



# Atlantic States Marine Fisheries Commission

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## Atlantic Striped Bass Commercial Tagging Ten-Year Review Meeting Report

October 2025

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The Atlantic Striped Bass Management Board tasked the Plan Review Team (PRT) with reviewing the striped bass commercial tagging program since it has been over a decade since the program was implemented. Requirements for striped bass commercial tagging programs were implemented in 2013 via [Addendum III to Amendment 6](#) to the Interstate Fishery Management Plan (FMP) for Atlantic Striped Bass and are maintained in [Amendment 7](#) (section 3.1.1).

The PRT and state commercial tagging contacts met via webinar on July 24 and July 30, 2025, with the following meeting objectives:

1. Inform the Board: Compile a summary of each state's tagging program.
2. Look Across Programs: Report any key observations and takeaways across programs, including common challenges faced by multiple states and the various biological metrics used to determine the number of tags for each season.
3. Share Information: Opportunity for states to share best practices and information on common issues, challenges, and solutions.
4. Streamline Reporting: Minimize duplicate information submitted in annual commercial tagging reports vs. annual state compliance reports. Confirm what information is most useful to law enforcement in tagging reports (e.g., tag color) vs. what is more relevant in state compliance reports (e.g., tag accounting).

Each state provided a written overview of their tagging program enclosed in the *Appendix* and presented an overview of their state program during the meeting. This report summarizes the subsequent discussion of observations and differences across state commercial tagging programs for striped bass.

### ***FMP Requirements***

[Addendum III to Amendment 6](#) was approved in 2012 to implement uniform, coastwide requirements for striped bass commercial tagging programs to be implemented in 2013 or 2014, depending on the state. These same requirements are maintained in the FMP currently under [Amendment 7](#) (section 3.1.1). While the coastwide FMP requirements were implemented in 2013 and 2014, many states already had commercial tagging programs in place, with some in place for decades preceding the coastwide FMP requirements.

The goal of the coastwide commercial tagging requirements implemented by the states is to limit the illegal harvest of striped bass by making it unlawful to sell or purchase commercially caught striped bass without a commercial tag. The FMP allows states to choose to implement commercial tagging at the point of harvest or the point of sale. Note that at the time of this report writing, the Board is considering whether to make a change that would require commercial tagging at the point of harvest or point of landing through Draft Addendum III. The Board is expected to make a decision on this topic in October 2025 with potential implementation in 2027 or 2028 if that change is made.

Per the FMP, states are required to allocate tags to permit holders based on a biological metric intended to prevent quota overages. States must require permit holders to turn in unused tags or provide an accounting report for any unused tags prior to next fishing season to account for the disposition of all tags issued to that permit holder (used, unused, broken, lost, etc.). The FMP recommends that if permit holders cannot account for unused tags, then that individual will not be issued a permit for the next year.

The FMP outlines specific requirements for the tags themselves. Tags must be tamper-evident and valid for one year/one fishing season only. They must be inscribed with at least the year, state, and a unique number associated with the permit holder. When possible, the tags should be inscribed with the size limit. Tags must remain affixed to the fish until processed for consumption.

Each state is required to submit a commercial tagging report to the Commission every year by 60 days prior to the start of its commercial fishery. The reports are then shared with the Law Enforcement Committee. The report must include a picture of the tags for the upcoming season and a description of color, style, and inscription. The report must also include the number of tags issued/printed and the biological metric used to determine the number of tags. The report must also note any changes or issues with program implementation. An optional report component is to include tag accounting from the previous year (number of tags issued, used, returned, unaccounted for, etc.). At the time of the annual report submission, the previous year's tag accounting is often preliminary.

***Meeting Consensus Point:*** The PRT and State Commercial Tagging Contacts agreed that including the optional preliminary tag accounting for the previous year is not a useful component of the tagging reports due to the preliminary nature of the information. Pending any objection from the Law Enforcement Committee, the group agreed that the annual state

tagging reports should no longer ask for that information and instead each state should provide near-final tag accounting in their annual striped bass compliance report submitted to the Commission.

### ***Characteristics of State Tagging Programs***

The PRT and State Commercial Tagging Contacts discussed key characteristics of the state tagging programs briefly summarized here. More details on how each state program operates are available in the state program overviews in the Appendix.

#### Varying Striped Bass Fisheries and Point of Tagging

Striped bass commercial fisheries vary widely by state, with different management systems (primarily whether or not a state manages with individual quotas), different gears, different seasons, and the number of commercial harvesters who participate in the fishery (Table 1).

As of the time of this report, three states implement commercial tagging at the point of sale, four states at the point of harvest, and one state requires two tags (one at the point of landing and one at the weigh station). It should be noted that while Maryland does tag at the point of harvest for some gears, other gears are required to tag by point of landing (see the definition in the following section).

**Table 1. State Tagging Program Key Characteristics**

State	Tag at Point of Harvest or Sale	2024 Commercial Tags Issued	2024 Participants Receiving Tags	Individual Fishing Quotas
MA	Sale	51,240	129	No
RI	Sale	10,030	18 plus Confidential # Floating Fish Trap	No
NY	Harvest	59,502	379	Yes
DE	Landing*	17,300*	165 <sup>+</sup>	Yes
MD	Harvest	441,000 <sup>^</sup>	805 <sup>^</sup>	Yes
PRFC	Harvest	87,713	263	Yes
VA	Harvest	188,700 <sup>^</sup>	362 <sup>^</sup>	Yes
NC	Sale**	0	0	No

\* Delaware's number of tags listed are the tags issued to and used by harvesters to tag before the fish are landed. Tags are also issued to weigh stations where a second tag is attached to each striped bass, such that each fish has two tags.

+ Delaware's gill net fishery (111 licensees) account for >99% of Delaware's commercial striped bass harvest; the remaining licensees (54 in 2024) are hook-and-line only licensees that often choose to transfer their allocated tags to the gill net fishery.

<sup>^</sup>Initial number of Maryland and Virginia participants receiving tags and initial number of tags issued, which may change during the season due to quota transfers/leases and requests for additional tags.

\*\* North Carolina has reported 0 commercial striped bass harvest from the ocean in over a decade. No tags were issued or used. Tags are on hand to issue if fish come inside three miles.

For states that tag at the point of sale, striped bass must be tagged immediately upon receipt by the dealer. For states that tag at the point of harvest or point of landing, states have defined the following definitions of when the tag must be affixed to the striped bass:

New York: Immediately after removing said striped bass from their gear and prior to attending another piece of gear.

Delaware: Before landing or putting on shore.

Maryland: (1) Immediately to a striped bass harvested by hook and line; (2) Within 200 yards of the pound net to a striped bass harvested from a pound net; or (3) Before removing a striped bass from a boat or removing a boat from the water, to a striped bass harvested by any other gear.

Potomac River Fisheries Commission: As soon as feasible and in no event shall any commercially caught striped bass be removed from the Potomac River or from the boat at the point of landing, whichever occurs first, without said tag being permanently affixed. The words “as soon as feasible” as used herein shall mean for the i) Commercial Hook & Line fishery – as soon as the fish is taken and before it is put into the cooler or storage area; ii) Pound Net fishery – as soon as the fish are taken and before the boat leaves the net site; and iii) Gill Net fishery – as soon as each separate piece of net is fished and before the boat leaves the net site.

Virginia: At the place of capture, and before leaving the place of capture.

#### Biological Metric

For the biological metric to determine the number of tags for each season, all states use average weight to convert quota pounds to number of fish (i.e., number of tags). There is a varying degree of complexity for this calculation with some states accounting for different average weights by gear type, different average weights by individual harvester, and different types of quota allocation (e.g., equal shares, full vs. part shares). One state also takes into account the anticipated size of striped bass targeted for certain markets. States note there is inherent uncertainty in whether the next season’s average fish weight will be similar to the current season’s average weight. States account for this uncertainty by ordering extra tags to have on hand if more tags are needed due to smaller fish size. Some states with individual quotas did note that this uncertainty in average size can lead to issuing too many or too few tags resulting in quota overages or underages.

#### Tags Unaccounted For

Per the FMP, states require tag recipients (harvester or dealer) to return unused tags at the end of the season and provide an accounting report for any unused tags prior to the next fishing season to account for the disposition of all tags issued to that harvester or dealer (used, unused, broken, lost, etc.). After this tag accounting, there are some tags that remain unaccounted for, which are tags that are not returned and that have not been reported as

lost/broken. In recent years, these unaccounted tags comprise about 1% to 3% of the total tags issued for most states, with a few states around 5-6% in some years. During COVID in 2020-2021, there was a higher percentage of unaccounted tags in many states due to COVID-related challenges with the tag return and accounting process (e.g., disruptions to the typical in-person tag return and reporting protocols).

### ***Common Challenges***

Many states noted the increasing cost of tags in recent years and long lead time for tag production and shipping, which requires the number of tags for the next season to be calculated and ordered months in advance. A few states also noted occasional instances of tag quality issues and errors by the vendor that had to be addressed. Some states, particularly those with no gap between seasons (e.g., 2024 season ends December and 2025 season starts January), noted the challenge of planning for the next season while the current season is still ongoing. In that case, tag accounting for the current season cannot be completed before the next season starts and data from the current season, including the number of tags used and average weight, is still accumulating. Some states also noted that any changes to commercial quota decided by management late in the year make it difficult to plan for the next season, since adjustments to the quota changes the number of tags needed for the season and distributed to each tag recipient. One state also noted license renewal (when harvester pays for number of tags) occurs before the next year's quota is finalized.

In addition to the administrative challenges of planning for next year's tags as described above, the actual process of distributing tags, facilitating the tag return process, and completing tag accounting and auditing each year is administratively demanding and requires significant staff time for each state.

### ***Differences Across Programs***

The PRT and State Commercial Tagging Contacts identified differences across state tagging programs and how they are implemented as summarized here. Table 2 on page X shows these differences by state. More details on how each state program operates are available in the state program overviews in the Appendix.

Tag Distribution Process: In some states, the state agency itself orders the tags, the state agency receives the tags from the vendor, and then the state agency distributes the tags via in-person pick-up, state drop-off, or by mail. In other states, the tag vendor ships tags directly to harvesters after verification from the state agency on eligible participants to receive tags. Tags may be distributed by providing the harvester/dealer with all of their tags up front in one batch or tags may be distributed in small amounts throughout the season. In the case where the tag vendor ships directly to the harvester, it was noted that errors have been documented including the harvester receiving the wrong number of tags, or tags with incorrect unique serial numbers.

