

January 27, 2009

Dr. Tom McIlwain
Chair, Gulf of Mexico Fishery Management Council
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Re: **S.O.S Progress Report to the Gulf Council**

At the last Gulf Council meeting in October, our group (representing over a hundred and fifty recreational for-hire business operators) presented a wide ranging plan that, if implemented, will help the Gulf Council and the NMFS end overfishing; provide more accurate and timely data; help to preserve the fishing heritage; and sustain coastal communities' economies all along the Gulf Coast. We respectfully submit this report as follow-on to that initial introduction, and an update on our progress since the last Council meeting.

Recreational fishing is huge business on the Gulf Coast. Many coastal communities are dependant on recreational fishing, and the tourism revenue it generates. For-hire fishermen are the professional component of this economic machine because many offshore anglers are dependant on for-hire vessels to access the fisheries in the Gulf of Mexico. Our SOS plan seeks to improve fisheries management; enhance the flagging economy; and thereby increase the odds of survivability within the for-hire sector. We propose this be accomplished through the implementation of a suite of electronic tools and innovative policies. Support for the SOS plan is growing as industry leaders, and other stakeholders are coming to the realization that the old ways of doing business are not working and threaten the very livelihood of our industry.

Electronic Logbook Development and Pilot Project

In order to demonstrate the viability of the use of electronic logbooks to capture and transmit detailed harvest and landing data in near or real-time, SOS has partnered with Environmental Defense Fund in developing a for-hire logbook system and, more, to demonstrate its benefits by implementing a pilot project. In early December, OLRAC representatives, NMFS, FWC and members of the SOS partnership met in Destin for two days to discuss components of the SOS plan, and to see a demonstration of the logbook capabilities. OLRAC was selected because they are considered an international leader in the implementation of quantitative tools in fisheries science and management. Their primary software product, Olfish, is an advanced system for the electronic collection, transmission and tracking of fisheries data. Olfish will soon be implemented by the Government of Canada, Department of Fisheries and Oceans, as *the fisheries recordkeeping and reporting software for all their fisheries*. Reactions at our meeting were very positive.

Following the meeting, GSMFC personnel were also contacted and briefed on the test, and how to best work with GSMFC during the test period. The pilot project will be conducted on a minimum of ten to fifteen for-hire vessels across the Gulf currently participating in the red snapper fishery. A full range of vessel sizes will be selected to reflect the actual dimensions of the for-hire sector. The pilot project will run for at least three months, beginning in early to mid-spring, with the distinct probability of expanding the study for the duration of the 2009 federal red snapper season. The development of the software is already underway in coordination with NMFS, GSMFC, VMS providers and OLRAC.

During the pilot project test period, information from the electronic logbooks will be sent directly from the vessels while at-sea to shore side data bases residing at NMFS, GSMFC, an as yet unidentified academic institution and an independent third party. The primary goal of the project is to demonstrate the feasibility of using the electronic logbooks to capture significant information regarding fishery participants, landings, discards, release mortality, geographic pressure and harvest effort. VMS monitoring will be used to provide temporal and spatial data and to provide a communications platform from which to send catch data collected by the logbook to fisheries managers in a near real-time. We see VMS monitoring as an essential aid in facilitating and reducing enforcement shore side as well as assisting in scientific validation. These improvements to data collection will provide managers with better tools to monitor and enforce catch limits; provide a greater level of certainty about data collected; increase timeliness of data; increase accountability while enabling the potential of operational flexibility in managing our portion of the quota.

Generating better data is critical for our industry due to new rules that implement Annual Catch Limits (ACL's) and Accountability Measures (AM's) that will require the 'repayment' of overfishing in subsequent years. Historically, many of the fish harvested by recreational anglers occur on the platform of for-hire vessels. We can identify the participants in the for-hire fishery and can implement powerful tools for tracking and reporting this sector of fishing efforts. It is critical that each sector be able to stop overharvesting in their sector and not be penalized for overharvesting that occurs outside of their sector. An integrated electronic monitoring and reporting system on board for-hire vessels can help us achieve our goal to end overfishing and start getting our days on the water back. To that end, we respectfully ask to give the Council a demonstration of our new logbook software at the next Council meeting. We feel that only positive results can come from broadening our discussion on new tools, such as electronic logbooks and VMS, for use in our fishery.

Generating Equity Through Sector Separation

For-hire fishermen are professional fishermen that operate for profit businesses. While we fall under the broad umbrella of the recreational sector for management purposes, we approach fishing from an entirely different perspective. Businesses need stability and the

free flow of information in order to remain profitable and plan for the future. Under our current system we have little of both. A separate sector for the Gulf of Mexico for-hire fleet can create the proper incentives to end overfishing and rebuild the stock, while unlocking equity in our fishery that can foster new innovation that will help the industry maximize profitability. The key aspect of comprehending profit potential is the understanding of the true value of each sector in the red snapper fishery. That is why we are working with economists to do a valuation study of the for-hire industry. If it is the Council's pleasure, we would appreciate bringing in a 3rd party economist to present the results of this finding at the next Council meeting.

Some people have stated that our desire for a sector separation would leave the private recreational fishermen with only a small portion of the TAC. We don't understand this argument and feel that it is simply a tactic to obfuscate the issue. Under the SOS plan not one fish will be taken away from any recreational angler. One hundred percent of the recreational TAC would still be caught by recreational anglers. It is just that under the SOS plan those fish that are caught aboard for-hire boats would be accounted for separately, using a separate set of tools. The for-hire fleet would have its own set of accountability measures that could prevent the overharvest of fish, while promoting the greatest amount of access to the resource and enhancing profitability. This is why we request the Council immediately consider setting a control date as soon as possible.

Conclusions

The problems facing our industry are urgent. It is critical that the Council resolve to move quickly in addressing RMSA's requirement to end overfishing. Refusing to make changes will likely result in even shorter seasons and longer rebuilding timelines in the future. We understand that changes in recreational management will require compromise by several parties, including our industry, and it will neither be easy nor pain-free; but it is essential to put our industry back on track to recover what we have lost, rebuild our investment, and recover equity in our fishery.

It is in that spirit of corporation that we are respectfully requesting to present the SOS plan to the Council at their next regularly scheduled meeting. We would also like to provide the Council with a demonstration of our electronic logbook software, and the results from our economic analysis of the for-hire industry. If the Council wishes we would also be willing to develop a full report on the tenants of the S.O.S. plan that includes additional background information, and justification for our initiative.

Sincerely,