

Draft Motion

To be incorporated into the Scoping Document as the Shrimp AP's recommendation

The Shrimp AP recommends:

That the current requirements of the shrimp permit moratorium remain in effect until October 26, 2026; except that—

1) any shrimp permit that—

- was valid or renewable as of December 31, 2014¹, and
- is not renewed before the close of the 1 year period after the expiration date of that permit,

shall not permanently expire and shall instead be held by NMFS in the “Gulf Shrimp Permit Reserve”.

2) NMFS shall reactivate and issue any permit in the Gulf Shrimp Permit Reserve upon the receipt of a qualified application and payment of the applicable fee on a first-come, first-serve basis.

3) To be qualified, an application must meet the following criteria:

- Applicant qualifications: must be a US citizen
- Vessel qualifications: vessel to which permit is attached must be no less than X ft registered length

¹ There were approximately 1482 valid + renewable permits as of December 31, 2014 (Steve Branstetter, pers. communication)

NOTES:

- 1) This motion would effectively establish a floor on the number of permits (valid + renewable) available for use in the Gulf shrimp fishery. That floor would be 1482 permits- the number provided by NMFS as of Dec. 31, 2014. In the future, any one of those 1482 permits could fall under 1 of 3 status categories -- 1) valid (renewed), 2) renewable (within 1 year of expiry), or a new category, 3) Gulf Shrimp Permit Reserve.

In the same sense, this motion also essentially places a cap on the number of permits. It would not allow the total number of permits available to the fishery under all 3 of those status categories to exceed 1482 in any given year.

Only permits that are valid can actively fish, however. Furthermore, some of those valid permits have not been actively fishing in recent years and have no recorded landings.

Therefore, under this motion, overall shrimp fishing effort could potentially increase if some of those inactive vessels began actively fishing so that the net number of vessels actively fishing in the fishery increased. Such an increase in fishing effort could have at least two effects. First, it could result in higher overall shrimp catch and landings, and 2) it could cause the overall fishing effort in the fishery to exceed one or both of the bycatch effort caps established for the fishery -- one involving juvenile red snapper bycatch, and the other sea turtle bycatch.

In an October 8, 2014, memo to the Council, SSA requested the agency perform an analysis of whether those bycatch effort caps would be exceeded in the theoretical (highly unlikely) scenario that 100% of the 1482 permits were to actively fish full-time in any given year. And if that would exceed one or both of those bycatch effort caps, what is the maximum number of permits that can actively fish full time in any given year in order for the fishery overall to remain below those 2 bycatch effort caps?

- 2) This motion would extend the moratorium, as modified, for another 10 years rather than making it permanent. There may be a benefit to the periodic review of the 'state of the shrimp fishery' and this 10-year extension would provide for/ensure that. Things change and should be reviewed again in the future.
- 3) This motion prevents permanent expiration of any permit – regardless of it being inactive ('latent'). Since the data analysis showed there is no apparent gain in CPUE (vessel profitability) by allowing permits, effort or catch to further decline, there is no need to address 'latency'. There are many plausible, legitimate reasons why a permit may not have

been actively fishing in recent years. There is no gain to the fishery in trying to force them out permanently. NOTE: This view could change if the bycatch effort cap analysis in 1) above shows that 1482 permits could theoretically exceed those caps if 100% fished full time.

4) This motion provides for applications to be considered on a first come first serve basis. Is there any benefit to prioritizing one permit application or applicant over another?

5) **Qualification criteria for applicants:**

What are the current criteria applied by NMFS? Need anything more than existing criteria?

6) **Qualification criteria for vessel to which the permit will be attached:**

Should there be a vessel size or registration criteria that would make it more likely the vessel will actually fish only in federal waters/EEZ?

- Explain why it is important to prevent these permits from being used only in State waters and, therefore, why vessel size criteria would be needed/beneficial.
- What are best criteria for achieving this? LOA? GRT? Documented? Federally registered? Select one or a combination? Need to clearly understand what each of these criteria mean and what they will achieve if applied.