

May 20, 2024

Ms. Catherine Blum
North Carolina Division of Marine Fisheries
P.O. BOX 769
Morehead City, NC 28557

RE: 15A NCAC 03I.0124 NON-COMMERCIAL HARVEST REPORTING REQUIREMENTS

Dear Ms. Blum,

On behalf of the Congressional Sportsmen's Foundation and the American Sportfishing Association, we thank you for the opportunity to comment on the temporary adoption of Non-Commercial Harvest Reporting Requirements. A fundamental challenge to successful marine fisheries management is reliable catch information on which to base both stock assessments and to monitor landings and discards for management purposes.

North Carolina has a unique, well-funded opportunity to develop a mandatory reporting requirement for both recreational and commercial fisheries that, if structured correctly, could significantly enhance the sustainability of the state's marine resources while providing additional access for North Carolina's recreational anglers. With a new and significant burden placed on recreational anglers who do not benefit financially from enjoying their public trust resources, it is imperative that any mandatory reporting system for the recreational sector provides reliable data that can effectively supplement or replace the highly variable angler catch information currently provided by the federal Marine Recreational Information Program (MRIP).

However, we are concerned that the proposed data requirements for angler reporting, along with the method of reporting, will not yield much in the way of statistically valid information that can be used beyond long-term trend data, which would be duplicative of the already poorly performing MRIP. Instead, we encourage you to develop a task force or working group comprised of recreational anglers, fishing tackle retailers, and academia to work cooperatively with the respective agencies in developing a meaningful harvest reporting program that significantly improves on current data collection methodologies. Anything less would be a disservice to North Carolina anglers and the waste of significant financial resources made available for the mandatory reporting program.

In the absence of a more calculated, cooperative approach to developing a worthwhile program, we have several suggestions regarding what is currently being proposed for the temporary rule. Specifically:

- (b) - For the method of reporting, adding a simple-to-use smart phone application that allowed for easy, quick reporting would result in less recall bias, would be less time consuming and burdensome, and would help to reduce non-reporting when anglers return home and are occupied with other tasks.
- (b)(4) - This requirement should include the number of each species harvested and released, rather than harvest only, to allow for estimates of discards.

- (b)(5) - This requirement would not be valid for science purposes as it is unlikely that most anglers would have a reliable measuring device or know how to effectively measure a fish for the level of accuracy required for a length-frequency histogram or other use of the length data. Little confidence in the data renders this an unnecessary reporting field.
- (b)(6) This requirement presents an ambiguous question that will precipitate a high degree of reporting errors. Reporting the county where the fish were landed would offer more consistent general location data.
- Line (b)(7), the type of gear used, should be a simple selection box or a selectable choice from a drop-down menu.

To increase the likelihood of angler compliance and data credibility, there needs to be a sharp vision from the agency and a belief by anglers that reporting their data will contribute to both the sustainability of their fisheries resources and the likelihood of increased recreational fishing access (e.g., longer seasons). That vision is not clear in either the proposed temporary rule or the background information presented on the agency website. Additionally, we recommend consulting with the Atlantic Coastal Cooperative Statistics Program regarding any required reporting elements to ensure they meet data standards.

The red snapper fishery in the Gulf of Mexico presents real-world examples of how state-developed angler harvest information programs can lead to better management and more angling opportunities. Faced with only a three-day red snapper season in federal waters – that was largely driven by poor angler harvest estimates using MRIP – all five Gulf States developed their own data collection programs. Today, anglers in those states enjoy months, not days, of opportunities to fish for red snapper. North Carolina's mandatory reporting requirement could greatly benefit from learning from the Gulf States, both in their successes and their mistakes in developing independent data collection programs.

In closing, we urge you not to implement a mandatory reporting program that will have little value simply because the legislature directed you to do so. Instead, we encourage a very purposeful, cooperative approach between the agencies, anglers, academia, and regional fishery management bodies that will yield better data, increase trust from the recreational fishing community, have the potential to be expanded to federally managed fisheries, and set an example for other Atlantic Coast states to follow.

Sincerely,

Chris Horton
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Michael Waine
Atlantic Fisheries Policy Director
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