



Testimony to the Gulf of Mexico Fishery Management Council at the Public Hearing for Amendment 39 to the Reef Fish Fishery Management Plan

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August 12, 2013

Good evening, Gulf Council members and staff. My name is Sharon McBreen with The Pew Charitable Trusts. Thank you for the opportunity to address you tonight on regional management of red snapper as proposed in Amendment 39.

As the Council considers this Amendment, we urge you to revise the Purpose and Need section of the document to reflect that rebuilding the red snapper population is a top priority. This Amendment is part of the Council's overall strategy to achieve the goals laid out in the rebuilding plan while maximizing opportunities for recreational fishermen to target this species.

There are three key components needed if regional management is to be successful.

First, accountability measures act as a safeguard to ensure adherence to catch limits and should include a payback provision if the Gulf-wide catch limit is exceeded. This is particularly important to prevent overfishing and to maintain progress towards full recovery of this population. Thus, in Amendment 39 we support Preferred Alternative 3 in Action 6, which would apply a payback provision only to those states that exceeded their allocation of the overall recreational quota for red snapper. This creates an incentive for states to prioritize setting up a system that will keep recreational catch in their waters within their portion of the quota.

However, we would not oppose "sub-option a" for Preferred Alternative 3, which would delay implementation of the state by state payback provision for one year. This would allow state agencies time to assess and adjust their data collection and monitoring programs to better track red snapper catch. It is

reasonable to expect that if Amendment 39 is approved, there will be a learning curve as each state determines how best to implement this new approach. There will also be an iterative learning process between NOAA Fisheries and the states as they work through this transition period. To account for this, a one-year grace period would be acceptable, but we strongly urge that the payback provision kick in the following year.

Second, states will need to re-tool or fine-tune their data collection programs to more closely monitor their red snapper fisheries. This is critical to prevent accountability measures from having to be applied. The Council and NOAA Fisheries should ensure that the management strategies proposed by the states are designed to achieve this goal.

To enhance the effectiveness of in-season monitoring, the states should consider the use of annual catch targets to build in a margin of error between the target for total landings and the limit over which accountability measures would be applied. This would be particularly useful while data collection and monitoring systems are being adjusted. To facilitate this, the Council should insert language that provides an option for states to use annual catch targets along with the other management decisions being delegated to the states either in Action 4 or as an accountability measure in Action 6.

Finally, we support the Council's Preferred Alternative 7 for Action 4, which gives states the flexibility to determine whether sub-allocations of their red snapper catch limit are something their fishermen want to pursue. This would let states become a breeding ground for new programs that tailor management plans and goals to the priorities and needs of for-hire fishing vessels and private anglers.

Thanks again for the opportunity to present our comments today.

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