



**MAFAC Recommendations for
Updating the NOAA National Saltwater
Recreational Fisheries Policy**

December 2022

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Executive Summary

The Marine Fisheries Advisory Committee (MAFAC) has supported the [National Oceanic and Atmospheric Administration \(NOAA\) Fisheries' National Saltwater Recreational Fisheries Policy](#) (Policy), and applauded NOAA Fisheries for the Policy when it first came out. As issues have changed since 2015, we appreciate the opportunity to provide recommendations to improve the Policy moving forward. The highlights of our comments focus on:

- Continued focus on the socio-economic importance of recreational fishing to coastal communities and the nation.
- Importance of improved transparency in fishery management science and processes.
- The need to incorporate and address equity and environmental justice.
- The need to include and address climate impacts.
- Recognize that outreach and engagement continues to be important and is a two-way dialog.
- Understanding the universe of anglers is still a top priority.
- Importance of identifying and using metrics to monitor the effectiveness of the Policy.
- Continued focus on sustainably managing the impact of recreational fishing on the health of fisheries and ecosystems.

Recommendations - Overarching Themes

I. Incorporate Equity and Environmental Justice in the National Saltwater Policy

Recommendation: Equity and environmental justice considerations can be better enfolded throughout the Policy. In particular, Guiding Principles 2 (prompting access), 5 (providing social, cultural, economic and ecological information), and 6 (engaging with the public) clearly overlap with the priorities of the agency's draft Equity and Environmental Justice strategy, and we recommend NOAA Fisheries establish a collaborative process between the teams working on this Policy and the revisions to the Equity and Environmental Justice strategy to identify how this Policy can be strengthened to better address equity, diversity, inclusion, and justice issues. The agency may also consider adding a new guiding principle or goal to the Policy.

Why? NOAA Fisheries activities under the National Saltwater Policy should work to identify underserved recreational fishing communities, address inequitable opportunities and access to sustainable fisheries, and avoid increasing barriers and burdens for underserved communities. For instance, social scientists can provide the data NOAA Fisheries needs to improve access to sustainable recreational fishing opportunities. Additionally, the agency should review existing decision-making systems to ensure the needs of underserved communities are included, and should enhance community outreach. MAFAC continues to support implementation of the [NOAA Fisheries Equity and Environmental Justice Strategy](#), refers the agency to our previous comments on that Strategy, and recommends thoughtful incorporation of the agency's Equity and Environmental Justice Goals into the National Saltwater Policy.

II. The impacts of climate change on recreational management are comprehensive, and thus warrant comprehensive treatment within the Policy

Recommendation: NOAA Fisheries should include a new Goal: “Establish climate-resilience as a key consideration in the conservation, management and promotion of recreational fisheries.” MAFAC considered making this a new guiding principle, but noted that climate affects each existing Guiding Principle already. So, we recommend that the agency add climate resilience as an overarching goal of the strategy, and consider during their revision of this strategy where it can also be included within the Guiding Principles.

Why? Climate change is dramatically reshaping our ocean and the communities that rely on it and poses serious challenges to the management system as a whole. For recreational fisheries and their management, climate change brings unique risks and issues and quantifying the impacts can be difficult. Sea level rise, coastal inundation, storms, and extreme events can cause fishery disasters, damage fishing infrastructure, and limit access to fishing opportunities, and these impacts can exacerbate existing inequitable access for excluded or underrepresented communities. Physical fishing access will need to be prioritized in disaster recovery to prevent continued issues of gentrification and the development of waterfronts for non-fishing purposes.

Shifting fish stocks and decreased stock productivity have serious implications for sustainable recreational management. The expansion of fish stocks into new areas can alter ecological interactions which can create issues around bycatch and discards with new fish and protected species. Further, shifting stocks can cause conflicts over allocation that will need to be addressed proactively and equitably. Lower productivity will require a sustained management response and is likely to reduce fishing opportunities on average. At the same time, some stocks may see increased abundance or productivity, and managers may not have information needed to implement sustainable management measures for new fishing opportunities. Additionally, increased stressors from climate change and other human activities may further degrade and alter habitats critical to supporting species valued by recreational fishermen.

Climate change impacts can increase unpredictability and result in greater uncertainty in fisheries science and management advice; this will require improved communication and engagement with the recreational fishing community to maintain trust in data and the management system overall.

III. Improve Saltwater Recreational Harvest Data

Recommendations: NOAA Fisheries should (a) explore the value and potential of establishing a true national registry of saltwater anglers and other options that might achieve such goals; and (b) pursue strong collaboration with states, Fishery Management Councils (Councils), and stakeholders to achieve these recommendations.

