 of the Modern Fish Act of 2018
NMFS Report to Congress

General Council Feedback

- The Report does not, but should, reference the efforts of the Gulf of Mexico Fishery Management Council (Council) and the Southeast Regional Office of the National Marine Fisheries Service (NMFS-SERO) to implement electronic logbooks for the for-hire component of recreational sector. This effort is expected to reduce uncertainty in, and improve the accuracy of, catch and effort data for the for-hire fleets, while also increasing the timeliness of the availability of the data.

State of Florida Feedback

Overall

- This report is supposed to address, in part, facilitating greater incorporation of data, analyses and surveys from State agencies, including:
 - Identifying recreational fishing data that can be used for conservation (management),
 - Providing recommendations for reducing uncertainty and improving accuracy, including whether such data and analyses could be provided by nongovernmental sources, and
 - Ensuring data adheres to science-based policies.
- Overall, the recommendations NOAA provides in this report simply highlight what they are currently doing without suggesting ways to improve upon and streamline their current processes. The current processes in place are inadequate for facilitating greater incorporation of data, analyses and surveys from State agencies. Recommendations in this report should focus on identifying and fixing current processes that are unnecessarily burdensome, subject to constant change, and create obstacles for states that want to collaborate with NOAA and provide better scientific data.

Types of Data and Analysis Used in Fishery Management

- The “Catch” paragraph should list Louisiana as a state that does not use MRIP, in addition to Texas and Alaska. The report also does not mention California, Oregon, Washington, NMFS Highly Migratory Species, NMFS Southeast Region Headboat Survey, or NMFS invertebrate species surveys as non-MRIP sources of recreational catch and effort.

The Inclusion of State and Non-governmental Sources

- The second sentence states that “state and non-governmental data are frequently incorporated into fisheries management decisions through cooperative data collection programs, such as...MRIP state supplemental surveys...” This is contrary to the white

paper (*Recommended Use of the Current Gulf of Mexico Surveys of Marine Recreational Fishing in Stock Assessments*, published July 2019). MRIP state supplemental surveys in the Gulf of Mexico have only been used by states for management decisions at this point (e.g., quota tracking and season projections for red snapper state management under EFPs). However, state surveys that occur in lieu of/replacing MRIP (and are not supplemental surveys) have been used for assessments and management decisions, even without certification.

Improving Accuracy and Precision of Data and Stock Assessments

- The first paragraph of this section states that, “Despite the high-quality data collection and monitoring programs that NMFS operates, additional, peer reviewed data can improve stock assessments.” This sentence should be modified to say, “Despite the high-quality data collection and monitoring programs that NMFS operates, additional, ~~peer reviewed~~ data collected by state agencies and non-governmental entities can improve stock assessments.”
 - NMFS and state-collected data are often not peer-reviewed in the traditional sense (i.e., sent off for independent review by unrelated experts in the relevant subject matter) before being used in stock assessments.
 - Requiring prior peer-review of all data would require a significant increase in the investment of time and funds to produce data for use in fisheries management.
 - Data do not have to be peer-reviewed before being used in stock assessments, or to be useful in informing management decisions.
 - In the southeastern U.S., for example, data are evaluated on a case-by-case basis during the SEDAR stock assessment process in the Data Workshop before being included in a stock assessment. Data are then subject to further scrutiny during the Assessment Workshop, and then again during the SSC peer-review.

Best Scientific Information as Basis for Fisheries Management – National Standard 2 Guidelines

- The peer-review discussed at the end of this subsection occurs after a stock assessment is complete. Here, data are not required to be peer-reviewed prior to use in a stock assessment. Although this is contrary to what is stated in the section titled “Improving Accuracy and Precision of Data and Stock Assessments”, it is a more appropriate description of what should occur and the standards that should be followed.

Best Scientific Information as Basis for Fisheries Management – MRIP

- The 3rd sentence of this paragraph: “Once certified, new surveys are eligible for...consideration in federal stock assessments and fisheries management.” This is contrary to the aforementioned white paper, which states that calibration and integration must also occur before state surveys are eligible for consideration in federal stock assessments and fisheries management. Additionally, NOAA recently revised Policy 04-114 to require that once surveys are certified, they must undergo a second peer-review and certification of the calibration method, which is overly burdensome.
 - Texas and Louisiana recreational catch and effort data were used for stock assessments without being certified since they were/are the only data available for those states.

- Having conducted multiple calibrations of new MRIP design modifications, NOAA should be able to provide a pre-approved list of recommended methods that may be used without requiring another peer-review.

Recommendations

- Item #1 under “For State or Nongovernmental Partners” says data should be based on sampling that covers the entire stock’s range, for a relatively long time series, and with a peer-reviewed sampling design.
 - In the southeastern U.S., it is not uncommon for data that fail to meet one or all of these standard recommendations to be used in stock assessments.
 - The South Atlantic Council SSC commented specifically on the utility and value of data that do not cover the stock’s entire range (e.g., ichthyoplankton surveys at a fixed point that can produce indices of abundance) or that occur for a short period of time to address specific questions (e.g., gear selectivity studies).
- Item #2 emphasizes the importance for partners that are designing studies to reach out to stock assessment staff, and recommends that NMFS Science Centers and Councils provide liaisons to this process. During the development of state surveys for red snapper and other reef fishes in the Gulf of Mexico, a series of region-wide workshops were held with representatives from each state, NOAA’s Office of Science and Technology, NMFS-SERO and Southeast Fisheries Science Center, and staff from the regional Gulf Council. Despite this, the new catch and effort surveys that were certified through MRIP as a result of these workshops still face multiple obstacles to being considered useful for stock assessments.
- We suggest a recommendation for NMFS be added to facilitate use of certified state survey data, by providing a pre-approved list of methods for calibration and eliminate requirement that these methods need to be peer-reviewed and certified.