



Gulf of Mexico Fishery Management Council

Managing Fishery Resources in the U.S. Federal Waters of the Gulf of Mexico

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January 6, 2020

The Honorable Wilbur Ross
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave. NW
Washington, D.C. 20230

Dear Secretary Ross,

As you are well aware, the Gulf of Mexico Fishery Management Council (Council) is charged with managing the red snapper (*Lutjanus campechanus*) resource in the United States' exclusive economic zone in the Gulf of Mexico. The condition of the red snapper stock, which has been subject to a rebuilding plan since 1990, continues to improve and now supports one of the most lucrative fisheries in the nation. This realized success can be attributed to an effective, science-based management scheme that has required tremendous buy-in and short-term sacrifice by both the commercial and recreational fishing sectors. It is for this reason that I bring to your attention the issue of illegal fishing of red snapper in U.S. waters by Mexican lanchas. This illegal activity undermines the progress of the rebuilding plan and poses a significant threat to fishery interests in the Gulf of Mexico. As such, the issue is of great concern to the Council.

Although a 2019 Report to Congress¹ provides a positive determination for Mexico's 2017 identification, it also re-identifies Mexico for having vessels fishing illegally in U.S. waters of the Gulf of Mexico. To paraphrase Chairman Huffman at the November 14, 2019, hearing on Illegal, Unreported, and Unregulated (IUU) fishing², this pattern of providing a positive determination for a country while at the same time identifying that country for illegal fishing appears to be ineffective in deterring new violations. This, of course, is frustrating to both fishery resource managers and enforcement officials. Additional information provided in the report identifies other potential issues and the Council seeks clarification so that it might better gauge the severity of the IUU problem, specifically as it relates to red snapper.

As stated in the 2019 report, "the United States imported 4,796,693 kilograms [10,574,898 pounds] of fresh and frozen snapper (*lutjanidae* spp.) from Mexico in 2018 (with a declared value of \$33,036,108 USD), raising concerns that these imports may include fish harvested illegally in U.S.

¹ Improving International Fisheries Management: 2019 Report to Congress. NOAA Fisheries.

² https://naturalresources.house.gov/hearings/wow-oversight-hearing_november-14-2019

waters.” The Council echoes this concern and notes that red snapper (*Lutjanus campechanus*) is only one of 11 species in the Lutjanidae family managed by the Council within its reef fish fishery management unit. Moreover, seven of those species belong to the same genus, i.e., *Lutjanus*. Although red snapper is reported to be one of 13 species monitored since January 1, 2018, under the Seafood Import Monitoring Program (SIMP), it is unclear from the 2019 report whether red snapper imports are being monitored at the species, genus, or family level. The Council seeks clarification on this issue as the level of specificity in the monitoring program has important implications for the potential to identify species of particular concern, i.e., red snapper.

A separate issue has to do with illegal fishing effort and the numbers of red snapper removed by Mexican nationals from U.S. waters. The Council concurs with the statement in the 2019 report that despite the increasing efforts by Mexico, “these actions have not yet had a material effect on the number of incursions.” In fact, recent data provided to the Council by a U.S. Coast Guard (USCG) representative (Table 1), indicates clearly the numbers of detections and seizures continues to increase. In fact, the greatest number of vessel apprehensions reported occurred in the past two years, 2018 and 2019. Moreover, the USCG estimates that it detects only between 5% and 15% of the total lancha incursions occurring annually, suggesting that the numbers provided in Table 1 reflect a small part of the actual volume of illegal activity in the Gulf of Mexico.

Table 1. Number of lancha detections and seizures (apprehensions) by the USCG for fiscal years 2010-2019.

FY Year	Detections	Seizures
2010	70	9
2011	116	21
2012	140	21
2013	152	35
2014	160	33
2015	211	39
2016	176	45
2017	133	31
2018	179	60
2019	177	74

Due to ongoing and increasing concerns for the illegal fishing of red snapper by Mexican lanchas in U.S. waters, the Council requests that the Office of International Affairs and Seafood Inspection provide an annual report regarding the specific impacts and measures taken by Mexico to address the Mexican IUU fishing issue. This report also should include actions being taken to address the unlicensed Mexican fleet and the monitoring of repeat offenders. Other important information to be included is the estimated take of red snapper by the illegal Mexican fleet and the economic impact on domestic recreational and commercial fishermen.

Finally, the Council invites a representative of the Office of International Affairs and Seafood Inspection to attend an upcoming Council meeting to make a presentation about ongoing efforts

to address IUU fishing of red snapper in the Gulf of Mexico. The Council would be especially interested to learn about the application of SIMP for monitoring red snapper imports, including the identification of red snapper imports and differentiation from other snapper species that are not included under SIMP.

The Council appreciates your efforts in addressing IUU fishing in U.S. Gulf of Mexico waters and looks forward to continued communication regarding this important issue. If you have any questions or concerns regarding these requests, please do not hesitate to contact either me or our Executive Director, Dr. Carrie Simmons.

Sincerely,

A handwritten signature in cursive script, reading "Thomas K. Frazer".

Thomas K. Frazer, Ph.D.
Council Chair

Cc: Alexa Cole, Director, Office of International Affairs and Seafood Inspection
Chris Oliver, Assistant Administrator of Fisheries
Andy Strelcheck, Deputy Regional Administrator, Southeast Regional Office
Mara Levy, Office of General Counsel, Southeast Regional Office
Gulf Council Members
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