

MEMORANDUM

Date: September 24, 2025
To: Council
From: Hannah Hart, José Montañez, Mary Sabo, Council staff
Subject: Recreational Tilefish Reporting Framework

On Tuesday, October 7, 2025, the Council will review and provide feedback on the draft range of alternatives for the Recreational Tilefish Reporting Framework. This framework considers two main issues: 1) simplifying and streamlining the current reporting requirements, and 2) modifying the required timeframe to submit the electronic vessel trip report (eVTR).

Meeting Materials

Materials listed below are provided for the Council's discussion of this agenda item.

- 1) Framework Action Plan (*as of September 24, 2025*)
- 2) Recreational Tilefish Reporting Framework Discussion Document with Draft Range of Alternatives



Recreational Tilefish Reporting Framework

Action Plan

As of September 24, 2025

Framework Purpose and Need: Recreational fishermen fishing for golden and blueline tilefish north of the North Carolina/Virginia border are subject to special permitting and reporting requirements. These requirements were implemented in 2020 and are intended to improve the accuracy and reliability of recreational catch and effort estimates. However, since the mandatory permitting and reporting requirements were implemented, angler reporting rates have been very low. A program evaluation conducted in 2024 highlighted a number of issues that have contributed to persistently low compliance and reporting rates. The intent of this framework is to consider options to improve the private recreational tilefish reporting program.

Alternatives to be Considered: The Council will develop and analyze a range of alternatives intended to improve the recreational tilefish reporting program. Alternatives that will be considered are expected to focus on improving compliance and reducing the reporting burden. These alternatives include:

- Simplifying and streamlining the trip reporting requirements
 - Eliminate the requirement to submit an eVTR for trips where no tilefish were caught or landed
 - Remove or modify certain data fields that are confusing or not yielding usable data (e.g., gear fished, quantity and size of gear, soak time, depth, chart area, and/or latitude/longitude where fishing occurred)
- Modifying the trip report submission timeframe
 - Require the eVTR to be filled out with all required information, except for information not yet ascertainable (e.g., time landed), prior to entering port. Information must be entered into the eVTR, through a NMFS-approved electronic reporting system, as soon as it becomes available.
 - Require an eVTR be submitted prior to offloading any fish at the conclusion of a trip.

Fishery Management Action Team (FMAT)

An FMAT is not being used for this action. Instead, NOAA Fisheries staff, including members of the Tilefish Monitoring Committee, GARFO permitting staff, and subject-matter experts familiar with the recreational and commercial tilefish fisheries, will be consulted as needed throughout development of alternatives and analyses.

Framework Timeline: *subject to change*

October 2024	<ul style="list-style-type: none">• Review the 2024 Program Evaluation of the tilefish permitting and reporting requirements
December 2024	<ul style="list-style-type: none">• Action initiated as part of the 2025 Implementation plan
October 2025	<ul style="list-style-type: none">• Framework meeting 1: Review and approve range of alternatives
Early 2026	<ul style="list-style-type: none">• Analyze alternatives• Public Input meeting• Tilefish Committee meeting to consider stakeholder input and refine options
April 2026	<ul style="list-style-type: none">• Framework meeting 2: Final action
Spring/Summer 2026	<ul style="list-style-type: none">• Finalize Council framework document; submission to NMFS, revisions as needed• Federal rulemaking and public comment periods (4-7 months after documents finalized)
TBD	<ul style="list-style-type: none">• Effective date of implementation



Recreational Tilefish Reporting Framework

Draft Range of Alternatives and Preliminary Analysis

October 2025 Council Meeting

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INTRODUCTION

Private recreational fisherman fishing for bluegill and golden tilefish north of the North Carolina/Virginia border are subject to permitting and reporting requirements. These requirements were implemented in 2020 and are intended to improve the accuracy and reliability of recreational catch and effort estimates. However, since the permitting and reporting program was implemented, angler reporting rates have been very low. A recent [program evaluation](#) highlighted a number of issues that have contributed to persistently low compliance and reporting rates. The evaluation recommended that the Council consider potential regulatory changes to simplify and/or streamline the reporting process.

This framework considers regulatory changes intended to improve compliance, reduce the reporting burden, and improve the overall effectiveness of the tilefish reporting program.