Physical Style of Tags: Some states use the standard plastic cap/ball style truck seals, and some states use the rectangular-grip truck seals with a metal locking mechanism. Both types are

marketed as tamper evident. One state noted past issues with the standard plastic truck seals where harvesters were able to manipulate the tag to remove it from a fish and then reuse the tag. The tag types may differ in tensile strength (tags with metal inserts often have greater tensile strength) which may affect the risk of tag breakage. For any tag type, there is a risk of tag breakage if the fish is picked up by the tag. Harvesters/dealers must report broken tags as part of their tag accounting.

Tag Reporting and Verification: In some states, striped bass harvest is reported in one harvester report. In other states, harvest is reported from multiple sources which allows for additional verification (e.g., harvester report and dealer report; harvester report and weigh station report). States also have different requirements for the type of information that must be reported for striped bass harvest. One state with point of sale tagging requires reporting on individual tags including the date of purchase, the weight of each individual fish, the tag serial number, the harvester name, and the harvester license number. Most states require reporting of the total number of tags used in addition to the total poundage. One state requires only the total poundage to be reported (not the quantity of tags used). Some Chesapeake Bay jurisdictions noted the difficulty of verifying tags used if fish are landed in a different state.

Consequences for Delinquent Tag Reporting: In most states, if a tag recipient has not accounted for all tags issued in the prior year, that harvester or dealer would receive a reduced number of tags from the state agency or no tags for the following year, depending on the degree of delinquent reporting. One state noted that while the agency can reduce the number of tags issued to a harvester based on unaccounted tags from the previous year, the state has not deducted any tags in recent years; this tag deduction mechanism was paused due to COVID-related issues and has not been reestablished. In two states, delinquent tag reporting is handled directly by law enforcement based on enforcement fines and commercial penalty schedule.

Personal Use: All states require striped bass that are kept for personal use to be reported. Some states also require bringing fish to a weigh station or dealer before taking the fish home for personal use. Five states do require fish kept for personal use to be tagged, and three states do not require fish kept for personal use to be tagged (and therefore are not counted toward the quota).

***Meeting Consensus Point:*** The PRT and State Commercial Tagging Contacts noted there are several differences across states' striped bass commercial tagging programs. It seems that all states have recognized various state-specific challenges and have made an effort to address these challenges. Overall, the striped bass commercial tagging programs have successfully met the goals of the FMP to implement coastwide commercial tagging requirements. There are still ongoing challenges and potential improvements to be made.

***Potential Changes for Point of Sale Programs (Draft Addendum III)***

As of August 2025, through Draft Addendum III, the Board is considering whether to require commercial tagging at the point of harvest or point of landing instead of allowing states to

choose point of harvest or point of sale. The Board is expected to make a decision on this in October 2025 with potential implementation in 2027 or 2028 if that change is made.

This potential change would have the biggest impact on the three states that currently implement commercial tagging at the point of sale: Massachusetts, Rhode Island, and North Carolina. Those three states noted anticipated challenges and program changes if they were to switch to point of harvest or point of landing commercial tagging. More detailed information from each of these three states are available in the state program overviews in the Appendix.

The potential change would require these three states to distribute tags to harvesters instead of to dealers. The three states noted their commercial fisheries are not managed via individual quotas and potentially thousands of harvesters could be eligible to receive tags, compared to dozens of dealers who currently receive tags. As an example, Rhode Island distributed tags to 18 dealers in 2024 for their general category fishery. If Rhode Island transitioned to point of harvest tagging, ~ 1,000 license holders have a license and/or endorsement that authorizes the commercial harvest of striped bass and therefore would be eligible to receive tags.

The three states noted concern about the staff capacity needed to administer the tagging program with that magnitude of increase in number of participants and number of tags. The three states also noted the difficulty of predicting how many tags each harvester would need since there are no individual quotas. This may lead to states either distributing too many tags at the beginning of the season with many tags going unused, or too few tags would be distributed and there would be many in-season requests for more tags which would be an additional process for harvesters and state staff. In either case, these states would have to order and distribute significantly more tags to accommodate a harvester tagging program.

Currently, Massachusetts' commercial striped bass fishery is open-entry with nearly 4,600 permits issued in 2025. To successfully administer harvester tagging, Massachusetts would potentially have to go to limited entry and reduce the number of participants to a more manageable number based on past fishing activity. This process could take up to two years. Rhode Island also noted additional concerns that tagging at point of harvest would slow down processing times for its floating fish trap fishery, which is a high-volume fishery processing a high volume of striped bass from each trap with the ability to quickly return any fish outside the size limit to the water. Increased processing time from harvester tagging may result in dead discards. Rhode Island also noted concern about less timely quota monitoring from harvester reports as compared with the current dealer reports that are updated within 24 hours of purchase with an incentive to report on time in order to receive any additional tags. Rhode Island also noted concerns about tags from inactive commercial licensees being used by recreational fishers and/or used out of season.

Massachusetts noted additional concerns about tag distribution and tag return processes since harvesters are more widespread throughout the states than dealers.

**Meeting Consensus Point:** The PRT and State Commercial Tagging Contacts agreed that switching a state commercial tagging program from point of sale to point of harvest or point of landing would be a significant change and states would need sufficient time to make all the necessary program changes.



**Table 2. Summary of Differences Discussed Among Tagging Programs**

<b>State</b>	<b>Point of Tagging</b>	<b># of 2024 Participants Receiving Tags</b>	<b>Tag Distribution Process</b>	<b>Reports Indicating Tag Use</b>	<b>Tag Information Reported</b>	<b>Consequences for Delinquent Tag Reports</b>	<b>Personal Use Fish</b>
<b>MA</b>	Sale	129	State Agency Receives Tags from Vendor and State Agency Distributes	End-of-season tag accounting report	None/Pounds of Fish only	No Tags for Next Season	Reported
<b>RI</b>	Sale	18 plus Confidential # Floating Fish Trap	State Agency Receives Tags from Vendor and State Agency Distributes	Dealer Reports tag data that can be checked against harvester reports for date sold and pounds	For each tag used: date of purchase, fish weight, tag serial number, harvester name, harvester license number	Reduced or No Tags for Next Season	Reported
<b>NY</b>	Harvest	379	Harvester Receives Tags from Vendor Directly (Agency tells vendor how many tags for each person)	Harvester Reports and Dealer Reports	Quantity of Tags Used and Pounds of Fish per trip	Reduced or No Tags for Next Season	Reported and Tagged
<b>DE</b>	Landing and Weigh Station	165+	State Agency Receives Tags from Vendor and State Agency Distributes	Harvester Reports and Weigh Station Reports	Quantity of Tags Used and Pounds of Fish per day	Reduced or No Tags for Next Season	Reported and Tagged

State	Point of Tagging	# of 2024 Participants Receiving Tags	Tag Distribution Process	Reports Indicating Tag Use	Tag Information Reported	Consequences for Delinquent Tag Reports	Personal Use Fish
MD	Harvest	805^	Harvester Receives Tags from Vendor Directly (Agency tells vendor how many tags for each person)	Harvester Reports and Weigh Station Reports	Quantity of Tags Used and Pounds of Fish per day	Enforcement Fines/License Penalties Issued by Natural Resources Police	Reported and Tagged
PRFC	Harvest	263	State Agency Receives Tags from Vendor and State Agency Distributes	Harvester Reports	Quantity of Tags Used and Pounds of Fish per day	Reduced or No Tags for Next Season- 1:1 Tag Penalty	Reported and Tagged
VA	Harvest	362^	State Agency Receives Tags from Vendor and State Agency Distributes	Harvester Reports and Dealer Reports	Quantity of Tags Used and Pounds of Fish per day	Fines for missing tags that cannot be accounted for	Reported and Tagged
NC	Sale	0	State Agency Receives Tags from Vendor and State Agency Distributes	Dealer Reports	Quantity of Tags Used and Pounds of Fish per day	Enforcement Citations Issued by Marine Patrol	Reported (as of December 2025)

+ Delaware's gill net fishery (111 licensees) account for >99% of Delaware's commercial striped bass harvest; the remaining licensees (54 in 2024) are hook-and-line only licensees that often choose to transfer their allocated tags to the gill net fishery.

^ Initial number of Maryland and Virginia participants receiving tags and initial number of tags issued, which may change during the season due to quota transfers/leases and requests for additional tags.

***Appendix***

Following are the state overviews of each striped bass commercial tagging program prepared for this commercial tagging review.

**Atlantic Striped Bass Commercial Tagging 10-Year Review - Summer 2025**  
**Massachusetts**

**Massachusetts**

Overview of Striped Bass Commercial Tagging Program

**A. Striped Bass Commercial Fishery Overview**

1. Type of Management (e.g., ITQ, limited entry, etc.):

**Open entry**

2. Point of Tagging (harvest and/or sale):

**Point of sale**

3. Number of Participants Receiving Commercial Tags

*If a state has gear-specific tags, it is optional to list participants by gear type. At a minimum, please provide some insight into the prevalence of different gears in question #4.*

*Maryland and Virginia please separate Ocean vs. Chesapeake Bay.*

	# Participants Receiving Tags
2020	170*
2021	131
2022	124
2023	128
2024	129

\*In 2020, there was a spike in harvesters purchasing the Retail Boat Seafood Dealer permit in order to act as their own dealer and sell fish straight off the boat during COVID.

4. Gears Used (please indicate which are most common):

**Rod & reel (no other gears authorized)**

5. 2024 Commercial Measures:

Gear	Size Limit	Trip Limit	Quota	Open Seasons*
Rod & Reel	35" minimum size	15-fish Boat-based permits, 2-fish for all other	683,773 lbs	<ul style="list-style-type: none"><li>June 16–September 30: Tuesdays &amp; Wednesdays, with Thursday added on August 1 if <math>\geq 30\%</math> quota remains</li><li>October 1–November 15: Monday–Friday if quota remains</li></ul>

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\* In 2024, the de facto season was Tuesdays & Wednesdays, June 16 –August 13 (2024 quota filled)

6. *Optional:* Provide any additional information about the commercial fishery the state would like to explain.

