

# COASTAL CONSERVATION ASSOCIATION

*Resource-First  
Science-Based  
Advocates for Angling*



## BRIEFING DOCUMENT for South Atlantic Red Snapper

### ***Mission Statement***

*The stated purpose of CCA is to advise and educate the public on conservation of marine resources. The objective of CCA is to conserve, promote and enhance the present and future availability of these coastal resources for the benefit and enjoyment of the general public.*

**March 26, 2009**

# Who Got Us Here?

## Red Snapper Stock Status

*according to science generated by the National Marine Fisheries Service*

<b>Targets</b>	<b>Current (2006)</b>
Fishing Mortality (F) Target = 0.07	F=0.84
Spawning Stock Biomass (SSB) Target = 17,396,676 pounds	SSB = 427,697 pounds

In many ways the Atlantic red snapper issue is the “Perfect Storm” in fisheries management. It is a species that declined before many of today’s fishermen were even fishing. There was not an adequate stock assessment until 2007, so the condition of the stock was unknown. This is a situation created by decades of federal management neglect.

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Perhaps most significantly, the fisheries governance law changed to force strict management action. Until two years ago there was little information on the status of the red snapper stock in the South Atlantic, until a modern stock assessment was done in 2007 by the National Marine Fisheries Service. The NMFS’ assessment indicated that the spawning stock is less than 5% of an unfished stock and currently fishing is occurring at about 12 times the sustainable rate.

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In addition to the NMFS generated estimates, basic biological information tends to confirm the analysis – red snapper have been documented living longer than 50 years yet most of the fish aged in the South Atlantic are five or under, with none aged over 10 in the sampling conducted in the assessment by the National Marine Fisheries Service. This is a classic sign of intense fishing pressure. In addition, there appears to be a range contraction. For example, red snapper were once common in the North Carolina party boat fishery in the 1970s, and are now a rarity.

**Is the science generated by the National Marine Fisheries Service (NMFS) perfect? No - no science is perfect. Is the NMFS generated science correct? Again, no one knows for sure. However, currently most southeast stock assessments are put through the Southeast Data Assessment and Review process, so the data and assessment have been through a rigorous review by outside scientists and judged adequate for management. Under current fisheries management law, that satisfies the definition of “best available science.”**

Red snapper grow relatively rapidly until about age 10 to 15, and then growth slows. While a one-year-old fish is about 9 inches long and weighs half a pound, a five-year-old fish is about 23 inches long and weighs 7 pounds; a 10-year-old fish is about 33 inches and may weigh 22 pounds; and a 15-year-old fish is about 37 inches long and weighs about 30 pounds. The females begin spawning at age 2 and all are spawning by age five.

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The overall legal authority to manage red snapper in federal waters (outer boundary of state waters to 200 nautical miles) comes from the Magnuson - Stevens Conservation and Management Act of 1977. It was significantly amended in 1996 to require that the fishery management councils and NMFS end overfishing and rebuild depleted stocks. Congress amended the Act again in 2006, essentially adding language that requires managers to end overfishing for all stocks by 2011 and rebuild overfished stocks within 10 years.

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This is what is driving the interim rule today – so the Council and NMFS can at least have a plan that begins to end overfishing in place later this year. This is not something they may or may not do - ***IT IS REQUIRED BY FEDERAL LAW.***

**Where is the Red Snapper mortality coming from?**

According to NMFS, in 2006...

Commercial Fishing Mortality (F)=0.172 (20%)	Recreational F=0.386 (45%)
Commercial discards F=0.055 (6%)	Recreational discards F=0.228 (27%)

# The Law

## **The Magnuson-Stevens Fishery Conservation and Management Act**

**The Act Sets A Firm Deadline To End Over-Fishing In America By 2011.** Over-fishing occurs when more fish from a species are caught than is sustainable, endangering the species' long-term existence. This Act directs Regional Fishery Management Councils to establish annual quotas in Federally-managed fisheries to end over-fishing by 2010 for fish stocks currently undergoing over-fishing and by 2011 for all other Federally-managed fish stocks.

