



March 17, 2025

National Oceanic and Atmospheric Administration
Southeast Regional Office

Re: Amendment 59 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region, NOAA-NMFS-2024-0142-0002

The International Game Fish Association (IGFA) was established in 1939 at the American Museum of Natural History to advance our knowledge of global fish species through recreational angling. Today, the IGFA stands as one of the most widely recognized authorities on game fish and angling-related matters in the world and represents the voice of the global recreational fishing community, made up of an estimated 300 million anglers.

Based on the updated stock assessment¹ and Draft Environmental Impact Statement for Amendment 59², we strongly support Action 1, Alternative 2 (preferred) to establish that the South Atlantic red snapper stock is no longer undergoing overfishing, as well as Action 2, Alternative 2 (preferred) to set the Annual Biological Catch (ABC) at 509,000 fish, representing a substantial increase and consistent with the F_{MSY} proxy. It is our view that none of the additional proposed Actions (3-5) in Amendment 59 are required by the Magnuson-Stevens Fishery Conservation and Management Act and none are required by the lawsuit settlement; we strongly oppose the implementation of these Actions.

Additionally, we are deeply troubled by proposed Action 4, which seeks to prohibit recreational bottom fishing for 55 species from December through February. If implemented, this rule will have devastating effects for the recreational fishing industry, coastal communities, and anglers throughout the state of Florida and the broader South Atlantic region. Recreational fishing contributes over \$9 billion to Florida's economy and supports over 80,000 jobs. The restriction of recreational access to fishing threatens coastal communities and small businesses, as well as recreational fishing manufacturers and suppliers throughout the country. Furthermore, the bottom fishing ban in Amendment 59 is based on questionable discard data collected through the Marine Recreational Information Program, which was found to overestimate discards by 30-40% and has been recognized as unsuitable for management use.³

According to the 2024 stock assessment update, the stock is still rebuilding and overfishing is occurring, however, since 2010, total abundance and spawning stock have been increasing,

¹ Stock Assessment of Red Snapper off the Southeastern United States, Update of SEDAR73 Assessment: <https://sedarweb.org/documents/sefsc-2024-update-to-sedar-73-south-atlantic-red-snapper-assessment/>

² Amendment 59 to the Fishery Management Plan for the Snapper-Grouper Fishery of the South Atlantic Region: https://www.fisheries.noaa.gov/s3/2025-01/SG_SecAm59_Red-snapper_final.pdf

³ Fishing Effort Survey Research and Improvements: <https://www.fisheries.noaa.gov/recreational-fishing-data/fishing-effort-survey-research-and-improvements>

showing substantial progress toward rebuilding. It was also noted that the increase in abundance has been stimulated by higher than average recruitment.⁴ Still, Amendment 59 seeks to simultaneously remove the overfishing designation, increase the Annual Catch Limit (ACL) to 500,000 fish, and expand the number of recreational fishing days, while preventing the public from accessing that very same resource, as well as an additional 55 species in the South Atlantic.

Per NOAA, the primary driver of overfishing in recent years has been recreational discards. While we understand the motivations behind the proposed rulemaking, we do not agree with the Agency's heavy-handed actions in preventing recreational fishing opportunities for our shared public resources. It is our view that the Agency should pursue alternative methods to decrease dead discards for red snapper through angler outreach and education initiatives, including the mandatory use of descending devices, like those provided by the Return 'Em Right program.⁵

If the Agency is interested in reducing dead discards for red snapper without heavy-handed management actions, increasing the implementation, training, and enforcement efforts for the use of descending devices across bottom fish fisheries in the South Atlantic would be a great way to allow small businesses and coastal communities to keep fishing and maintain their livelihoods while co-developing solutions alongside the Agency and other federal and state partners. We at the IGFA are happy to utilize our extensive network of anglers and industry partners to educate anglers on the use and benefits of descending devices and encourage the Agency to do the same.

In the context of unreliable information on both recreational fishing effort and the stock status of red snapper in the South Atlantic, we strongly urge the Secretary of Commerce to consider the best-available science in the face of the proposed rulemaking in Amendment 59. We look forward to your reconsideration of the sweeping bottom fishing ban and hope you consider alternative methods to reduce red snapper dead discards. Please do not hesitate to reach out if you have any questions.

Sincerely,



Jason Schratwieser
IGFA President

⁴ Stock Assessment of Red Snapper off the Southeastern United States, Update of SEDAR73 Assessment: <https://sedarweb.org/documents/sefsc-2024-update-to-sedar-73-south-atlantic-red-snapper-assessment/>

⁵ Return 'Em Right: <https://returnemright.org/>