**The Massachusetts commercial striped bass endorsement is an open entry endorsement. 4,555 endorsements have been issued in 2025. Typically, only about a quarter of issued striped bass endorsements are active in a year. The tradition of open access participation in this fishery has been intended to foster the cultural and historical aspects of the fishery and to support those that may be interested in pursuing fishing as an occupation or as a gateway to other employment in the marine economy. This works in MA given the highly restrictive rules on gear, season/days, and possession limit. Transitioning to point-of-harvest tagging in Massachusetts would necessitate DMF to limit entry and not renew the majority of permits given current administrative resources.**

### ***B. Biological Metric, Number of Tags, and Program Operation***

1. Describe the biological metric used to determine the number of tags printed and issued to participants:

**An average weight of commercially harvested fish from the prior year is used to convert the current year quota in weight to number of fish. Generally, about twice as many tags are ordered as projected to be used to ensure sufficient supply under the dealer-tagging based approach. Tags are distributed to dealers who have declared their intent to act as primary purchasers of striped bass that year according to their prior year purchases, plus a buffer to minimize the need to fulfill in-season requests for additional tags. Buyers with no/limited history receive a minimum default number of tags. Requests for additional tags are fulfilled after reviewing the buyer's in-season transactions, with the amount of tags provided based on their activity level and remaining quota amount.**

**For example, for the 2025 season, an average weight of 22 lb/fish (based on preliminary 2024 landings/reported tag use and market sampling) was used to estimate that the Commonwealth's 2025 quota of 683,773 lb will require approximately 31,081 tags to fill. DMF ordered a total of 65,000 tags, allowing us to stage extra tags at both our Gloucester and New Bedford offices in case seafood dealers need more throughout the season. DMF reviewed the 2024 purchase history of each Primary Buyer authorized for striped bass purchases and established an initial tag issuance based on the total pounds purchased and an average weight of 22 lb/fish, plus a 20% buffer. Authorized primary buyers with no or limited purchase history received a default initial issuance of 20 tags. Subsequent tag issuances will be completed upon request based on the Primary Buyer's in-season transactions (as**

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documented by SAFIS dealer reporting records) and the remaining quota level. An average of 30 in-season requests for additional tags were fulfilled the prior two years.

### 2. Number of Tags Issued and Tags Not Accounted For:

	# Tags Issued	Percent of Tags Not Accounted For*
2020	46,520	2.98% (1,388)
2021	46,760	1.78% (834)
2022	58,560	1.09% (640)
2023	54,560	1.05% (574)
2024	51,240	1.02% (525)

*\*Tags not accounted for refers to unused tags that were not returned/not reported as lost.*

### 3. What is the process and timing for tag distribution? E.g., tags distributed by mail during the month of November before the fishery opens on January 1.

**Tags are distributed during the month of May before the fishery opens in mid-June. Depending on dealer location, tags are delivered by DMF staff/Environmental Police, mailed, or picked up at a DMF office.**

### 4. Are tags allowed to be transferred between individuals? If so, how are transfers monitored?

**No.**

### 5. Does the state require data about the use of each tag to be reported back to the state? This could include sale date, poundage of each fish tagged, etc.

**No.**

### 6. Describe the process for returning and auditing unused tags.

**Approximately 2-3 weeks after the season closes, DMF mails an accounting report to each dealer that received tags during the season. The reports identify the number of tags issued to the dealer and the total weight of striped bass they reported purchasing, and asks for the number of tags being returned, the number of tags lost,**

and the number of tags damaged. The signed accounting reports and any unused tags are required to be returned to a DMF office within 30 days. DMF staff follow up with phone calls, emails, and letters if needed. DMF then audits the number of tags returned against the calculated number of tags a dealer should have remaining based on the landings reported to the SAFIS database.

7. Describe how the state responds to non-compliance with commercial tagging or reporting requirements (e.g., failure to return unused tags, submit mandatory reports, etc.)?

Discrepancies and delinquent reports are followed up on and dealers found out of compliance may be denied tags the following year. Denial of tag issuance occurs infrequently but the threat acts as a solid deterrent to violating the tag accounting requirements. Delinquent reports have most frequently originated from dealers with no or minimal striped bass purchasing history who receive the default allotment. Dealers who are out of compliance with their SAFIS dealer reporting requirements are not allowed to renew for the following year until their reporting is completed.

### ***C. Program Changes and Challenges***

1. Identify any major changes and challenges with the commercial tagging program over the past ten years. Feel free to use the following categories to organize various issues or modify/add categories as needed.

Tag Procurement/Distribution: **During COVID, there was a significant delay in receiving our tag orders from Cambridge Security Seals. Over the past few years that delay is gone and we have received our tags in 2-3 weeks. Between 2016 and 2025 the cost of a tag rose from \$.05 to \$.0906. DMF pays for the tags.**

**In terms of distribution, DMF staff now reach out to smaller dealers or dealers with no recent primary buyer history to confirm they want tags before staff drop them off. This minimizes the number of inactive dealers receiving tags and, consequently, the number of unused tags that need to be returned.**

Tag Accounting/Return of Unused Tags:

**We have found that it is much easier to recover tags and accounting reports if the striped bass season closes before Labor Day. After Labor Day, seasonal businesses close and we spend more time reaching out to businesses to recover tags. With our current quota, regulations, and fish availability the season has been closing prior to Labor Day for the past several years. Fishery dynamics in 2018–2020 that lead to the fishery not taking its quota and thus not closing until December 31**

prompted DMF to adopt a November 15 default closure date to aid in tag accounting prior to the end of the year and the onset of the permit renewal season.

DMF's commercial harvester and dealer reporting forms collect the weight of striped bass sold, but not the number of fish, which necessitates the use of average fish weights to conduct tag accounting processes. Consideration is being given to modifying these forms to collect the number of striped bass sold. This would also aid in the enforcement of the striped bass possession limits (which are in numbers of fish).

Enforcement:

Other:

2. For states who tag at the point of sale: Since Draft Addendum III includes an option to require tagging at point or harvest, identify any major challenges the state's commercial tagging program may encounter by transitioning to point of harvest.

The biggest challenge for Massachusetts in transitioning to point of harvest tagging would be the open entry nature of our permit system. For the past three years we have issued over 4,500 commercial striped bass endorsements. At current staffing levels we could not administer a point of harvest tagging program to that many permit holders. We would likely need to limit entry and then reduce the number of permit holders to somewhere between 400 and 500. Administering a tagging program to that number of permit holders would be more feasible. Were DMF to limit entry to the fishery under a harvester tagging requirement, we do not anticipate adopting an Individual Fishing Quota management approach like every other point of harvest tagging state has (and already had when coastwide tagging was instituted). This means that DMF would likely be in a position of needing to either distribute many more tags than required to fill the quota or having to fulfill many in-season requests for additional tags (or both). Additionally, harvesters are more widespread throughout the state, including remote locations (i.e., Martha's Vineyard, Nantucket) than primary buyers, further burdening the process of tag distribution and return.

#### ***D. Program Successes***

1. Identify how challenges are being addressed/resolved and any other major successes the state would like highlight from the past ten years.



In recent years, DMF received feedback from law enforcement that in some instances striped bass were being dropped off at seafood dealers after hours and in some instances the harvesters were affixing the dealer tags to the fish themselves. In response to this, DMF updated its tagging regulations in 2024 to specifically require both the commercial harvester and primary buyer dealer be present at the primary sale and the fish must be tagged immediately. Law enforcement reports this activity stopped and some dealers started having staff stay later to accept fish after the regulation change.

2. Would the state deem its current tagging program as a success in minimizing illegal harvest? Are there ongoing sources of illegal commercial harvest?

The current tagging program has been successful at increasing accountability at primary buyer dealers and throughout the supply chain. For example, untagged striped bass found at a restaurant or seafood market are easily identified as potentially illegal. This reduces the ability of harvesters to make “back door” deals and not sell to a permitted primary buyer. Law enforcement, however, still deals with illegal commercial harvest by both permitted and unpermitted harvesters at a modest level.



**Rhode Island Department of Environmental Management**  
**Division of Marine Fisheries**

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TO: Emilie Franke, Fishery Management Plan Coordinator, ASMFC

FROM: Nicole Lengyel Costa, RI DEM, Striped Bass TC Member

DATE: July 18, 2025

SUBJECT: 2025 Overview of Striped Bass Commercial Tagging Program

Please find a copy of Rhode Island's 2025 overview of the striped bass commercial tagging program. Red text throughout this report indicates confidential data. All floating fish trap data, and total commercial pounds landed are confidential. If you have any questions, you may contact me directly at 401.423.1940.

# Atlantic Striped Bass Commercial Tagging 10-Year Review - Summer 2025

## RHODE ISLAND

### Overview of Striped Bass Commercial Tagging Program

#### A. Striped Bass Commercial Fishery Overview

1. Type of Management (e.g., ITQ, limited entry, etc.):  
RI has a limited entry fishery. New licenses are only issued based on the retirement of existing licenses. An exit:entry ratio and detailed prioritization for issuance can be found at: <https://rules.sos.ri.gov/regulations/part/250-90-00-2>
2. Point of Tagging (harvest and/or sale):  
Point of sale. Several harvesters are also licensed dealers; therefore, some tagging is already occurring at point of harvest.
3. Number of Participants Receiving Commercial Tags  
*If a state has gear-specific tags, it is optional to list participants by gear type. At a minimum, please provide some insight into the prevalence of different gears in question #4.*  
*Maryland and Virginia please separate Ocean vs. Chesapeake Bay.*

	# Participants Receiving Tags	
	General Category	Floating Fish Trap
2020	23	3
2021	20	C
2022	18	C
2023	18	C
2024	18	C

4. Gears Used (please indicate which are most common):  
General category: All gears except gillnet and floating fish trap are allowed. The most common is rod & reel.  
Floating fish trap: Restricted to floating fish traps.
5. 2024 Commercial Measures:

Gear	Size Limit	Trip Limit	Quota	Open Seasons
General Category	34"	5 fish pp or 5 fish/vsl	84,465	6/11 – 6/20; 7/9 – 12/31*
Floating Fish Trap	26"	Unlimited**	54,002	4/1 – 12/31

\* Closed Thursday, Friday, Saturday, Sunday throughout. Only open until quota reached.

\*\*Once eighty percent (80%) of the seasonal allocation is projected to be harvested, the possession limit shall be five hundred (500) pounds per floating fish trap licensee per calendar day.

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6. *Optional:* Provide any additional information about the commercial fishery the state would like to explain.

The general category (GC) fishery is typically less than 14 days, it was only 8 days on 2025. The GC fishery operate in June – early July and then closes. In some years when the floating fish trap (FFT) quota is not fully harvested by September 15, the RIDEM may transfer pounds to the GC and re-open the GC fishery. There is typically a 2-3 month closure before a GC re-opening. As a result, dealers keep their unused tags after the initial closure because they may need them again in the fall for a re-opening. During this closure period, it is common for tags to be inadvertently discarded or lost.

For 2025, we will be encouraging dealers to return unused tags after the initial GC closure to avoid tag losses. We will then re-issue tags in the fall should the fishery re-open.

### ***B. Biological Metric, Number of Tags, and Program Operation***

1. Describe the biological metric used to determine the number of tags printed and issued to participants:

Number of tags printed: Based on the striped bass biological data collected in 2024, the average weights of general category and floating fish trap striped bass were used to estimate the number of tags needed. Based on our Amendment 7 quota (148,889 lbs; 90,822 lbs GC; 58,067 lbs FFT) that would equate to ~4,000 general category and 10,000 floating fish trap tags respectively. The DMF always orders extra tags for a buffer as the number of tags used each year can vary with fish size.