1. Establish a mechanism for specifying annual catch limits in the plan (including a multiyear plan), implementing regulations, or annual specifications, at a level such that overfishing does not occur in the fishery, including measures to ensure accountability. The amendment made by subsection (a)(10)—(1) shall, unless otherwise provided for under an international agreement in which the United States participates, take effect— (A) in fishing year 2010 for fisheries determined by the Secretary to be subject to over fishing; and (B) in fishing year 2011 for all other fisheries; and (2) shall not apply to a fishery for species that have a life cycle of approximately 1 year unless the Secretary has determined the fishery is subject to overfishing of that species; and (3) shall not limit or otherwise affect the requirements of section 301(a)(1) or 304(e) of the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. 1851(a)(1) or 1854(e), respectively).
2. Requires that rebuilding plans be submitted 2 years after stock declared overfished and overfishing is ended immediately.

# *Where Does the "Science" Come From?*

SEDAR (Southeast Data, Assessment and Review) is the cooperative program through which stock assessments of Council managed fisheries resources in the Southeastern United States are developed and reviewed. SEDAR was initially developed by NOAA Fisheries' Southeast Fisheries Science Center and the South Atlantic Fishery Management Council to improve the quality and reliability of stock assessments and to ensure a robust and independent peer review of stock assessment products.

SEDAR provides a means for developing and reviewing complex fisheries stock assessment analyses. The program provides an opportunity for participation in the assessment process by data collectors, fisheries researchers, and constituents. SEDAR provides a venue for managing and distributing a vast array of information in support of assessment decisions and outcomes. SEDAR strives to improve the quality of assessment advice provided for managing fisheries resources in the Southeast U.S. by increasing and expanding participation in the assessment process, ensuring the assessment process is transparent and open, improving documentation of assessment methods and input data, and providing a robust and independent review of assessment products.

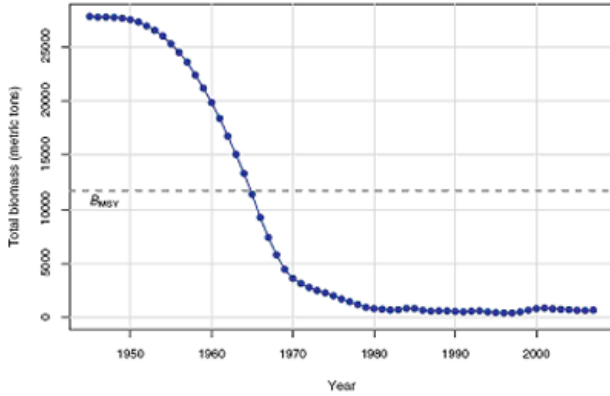
SEDAR is organized around three workshops. First is the Data Workshop, during which fisheries, resource monitoring, and life history data are reviewed and compiled. Second is the Assessment Workshop, during which assessment models are developed and population parameters are estimated using information provided from the Data Workshop. Third and final is the Review Workshop, during which independent experts review the input data, assessment methods, and assessment SEDAR workshops are organized by SEDAR staff and the lead council. Data and Assessment Workshops are chaired by the SEDAR Coordinator.

Participants drawn from state and federal agencies, non-government organizations, council technical and advisory panels, and the fishing industry are appointed by the Council with a goal of including a broad range of disciplines and perspectives. All participants are expected to contribute to the process by preparing working papers, contributing to discussions, providing assessment analyses, and completing the workshop report.

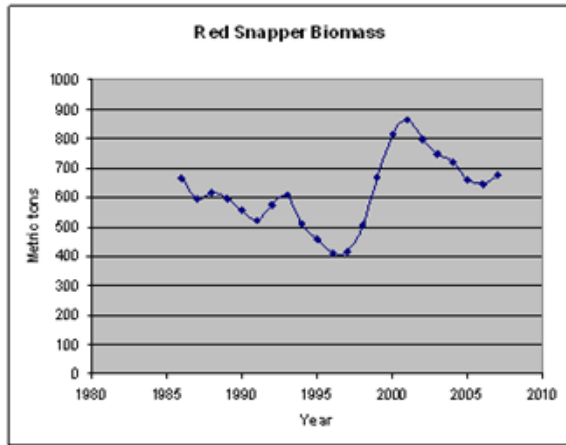
SEDAR Review Workshop Panels consist of a chair, a reviewer appointed by the Council, and 3 reviewers appointed by the Center for Independent Experts (CIE), an independent organization that provides independent, expert reviews of stock assessments and related work. The Review Workshop Chair is appointed by the SEFSC director and is usually a NOAA Fisheries employee from outside the Southeast Region. Participating councils may appoint representatives of their Scientific and Statistical Committee, advisory, and other panels as observers to the Review Workshop. Participants are appointed to SEDAR workshops by each Council having jurisdiction over the stocks assessed. Federal agency scientists are appointed by the SEFSC Director and SERO Regional Administrator.