Draft Purpose and Need Statements

The *purpose* of this framework is to consider modification to the private recreational tilefish reporting program that would streamline the reporting requirements and reduce the reporting burden on anglers. These modifications are intended to improve the overall reporting rate as well as the accuracy and reliability of the recreational tilefish catch estimates.

The *need* for this action is to improve angler compliance with reporting requirements, reduce the reporting burden, and gather necessary private recreational tilefish catch data that are not currently captured through dockside interviews or angler surveys. Collecting these data are critical to supporting the Council's efforts to effectively manage bluegill and golden tilefish.

Proposed Timeline

Subject to change

October 2024	<ul style="list-style-type: none">• Review the 2024 Program Evaluation of the tilefish permitting and reporting requirements
December 2024	<ul style="list-style-type: none">• Action initiated as part of the 2025 Implementation plan
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TBD	<ul style="list-style-type: none">• Effective date of implementation

BACKGROUND

In 2016, the Mid-Atlantic Fishery Management Council adopted Amendment 6 to the Tilefish Fishery Management Plan (FMP). This amendment incorporated blueline tilefish (*Caulolatilus microps*) as a managed species in the FMP and established management measures for blueline tilefish in Federal waters north of the Virginia/North Carolina border. Through Amendment 6, the Council recommended implementation of permitting and reporting requirements for private recreational vessels fishing for blueline or golden tilefish (*Lopholatilus chamaeleonticeps*). These requirements were intended to gather necessary recreational tilefish catch and effort data that are not captured through dockside interviews and/or angler surveys. The recreational tilefish fishery occurs so far offshore that relatively few anglers partake, and therefore few tilefish anglers are intercepted in traditional port access site interviews conducted by the Marine Recreational Information Program (MRIP). Estimating private recreational catch has been recognized as a key data gap by both fisheries scientists and managers.

The Environmental Assessment (EA) for Amendment 6 noted that requiring a dedicated recreational fishing permit for private recreational anglers to catch blueline or golden tilefish should support effective conservation and management of tilefish “by identifying vessels participating in the fishery, which can assist with catch monitoring and regulatory enforcement.” The EA also stated that the reporting requirement was considered due to the rare-event nature of blueline and golden tilefish catches, noting that “it should support effective conservation and management of blueline and golden tilefish by helping monitor recreational catch.”

On November 15, 2017, NOAA Fisheries announced approval of all measures in Amendment 6. However, the [final rule](#) stated that implementation of the recreational permitting and reporting requirements would be delayed to allow additional time for development of permitting and reporting systems. On July 16, 2020, NOAA Fisheries published a [final rule](#) implementing the permitting and reporting measures for private recreational tilefish vessels.

The final rule was generally consistent with the Council’s recommended permit and reporting measures; however, instead of requiring electronic vessel trip reports (eVTRs or trip reports) to be submitted before any tilefish are removed from the vessel, as the Council had recommended, the final rule implemented a 24-hour submission requirement. The rule noted that this submission timeframe was intended to be consistent with the requirement for Highly Migratory Species (HMS) permit holders, since some anglers may hold both permits. Additionally, while the Council intended to require reporting of trips where blueline or golden tilefish were *caught*, the regulations implemented through the final rule required reporting of any trips where tilefish were *targeted* (even if none were caught).

Summary of Current Permitting and Reporting Regulations

Private recreational vessel owners or operators are required to obtain a Federal vessel permit before taking a trip to fish for and/or retain blueline or golden tilefish in the mid-Atlantic.¹ There

¹ 50 CFR 648.4(a)(12)

is no cost to obtain the private recreational tilefish vessel permit. Permits must be renewed annually.

The owner or operator of any fishing vessel that holds a Federal private recreational tilefish permit must report for each recreational trip fishing for or retaining blueline or golden tilefish.² This report must be submitted through a NMFS-approved electronic reporting system within 24 hours after entering port at the conclusion of a trip.³ The vessel operator may keep paper records while onboard and upload the data after landing. The report must contain the following information:

- A. Vessel name;
- B. USCG documentation number (or state registration number, if undocumented);
- C. Permit number;
- D. Date/time sailed;
- E. Date/time landed;
- F. Trip type;
- G. Number of anglers;
- H. Species
- I. Gear fished;
- J. Quantity and size of gear;
- K. Soak time;
- L. Depth;
- M. Chart Area;
- N. Latitude/longitude where fishing occurred;
- O. Count of individual golden and blueline tilefish landed or discarded; and
- P. Port and state landed.

