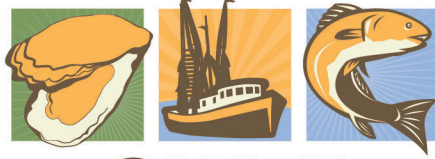


Audubon Nature Institute



G.U.L.F.

Gulf United for Lasting Fisheries

Texas Shrimp Action Plan

Updated January 2018

Prepared by:

Audubon Nature Institute

Gulf United for Lasting Fisheries (G.U.L.F.)

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Introduction

Gulf United for Lasting Fisheries (G.U.L.F.) was founded in 2012 and is the sustainable seafood program of Audubon Nature Institute, a not-for-profit network of attractions dedicated to “Celebrating the Wonders of Nature.” G.U.L.F.’s Fishery Improvement Projects (FIPs) were initiated under the Gulf States Marine Fisheries Commission (GSMFC) Oil Disaster Recovery Program (ODRP). GSMFC requested that G.U.L.F. create FIPs based on assessments of U.S. fisheries in the Gulf of Mexico using the United Nations Food and Agriculture Organization (FAO) Code of Conduct for Responsible Fisheries (CCRF).

G.U.L.F. adapted market-accepted models of FIPs, called **Marine Advancement Plans (MAPs)** by incorporating assessments conducted using the FAO CCRF. Comprehensive information of the fishery was gathered through interviews with management and industry representatives, public documents, and research publications and compared to the CCRF and G.U.L.F Sustainability Benchmarking Report (SBR).

in June 2016, Sustainable Fisheries Partnership transitioned the Texas FIP they had been leading since 2008 to G.U.L.F. Based on the needs of some participants, in 2016 the decision was made to transition this project to a Comprehensive FIP based on the guidelines published by the [Conservation Alliance for Seafood Solutions](#). An MSC Pre-assessment was completed in November 2016. Actions associated with gaps in the MSC Pre-assessment and SBR have been developed.

The full SBR and MSC Pre-assessment reports can be found on the G.U.L.F. website, www.AudubonGULF.org.



Scope

- Species:
 - White Shrimp (*Litopenaeus setiferus*)
 - Brown Shrimp (*Farfantepenaeus aztecus*)
- Location
 - Texas state territorial waters (nine nautical miles(nm))
 - U.S. Exclusive Economic Zone (EEZZ, 200 nm)
- Gear
 - Otter Trawl
- Management
 - National Oceanic and Atmospheric Administration (NOAA)
 - Gulf of Mexico Fishery Management Council (GMFMC)
 - Texas Parks and Wildlife Department (TPWD)

Current Participants (as of G.U.L.F. transition in 2016)

[Paul Piazza](#) - Joined June 2016

[Big Easy Foods](#) - Joined June 2016

[Cox Wholesale Foods](#) - Joined June 2016

Port Arthur Area Shrimpers Association - Joined June 2016

[JBS Packing, Inc](#) - Joined June 2016

[Philly Seafood](#) - Joined March 2017

[Lafitte Frozen Foods](#) - Joined May 2017

[Oceans 97](#) - Joined August 2017



Status of the Fishery

The Texas shrimp fishery primarily harvests brown and white shrimp in Texas state territorial waters and federal waters in the U.S. Gulf of Mexico. In 2015, 52.6 million pounds of brown shrimp and 16.6 million pounds of white shrimp were landed in Texas with revenues of \$96.9 million and \$46.5 million respectively. Shrimp accounts for approximately 85% of both landings and overall economic value of the Texas commercial fishing industry. Harvest of brown shrimp peaks in the summer, and harvest of white shrimp peaks in the fall. Brown and white shrimp stocks are found in both state (0-9 nautical miles) and federal waters (9-200 nautical miles) in the U.S. Gulf of Mexico and are assessed regionally. Annual stock assessments conducted by NOAA Fisheries Galveston Lab indicate that neither shrimp species is overfished or experiencing overfishing.

The Gulf of Mexico Fishery Management Council (GMFMC) and NOAA Fisheries manage the fishery in federal waters and the Texas Parks and Wildlife Department (TPWD) manages the fishery within state waters. These agencies work collaboratively to effectively manage the fishery, which is managed through limited entry licenses, season and area closures, and gear restrictions.