# The Science

Developed by the National Marine Fisheries Service & Reviewed by Southeast Data Assessment and Review (SEDAR)

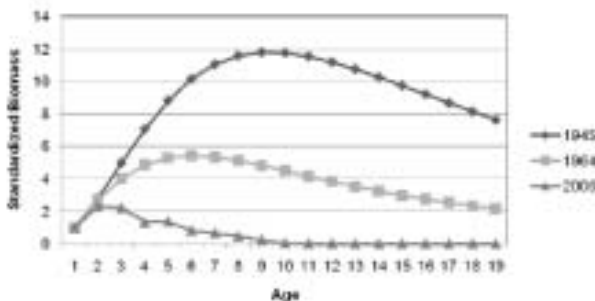


**According to NMFS:** Total biomass and spawning biomass show nearly identical trends—sharp decline during the 1950s and 1960s, continued decline during the 1970s, and stable but low levels since 1980.



**According to NMFS:** Overall, there has been a decline in biomass but when data are plotted since 1996, an increase in biomass is apparent. Part of the explanation for the recent increase in biomass in the past couple of years is good survival of young fish (recruitment) in 1998-2000.

Figure 5. Age structure of the population (standardized to year-1 biomass).



**According to NMFS:** The average age is currently fairly stable between four and five years of age with an increase in recent years. Good recruitment in 1998-2001 appears to be responsible for the recent increase in the mean age.

Figure 5 from the stock assessment indicates 99% of the population is age 10 or younger, and it has been that way since 1976. This is based on ages from over

7,000 fish. Since red snapper are long-lived, heavy fishing pressure is likely responsible for the truncation in the age structure. Evidence indicates most of the older fish were removed in the 1950s and 1960s and the population never recovered.

**Figure 1. Biomass and Spawning Stock Biomass.**

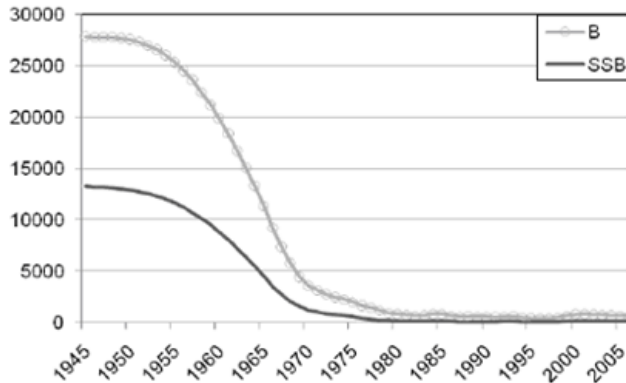
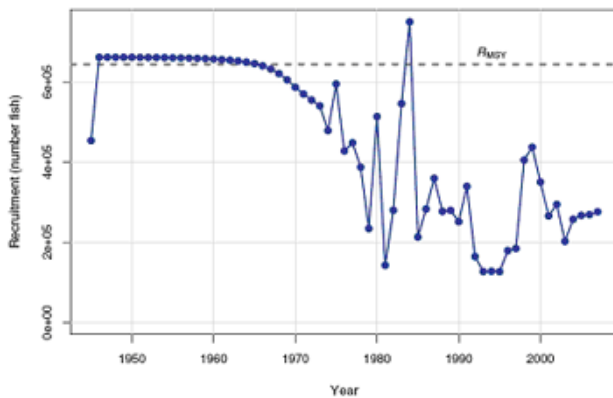


Figure 3.21. Red snapper: Top panel - Estimated recruitment of age-1 fish. Bottom panel - log recruitment residuals.