These requirements apply to anglers using a personal vessel to fish for and/or retain blueline or golden tilefish. However, this may be the same vessel that is used in for-hire or commercial fisheries on other trips. Fish retained on a recreational trip may only be kept for personal consumption and may not be sold or bartered.

Issues With the Current Reporting Program

Although the tilefish permitting and reporting requirements have been in place since August 2020, the program continues to encounter challenges with recruiting anglers to acquire the permit and then to report blueline and golden tilefish catch/effort, inhibiting the ability of the Council and NOAA Fisheries to use the data for science and management purposes. Collectively from 2020 through 2024, more than 6,000 private recreational tilefish permits were issued, yet only 389 eVTRs reporting tilefish catch were reported (Appendix A). This discrepancy between the number of permits issued and the number of reported eVTRs highlights the need to further

² 50 CFR 648.7(b)(1)(iv)

³ 50 CFR 648.7(f)(2)(iv)

investigate whether low reporting rates stem from anglers being unaware of the requirements or from other barriers to reporting.

In early 2024, the Council engaged a contractor to conduct an evaluation of the recreational tilefish permitting and reporting program, with a focus on identifying barriers to compliance and factors that would increase angler participation in the program. Through a series of facilitated focus group discussions with participants in the recreational tilefish fishery, the contractors evaluated strengths and weaknesses of the program and identified barriers to angler participation and compliance. The program evaluation concluded that “The program is not achieving its goals as originally intended, largely due to lack of participation and concern by fishery scientists and managers about the reliability of data that are submitted.” The final report, which was presented to the Council at the October 2024 meeting, highlighted several major themes along with recommendations to address program weaknesses.⁴

Because NOAA Fisheries is responsible for implementation of the tilefish reporting program, many of the recommendations from the program evaluation were directed toward NOAA Fisheries and NOAA’s Office of Law Enforcement (OLE). However, the report recommended that the Council consider regulatory changes to simplify the reporting requirements.

Focus group participants consistently emphasized that the complexity and wording of the tilefish reporting requirements are a major barrier to compliance. Many fields were seen as overly technical, duplicative, or irrelevant to recreational fishing practices, leading to widespread confusion. Anglers noted challenges with reporting effort, such as the need to break down trips by statistical area or provide granular details (e.g., number of hooks, depth, trip times) that are difficult to recall or not meaningful for recreational trips. They highlighted that many of the required fields seem to be carried over from commercial reporting systems, and although commercial and for-hire fisherman may be familiar with things like statistical areas, this information is not necessarily intuitive to private recreational anglers who are not as familiar with reporting their trips. These requirements, coupled with the confusing layout and terminology in the reporting applications, have created a perception of reporting as both burdensome and impractical. As a result, fishermen reported low willingness to participate and raised concerns that the data being submitted is often inaccurate or incomplete, undermining both compliance and data utility.

Based on tilefish permit and reporting data as of September 2025, recent trends continue to show a disconnect between the number of tilefish permits issued and the number of trips or landings reported. While the total number of permits has increased over time, only a small fraction of those permits are reporting tilefish catch (landings and/or discards), and the number of trips reported by such permits remains low at roughly one to two trips per year (Appendix A). Reported landings of blueline tilefish have remained relatively stable, while golden tilefish landings show a more notable increase; however, eVTR-reported landings are substantially lower than estimates provide by other data sources, including MRIP and the Large Pelagic Survey

⁴ Briefing materials and presentations for the October 2024 private recreational tilefish permitting and reporting agenda item are available here: <https://www.mafmc.org/briefing/october-2024>.

(LPS) as shown in Table 1 and Table 2. These trends highlight persistent challenges in obtaining accurate catch information from the private recreational sector and reinforce the need to improve the reporting program. Additional detail on the number of permits, reported trips, and landings is provided in Appendix A and B.

Table 1. Estimated landings of blueline tilefish in number of fish from the various data sources. Landings estimates from MRIP and LPS from 2015-2024 and for the private recreational tilefish eVTRs from 2020-2025

Year	MRIP	LPS	eVTR
2015	4,663	1,312	-
2016	97,477	435	-
2017	12,122	2,322	-
2018	2,989	2,580	-
2019	4,839	2,335	-
2020	481	3,342	59*
2021	44,199	3,568	327
2022	65,714	2,309	415
2023	45,919	9,856	310
2024	33,683	6,593	484
2025 (<i>as of Sept. 22, 2025</i>)	49,894	<i>Not available</i>	397

Table 2. Estimated landings of golden tilefish in number of fish from the various data sources. Landings estimates from MRIP and LPS from 2015-2024 and for the private recreational tilefish eVTRs from 2020-2025.