The primary gear type used in the Texas fishery is the otter trawl. Turtle Excluder Devices (TEDs) are required in otter trawls in both state and federal waters. Bycatch Reduction Devices (BRDs) are also required in shrimp trawls in both state and federal waters. These regulations are enforced by TPWD, NOAA, and the U.S. Coast Guard (USCG). Shrimp fishermen are also allowed to retain most bycatch species within certain regulations.

G.U.L.F. completed a Sustainability Benchmarking Report (SBR) in September 2015 to assess the status of the Texas shrimp fishery and identify areas of potential improvement. Based on the G.U.L.F. SBR and the 2016 MSC Pre-assessment, the following gaps were identified:

- Bycatch ratios are still high in comparison to other U.S. trawl fisheries.
- Observer coverage is low (1-2% on otter trawl fleet) and currently ranked as a Tier 2 “Pilot/Baseline” level program according to NOAA’s National Bycatch Report.
- TED compliance rate has fluctuated close to the required levels in past years and maintaining high compliance is required to prevent additional fishery restrictions, including possible closures, if minimum compliance levels are not met.
- The state Fishery Management Plan is outdated.
- Species characterization in the current observer bycatch reports contain large categories of



unidentified finfish (27%), crustaceans (5%), and invertebrates (7%), prohibiting the MSC assessment team from fully identifying all categories of bycatch required for MSC evaluation.

Work Plan (updated 1.3.2018)

ACTION 1	Increase TED/BRD compliance through gear checks and reporting.
Reference	MSC PI 2.3.3 G.U.L.F. SBR: 7.2.2 (d), 7.2.2 (g)(iii), 7.6.9 (a)(i,ii,iii), 8.5.1 (a), 12.10(c)
Participants	All participants
Target Completion Date	Annual updates.

Action 1 Summary:

Data on sea turtle interactions with the fishery is collected and monitored through enforcement and compliance checks carried out by NOAA, US Coast Guard, State resource agencies and trained Sea Grant agents. The NOAA TED Compliance Policy was recently implemented in September 2016. Increasing courtesy inspections will provide participants with verification that the vessels they are sourcing from are in full compliance and are operating efficiently and will increase the data available for use in meeting the requirements of the NOAA TED Compliance Policy. Participants agree to work with harvesters and docks to ensure that TEDs and BRDs are checked at least annually through courtesy inspections by either NOAA Gear Monitoring Team or Texas Sea Grant gear specialist. Documentation of gear inspections will be maintained by participants. Participants will seek to increase vessel participation annually.

ACTION 1 PROGRESS SUMMARY				
	Total # Vessels Inspected	# Fully Compliant	# With Non-Compliances	Non-Compliances Fixed
2016	18	11	7	7
2017	60	35	25	14

* Some gear adjustments required more time than available during site visit. Participants acknowledged any issues are committed to resolving them.



2016 Gear Evaluations

2016 GEAR EVALUATIONS							
	Date	Vessel #	FC*	Minor NC**	Major NC	NC fixed?	Addt'l advice?
1	5/12/16	BE-1	X				Y
2	6/27/16	PAASA-1		X		Y	Y
3	6/27/16	PAASA-2		X		Y	Y
4	6/27/16	PAASA-3	X				
5	6/28/16	PAASA-4	X				Y
6	6/28/16	PAASA-5	X				
7	6/28/16	PAASA-6	X				
8	6/30/16	PAASA-7		X		Y	Y
9	6/30/16	PAASA-8		X		Y	Y
10	7/1/16	PAASA-9		X		Y	Y
11	7/9/16	PP-1		X		Y	Y
12	7/9/16	PP-2	X				Y
13	7/13/16	JBS-1		X		Y	
14	7/13/16	JBS-2	X				Y
15	7/13/16	JBS-3	X				Y
16	7/13/16	JBS-4	X				Y
17	7/13/16	JBS-5	X				Y
18	7/13/16	JBS-6	X				

Special Notes:

*FC= Full Compliance

**NC-Non-Compliance

2017 GEAR EVALUATIONS							
	Date	Vessel #	FC*	Minor NC**	Major NC	NC fixed?	Addt'l advice?
1	1/5/17	PP-3			X	Y	Y
2	1/5/17	PP-4		X		Y	Y
3	1/5/17	PP-5		X		Y	Y
4	1/5/17	PP-6		X		Y	Y
5	2/7/17	PAASA-10	X				
6	2/7/17	PAASA-11	X				
7	2/7/17	PAASA-12	X				
8	3/28/17	CP-1	X				Y