Number of tags issued: Dealers are given an initial allotment of tags based on how timely their reporting was the previous calendar year, e.g., 25-200 tags at a time. Dealers may receive additional tags only if they submit tag reports for each tag they have already used and are up to date with their required Standard Atlantic Fisheries Information System (SAFIS) reporting requirement. Dealers are required to report to SAFIS within 24 hours of purchase so staff can accurately track the commercial quota. If a dealer fails to report in a timely fashion, their allotment amount will be reduced.

2. Number of Tags Issued and Tags Not Accounted For:

	# Tags Issued	Percent of Tags Not Accounted For*
2020	13,760	7%
2021	13,640	12%**
2022	16,210	3%
2023	12,610	1%

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2024	10,030	3%
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*\*Tags not accounted for refers to unused tags that were not returned/not reported as lost.*

*\*\* See section C(1) for further details on 2021*

3. What is the process and timing for tag distribution? E.g., tags distributed by mail during the month of November before the fishery opens on January 1.

Tag distribution begins ~ 1 month prior to the start of a commercial season and occurs throughout the season. Tags are available for pickup M-F, 8:30 – 4pm, at two RIDEM offices in Jamestown and Narragansett.

4. Are tags allowed to be transferred between individuals? If so, how are transfers monitored?

No

5. Does the state require data about the use of each tag to be reported back to the state? This could include sale date, poundage of each fish tagged, etc.

Yes, for each fish purchased, the dealer must report:

- Date landed
- Pounds
- Tag #
- Fisher name
- Fisher license #

6. Describe the process for returning and auditing unused tags.

Dealers are required to submit data reports for all tags used and any unused tags by January 1 the following calendar year. Data reports may be emailed, faxed, mailed or dropped off in person. Unused tags may be mailed back or dropped off in person.

An access database is used to track all striped bass tags distributed, returned as unused, and reported as used. RIDEM staff query the database following the January 1 deadline each year and reach out to dealers to request data reports and unused tags.

7. Describe how the state responds to non-compliance with commercial tagging or reporting requirements (e.g., failure to return unused tags, submit mandatory reports, etc.)?

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Dealers who fail to account for all of their tags, or submit dealer reports late when the season is open, may be restricted the following calendar year. Restrictions may include receiving a reduced number of tags or no tags at all. Dealers who have had their tag allotment reduced, may have it increased again once they demonstrate improved compliance.

For 2026, Marine Fisheries staff plan to coordinate with our Division of Law Enforcement to ensure increased compliance with returning tags and data reports from 2025.

### ***C. Program Changes and Challenges***

1. Identify any major changes and challenges with the commercial tagging program over the past ten years. Feel free to use the following categories to organize various issues or modify/add categories as needed.

#### Tag Procurement/Distribution:

- In 2021, following the covid-19 pandemic, tag distribution changed to reduce the risk of staff becoming sick. The tagging database was queried to determine the number of striped bass typically used by a dealer in a year. The full number of tags was then given to the dealer. This method of distribution ended due to increased non-compliance of returning unused tags and dealers reporting they lost tags when given larger amounts initially.

#### Tag Accounting/Return of Unused Tags:

- Changes in staff responsibility for the tagging program from 2020 – 2021 led to less rigorous audits in those years and consequently, the % of tags unaccounted for in those years increased.

#### Enforcement:

- Tagging program staff and DLE intend to work closely in 2026 to ensure increased compliance for returning unused tags and data reports for 2025.

#### Other:

2. For states who tag at the point of sale: Since Draft Addendum III includes an option to require tagging at point of harvest, identify any major challenges the state's commercial tagging program may encounter by transitioning to point of harvest.

If RI is required to transition to tagging at the point of harvest, there will be several negative consequences and the administrative burden of the program will drastically increase.

- RI currently distributes tags to 18 individuals for our general category fishery. If harvester tagging is required, the number of individuals who will receive

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tags will significantly increase. Since RI does not have an ITQ, a striped bass license, or a striped bass endorsement, RI will be forced to issue tags to any individual with a license authorized to catch and retain striped bass. In 2025, there are currently 1,017 license holders who would be authorized to receive striped bass tags with harvester-required tagging. At a possession limit of 5 fish/person/day, and a commercial general category season that typically lasts a minimum of 8 days, RIDEM may have to distribute 40,680 tags just for the general category fishery. In 2024, 5,030 tags were issued to the general category fishery. This is a potential increase of 35,650 tags that would need to be distributed and accounted for.

- Data from our tautog tagging program, which has point of harvest tagging, shows a similar pattern where the number of tags issued is significantly more than the number of tags used.
  - The tautog tagging program consistently issues ~25,000 tags each year to ~300 harvesters that end up using 12-13k tags.
  - Based on what we have seen with the tautog program, we expect we will have to purchase and distribute significantly more tags if we switch to point of harvest tagging as explained above.
- Our floating fish trap fishery is a high-volume fishery that operates under an unlimited possession limit. Having to tag at the point of harvest would significantly impact their operations by increasing the processing time of catch. The nature of this fishery makes it a very clean fishery with little discards due to their ability to quickly return regulatory discards to the water alive. Increased processing time for catch could impact this aspect of their operation and cause unnecessary dead discards. In recent years, floating fish trap harvesters have also been licensed dealers and typically tag fish at the point of landings.
- Having to purchase an additional 35-40k tags each year will increase costs to RIDEM by \$3500.
- The increased number of tags that would need to be distributed would lead to an increased burden for auditing tags. Staff spend a significant amount of time auditing the tagging data and reaching out to dealers to request that they return their tagging data and unused tags. At this point in time, RIDEM does not have the staff and resources to perform the same auditing procedures if the number of individuals receiving tags and number of tags distributed were to increase to the level described above. This would lead to an increased number of tags that are unaccounted for and could increase illegal activity.
- Switching from dealer to harvester reporting would decrease our ability to closely track our striped bass quota to prevent quota overages. Striped bass dealers are currently required to report landings to SAFIS within 24 hours of purchasing to facilitate quota monitoring and projections. Given that the general category fishery only lasts ~ 8 days, timely quota monitoring is important for preventing overages. The striped bass tagging program is used

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to ensure compliance with the 24-hour dealer reporting rule. Dealers who are non-compliant with the 24-hour SAFIS reporting are not issued additional striped bass tags until they enter compliance. If tagging is harvester based, RIDEM staff will have to resort to taking legal administrative action against the dealer. This is a long process and would not allow for any immediate action to prevent quota overages.

- For example, Dealer A receives 200 striped bass tags. The season opens on Tuesday and Dealer A buys 75 fish on Tuesday and 100 fish on Wednesday. With only 25 tags left, Dealer A comes into the office to get more striped bass tags on Thursday. Staff check our dealer compliance file and see that Dealer A has not reported any striped bass to SAFIS for Tuesday or Wednesday. Dealer A will be refused additional tags until they submit SAFIS reports and provide documentation to prove reports have been submitted.
- If harvesters are required to tag fish, when Dealer A does not report their landings to SAFIS, there is no immediate mechanism to force them to report or even if we know that they are withholding reports. Dealer A ends up reporting their landings the following week, 7 days late, and RI exceeds their annual quota. Administrative action to suspend Dealer A's license could take 6+ months.
- RI DEM DLE is concerned that with up to 40k additional tags being distributed, including to fishers who are not currently active but have a license authorizing the harvest of striped bass, these tags could be placed on fish prior to being sold on the illegal market, making them indistinguishable from a legally sold fish through a licensed dealer. These tags could also be attached to the fish after the season has closed or by recreational fishers who obtained tags from a non-active commercial license holder. Our enforcement efforts would then be focused on the disposition of unused and unreturned tags (attached to illegal market fish, lost, broken) months after these fish were harvested and these cases would be a challenge to prosecute.

### ***D. Program Successes***

1. Identify how challenges are being addressed/resolved and any other major successes the state would like highlight from the past ten years.
  - Successes: Increased compliance with dealer reporting that prevents quota overages
  - Challenges: getting dealers to return unused tags and data reports. Staff will be working closely with DLE in 2026 to increase compliance with returning unused tags and data reports.



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2. Would the state deem its current tagging program as a success in minimizing illegal harvest? Are there ongoing sources of illegal commercial harvest?

RI has had a commercial tagging program since 1990, 24 years prior to ASMFC requiring tagging programs. We have consistently had the same program as far as distribution and accounting with the exception of 2021 as described above.

RI views our program as a success with little evidence to support ongoing illegal activity. Additionally, there is no overlap in our commercial and recreational size limits and our GC season is extremely short only lasting 8 days in 2025.

In states that have individual quotas, there is great incentive to sell striped bass in an illegal market and have no record of your individual quota utilization. Point of harvest (POH) tagging gives enforcement the opportunity to prevent this practice and is essential for states with individual quotas. RI does not have individual quotas.

In Rhode Island, the only specific enforcement concerns that POH tagging could help to address is striped bass legally harvested by licensed commercial fishers being sold on the black-market and/or not being reported. However, the RIDEM Division of Law Enforcement believes that this is not a significant issue and very few fish are meeting this outcome.

Most fish being sold at an illegal market are from non-commercial recreational fishers and POH tagging would do little to aid in the enforcement of this issue and could exacerbate it. Recreational fishers would not be allowed to take a commercial-sized striped bass (there is no overlap in sizes like tautog) whether the fish were tagged at POH or not. The same enforcement efforts and actions are going to take place to combat illegal sales of recreational striped bass if there is POH or POS tagging.

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**New York**

**New York**

Overview of Striped Bass Commercial Tagging Program

**A. Striped Bass Commercial Fishery Overview**

**1. Type of Management (e.g., ITQ, limited entry, etc.):**

Limited entry permit system with non-transferable individual fishing quotas (through tag allotments).

Commercial Striped Bass Harvester Permits (CSBHP) are an “endorsement” on the New York Food Fishing License (FFL). In order to have a CSBHP, you must have a FFL. Permits may only be transferred to immediate family members (as defined by NY law), or in the event of a death of a permit holder, a one-time transfer to non-family members is permitted.

Each CSBHP holder is assigned either a “full” or “part” share of tags. This is determined based on percent of income that comes from commercial fishing activity.

**2. Point of Tagging (harvest and/or sale):** Harvest

**3. Number of Participants Receiving Commercial Tags**

*If a state has gear-specific tags, it is optional to list participants by gear type. At a minimum, please provide some insight into the prevalence of different gears in question #4.*

*Maryland and Virginia please separate Ocean vs. Chesapeake Bay.*

	<b># Participants Receiving Tags</b>
2020	407/*
2021	410/392
2022	394/376
2023	396/382
2024	392/379

New York does not issue tags based on gear type. Each CSBHP holder who is in good standing with the department and has renewed on time is eligible to order tags. Not all permit holders buy tags.