Year	MRIP	LPS	eVTR
2015	0	294	-
2016	29,692	242	-
2017	59,413	2,121	-
2018	893	1,440	-
2019	10,364	2,357	-
2020	9,336	2,808	49*
2021	9,920	3,095	164
2022	96,718	3,409	310
2023	24,622	5,289	272
2024	52,585	8,713	829
2025 (<i>as of Sept. 22, 2025</i>)	102,309	<i>Not available</i>	1,293

*Note: blueline and golden tilefish eVTR data from 2020 includes a partial year of data from when the reporting requirements were implemented on 8/17/20 through the end of the year.

DRAFT MANAGEMENT ALTERNATIVES

Alternative Set 1: Modified Reporting Requirements

Note: Alternatives 1B and 1C could be selected individually or in combination.

Alternative 1A: No Action/Status Quo

This alternative would maintain the current private recreational tilefish reporting requirements which currently requires all vessel owners or operators that hold a federal private recreational tilefish permit to submit an eVTR **for any trip fishing for or retaining** blueline or golden tilefish in the MAFMC Tilefish Management Unit (Maine – Virginia). The required trip report information includes:

- (A) Vessel name;
- (B) USCG documentation number (or state registration number, if undocumented);
- (C) Permit number;
- (D) Date/time sailed;
- (E) Date/time landed;
- (F) Trip type;
- (G) Number of anglers;
- (H) Species;
- (I) Gear fished;
- (J) Quantity and size of gear;
- (K) Soak time;
- (L) Depth;
- (M) Chart Area;
- (N) Latitude/longitude where fishing occurred;
- (O) Count of individual golden and blueline tilefish landed or discarded; and
- (P) Port and state landed.

Alternative 1B: Remove the Requirement to Report Effort-Only Trips

This alternative would remove the effort component of the current reporting requirements (i.e., requirement to report all trip targeting tilefish even if none were caught) and would only require submission of an eVTR for trips that **catch or land** blueline or golden tilefish in the MAFMC Tilefish Management Unit.

Alternative 1C: Modify the Required Reporting Fields

This alternative would simplify the current reporting requirements by removing certain data fields that are causing confusion or not yielding usable data. Under this alternative, the following fields would be eliminated:

- Trip type
- Species
- Gear fished
- Quantity and size of gear

- Soak time
- Depth
- Chart Area
- Latitude/longitude where fishing occurred

Discussion

According to the 2024 program evaluation, many anglers' reluctance to submit required eVTRs is linked to confusion and burden associated with several fields currently required, particularly those related to fishing effort. For example, the current regulations require permit holders to separately report effort for each statistical area within a single trip, despite the recreational community's general lack of familiarity with the statistical areas used in fisheries data collection. In addition, some required effort fields lack the detail necessary to meaningfully link effort to species-specific catch information (e.g., blueline tilefish vs. golden tilefish), while others are overly granular and difficult to answer accurately, such as number of hooks per line or exact depth, which may vary throughout a trip. Due to these challenges, effort data is not likely reported accurately, especially location, effort by species targeted (which is not requested by the program), and hours spent fishing.

Although effort information can be useful for understanding recreational fishing activity, the current requirements impose a level of burden that outweighs the benefit, particularly given the low reporting rates. Therefore, it may be more critical to simplify requirements so that reporting is easier. Higher reporting rates will ultimately provide more reliable catch estimates, which are the most immediate need for managing these fisheries. Once stronger participation is achieved, more refined approaches to collecting effort data could be reconsidered.

Alternative Set 2: Modified Trip Report Submission Timeframe

Note: Alternatives 2B and 2C could be selected individually or in combination.

Alternative 2A: No Action/Status Quo

This alternative would make no changes to the current regulations, which require eVTRs to be submitted within 24 hours after entering port at the conclusion of the trip.

Alternative 2B: Require eVTR to be Filled Out Prior to Entering Port

This alternative would require the eVTR to be filled out with all required information, except for information not yet ascertainable (e.g., time landed), prior to entering port. Information must be entered into the eVTR, through a NMFS-approved electronic reporting system, as soon as it becomes available.