Why? MAFAC explored the importance of [Better Defining the Universe of Offshore](#)

[Recreational Anglers](#)¹ (MAFAC, 2020) and identified data gaps and developed a framework to address them for improved statistical accuracy. Although a national registry may be difficult to implement, NOAA Fisheries should explore the information gaps that a registry could fill, consider other means or methods for filling these gaps other than through a national registry, and consider a cost benefit analysis comparing the two. Such an analysis might motivate finding funding and mechanisms for gathering consistent and accurate information on recreational fisheries.

IV. Use of Metrics to Monitor the Effectiveness of the National Saltwater Recreational Fisheries Policy

Recommendation 1: Include more general metrics in the Policy, then further tailor and refine metrics in regional implementation plan updates. MAFAC also strongly supports the agency identifying and receiving the necessary resources and funding to achieve the stated goals and metrics.

Why? Metrics that express more detailed actions to implement the Policy are important because they provide a defined roadmap to the recreational community, and also allow recreational champions within the agency to advocate for effective implementation of the Policy internally, especially for resource/budget requests and data innovation.

Recommendation 2: NOAA should prioritize (a) the production of additional socio-economic data metrics to provide to Councils for management decisions under Guiding Principle #5; and (b) rescheduling the NOAA Fisheries Recreational Economic Constituent Workshop that was postponed due to COVID.

Why? NOAA Fisheries collects recreational expenditure information in its Marine Recreational Fishing Expenditure Survey every five years, and between surveys, expenditure information is adjusted by the Consumer Price Index to the current year. However, the [2018 Saltwater Recreational Fisheries Summit](#) identified that the economic research conducted by the agency does not match all the needs of the Councils. In response, the agency scheduled a workshop in 2020 among experts and stakeholders to determine the priority research needs for economic research. However, that effort was indefinitely postponed due to the pandemic. The purpose of this recommendation is to determine whether the Policy is working, but the additional socio-economic element can illustrate how it operates in the real world in Council management decisions.

Recommendations for Each Existing Guiding Principle

Guiding Principle #1 - Support Ecosystem Conservation and Enhancement

Recommendation 1: This Guiding Principle should include consideration of MAFAC's work on deterring interactions with marine mammals, when that work is completed.

Why? MAFAC is currently developing a survey to assess the type, frequency, and degree of interactions that fisheries and other activities have with marine mammals. Once

¹ MAFAC report, "Better Defining the Universe of Offshore Recreational Anglers." Oct. 2020. https://s3.amazonaws.com/media.fisheries.noaa.gov/2020-11/MAFAC_2020.10.21_FinalRpt_Defining_Universe_of_Offshore_Anglers.pdf?null.

implemented, this survey should provide information to assist in supporting the Ecosystem Conservation Guiding Principle of the National Saltwater Recreational Fisheries Policy, including guidance on the effectiveness of different methods for avoiding and deterring marine mammal interactions.

Recommendation 2: NOAA should enhance the content of this section to recognize that fishery management approaches—including rebuilding plans, preventing overfishing, using science-based management with annual catch limits and accountability, and greater consideration of social, economic, and ecological considerations via the optimum yield framework—are foundational to sustainable recreational fisheries management.

Why? Sustainably managed, abundant fisheries are the foundation of quality recreational fishing opportunities and experiences. Abundant fish stocks are more resilient to climate impacts and also provide for more sustainable fishing, creating more opportunities to access this public resource, including for underserved communities. Continuous improvement in recreational fisheries management from the agency via implementation of this Policy should result in healthier ecosystems and a better fishing experience.

Recommendation 3: This Guiding Principle should include more direct acknowledgment of the need to address ecosystem interactions like discards and depredation.

Why? Recreational fisheries can interact with other parts of marine ecosystems in different ways than commercial fishing. Better understanding and reducing discard rates and discard mortality for recreational fisheries is an important component of managing the impact of fishing on the stock, and for creating opportunities for verifiable improvements in catch and release practices to be considered in management. Additionally, recreational fisheries may interact with predators of targeted species in unique ways; there is rising concern from recreational anglers about shark depredation, and we encourage NOAA Fisheries to continue [efforts to better understand these interactions](#).

Recommendation 4: Anglers should receive more education on topics that may increase their fishing opportunities, such as proper catch and release techniques, the importance of stewardship, and other actions that support resource conservation more broadly.

Why? There is a need to continue to improve fishing practices that reduce bycatch mortality by species, and also communicate that these methods may result in improved access to the fishery for recreational anglers. NOAA should consider expanding the distribution of new information regarding improved fishing methods that reduce mortality of non-target species (e.g. rockfish release mortality improvement such as [Return 'em Right](#) and the [Barbless Circle Hook Program](#)). This may be partially encompassed under Guiding Principle #4, applying innovative and on-the-water experience for better outcomes.

