



## FIFTY TWO REASONS NOAA MUST CONDUCT FISHERIES STOCK ASSESSMENTS IN THE SOUTHEASTERN UNITED STATES ©

**March 25, 2013**

**(Week # 13 of 52 weeks)**

**“If NOAA does not measure a fish stock, NOAA cannot manage it.”**

Each week I write about the inordinate need for NOAA to conduct and then implement honest stock assessments in the southeast. By honest, I mean opening all aspects of fisheries management to all stakeholders including fisheries dependent, fisheries independent and spawning aggregation research projects, so actual scientific efforts can be reviewed by scientists not connected to NOAA or the council.

Another need for total stock assessment management dialogue is for councils to adopt a protocol allowing up to five fishermen to pool their three minutes of testimony currently allowed by the councils. The protocol would allow the spokesperson fifteen minutes to present their position on the issue before the council.

Three minutes of testimony is not enough time to discuss a proposed federal regulation that is supposed to be based on stock assessments. Three minute limits result in repetition. Three minutes are not sufficient time to compensate driving from Key West to North Carolina, missing two or three days of fishing and spending as much as a thousand dollars just to stand before the South Atlantic Fishery Management Council for three minutes hoping and often begging to save your job and your culture.

The spokesperson should file a written statement before giving testimony about the organization represented including a disclosure statement and the IRS 990's reports for the past three years. (*Congress Disclosure Form-As required by and provided for in House Rule XI, clause 2(g) and the Rules of the Committee on Natural Resources.*) This transparency would identify who the speaker represents in an honest and forthcoming manner. These are the same written requirements to testify before a Congressional Committee and would be required of the spokesperson when fishermen pool their allotted time.

Of course the worst result of flawed stock assessment work is the quagmire the Gulf of Mexico Fishery Management Council finds itself in over red snapper. The entire fishing world knows there are more red snapper in the Gulf of Mexico (and South Atlantic) than has been there in decades based on observations by thousands of fishermen both commercial and recreational. It seems that 40% of all red snapper in the Gulf of Mexico is landed from waters off Alabama which has a short coastline, but an extensive artificial reef program. Texas has had their own private red snapper management system “in state waters” for years and more or less told NOAA to take a hike a long time ago. Texas certainly has the authority to do that in state waters, but under federal law that has been in place since 1976, their actions will not go unaddressed by NOAA at some point in time and that time appears to be now.

Southeastern Fisheries Association (SFA) does not believe the federal red snapper plan is accurate nor does it reflect the abundance of red snapper in the Gulf of Mexico or the South Atlantic Bight. SFA strongly believes in the rule of law and if coastal states become non-compliant with federal law then whatever consequences that follow have already been spelled out in fishery management plans or federal regulations. SFA believes up-to-date, transparent stock assessments would greatly reduce the angst and anger by the fishermen who are now being over-regulated. SFA also believes the proper way to address the stock assessment flaws in most plans in the southeast is a non-biased review of what NOAA does and how it does it. A GAO investigation has been requested by a non-partisan group of eight United States Senators. Hopefully GAO will agree to the request in the near future.

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