Alternative 2C: Require eVTR Submission Prior to Offloading Fish

This alternative would require submission of an eVTR **prior to offloading fish** at the end of a trip.

Discussion

If selected individually, Alternative 2B preserves flexibility by continuing to allow anglers additional time to submit their final eVTR within 24 hours but also requires that an eVTR be filled out in one of the NMFS-approved electronic reporting systems with the required data fields and available immediately upon return to port. If Alternative 2B was selected individually, this hybrid approach could help address enforcement challenges by ensuring electronic documentation exists at the end of the trip, giving law enforcement a record to check against observed landings. While still giving anglers additional time to finalize submission. In addition, this approach aligns with existing logbook requirements for for-hire and commercial vessels (Table 3). Regulations found at 50 CFR 648.7(c) state: “Vessel trip reports required by [paragraph \(b\)\(1\)\(i\)](#) of this section must be filled out with all required information, except for information not yet ascertainable, prior to entering port.” Establishing a similar standard for private recreational trips promotes consistency across sectors and reinforces the expectation of timely, verifiable recordkeeping.

Alternative 2C, however, would require that trip reports be both completed and submitted as prior to offloading any fish at the end of a trip. This approach provides the highest level of enforceability, as enforcement personnel can confirm on the spot that reporting obligations are fully satisfied, eliminating the risk of delays, incomplete records, or reconstructed reports. Requiring immediate submission also maximizes the timeliness and accuracy of the data, supporting stronger confidence in catch estimates. Alternative 2C also represents the original Council-approved alternative during the development of the private recreational reporting requirements through Amendment 6. At that time, the Council supported that trips must be submitted upon landing because of its clear enforceability and strong alignment with the program’s purpose and need. However, in final rulemaking, NOAA fisheries modified the requirement to allow reports to be submitted within 24 hours of returning to port. The final rule cites that the 24-hour submission timeframe is consistent with the requirement for HMS permit holders.

It is also important to recognize that private recreational trips differ in nature from commercial and for-hire operations, which justifies revisiting a stricter timeframe requirement for this sector. Federally permitted commercial vessels, for example, must sell their catch to federally permitted dealers, and until that transaction occurs they may not have all the information necessary to complete their vessel trip report. While for-hire vessels often run multiple trips per day, and the current regulations allow them additional time to finalize electronic submission to avoid disrupting their business operations. By comparison, private recreational anglers typically conduct single trips and do not rely on dealer transactions, making it far more feasible to require completion, and even submission, immediately upon returning to port.

Table 3. eVTR Requirements by Vessel Permit Type.

Permit Type	Requirements During Trip	Submission Timeframe
Commercial	Vessel trip reports <u>must</u> be filled out with all required information, except for information not yet ascertainable, prior to entering port.	eVTRs must be submitted within 48 hours at the conclusion of a trip.
For-Hire (Charter/Party)	Vessel trip reports <u>must</u> be filled out with all required information, except for information not yet ascertainable, prior to entering port.	eVTRs must be submitted within 48 hours at the conclusion of a trip.
Private Recreational Tilefish	The vessel operator <u>may</u> keep paper records while onboard and upload the data after landing.	eVTRs must be submitted within 24 hours after entering port at the conclusion of a trip.

APPENDIX A: 2025 PERMITTING AND REPORTING UPDATE

Each year since implementation of the tilefish reporting requirements, the Council has received an update from GARFO that includes trends in the number of permits issues or renewed each year, the number of trips reported, and the number of blueline and golden tilefish landed. Based on the most recent information, 1,448 private recreational tilefish permits were issued in 2025 (as of September 22, 2025), this includes 421 new permits and 1,027 permits that were renewed from 2024. The total number of permits issued in 2025 to date is similar to the total number issued in 2024; however, a larger portion of those permits were renewed comparatively (Figure 1).