Guiding Principle #2 - Promote Public Access to Quality Recreational Fishing Opportunities

Recommendation: MAFAC supports this Guiding Principle and recommends retaining the section.

Why? NOAA needs to ensure current and future fishing opportunities. Shoreline and pier based access can sometimes be disproportionately impacted by regulations, an important equity factor with subsistence fishing. Additionally, climate-related loss of shoreline and beaches will affect the recreational community. Effective outreach—as recommended as an overarching theme above—will be essential to understanding the access concerns recreational anglers face in their communities.

Guiding Principle # 3 - Coordinate with State and Federal Management Entities

Recommendation: MAFAC supports this Guiding Principle and recommends retaining the section. Additionally, NOAA should examine how it can improve its outreach to, and partnership with, Councils, state management entities and local indigenous groups to attain the goals of this Recreational Fishing Policy.

Guiding Principle #4 - Advance Innovative Solutions to Evolving Science, Management, and Environmental Challenges

Recommendation: MAFAC supports this Guiding Principle and recommends retaining the section. NOAA Fisheries should also develop the implementation roadmap and guidance for using electronically reported recreational fishing data from private anglers to **enhance** and **complement** Marine Recreational Information Program and other data sources.

Why? The MAFAC Electronic Reporting Task Force was engaged by NOAA to consider the current and potential future use of electronic reporting options for private anglers, to address gaps in federal surveys of recreational harvest. The Task Force concluded that electronic monitoring technology is advancing quickly, it's employed to gather data and provide insight globally, and the opportunities for improving data collection, analysis, and management of fisheries is enormous. Their overarching recommendations were that NOAA Fisheries should use data reported electronically by anglers to enhance and complement other data sources. All their recommendations and guidance should be considered.

Guiding Principle #5 - Provide Scientifically Sound and Trusted Social, Cultural, Economic, and Ecological Information

Recommendation: NOAA Fisheries should revise this section to better include recognition of ongoing necessary processes to improve data, and to more directly commit to filling existing data gaps.

Why? While all fisheries data contain gaps, recreational fishery management faces unique and significant challenges that arise from the inherent challenges of monitoring, understanding, and managing the heterogeneous activities included in recreational fishing. Key data gaps include fundamental questions as to the number of anglers participating, their mode of fishing, their target species, the location and depth of catch, the instance and condition of released fish, and more.

Further, as we have addressed above, socio-economic and cultural data on recreational fishing is sparse. We appreciate the agency and MRIP are engaged in continuous analysis

and improvements to address these issues. We also recognize the increased challenge of coordinating among many different forms of data relevant to recreational fishing, including integration challenges with state and federal surveys, new approaches to estimating abundance and fishing impact, and more. However, when reflecting on the challenges that exist and the efforts that the agency is already engaged in, and comparing that to the content of this Guiding Principle, we felt that the agency has room to be more specific about the type of efforts they are engaged in to improve the information that underpins recreational management. For instance, the Policy does not clearly acknowledge existing efforts in multiple regions to ensure calibrated and integrated data support science-based decision making on recreational data. Under the policy, there could also be more intentional processes for identifying key data and science gaps, possibly in collaboration with councils, and developing intentional efforts to address them. For example, the current development of the Next Generation Data Acquisition Plan could offer opportunities to specifically develop new approaches and surveys for understanding recreational fishing, and active engagement in that process by NOAA Fisheries experts in recreational fishing data challenges is important.

Finally, we note the overlap between this Principle and Guiding Principle #6. This guiding principle highlights the need for the information to be trusted, which means that ongoing communications efforts are critical, but that the agency should also explore new ways of increasing trust and transparency in the data enterprise.

Guiding Principle #6 - Communicate and Engage with the Recreational Fishing Public

Recommendation: NOAA Fisheries should (1) continue the Regional Recreational Roundtables and support other venues and programs for local engagement; (2) and expand opportunities that promote two-way dialog, mutual engagement, and engage anglers better in regulatory and science processes. Scientists and managers can learn from fishermen, as well as fishermen from scientists and managers.

Why? NOAA Fisheries should continue to improve communications and facilitate transparency and dialogue between scientists, managers, and stakeholders on science-based decision making. The agency should investigate if there are other innovative ways to engage. Successful programs like MREP, that engage anglers in regulatory and science processes, should be promoted and expanded. It's also important to provide clear access to information, and engage anglers on research activities, particularly on the factors, like climate impacts, that affect stock trends.