	Date	Vessel #	FC	Minor NC	Major NC	NC Fixed?	Addt'l Advice?
9	3/28/17	CP-2			X		Y
10	3/28/17	CP-3			X	Y	Y
11	3/29/17	IC-1	X				Y
12	3/29/17	IC-2	X				Y
13	3/29/17	IC-3		X			Y
14	3/29/17	IC-4	X				Y
15	3/29/17	IC-5		X			Y
16	3/29/17	IC-6		X			Y
17	3/29/17	IC-7	X				
18	3/29/17	IC-8	X				
19	3/29/17	IC-9	X				
20	3/29/17	IC-10	X				
21	3/29/17	IC-11		X			
22	3/29/17	IC-12		X			
23	3/29/17	IC-13	X				
24	3/29/17	IC-14		X	X		Y
25	3/29/17	IC-15	X				
26	3/29/17	IC-16	X				
27	3/29/17	IC-17	X				Y
28	3/29/17	IC-18		X		Y	
29	3/29/17	IC-19	X				
30	3/29/17	IC-20	X				
31	3/29/17	IC-21	X				
32	3/28/17	IC-22		X		Y	
33	3/30/17	IC-23	X				
34	3/30/17	IC-24		X	X		
35	3/30/17	IC-25	X				
36	3/30/17	IC-26			X	Y	Y
37	3/30/17	IC-27	X				
38	3/30/17	IC-28			X	Y	
39	3/30/17	IC-29	X				
40	3/30/17	IC-30	X				
41	3/30/17	IC-31	X				
42	3/30/17	IC-32	X				



	Date	Vessel #	FC	Minor NC	Major NC	NC Fixed?	Addt'l Advice?
43	3/30/17	IC-33		X			Y
44	3/30/17	IC-34	X				
45	3/30/17	IC-35	X				
46	3/30/17	IC-36	X				
47	3/30/17	D-1		X			Y
48	3/30/17	D-2		X		Y	Y
49	7/10/17	PS-1		X	X	Y	
50	6/20/17	PS-2		X		Y	
51	6/21/17	PS-3	X			Y	
52	6/23/17	PS-4	X				
53	7/10/17	PS-5			X	Y	
54	7/10/17	PS-6	X				
55	7/10/17	PS-7	X				
56	7/12/17	PS-8	X				
57	12/11/17	FL-1	X				
58	12/11/17	FL-2		X			Y
59	12/12/17	FL-3	X				Y
60	12/11/17	FL-4		X			Y

ACTION 2	Evaluate observer coverage levels and achieve statistically appropriate coverage level.
Reference	MSC PI 2.1.3, 2.2.3, 2.3.3 G.U.L.F. SBR: 7.7.3(ii), 8.4.3(b)
Participants	Gulf of Mexico Shrimp Supplier Roundtable Members
Target Completion Date	2021

Action 2 Summary:

The observer program for the Gulf of Mexico shrimp fishery is currently considered a “Pilot/Baseline” program according to [NOAA's U.S. National Bycatch Report](#). The NBR indicates that bycatch estimates for the fishery may be based on inconsistent or unreliable information and/or that sampling levels may have been inadequate or inconsistent. A statistical analysis is needed to determine appropriate observer coverage levels for the fishery. Participants will continue to work in conjunction with



the Sustainable Fisheries Partnership (SFP) Gulf of Mexico Shrimp Supplier Roundtable to request that the government perform an evaluation of the program.

ACTION 2 PROGRESS		
Date	Progress	Participants
March 2016	Meeting In Boston to decide on actions for Shrimp Suppliers' Roundtable for 2016.	Big Easy, Paul Piazza, Cox
April 2016	A Statement of Work with two actions (ecosystem and observer coverage) was agreed upon by all participants and posted.	Big Easy, Paul Piazza, Cox
August 2016	A letter was sent to the NOAA Observer Program by Sustainable Fisheries Partnership Supplier Roundtable (lead- Woods Fisheries) requesting a statistical analysis of observer program coverage for the Gulf of Mexico shrimp fleet.	Paul Piazza, Big Easy Foods, Cox
September 2017	Letters of Support to NOAA's Cooperative Research Program supporting a proposal focused on data collection for bycatch and observer coverage.	New Orleans Fish House, members of the Shrimp Suppliers' Roundtable