**According to NMFS:** Since 1945, the rate at which fish have been removed from the population has been greater than the rate at which the stock has been replenished through reproduction (recruitment). As a result, biomass has decreased.

**According to NMFS:** A plot of recent data indicates there have been times when recruitment has been high (i.e. 1998-2000), as a result there have been some increases in biomass.

Generally, recruitment is expected to be larger in magnitude and occur more often when the population is large. However, even when the population is large, successful survival of eggs and larvae will vary from year to year depending on conditions such as food availability for first feeding larvae, predators, water

temperature, favorable currents, etc. Since survival of eggs and larvae is episodic, the greater the number of year classes and the larger the stock, the greater the chance the population can survive periods of time when oceanographic conditions are not conducive for survival of eggs and larvae.

Even when stock size is small, peaks in recruitment can occur when conditions are conducive for survival of eggs and larvae. These peaks in recruitment can lead to increases in biomass, particularly if fishing mortality decreases. Therefore, biomass can increase if there are periods of good recruitment and reductions in fishing mortality. If no new recruitment events occur, and fishing mortality remains at constant levels, biomass can be expected to decrease.

References

Fitzhugh, G.R., M.S. Duncan, L.A. Collins, W.T. Walling, and D.W. Oliver. 2004. *Characterization of red snapper (Lutjanus campechanus) reproduction: for the 2004 Gulf of Mexico SEDAR. National Marine Fisheries Service, Panama City Laboratory, Contribution Series 04-01.*

SEDAR 15. 2008. *Stock assessment report 1 (SAR 1) South Atlantic Red Snapper. February 2008. 4055 Faber Place #201, North Charleston, SC 29405.*

Coastal Conservation Association

## **Comments to the South Atlantic Fishery Management Council on Interim Rule**

According to the science presented by the National Marine Fisheries Service, the Atlantic red snapper population appears to be in a serious state, with all the signs indicating severe trouble.

Under the tenets of the Magnuson-Stevens Act, closing the red snapper directed harvest to both the commercial and recreational fishery is a required first step in beginning the ultimate recovery of this important population. But in and of itself, it will not end overfishing. We await the proposed management measures to be found in Amendment 17 to begin the full recovery of Atlantic red snapper to a healthy population level and their former geographic distribution.

We are very concerned that this fishery, like many others in the snapper-grouper complex, has been allowed to sink to such low levels before management action was taken. If managers in the past had taken the necessary steps to recover this and other stocks we would not be facing such difficult decisions now.

As this population recovers we expect that the Council and the National Marine Fisheries Service will reexamine the red snapper fishery to establish a fair and equitable distribution between the commercial and recreational sectors.

We believe fisheries should be managed as a public resource for the greatest economic benefit to the nation.

Coastal Conservation Association  
**Comments to National Marine Fisheries Service  
on Amendment 16**

Jack McGovern  
NOAA Fisheries Service  
Southeast Regional Office  
Sustainable Fisheries Division  
263 13th Avenue South  
St. Petersburg, Florida 33701

Dear Mr. McGovern,

Thank you for the opportunity to comment on Amendment 16 to the South Atlantic Fishery Management Council's Snapper Grouper Fishery Management Plan. The Coastal Conservation Association is a non-profit marine fishery conservation organization with more than 100,000 members in 17 state chapters along the Atlantic, Gulf and Pacific coasts.

Most species in this complex are long-lived, slow-growing fish that cannot tolerate intense fishing pressure. The history of the snapper/grouper complex has become a testimony to poor management. Past failures have led to draconian season closures coupled with low bag limits and quotas. According to NMFS' analysis of these stocks, these measures are necessary to rebuild gag grouper and vermilion snapper, as required by law.

But, in addition to the valid concerns about the conservation of these stocks, it is important to note that drastically reducing harvest levels severely disadvantages the recreational fishery when compared to the commercial fishery. We believe fisheries should be managed as a public resource for the greatest economic benefit to the nation. Management in mixed fisheries, like gag grouper and vermilion snapper, should examine closely the relative economic value of the fishery and set allocations accordingly.

