OCEANA Protecting the World's Oceans

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September 16, 2019

Adrienne Thomas
Government Information Specialist, NOAA
151 Patton Avenue, Room 159
Asheville, NC 28801

RE: Proposed Information Collection; Comment Request; Southeast Region Logbook Family of Forms

Dear Ms. Thomas:

Oceana is the largest international ocean conservation organization solely dedicated to protecting the world's oceans. As part of Oceana's efforts to reduce bycatch and overfishing, protect important ocean habitats and improve transparency and traceability, Oceana appreciates the opportunity to submit comments regarding the proposed collection of information from fishery catch and effort logbooks. The National Oceanic and Atmospheric Administration (NOAA) should continue to require that vessels report gear type and effort data in catch logbooks, which are critical to implementing effective fisheries management, enhancing sea turtle and marine mammal protections, and providing critical catch documentation demonstrating the fish was caught in a legal fishery.

The Magnuson-Stevens Act requires that each Fishery Management Plan (FMP) provide a detailed description of the fishery including the type of fishery, type of gear used, catch quantities and effort.[1] Interaction with fishing gear is the single greatest threat that sea turtles currently face, and, between 1990 and 2007, fisheries in the southeast region of the United States accounted for up to 98 percent of sea turtle bycatch among U.S. fisheries.[2] Establishing effective bycatch reduction regulations to address this dire threat to marine turtles and other protected species relies on accurate and up-to-date information that reflects gear type and fishing effort. Collecting detailed and precise logbook data is an important tool for tracking gear type and effort within each fishery, which can inform fisheries management measures to reduce bycatch and enhance sea turtle and marine mammal conservation.

Catch documentation information that can be used to verify the legality and identity of seafood products include where, when, and how a fish was caught, key vessel information, species specific name, whether the product was farmed or wild caught, and tracking data for the seafood from boat or farm to the U.S. border. Under the Seafood Import Monitoring Program (SIMP), established in December 2019, NOAA requires that some imported seafood at risk of illegal fishing and seafood fraud provide catch documentation and be traceable from the point of catch to the first entry into U.S. commerce.[3] This regulation assumes that U.S. fisheries are required to report similar documentation. An estimated 20-32 percent of wild-caught seafood imports entering the U.S. each year are illegally caught, thereby competing with their legal counterparts.[4]

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[1] 16 U.S.C. § 1853(a)(2)

[2] Finkbeiner, E. M., Wallace, B. P., Moore, J. E., Lewison, R. L., Crowder, L. B., & Read, A. J. (2011). Cumulative estimates of sea turtle bycatch and mortality in USA fisheries between 1990 and 2007. *Biological Conservation*, *144*(11), 2719-2727.

[3] -- (2017) Final Rule to Implement U.S. Seafood Import Monitoring Program RIN 0648-BF09. National Oceanic and Atmospheric Administration.

[4] Pramod G, Nakamura K, Pitcher T, and Delagranc L (2014) Estimates of illegal and unreported fish in seafood imports to the USA.

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To effectively hold seafood importers to similar standards as domestic seafood producers, NOAA must collect comparable information on catch and effort from U.S. fisheries.

Furthermore, Oceana recommends that NOAA prioritize transitioning to electronic catch reporting, which would enhance the utility and accessibility of the catch information collected. In addition to requiring certain information be included in the catch documentation of some seafood imports, SIMP requires that importers submit this data electronically. In 2013, the Gulf of Mexico Fishery Management Council piloted the use of electronic logbooks that collect shrimp catch data and vessel speed to predict catch-per-unit-effort for the fishery and inform shrimp stock assessments.[5] Programs like these should be expanded to other regions and fisheries.

Data collected from catch logbooks, namely information about the gear type used and fishery effort, are important for:

- incorporating catch, gear type and effort data into FMPs,
- enhancing bycatch reduction efforts and endangered species protections,
- demonstrating that catch was legally caught or farmed,
- and ensuring that seafood importers are held to similar standards as domestic fisheries.

In conclusion, Oceana urges NOAA to continue collecting logbook information that documents when, where and how fish were caught so that federal fisheries managers can continue using this data in FMPs and better inform sea turtle and marine mammal conservation efforts. Oceana has called for increased transparency and traceability in the seafood supply chain to help stop seafood fraud and illegal fishing. By requiring equivalent catch documentation of both seafood imports and domestically caught seafood, the U.S. can effectively manage domestic fisheries while holding foreign importers accountable to the same standards. Finally, Oceana recommends that NOAA prioritize transitioning to electronic catch reporting to enhance data collection methodologies and expand current electronic catch reporting pilot programs.

Continuing to collect catch and effort logbook data and improving data collection methodologies will benefit domestic seafood producers, U.S. seafood consumers, and protected marine species. Oceana thanks NOAA for taking these comments into consideration when approaching the task of reinstating these important data collection measures.

Sincerely,

Beth Lowell
Deputy Vice President, U.S. Campaigns

In: Marine Policy 48: 102-113. doi: 10.1016/j.marpol.2014.03.019

[5] -- Electronic Logbook for the Gulf of Mexico Shrimp Permit. National Oceanic and Atmospheric Administration. Available: https://www.fisheries.noaa.gov/southeast/commercial-fishing/electronic-logbook-gulf-mexico-shrimp-permit#ongoing-development-and-testing