The table lists out the “number of participants eligible to purchase tags”/ “number of participants who actually purchased tags”.

*\*Don’t have the second metric easily accessible for 2020 due to a database change.*

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**4. Gears Used (please indicate which are most common):**

“Striped bass may be taken for commercial purposes by the following gear types only: hook and line, pound net, trap net, gill net with mesh size of 6.00 to 8.00 inch stretched mesh, or as by-catch in otter trawls. It is unlawful to use gill nets to take striped bass, or to possess striped bass while tending any gill net in Great South Bay, South Oyster Bay, or Hempstead Bay. Otter trawl by-catch is limited to 21 striped bass per vessel per trip and must be boxed separately. Gill nets with mesh sizes less than 6.00 inches, or greater than 8.00 inches, are limited to a by-catch of 7 striped bass per trip and must also be boxed separately. All other types of gear are prohibited for the use in taking striped bass, including, but not limited to, haul seines and spears.”

The average percentage of landing by gear from 2020-2024 is as follows:

Gillnet (64%), Hook and Line/Hand Line (24%), Trawl (6%), and Fixed Nets (5%).

**5. 2024 Commercial Measures:**

<b>Gear</b>	<b>Size Limit</b>	<b>Trip Limit</b>	<b>Quota</b>	<b>Open Seasons</b>
*	Not less than 26" TL nor greater than 38" TL	By tag allocation	595,686	May 15-December 15

*\* Striped bass may be taken for commercial purposes by the following gear types only: hook and line, pound net, trap net, gill net with mesh size of 6.00 to 8.00 inch stretched mesh, or as by-catch in otter trawls.*

**6. *Optional:* Provide any additional information about the commercial fishery the state would like to explain.**

***B. Biological Metric, Number of Tags, and Program Operation***

**1. Describe the biological metric used to determine the number of tags printed and issued to participants:**

The biological metric used for determining the number of tags is the average weight of fish which comes from NY's fisheries dependent sampling program. Commercially caught fish from markets are weighed, total length is measured, and scales are collected for ageing.

Only data from NY caught/tagged fish is collected. Length and age frequencies of these fish are also used to inform the predicted weight for the next year when calculating tag numbers.

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New York**

In addition to the biological metrics, the following factors are considered when calculating the total number of tags issued: the number of permit holders who have renewed, current split between full and part share permit holders, and the amount of tags that went unused and were returned to the department.

Example of how tags are calculated yearly:

<b>Table 3. 2025 Striped Bass Tag Distribution Calculation</b>	
Quota (lbs)	580307
av weight (lbs) per fish market sampling	11.3
2024 comm permits issued	394
# full shares 2024*	316
# part shares 2024*	78
# tags (quota/avg lb per fish)	51354.60177
# tags+ 8% returns (based on 2024 returns)	55462.96991
# tags/394 permit holders	140.7689592
part share allocation (20% of 140)	28.15379183
part share total tags	2195.995763
full share total tags (total tags- part share tags)	53266.97415
full share allocation	168.5663739

**2. Number of Tags Issued and Tags Not Accounted For:**

	# Tags Issued	Percent of Tags Not Accounted For*
2020	62430	^
2021	67991	1.6%
2022	61000	1%
2023	61601	0%
2024	59502	0.5%

*\*Tags not accounted for refers to unused tags that were not returned/not reported as lost.*

*^don't have the 2020 unaccounted for tags easily accessible due to data base change*

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**3. What is the process and timing for tag distribution? E.g., tags distributed by mail during the month of November before the fishery opens on January 1.**

NYSDEC provides Cambridge Security Seals with the list of permit holders and the serial numbers they are assigned. Permit holders purchase their tags directly from Cambridge Security Seals. Cambridge Security Seals has requested an 8-10 week lead time for production, so tag numbers and permit information is sent to the company in late February in order for tags to be in hand by the May 15<sup>th</sup> start date.

Since DEC does not directly distribute tags to the fishermen, once permit holders receive their tags they must sign and return an "Acknowledgement of Receipt of Tags" form that attests to them receiving the correct number of tags and the correct serial numbers.

**4. Are tags allowed to be transferred between individuals? If so, how are transfers monitored?**

Tags are currently not allowed to be transferred between individuals in New York and the tag holder MUST be present if the tags are being filled. New York's Marine Resource Advisory Council (MRAC) and DEC are considering amending regulations to allow tag transfer between commercial striped bass harvester permit holders in the future.

**5. Does the state require data about the use of each tag to be reported back to the state? This could include sale date, poundage of each fish tagged, etc.**

Commercial fishers must submit vessel trip reports (VTR) for each commercial fishing trip that is taken. VTRs must have the pounds of striped bass landed and the number of tags used. It is not required by regulation that the serial numbers of tags are recorded on VTRs, but it is encouraged.

Additional information collected on the VTRS include:

**Harvester Reporting:**

Vessel Name	Average Tow/Soak Time	Date Sold
State Reg or Vessel Doc #	NMFS Statistical Area Fished	Port and State Landed
Permit Type and Number	LAT/LONG or Loran of Area	Date/Time Landed
Date/Time Sailed	Fished	
# of Crew	Average Depth	
# of Anglers	Species Fished	
Gear Fished	Pounds of each Species	
Mesh/Ring Size	Kept/Discarded	
Quantity of Gear	Dealer Permit # or Sales	
Size of Gear	Disposition	
# of Haul	Dealer Name	

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**New York**

**6. Describe the process for returning and auditing unused tags.**

Unused tags must be returned to the department by December 20 (or 5 days after the close of the commercial season). Tags may be returned in person or by mail. Returned tags are counted by staff and serial numbers are checked. Any permit holder who has two or more tags unaccounted for are notified by mail of their discrepancy. Mailings continue until the discrepancy is resolved. If the permit holder is unable to account for the tags, a signed letter stating that tags are lost is required and held in their file.

**7. Describe how the state responds to non-compliance with commercial tagging or reporting requirements (e.g., failure to return unused tags, submit mandatory reports, etc.)?**

Permit holders are NOT eligible to receive tags for the current year if they have not resolved reporting and tag compliance issues from the previous year or if they have missed the Commercial Striped Bass Harvester Permit renewal deadline. According to regulation, DEC can deduct the number of tags issued to a fisher if they have not accounted for all the previous year; however, this has not been done since at least 2020, if not earlier.

***C. Program Changes and Challenges***

**1. Identify any major changes and challenges with the commercial tagging program over the past ten years. Feel free to use the following categories to organize various issues or modify/add categories as needed.**

**Tag Procurement/Distribution:**

- Starting in 2015 and due to staffing and logistical constraints at DEC, the department switched from distributing tags in house to having permit holders order tags directly from Cambridge Security Seals.
- The 2022 season saw delays in permit holders receiving their tags in time for NY's May 15 opening date, due to production issues with the tag vendor. This issue caused significant economic impact to fishermen who did not have their tags on opening day. For the 2023 commercial fishing season, the tag vendor increased production lead time for tags from 4 weeks in 2022 to 8-10 weeks. To avoid a delay in 2023 and to accommodate the new production lead time, New York distributed tag order material earlier than the past (late February) to give permit holders ample time to purchase tags before the start of the commercial fishing season and to ensure equitable opportunity for commercial harvesters. DEC has maintained this earlier timeline since 2023 but this has resulted in needing to estimate the number of used/unused tags for the previous fishing year, as well as the number of permit renewals for the current year.

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- New York's regulations (prior to March 7, 2023) stated a \$0.25 price cap on commercial tags. This price cap had become an issue for NY's tag vendor, as they had not had a price increase in many years. To address this issue and to maintain a functioning commercial tagging program, New York filed an emergency rule making in 2023 to remove the \$0.25 price cap. This measure allows for flexibility in the future and avoid subsequent regulatory changes in order to work with tag manufacturers.
- Cambridge Security Seals has had QA/QC issues resulting in permit holders receiving the wrong number of tags or set of serial numbers. Although this has happened consistently the last several years, it appears to be a small percentage of orders based on what has been reported to the department by the permit holders.

**Tag Accounting/Return of Unused Tags:**

- There have not been any major issues with tag accounting or return of unused tags over the past ten years.
- Staffing and departmental changes, as well as the development of new commercial fisheries databases since 2018, have caused some minor inconsistencies when calculating final numbers year-to-year, but overall the transition has been smooth and percentage of "unaccounted for" tags remains low.
- Tag deductions are a mechanism the department can use to help with tag accounting and compliance, but since at least 2020 tags this has not been utilized. This first began because of administrative and logistical issues related to COVID and has yet to be reestablished as part of the program.

**Enforcement:**

- Within the last ten years, Law Enforcement requested that the permit numbers be printed on the commercial tag. Law Enforcement has found this effective.

**Other:**

- In 2024, NY went over commercial harvest by ~15k pounds. This is likely due to both fish availability (2015 and 2018 year class in the slot) and also heavier fish. Additionally, in 2024 DEC was less conservative with their "unused tag rate" buffer. This was driven by a requests by the Marine Resources Advisory Council and their concern with consistent underharvest of commercial quota in NY prior to 2024.

*From 2024 Tagging Report:*

"In previous years, including 2023, tag determinations were based on an observed trend in the fishery which showed an 8% return rate of tags. This 8% has been used as a buffer to increase finalized tag allocations. The quota utilization rate has been increasing in recent years, but still falls short of full utilization. For 2024, we are using an 11% tag

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New York**

return rate/buffer for our tag allotment calculations. This percentage was selected in consideration of the 4,000 unaccounted for 2023 tags (as of January 2024 when the allotments were calculated) and with the assumption that half of the tags will be returned, and half will be used. While this is a slightly less conservative approach, the tag utilization trends, the size and numbers of available fish projected to fall in the 26-38" slot size, and the consistent underharvest from the commercial fishery provides confidence that we will not overharvest during the 2024 season. Additionally, to safeguard against overharvest, our regulations allow us to close the fishery if the harvest is projected to be over quota, despite issuance of tags to all permit holders."

- 2. For states who tag at the point of sale: Since Draft Addendum III includes an option to require tagging at point or harvest, identify any major challenges the state's commercial tagging program may encounter by transitioning to point of harvest.**

The Addendum III option that may require point of harvest tagging will not affect New York as point of harvest tagging is already required in New York.