ACTION 3	Evaluate current data collection methods and protocols of the Observer Program to determine if current methods are able to identify and quantify all Primary, Secondary, and main species as defined in MSC terminology.
Reference	MSC PI 2.1.3, 2.2.3
Participants	Paul Piazza, Big Easy Foods, Cox Wholesale Seafood
Target Completion Date	2021

Action 3 Summary:

There is currently onboard observer coverage for the Gulf of Mexico federal shrimp fleet which collects data on non-target species caught by the fishery. Current observer reports, however, contain some large categories of unidentified finfish, crustaceans, and invertebrates with catch percentages higher than 5%. MSC Principle 2 requires the classification of all non-target species into Primary/Secondary and main/minor. Under the current reporting system, it is unclear if all primary species and main species are identified. Primary species are species targeted by other fisheries that are managed



under tools, measures, and reference points. Main species are species that comprise 5% or above of catch, or >2% if the species is considered vulnerable. Participants agree to engage NOAA Galveston Lab to address this issue.

ACTION 3 PROGRESS		
Date	Progress	Participants
March 2016	Meeting In Boston-decide on actions for Roundtable for 2016.	Big Easy, Paul Piazza, Cox
April 2016	A Statement of Work with two actions (ecosystem and observer coverage) was agreed upon by all participants and posted.	Big Easy, Paul Piazza, Cox
September 2017	Letters of Support to NOAA's Cooperative Research Program supporting a proposal focused on data collection for bycatch and observer coverage.	New Orleans Fish House, members of the Shrimp Suppliers' Roundtable

ACTION 4	Engagement with Gulf of Mexico Fishery Management Council and NOAA Fisheries to pursue a more well-defined Harvest Control Rule (HCR) in the event that the stock falls below established reference points.
Reference	MSC PI 1.2.2
Participants	Paul Piazza, Big Easy Foods, Cox Wholesale Seafood
Target Completion Date	2021

Action 4 Summary:

The recent MSC pre-assessment notes that there is a generally understood HCR; however, it is currently unclear what tools the management system would use should the abundance drop to levels near PRI (point of recruitment impairment). A well-defined HCR should be developed that includes pre-agreed rules and management actions to be taken in response to changes in stock status.

COMPLETED ACTIVITIES

Ecosystem-Based Fishery Management	
Reference	G.U.L.F. SBR - 7.2.2(d), 12.10(c) MSC Principle 2 (2010 Report)- Ecosystem
Participants	Paul Piazza, Big Easy Foods, Cox Wholesale Seafood



Completed Action Summary:

The GMFMC and NOAA Fisheries have implemented several measures designed to maintain the functioning of ecosystems focusing primarily on bycatch, habitat and ETP species; however, there is currently no explicit ecosystem management plan for the Gulf of Mexico. The GMFMC has an ecosystem committee and NOAA's Integrated Ecosystem Assessment Program has produced an [Ecosystem Status Report for the Gulf of Mexico](#) (December 2013). NOAA is currently working to develop an agency-wide [Ecosystem-based Fishery Management Policy](#), which was available for public comment through December 2015. Participants plan to work through the SFP Gulf of Mexico Shrimp Supplier Roundtable to initiate outreach to the GMFMC and NOAA regarding further development of ecosystem-based fishery management in the Gulf of Mexico.

Ecosystem-Based Fishery Management Progress		
Date	Progress	Participants
August 2016	A letter was sent to Gulf of Mexico Fishery Management Council by Sustainable Fisheries Partnership Supplier Roundtable regarding implementation of Ecosystem Based Fisheries Management in the Gulf (lead, Big Easy)	Paul Piazza, Big Easy Foods, Cox

Transition to "Comprehensive FIP"	
Reference	"Guidelines for Supporting Fishery Improvement Projects" by Conservation Alliance for Seafood Solutions
Participants	Paul Piazza, Big Easy Foods, Cox Wholesale Seafood

Completed Action Summary:

Some participants have requirements from their buyers to meet MSC-specific goals. These participants agree to conduct an updated MSC pre-assessment to assess the status of the fishery against current MSC standards. Once a pre-assessment is completed, participants will meet to discuss and incorporate results as necessary.

Comprehensive FIP Transition		
Date	Progress	Participants
August 2016	MSC Pre-assessment update commissioned	Paul Piazza, Big Easy Foods, Cox
January 2017	Updated Work Plan (transition to Comprehensive FIP Complete)	Paul Piazza, Big Easy Foods, Cox



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