



## Mid-Atlantic Fishery Management Council

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Michael P. Luisi, Chairman | G. Warren Elliott, Vice Chairman  
Christopher M. Moore, Ph.D., Executive Director

April 23, 2019

Ms. LeAnn Hogan, Acting Chief  
Atlantic Highly Migratory Species Division  
Office of Sustainable Fisheries  
National Marine Fisheries Service  
1315 East-West Highway  
Silver Spring, MD 20910

Dear LeAnn:

The Mid-Atlantic Fishery Management Council (Council) conducted a Law Enforcement/For-Hire Workshop held on November 13-14, 2018 with attendees from the for-hire industry, U.S. Coast Guard (USCG), NOAA Office of Law Enforcement (NOAA OLE), the Atlantic States Marine Fisheries Commission (ASMFC), the Greater Atlantic Regional Fisheries Office, and Highly Migratory Species (HMS) Division. This workshop addressed several topics, including: (1) Operator versus angler (client) responsibilities for fisheries violations that occur on for-hire vessels, (2) issues related to the sale of golden tilefish and tuna by recreational vessels that do not possess USCG vessel safety requirements for commercial vessels; and (3) complexity of fishing regulations impacting enforceability. As a result, recommendations were presented to the Council's HMS, Law Enforcement, and Tilefish Committees and the full Council at the April 2019 Council Meeting in Avalon, New Jersey for their consideration.

In reaction to the HMS Committee report, the Council passed a motion requesting that the HMS division address improvements to the permitting/reporting systems, as follows:

- 1) The vessel trip report (VTR) and HMS reporting mechanisms need to be integrated to reduce duplicate reporting burdens for dual permit holders and to draw parity between the data (e.g., species and disposition) collected under each system;
- 2) Holders of HMS permits with a commercial sale endorsement should be required to report catch and harvest of all species, as well as discarded/undersized fish, to develop consistency with data reported on VTRs;
- 3) Individuals applying for an HMS permit with a commercial sale endorsement or tilefish open access permits should be required to enter their USCG safety sticker number (or expiration date of Certificate of Inspection); and
- 4) The NOAA HMS database and USCG safety inspection databases need to be integrated to allow stronger verification procedures for vessel operators applying for a commercial sale endorsement.

Please accept this letter as a formal request from the Mid-Atlantic Fishery Management Council that the HMS division address these concerns as soon as possible.

Please call me or Matt Seeley of my staff if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "C. Moore". The signature is fluid and cursive, with a large initial "C" and a stylized "Moore".

Christopher M. Moore, Ph.D.  
Executive Director

cc: M. Luisi, W. Elliott, T. DiLernia, D. Hemilright, D. Stutt, S. Heins, J. Montañez, M. Seeley