***D. Program Successes***

- 1. Identify how challenges are being addressed/resolved and any other major successes the state would like highlight from the past ten years.**

**Tag Procurement/Distribution:**

- To eliminate the need to estimate the number of permit renewals each year, DEC is proposing a regulatory change to amend the permit renewal deadline from April 15 to February 15. This will provide more precise metrics for calculating tag allotments.

**Tag Accounting/Return of Unused Tags:**

- DEC commercial data management staff continually work on ways to improve data entry methods to have more timely and precise tag accounting.
- DEC staff is developing a protocol to begin docking tags in a standardized way, including keeping detailed records of permit holders who are late on reporting or who consistently lose tags.
- DEC is exploring switching tag distribution back to in house rather than directly from the tag company. This will allow for greater oversight over the tags, reduce QA/QC concerns from the tag company, and make it easier to reinstate the tag docking protocol.

**Other:**

- Quota was reduced in 2025 to account for the 2024 overage



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- For 2025 tag calculations, the “unused tag rate” buffer was returned to 8% (down from 11% in 2024) since quota was more fully utilized than past years. This reflected what was seen in the fishery.
- Besides 2024, NY has generally harvested under quota, indicating the yearly tag allotment calculation system has been successful.

**2. Would the state deem its current tagging program as a success in minimizing illegal harvest? Are there ongoing sources of illegal commercial harvest?**

*According to NYSDEC and Law Enforcement staff:*

“We are happy with our current tags and point of harvest tagging as a deterrent of illegal sales. I agree, the change of having the permit number on the tag to make sure the tags are being used by the actual holder has had an impact on the illegal sharing of tags. We are never going to be able to stop all illegal harvest and sales, but the system does have a significant impact.”

“It minimizes illegal harvest. There is likely poaching and illegal commercialization ... hear most often anecdotal comments about restaurant sales.”

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**Delaware**

**DELAWARE**

Overview of Striped Bass Commercial Tagging Program

**A. Striped Bass Commercial Fishery Overview**

1. **Type of Management (e.g., ITQ, limited entry, etc.):** ITQ, limited entry
2. **Point of Tagging (harvest and/or sale):** Point of tagging was changed by the legislature from harvest to “before landing or putting on shore” in 2015.

**3. Number of Participants Receiving Commercial Tags**

*If a state has gear-specific tags, it is optional to list participants by gear type. At a minimum, please provide some insight into the prevalence of different gears in question #4.*

*Maryland and Virginia please separate Ocean vs. Chesapeake Bay.*

	# Receiving Tags				# Receiving Tags		
	GN	HL	Total		GN	HL	Total
<b>2016</b>	111	122	233	<b>2021</b>	111	141	252
<b>2017</b>	111	131	242	<b>2022</b>	111	133	244
<b>2018</b>	111	150	261	<b>2023</b>	111	130	241
<b>2019</b>	111	138	249	<b>2024</b>	111	130	241
<b>2020</b>	111	128	239	<b>2025</b>	111	126	237

4. **Gears Used (please indicate which are most common):** Three types of gear are used to harvest Delaware’s commercial quota. The primary gear is anchored gill net. Three to five licensees fish only drift net annually. Lastly, hook and line harvest is responsible for less than 1% of the annual total quota.

**5. 2024 Commercial Measures:**

Gear	Size Limit	Trip Limit	Quota (lbs)	Open Seasons
Anchor Gill Net	≥20"	None	Per license 1134, Total 125,876	Feb 15 - April 27*
Drift Gill Net	≥20"	None	Per license 1134, Total 125,877	Feb 15 - May 31*
Hook and Line	≥28"	None	Per licence 51, Total 6,625	April 1 - Dec 31

\*if <98% of quota is caught during spring season, then DE opens a fall GN season beginning November 15 with a min size of 28"

**6. Optional: Provide any additional information about the commercial fishery the state would like to explain.**

Although Delaware issues 111 commercial Striped Bass gill net licenses annually, only 35 to 40 are fished annually due to ITQ. Transfers must occur prior to the season start date which reduces the number of fishers whose tags Delaware has to track. Delaware also incorporates weigh stations which serve as a second point of harvest verification. Weigh stations are responsible for attaching a second tag to each fish and call in each licensed fisher's catch daily. Tag color for both fisher and weigh station tags changes on a rotating basis every year.

**B. Biological Metric, Number of Tags, and Program Operation**

**1. Describe the biological metric used to determine the number of tags printed and issued to participants:**

DDFW uses metrics such as average weight from previous years' landings and estimated year class strength of striped bass recruiting to the commercial gear to inform the decisions on the number of tags needed for the upcoming season. However, these biometrics do not describe the future year's tag needs completely. Due to the manner in which tags are administered by DDFW licensing, an overage must be built in to provide for multiple weigh stations and all 111 licensees receiving the same amount of tags initially, regardless of fishing effort, latency, or transfers. Furthermore, while the spring gill net fishery targets larger (>26") striped bass that can be sold in NY, the size limit for this fishery is 20" and the fishery will target smaller fish under certain conditions, so the number of tags ordered must also account for that situation.

**2. Number of Tags Issued and Tags Not Accounted For:**

	# Tags Issued GN	# Tags Issued HL	Percent of Tags Not Accounted For*
2020	16,650	896	<1
2021	16,650	846	<1
2022	16,650	931	<1
2023	16,650	650	<1
2024	16,650	650	0

*\*Tags not accounted for refers to unused tags that were not returned/not reported as lost.*

**3. What is the process and timing for tag distribution?**

Tags are ordered in November so they are available for distribution to fishers February 1<sup>st</sup> of each year for the February 15<sup>th</sup> start date.

**4. Are tags allowed to be transferred between individuals? If so, how are transfers monitored?**

Tags can be transferred between individuals but such transfers must be done prior to the start of the season. Each quota is allocated 150 tags with unique numbering. When a quota is transferred, tags with specific numbers assigned to that quota are given to the individual licensee in which the quota is transferred to.

**5. Does the state require data about the use of each tag to be reported back to the state? This could include sale date, poundage of each fish tagged, etc.**

Cumulative weight and number of fish is reported for each licensed individual via an IVR (Interactive Voice Response) system daily and again via monthly fisher reports. Catch date, license number, cumulative weight and number of fish are reporting elements.

**6. Describe the process for returning and auditing unused tags.**

Fishers return tags to the Division when their quota is filled. The number of tags returned is checked against IVR reports and harvest logs.

**7. Describe how the state responds to non-compliance with commercial tagging or reporting requirements (e.g., failure to return unused tags, submit mandatory reports, etc.)?**

Unused tags, including broken tags, are required to be turned into the Division along with a Daily Striped Bass Catch Report by June 30<sup>th</sup> of the year. Non-compliant individuals are not issued quota for the following year.

***C. Program Changes and Challenges***

**1. Identify any major changes and challenges with the commercial tagging program over the past ten years. Feel free to use the following categories to organize various issues or modify/add categories as needed.**

Tag Procurement/Distribution:

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Product quality went down and price went up using former vendor. A new vendor is now used, resulting in a more reliable product at a lower cost. Fisher tags have a tensile strength of roughly 110 lbs while weigh station tags are not nearly as strong. Price of tags will increase with quality and strength of tag type. Weigh station tags are much cheaper as they do not have the strength of fisher tags.

### Tag Accounting/Return of Unused Tags:

Fishers are required to turn in any unused tags after the season. This includes the small proportion (<1%) of broken or defective tags. Over the years, the Division has had very few instances of tag loss – blown overboard, out of vehicles, etc. but these losses have been called in immediately by the fisher.

### Enforcement:

Enforcement officers routinely check fishers at landing sites and weigh stations. On the water inspections have occurred but are not common.

### Other:

- 2. For states who tag at the point of sale: Since Draft Addendum III includes an option to require tagging at point or harvest, identify any major challenges the state's commercial tagging program may encounter by transitioning to point of harvest.**

## ***D. Program Successes***

- 1. Identify how challenges are being addressed/resolved and any other major successes the state would like highlight from the past ten years.**

Weigh stations present a conflict of interest in some cases. But having a weigh station is generally viewed as a privilege and the Division, in conjunction with enforcement, heavily scrutinizes weigh station applications and the number of weigh stations is capped.

- 2. Would the state deem its current tagging program as a success in minimizing illegal harvest? Are there ongoing sources of illegal commercial harvest?**

Providing independent verification and generally doing more to abate illegal harvest, DE feels that any illegal activity has been minimized. It is DE's belief that multiple means of verification minimizes illegal activity.

**MARYLAND**

**Department of Natural Resources (MDNR)**

Overview of Striped Bass Commercial Tagging Program

**A. Striped Bass Commercial Fishery Overview**

1. Type of Management (e.g., ITQ, limited entry, etc.):  
Maryland currently manages limited entry ITQ (Individual Transferable Quota) fishery. For many years there was a small limited entry derby fishery (Common Pool) being managed in parallel with the ITQ. However, the last year for Common Pool was 2024. In 2025 and forward, ITQ is the only option.
2. Point of Tagging (harvest and/or sale):  
“At harvest”. Per Maryland’s regulation, fish must be tagged (1) Immediately to a striped bass harvested by hook and line; (2) Within 200 yards of the pound net to a striped bass harvested from a pound net; or (3) Before removing a striped bass from a boat or removing a boat from the water, to a striped bass harvested by any other gear.
3. Number of Participants Receiving Commercial Tags  
*If a state has gear-specific tags, it is optional to list participants by gear type. At a minimum, please provide some insight into the prevalence of different gears in question #4.*  
*Maryland and Virginia please separate Ocean vs. Chesapeake Bay.*

	# Coastal Participants Receiving Tags Initially at the Beginning of the Season	# Bay Participants Receiving Tags Initially at the Beginning of the Season
2020	45	802
2021	44	786
2022	45	777
2023	44	746
2024	47	758

\*Number of participants changes throughout the year based on transfers of permits/share/allocation, and tags. “# of Participants Receiving Tags” in the table above are the amount of people issued tags at the beginning of each season.

\*The maximum number of permits available to the fishery is 1,231. A commercially licensed harvester must also have a permit in order to fish for striped bass.

4. Gears Used (please indicate which are most common):

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Gill Net (Drift and Anchored, anchored only allowed in Ocean)

Hook -n- Line (Bay only)

Pound Net (Bay only)

Haul Seine (Bay only)

Otter and Beam Trawl (Ocean only)

Pound net and gill net are used more commonly in the Bay Fishery. Gill net is most commonly used in the coastal fishery.