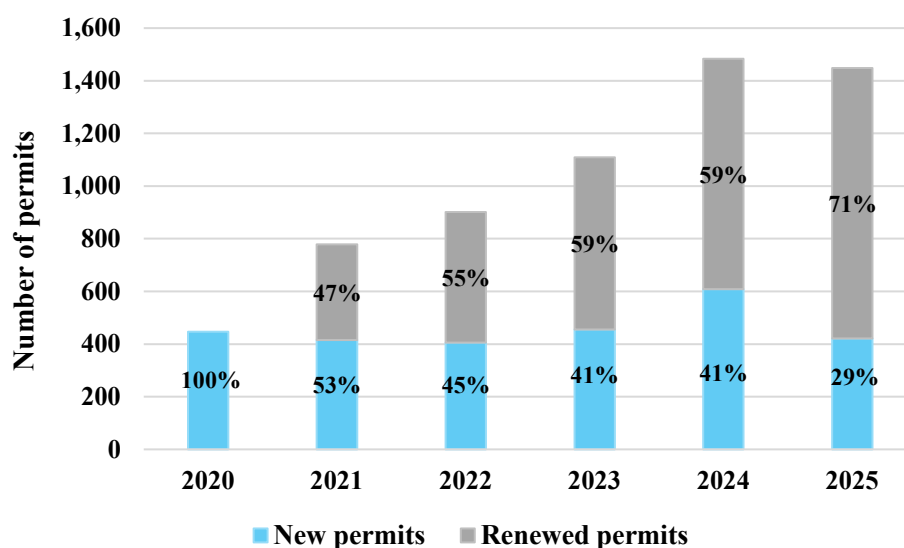


Figure 1. Number of private recreational tilefish permits issued each year from 2020 through 2025 to date. The blue bars represent the number of new permits each year and the grey bars are the number of permits renewed from the previous year. The percentage of total new vs. renewed permits are provided inside the associated bars.

Although the total number of permits including renewed permits shows a general positive trend over the past several years, the percentage of permits that have reported catching tilefish has remained relatively steady across all years (Table 4)

Table 4. The total number of permits issued each year from 2020 through 2025 to date compared to the percentage of permits that have reported at least 1 trip catching (landing and/or discarding) tilefish.

Year	Total Num. of Permits	Percent of Permits reporting tilefish catch (landings or discards)
2020	447	2%
2021	779	4%
2022	902	4%
2023	1,109	3%
2024	1,484	4%
2025	1,448	4%

Additionally, since implementation of these permit and reporting requirements, the average number of trips reported per permit that has reported tilefish catch has remained relatively constant at about 1 to 2 trips per year. However, the total number of private recreational trips reported catching tilefish has generally increased since 2020 (Table 5)

Table 5. Number of reported trips by Private Recreational Tilefish Permit holders only. Including trips with reported tilefish catch, trips that caught no tilefish but reported catching other species, and trips that did not catch anything each year from 2020 through 2025 to date.

Year	Number of reported trips by Private Rec. Tilefish Permit holders		
	Trips with Tilefish catch	Trips catching no Tilefish but caught other species (e.g., mahi, yellowfin)	Trips with no catch of any species
2020	9	16	3
2021	50	62	7
2022	60	90	8
2023	52	120	19
2024	96	37	30
2025	122	66	8

Figure 2 shows the number of reported blueline and golden tilefish landings and discards. Reported blueline tilefish landings has generally been consistent since 2021 with some years having higher reported landing compared to others (Figure 2A). Unlike golden tilefish where there appears to be a more drastic increasing trend (Figure 2B). However, compared to the other data sources available that estimate private recreational tilefish landings, including the MRIP LPS, the reported landings from the private recreational tilefish eVTRs is substantially lower than these two other data sources (Table 1; Table 2). As described below, there are caveats associated with each of these data sources; however, the substantially lower reported estimates associated with the eVTRs further highlights the need to improve these reporting requirements to

get a more accurate understanding of annual removals of both tilefish species to effectively manage these species.