In closing, we appreciate the opportunity to comment on this important issue. Please do not hesitate to contact us if you have any questions.



# News Release

## Coastal Conservation Association

6919 Portwest, Suite 100

Houston, TX 77024

Email: [twvenker@joincca.org](mailto:twvenker@joincca.org) Website: [www.joincca.org](http://www.joincca.org)

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CONTACT: Ted Venker, 1-800-201-FISH

### **Study reveals economic reality for Gulf grouper**

*CCA-funded study shows value of 100 percent recreational allocation.*

In an important development in the debate over the proper management of gag and red grouper in the Gulf of Mexico, a newly released economic study of the fishery finds that a 100 percent allocation to the recreational sector would yield maximum economic value to society.

Gulf grouper has been a hotly debated issue in the Gulf of Mexico Fishery Management Council, which is meeting this week in Mississippi to discuss grouper management among other issues. The study's economic findings should add a new twist to the management of this intensely debated fishery.

"Most in the recreational community would not be surprised by these results, but I think many federal managers have ignored this reality," said Frederic Miller, chairman of the Coastal Conservation Association National Government Relations Committee. "This fishery would yield more jobs and economic output from a 100 percent recreational allocation."

The study was conducted by Brad Gentner, who ran the recreational economics data collection program for the National Marine Fisheries Service (NMFS) for eight years before starting his own company, Gentner Consulting Group. As a NMFS Economist in the Division of Economics and Social Analysis, he specialized in survey design, recreational fisheries demand and welfare analysis, non-market valuation, and economic impact modeling for recreational fisheries

Gentner's study used economics to analyze grouper allocations in the Gulf of Mexico. Among other findings, his analysis revealed that recreational gag grouper fishing generates \$107 million in value added, \$60.8 million in income and supports 1,513 jobs while red grouper fishing generates \$35.2 million in value added, \$20 million in income and supports 501 jobs. Commercial gag grouper fishing generates \$16 million in value added, \$7.7 million in income and supports 322 jobs while red grouper fishing generate \$49 million in value added, \$23.7 million in income and supports 988 jobs. The majority of the economic impacts in the commercial sector in both fisheries occur in the retail and restaurant sectors, and Gentner concludes that those sectors would experience very few losses with a 100 percent recreational allocation.

"This study cannot be ignored. More than ever allocation is a critical component of virtually every fishery management system," said Chester Brewer, vice chairman of the CCA National Government Relations Committee. "With this information in hand, it is outrageous that the Gulf Council should establish an Individual Fishing Quota system for Gulf grouper without first addressing the allocation issue."

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Go to [http://www.joincca.org/Grouper\\_Economics\\_2009.pdf](http://www.joincca.org/Grouper_Economics_2009.pdf) for a copy of the study.

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# Conservation Talking Points

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- 1. All management measures must focus on sound conservation of the resource.**

We must put the health and longevity of our fisheries above politics and before the desires of the user groups. The management system must act as a steward of the resource and the management process should put the health of the resource first.
- 2. We must establish a conservation ethic not only in the user groups, but also in the administrators and managers of our resources.**

Our fishery populations cannot withstand exploitation and over-utilization if we are to achieve recovery. Our management system's effectiveness should be judged on the health of the resource it governs.
- 3. We must have high qualifications for resource management.**

For our management system to regulate effectively for the health and longevity of the resource there must be fair and equitable balance on all panels, boards, councils, and commissions, high qualification requirements for management members, and clear conflict of interest requirements.
- 4. We must eliminate the practice of arbitrary management.**

To eliminate arbitrary management decisions, the management process must focus on the specifics of the health of the resource and the role of the users, not solely on the economic and political ramifications of the decision-making process.
- 5. We must have sound, peer-reviewed science upon which to base our management decisions.**

If we do not have reliable science, the management system should pursue a conservative route and err on the side of the resource to comply with the law. We must continue to advocate for better and more accurate science whenever possible.
- 6. Users and federal managers must be more visionary.**

If history tells us anything, it is that our federal management losses outnumber our victories. But that is the result of a federal system that has been anchored in the tenet of utilization first, with conservation second. Collectively, we must be more visionary.