### 5. 2024 Commercial Measures:

Gear/Region	Size Limit	Trip Limit	2024 ASMFC Quota	Open Seasons
Chesapeake Bay: pound net	18-36" TL	none for ITQ	1,344,217 pounds*	June 1-Dec 31
Chesapeake Bay: haul seine	18-36" TL	none for ITQ		Jan1-Feb 29, June 1-Dec 31
Chesapeake Bay: hook and line	18-36" TL	none for ITQ; common pool 250 lbs/permittee/week		June 1-Dec 31; common pool- 2 days out of the month only
Chesapeake Bay: gill net	18-36" TL	none for ITQ; common pool 300 lbs/permittee/week		Jan1-Feb 29, Dec 1-31; common pool- 2-3 days out of the month only
Atlantic Ocean: gill net and trawl	24" TL min	none	82,857 pounds**	Jan 1-May 31, Oct 1-Dec 31

\*The 2024 Chesapeake Bay quota of 1,445,394 pounds was already allocated to permit holders prior to when Addendum II reductions were made. Any overage will be subtracted from the 2026 quota.

\*\*The 2024 Chesapeake Bay quota of 89,094 pounds was already allocated to permit holders prior to when Addendum II reductions were made. Any overage will be subtracted from the 2025 quota.

\*\*\*Common Pool openings/limits dependant on available quota each month. Common Pool is no longer an option in 2025 and forward.

### 6. *Optional:* Provide any additional information about the commercial fishery the state would like to explain.

## B. Biological Metric, Number of Tags, and Program Operation

- Describe the biological metric used to determine the number of tags printed and issued to participants:

Average fish weight by fishery location and gear type. DNR's field biologists sample fish at check stations to determine this.

2. Number of Tags Issued and Tags Not Accounted For:

	# Tags Issued	Percent of Tags Not Accounted For*
2020	500,320	9.8%**
2021	525,000	17.9%**
2022	442,850	3.8%
2023	441,600	6.5%
2024	441,000	5.9% (Preliminary)

*\*Tags not accounted for refers to unused tags that were not returned/not reported as lost.*

*\*\*Tag return began at the start of 2020, however, when the COVID pandemic started in mid-March, the process of tag return was halted. There was a two-year tag return process in 2022 of which permittees were asked to return unused tags from both 2020 and 2021. Information from the industry to MDNR reported discarding tags thinking the tag return process would not occur given the continuing pandemic.*

3. What is the process and timing for tag distribution? E.g., tags distributed by mail during the month of November before the fishery opens on January 1.

From July 1 to July 14, staff calculate what each permittee is required to pay for tags. This is done using each permittee share percentage, a guesstimate on the upcoming years quota, and a guesstimate on the per tag cost.

DNR's license renewal and permit declaration period runs from July 15 to September 15. At this time permittees pay for their tags.

After the quota is officially set, staff then determine how many tags each permittee requires in mid October to mid November. Using DNR biologist data on weight per fish per fishery and gear, this is divided into each permittees allocation pounds to determine the number of tags required.

In late November to early December, staff provide the vendor with a list of permittee, their mailing address, and then number of tags required for each permittee. The vendor produces the tags and ships them to the permittee via certified mail. The return address



on the shipments is DNR's address so that staff are aware of undeliverable tags. The vendor supplies DNR with the unique tag numbers for each permittee.

4. Are tags allowed to be transferred between individuals? If so, how are transfers monitored?

Yes, tags are able to be transferred between permit holders. Permit holders are required to fill out this form and submit it to MDNR.

[https://dnr.maryland.gov/fisheries/documents/2025\\_Tag\\_Transfer\\_Form.pdf](https://dnr.maryland.gov/fisheries/documents/2025_Tag_Transfer_Form.pdf)

Permittees are required to fill out the tag sequence numbers being transferred and the total number of tags being transferred. Permittees also provide a total number of fish harvested at the time of requesting a transfer.

5. Does the state require data about the use of each tag to be reported back to the state?

This could include sale date, poundage of each fish tagged, etc.

No. MDNR biologists will sample striped bass at check in stations to obtain data on pound per fish, etc...

Permittees and Check Stations are only required to provide total poundage and total number of fish per day on the permit holders permit card.

Permittee are also required to send in either monthly paper harvest reports, daily electronic harvest reports, or use SAFIS to report. The fish are required to be weighed and counted at check stations. Check stations are required to either send in weekly paper reports or daily electronic reports.

6. Describe the process for returning and auditing unused tags.

Permit holders are notified of tag return bins placed around the state. These bins are placed at locations such as Natural Resource Police field offices, MDNR fisheries field offices, major landing locations, etc... The unused tags are required to be dropped off in these bins by March 31 along with a signed Tag Return Affidavit. DNR staff collect the tags multiple times at each location during the tag return period. These unused tags are then returned to MDNR's office, identified to the assigned permit holder, and counted.

If tags are lost by the permit holder, thus unable to be returned to MDNR, an incident report must be submitted to Maryland's Natural Resource Police. This report is sent to MDNR's permitting staff.

7. Describe how the state responds to non-compliance with commercial tagging or reporting requirements (e.g., failure to return unused tags, submit mandatory reports, etc.)?

Maryland Natural Resources Police would handle enforcement of non-compliance in their normal course of business. There are fines and administrative penalties (i.e., license suspension or revocation) that are tied to different types of violations. The Fine and Bond Schedule is available [here](#), which lays out the fines that would be administered by the Maryland District Court, and the commercial penalty schedule is available [here](#). Any striped bass violation that leads to at least 10 points results in the suspension of the licensee for the next practicable quota year in the striped bass fishery. Any violation or set of violations that result in an individual having 35 points or more on their license would lead to revocation from Maryland's commercial fisheries.

### ***C. Program Changes and Challenges***

1. Identify any major changes and challenges with the commercial tagging program over the past ten years. Feel free to use the following categories to organize various issues or modify/add categories as needed.

#### Tag Procurement/Distribution:

The time between ASMFC setting the annual quota and tag distribution can be short some years. Furthermore, the vendor producing the tags is requiring more time in order to complete orders before mid-December.

#### Tag Accounting/Return of Unused Tags:

This is very time consuming for staff.

#### Enforcement:

Maryland would expect that the Law Enforcement Committee (LEC) would have accurate input on enforcing our tag program and will defer this question to them.

#### Other:

Considering the vendor produces tags in bags of 100, there can be quite a lot of unused tags leftover at the end of the harvest year. This can seem wasteful to some in the industry. On average, 20% of the tags are returned unused.

MDNR's license season runs from September 1 to August 31. This is different from ASMFC striped bass harvest season (January 1 to December 31). When permit holders are renewing their licenses and permits, they are required to pay for tags at

this same time. The differences between ASMFC harvest season and MDNR's license season requires MDNR to guesstimate the upcoming quota to determine what each permit holder is required to pay for tags (based on their percent share) during the pre-season declaration window.

The license year/calendar year issue as described above also means that there are often concerns about getting tags to individuals on time. In Maryland, this is a huge concern because commercial harvest opens starting on January 1 when the market is often at its highest. In addition, because permittees are using last year's tags up until December 31 and then the present year starting on January 1, this means permittees need to be very careful to grab the tags with the right year starting on January 1.

Tags are increasing in cost.

The Tag Compliance report is due prior to when MDNR has not completed collecting and processing unused tags. If the report deadline could be extended to mid-summer this would make all the information available within the report.

2. For states who tag at the point of sale: Since Draft Addendum III includes an option to require tagging at point or harvest, identify any major challenges the state's commercial tagging program may encounter by transitioning to point of harvest.

N/A

#### ***D. Program Successes***

1. Identify how challenges are being addressed/resolved and any other major successes the state would like to highlight from the past ten years.

The current challenges of the tagging program are mostly related to the timing of quota decisions made by the Board and staff resources used to collect and record all of the unused tags. In order for Maryland to address these challenges, MDNR would need changes to the 'quota year' and the requirements to collect all unused tags and account for them to the specific individual. While this would help MDNR, it is understood how this concept could be difficult for other states and it would ultimately reduce individual accountability which isn't something desired.

2. Would the state deem its current tagging program as a success in minimizing illegal harvest? Are there ongoing sources of illegal commercial harvest?

## **Atlantic Striped Bass Commercial Tagging 10-Year Review - Summer 2025 - MARYLAND**

The current tagging program is a success when compared to the program operating during the derby fishery (pre-2015). MDNR staff are not aware of any ongoing sources of illegal harvest related to the tagging program. Similar to the question above about enforcement, LEC feedback should be sought out to provide details on current/ongoing illegal harvest related to tagging.

**Atlantic Striped Bass Commercial Tagging 10-Year Review - Summer 2025**  
**PRFC**

**Potomac River Fisheries Commission**  
Overview of Striped Bass Commercial Tagging Program

***A. Striped Bass Commercial Fishery Overview***

**1. Type of Management (e.g., ITQ, limited entry, etc.):**

The Potomac River Fisheries Commission (PRFC) manages the striped bass tagging program by limiting entry for various gear types. The gear types include gill net, pound net, hook and line, fyke net and haul seine.

**2. Point of Tagging (harvest and/or sale):**

Point of harvest – striped bass tags must be applied as soon as feasible and in no event shall any commercially caught striped bass be removed from the Potomac River or from the boat at the point of landing, whichever occurs first, without said tag being permanently affixed. The words “as soon as feasible” mean for the i) Commercial Hook & Line fishery – as soon as the fish is taken and before it is put into the cooler or storage area; ii) Pound Net fishery – as soon as the fish are taken and before the boat leaves the net site; and iii) Gill Net fishery – as soon as each separate piece of net is fished and before the boat leaves the net site.

**3. Number of Participants Receiving Commercial Tags**

*If a state has gear-specific tags, it is optional to list participants by gear type. At a minimum, please provide some insight into the prevalence of different gears in question #4.*

*Maryland and Virginia please separate Ocean vs. Chesapeake Bay.*

	<b># Participants Receiving Tags</b>
2020	267
2021	265
2022	265
2023	258
2024	263

**4. Gears Used (please indicate which are most common):**

Gear types: **gill net, pound net, hook and line**, fyke net and haul seine. **Bolded are most common.**

## 5. 2024 Commercial Measures:

Gear	Size Limit	Trip Limit	Quota	Open Seasons
Hook & Line	Jan. 1 – Feb. 14: 18.0" min. Feb. 15 - Mar. 25: 18.0" - 36.0" slot Jun. 1 – Dec. 31: 18.0" min.	NA	76,222 lbs.	Jan. 1 – Mar. 25, 2024 Jun. 1 – Dec. 31, 2024
Pound Net	Feb. 15 - Mar. 25: 18.0" - 36.0" slot Jun. 1 – Dec. 31: 18.0" min.	NA	118,806 lbs.	Feb. 15 - Mar. 25, 2024 Jun. 1 - Dec. 15, 2024
Misc. Gear (Haul Seine & Fyke Net)	Feb. 15 - Mar. 25: 18.0" - 36.0" slot Jun. 1 – Dec. 31: 18.0" min.	NA	12,786 lbs.	Feb. 15 - Mar. 25, 2024 Jun. 1 - Dec. 15, 2024
Gill Net	Nov. 7 - Dec. 31, 18.0" min Jan. 1 - Feb. 14, 18.0" min Feb. 15 - Mar. 25, 18.0" - 36.0" slot	NA	349,405 lbs. *	Nov. 6 - Dec. 31, <b>2023</b> Jan. 1 – March 25, <b>2024</b>

\* Gill net quota does not reflect the 7% reduction in 2024 due to the season ending March 25, 2024. The 7% reduction is reflected in the next gill net season (2024-2025).