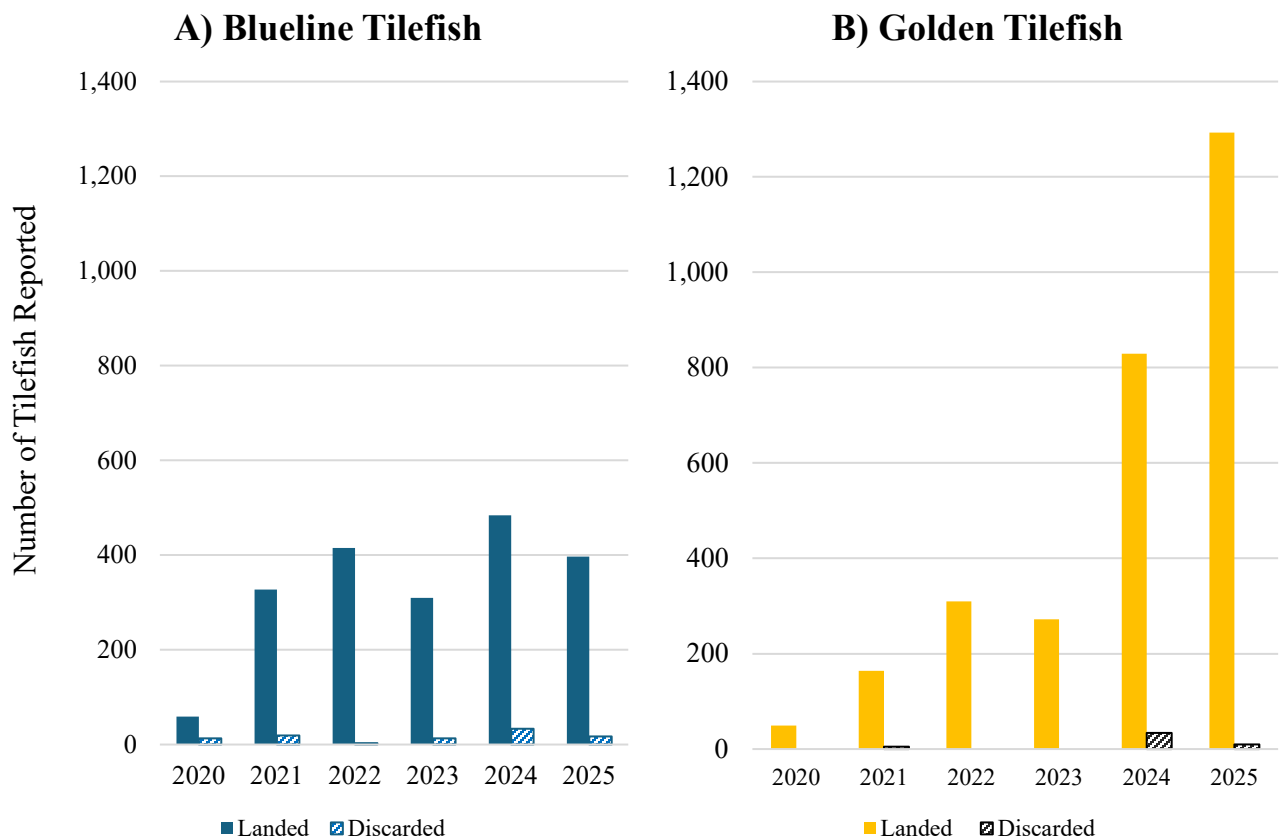


Figure 2. Number of private recreational reported A) blue line and B) golden tilefish catch each year from 2020 through 2025 to date. The number of blue line and golden tilefish caught each year is also broken down in landings (solid-colored bars) vs. discards (hashed colored bars).

APPENDIX B: OTHER PRIVATE RECREATIONAL TILEFISH DATA SOURCES AVAILABLE

Private recreational catch for blueline and golden tilefish are currently estimated through several data sources, including MRIP⁵, LPS⁶, and private recreational eVTRs. While eVTRs provide some level of self-reported information, the concerns about low compliance and data quality limit their reliability as a primary source of harvest estimates. For this reason, the most recent stock assessments have relied on MRIP estimates for blueline tilefish and private recreational LPS estimates for golden tilefish.

Each of these data sources presents notable challenges. For MRIP, the primary concern is the very high percent standard error (PSE) associated with the estimates, which in some years, and depending on the level of stratification, can exceed 100%. Such high variability limits the precision and confidence that can be placed in these estimates. LPS data, while it provides some coverage of golden and blueline tilefish, was not designed for this purpose. Because the survey focuses on large pelagic species and only samples anglers holding a Highly Migratory Species Angling Permit, the resulting estimates may not always fully represent the broader population of anglers targeting tilefish. Despite these limitations, both MRIP and LPS produce catch estimates that are significantly higher than the harvest reported through the eVTR program (Table 1; Table 2). This discrepancy highlights both the shortcomings of current reporting systems and the importance of identifying more reliable, targeted methods to characterize private recreational harvest of tilefish.

⁵ Additional information about MRIP is available here: <https://www.fisheries.noaa.gov/recreational-fishing-data/about-marine-recreational-information-program>

⁶ Additional information about LPS is available here: <https://www.fisheries.noaa.gov/recreational-fishing-data/large-pelagics-survey-glance>