



R.I. Party and Charter Boat Association
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September 20th, 2018

Mr Jason McNamee, Chief
RIDEM Division of Marine Fisheries
3 Ft Wetherill Rd
Jamestown, RI 02835

RE: Public Hearing Item 12 (section 2.9.2). Proposed reporting requirements for Party/Charter vessels.

Mr. McNamee,

On behalf of the 65 Member Captains of the Rhode Island Party and Charter Boat Association (RIPCBA), I offer the following comments relative to the proposed reporting requirements for party/charter vessels.

The RIPCBA supports the collection of timely and accurate catch and effort data from all members of the party/charter sector of the recreational fishery in Rhode Island. We believe the implementation of a log book for all RI party/charter permit holders is long overdue. In addition to a RI party/charter permit, most of our members hold federal permits issued by GARFO and SERO. These Federal Regional Office's have or are working towards implementing electronic vessel trip reports for permit holders under their jurisdiction. We believe it is in the best interest of our industry to support state efforts to do the same. The best way to ensure the accuracy of the catch and effort data collected from the party/charter sector is to collect that data in the same way from all permit holders. All of the species that we fish for are available to party/charter vessels in state waters and a party/charter operator may not need a federal permit to prosecute this fishery, thus not subject to any self-reporting requirements. Collecting data from all state permit holders via an electronic logbook will allow for a better understanding of the entire industries impact on our marine resources.

As you know, our association has concerns about the accuracy of the current data collected through the APAIS dockside survey of our clients. It is our hope that implementing a reporting requirement for every state party/charter permit holder is a step towards more of a census for estimating our catch and effort where captains provide catch and effort data and APAIS surveyors are used to validate the catch and effort data we provide.

Specific to the proposed rule:

1. All trips in party/charter mode shall be documented and submitted electronically in SAFIS.

We support this proposal. All members of the RIPCBA, that are currently mandated to submit eVTR's, utilize the SAFIS system to report and we have found it to be easy to use. There is also no cost for the program and it can be used on mobile devices or home computer.

2. All trips shall be documented on board the vessel prior to the end of the fishing trip.
This seems doable and is consistent with federal reporting requirements, but we suggest clarification. RIDEM should be more specific regarding what will be approved for documenting the trip on board the vessel. Some Captains may choose to submit the report electronically when they get home and they will need to document the trip in some way before landing. Will a captain's personal log be sufficient? Will there be an approved paper log that the captain will use? Who will provide the paper log? SAFIS eTrips will be available on cellphones prior to the 2019 season and we anticipate that this will virtually eliminate the need for paper, but in the interim a solution needs to be clear.
3. All trips shall be submitted electronically within 48 hours of the end of the trip.
This is consistent with GARFO requirements for federal eVTR's and we support keeping the rule consistent with those federal requirements to avoid confusion.
4. In cases where no party/charter mode trips were made, at least one negative report must be submitted to the Department prior to the renewal of license.
We can support this proposal as it will help to ensure reporting compliance by making a permit holder declare they were inactive as opposed to not filing a report. Did Not Fish reports were eliminated from federal reporting by GARFO, but SERO is considering them as part of their eVTR program. We would suggest clarifying how a DNF report will be submitted. (electronically or paper). We would also suggest clarifying with the ACCSP that DNF reports can be submitted via the SAFIS eTrips system, prior to implementing this reporting requirement.

In addition to the above comments specific to the proposed rule, we would suggest that an education and outreach program be defined, and resources allocated to that program. While many party/charter operators already submit reports electronically due to federal requirements, this proposal may be new to state only permit holders. We would also suggest rolling out a new reporting program in the off season and allowing for a roll out period of 3-6 months to allow party/charter permit holders to learn the system and work the reporting requirement into the routine.

We applaud the Department for taking this step to improve catch and effort data collected from the party/charter sector of the recreational fishery in RI. If you have any further questions about our comments, feel free to contact us.

Capt. Rick Bellavance, President
RI Party and Charter Boat Association