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CONSERVATION & PROTECTION OF MARINE LIFE

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May 10, 2019

Jessica McCawley, Chairman
Snapper Grouper Committee
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Dear Chairman McCawley,

We appreciate the opportunity to comment on the South Atlantic Fishery Management Council's Amendment 29 – Best Fishing Practices. The Coastal Conservation Association is the largest conservation group of its kind in the nation, with more than 125,000 members on all three coasts committed to ensuring the health and conservation of our marine resources and anglers' access to them.

Recreational anglers have often led the way in promoting better fishing practices to conserve marine species, and we are confident that the vast majority of anglers would gladly do their part to reduce discard mortality. Though it may be impossible to eliminate discard mortality entirely, as good stewards we believe anglers must do everything we can as soon as possible to lower the discard mortality rate. CCA is committed to educating its members and the general public on proper release methods through its ReleaSense program and is eager to work with the Council on educational programs going forward.

The key element in Amendment 29 is being able to estimate the reduction in discard mortality for use in stock assessments. All the required measures in the world will accomplish little if their effect on the species in question is not quantified. We expect the use of descending devices and other tools will only increase as awareness of the issue is raised, but anglers also expect that their efforts will result in less dead discards that will also translate into better data for stock assessments.

We would support the mandatory use of venting tools and/or descending devices while fishing for snapper grouper species so long as there are quantifiable estimates of discard mortality for use in stock assessments. Lacking a commitment from NMFS to quantify the reduction in discard mortality rate, then the strong suggestion that anglers possess these devices when fishing for snapper grouper species would suffice.

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We encourage the Council to consider allowing the use of venting tools only on For-Hire vessels where the crew has had training in their use. Venting tools are essentially a surgical device to allow for the deflation of a fish's air bladder, and we are concerned with the efficacy of such a device in the hands of untrained anglers. Given the volume of fish that a For-Hire vessel may encounter in a short period of time, a properly trained deckhand using a venting tool could be a much faster – and still effective - method of release. While perhaps more cumbersome and slower, descending devices are a much safer and efficient alternative for most anglers.

Thank you for the opportunity to comment on Amendment 29 – Best Fishing Practices.

Sincerely,

A handwritten signature in blue ink, appearing to read 'TV', with a long horizontal flourish extending to the right.

Ted Venker, Conservation Director
CCA National