## 6. *Optional: Provide any additional information about the commercial fishery the state would like to explain.*

Since 2008, the PRFC has managed the gill net fishery on a split year season to improve the procedure for issuing tags for the gear. For example, the 2024 quota year's gill net season began on November 6, 2023 and ended March 25, 2024. Prior to the split year season, the procedure was extremely cumbersome and required significant staff time during the busiest time of the year for the PRFC office. To better serve the stakeholders and improve the efficiency of the tagging program, the PRFC shifted to a split year season which allowed for a shift of the gill net tag issuance to occur in November ahead of the license renewal period for the other gear types and for gill net tag reconciliation to occur in April once the license renewal period has ended.

## B. Biological Metric, Number of Tags, and Program Operation

### 1. Describe the biological metric used to determine the number of tags printed and issued to participants:

The PRFC uses the average weight of a fish by gear type for the last full year of data to calculate how many tags should be issued to each license/licensee for the next season. Pound

net, hook and line, fyke net and haul seine can harvest for most of the year which requires PRFC to use the average weight of fish from the 2023 season to allocate tags for the 2025 season. Gill net is only a 5-month season thus the reporting for this gear is near-final by the time the next season begins so the 2023-2024 season's average weight of fish can be used to calculate the allocation for the 2024-2025 season.

The PRFC submits orders for next year's tag shipment in July and are typically received by the Commission in October. The tags are then organized and checked for quality control prior to issuing to harvesters. The following formula is used to calculate the number of tags ordered and allocated to each harvester by gear type.

The PRFC commercial striped bass quota for 2025 is 532,761 pounds. The gill net, pound net and hook & line fisheries are limited entry and are allocated tags per license. Note one person may hold multiple of one or more types of these licenses. Miscellaneous gears such as fyke net and haul seine are allocated per qualified licensee. To be considered a qualified licensee, the harvester must have reported landing any fish species in the gear for at least three consecutive years before being eligible to harvest striped bass from that gear.

GN quota = 324,947 lbs.      H&L quota = 76,222 lbs.

PN quota = 118,806 lbs.      Misc. quota = 12,786 lbs.

		<u># of Tags Ordered</u>
GN:	324,947 lbs. / 7.3 (2023-2024 avg. weight of fish) = 44,513 tags 44,513 tags / 710 GN licenses = 63 tags/license	GN: 46,000
PN:	118,806 lbs. / 4.8 (2023 avg. weight of fish) = 24,751 tags 24,751 tags / 100 PN licenses = 247 tags/license	PN: 26,000
H&L:	76,222 lbs. / 4.9 (2023 avg. weight of fish) = 15,555 tags 15,555 tags / 205 H&L licenses = 75 tags/license	H&L: 19,000
Misc:	12,786 lbs. / 5.4 (2023 avg. weight of fish) = 2,367 tags HS (60%) = 1,420 tags / 14 (# qualified licensees) = 100 tags FN (40%) = 946 tags / 12 (# qualified licensees) = 78 tags	Misc: 4,000

Note: The PRFC orders approximately 1,500 additional tags for each gear to account for replacing any lost, broken, or defective tags. For the hook and line gear, the PRFC orders a larger buffer of ~3,500 tags due to a policy that allows a gill net license to be converted into a hook and line license during the renewal season. Historically this policy only converted 3-5 licenses annually, but for the 2024 and 2025 renewal periods over 45 licenses in total have been converted. This unexpected change in behavior in 2024 required the Commission to place an additional order in January 2024 to guarantee there were enough tags for this gear given the influx of participants. Since the trend from 2024 continued into the 2025 renewal period, the Commission now orders enough tags to accommodate an additional 30 licenses in the fishery.

**2. Number of Tags Issued and Tags Not Accounted For:**

	# Tags Issued	Percent of Tags Not Accounted For*
2020	80,718	0.43%
2021	81,370	0.19%
2022	83,616	0.24%
2023	79,368	0.39%
2024	87,713	0.53%

*\*Tags not accounted for refers to unused tags that were not returned/not reported as lost.*

**3. What is the process and timing for tag distribution? E.g., tags distributed by mail during the month of November before the fishery opens on January 1.**

All tags must be picked up in-person at the PRFC office by the harvester or a designee and sign that they have received the correct sequences of tags. For the gill net fishery, harvesters can pick up tags and renew their licenses beginning November 1<sup>st</sup> in preparation for the season to begin the second Monday in November. For pound net and fyke net, the nets must be set and verified by law enforcement prior to any tags being issued for these gears which is first legal beginning February 15<sup>th</sup> each year. For haul seine, the net must be verified and sealed by PRFC staff prior to tags being issued. For hook and line gear, tags can be issued at the time of license renewal beginning December 1<sup>st</sup> for the season to begin January 1<sup>st</sup>. For all gears, prior to issuing tags for the next season, all tags must be accounted for from the previous season. See question #6 for more details about the accounting process.

**4. Are tags allowed to be transferred between individuals? If so, how are transfers monitored?**

Tags are only allowed to be transferred between participants of the Hook and Line Exchange Program where hook and line licensees may opt-in to receive tags from those licensees who do not intend to fish either their whole or partial quota allocation. The licensee receiving tags must have reported use of 100% of their personal tag allocation, be up to date on harvest reporting, and have no fishing violations or tag accounting issues for the past three years to be able to receive any additional tags. All transfers of tags must be done in person at the PRFC office so that the sequencing of tags is accounted for properly in our database.



**5. Does the state require data about the use of each tag to be reported back to the state?** This could include sale date, poundage of each fish tagged, etc.

Harvesters are required to report trip level data including species, market grade category, gear, quantity of tags, total poundage, area fished, port of landing, and effort on their mandatory weekly harvest reports. PRFC does not collect any additional data on a per tag/fish basis.

**6. Describe the process for returning and auditing unused tags.**

Harvesters are encouraged to return any unused tags to the office once the season is over and prior to the start of the next fishing season. For example, the gill net season ends March 25<sup>th</sup> each year, so many harvesters return unused tags in April and May. For the other gears, most of the unused tags are returned to the Commission at the time of renewal for the next season. All returned tags are kept in office until July 1 of the following year to allow for auditing should a harvester note a discrepancy with their count compared to the database. After July 1, the returned tags and any unissued tags are disposed of at the local landfill.

Prior to issuing tags for the next season, harvester must account for all tags that were issued to them from the previous season. If there are any discrepancies, a one-for-one penalty is applied to next season's allocation. For example, if 20 tags remain unused for a harvester from the 2025 season and they have completed all their reporting for the season, 20 tags will be audited from their 2026 season allocation to reconcile for the unaccounted tags. If the harvester can supply the missing tags at any point throughout the 2026 season, PRFC staff will release tags equivalent to what was returned, up to the current year's allocation. If the harvester believes the number of unaccounted tags is a data error in the system, they can opt in to an official audit where PRFC staff validate all physical harvest reports against the database. If the records were entered correctly into the database, a \$25 administrative fee is collected from the harvester and a one-for-one penalty is applied to the next season's allocation. If there were data entry errors on part of the PRFC staff, no fee is applied. If the submitted reports differ from what the harvester believes is accurate, they must provide proof via buyer/dealer tickets and their logbook to qualify to amend a report.

**7. Describe how the state responds to non-compliance with commercial tagging or reporting requirements (e.g., failure to return unused tags, submit mandatory reports, etc.)?**

Beyond the typical audit process occurring at license renewal, the PRFC may call to a hearing any harvesters who are delinquent in their harvest reporting for any species. The Commission may also call individuals who have outstanding remaining tag balances or if there is suspicious activity regarding the use of their tags. At the hearing, the Commission may revoke striped bass privileges, suspend licenses, place licensees on probationary periods, refuse to issue tags, and/or audit tags from future seasons depending on the severity of the case.

### ***C. Program Changes and Challenges***

- 1. Identify any major changes and challenges with the commercial tagging program over the past ten years. Feel free to use the following categories to organize various issues or modify/add categories as needed.**

#### **Tag Procurement/Distribution:**

Manufacturer issues: Since the beginning of the striped bass tagging requirement, the PRFC used the vendor Tyden Brooks to produce the tags. In 2023, the company unexpectedly was unable to produce the order at a reasonable price due to having a new high volume order taking priority over routine annual orders. There was a very short deadline to find a replacement vendor but by reaching out to other states, a new supplier was found in time for the season to start. Since 2023, the Commission has purchased tags from Sierra Group LLC and have been satisfied with the quality and experience. It is also important to note that striped bass tags are purchased by the PRFC with funding from a five-year NOAA grant and no cost of the product is passed on to the harvester.

#### **Tag Accounting/Return of Unused Tags:**

The majority of tags are returned at the time of renewal for the next season's license. This is one of the busiest times for PRFC staff thus returned tags are not always able to be sequenced due to the volume staff receives during a short timeframe. Most often, PRFC staff only have time to count the quantity of tags returned and verify against the remaining tag balance. This can lead to some data entry errors that are difficult to research as the sorting of the returned tags is not an easy endeavor. To address this issue, the Commission is creating a return log that requires the harvester's signature to help cut down on the confusion of tag returns in the future.

#### **Enforcement:**

There are three jurisdictions that manage waters of the Potomac River and its tributaries: PRFC, Maryland Department of Natural Resources and Virginia Marine Resources Commission. PRFC regulations are enforced jointly by the Maryland Natural Resources Police and the Virginia Marine Police. Since many of the harvesters hold licenses of the other state/jurisdictions, PRFC, MD, and VA each have regulations in place that prohibit a harvester from possessing another state/jurisdiction's striped bass tags while fishing in the respective area. This is largely one of the bigger enforcement issues in the Potomac River since the boundaries that define the territories, although physically demarcated, require more effort on the enforcement side to intercept in the right jurisdiction.

#### **Timing of Commercial Quota Modifications:**

Due to the split year gill net season, changes to commercial quota past October each year become extremely difficult for the PRFC to accommodate due to the current tag allocation procedure where the PRFC staff issues most tags in November. The gill net fishery is allocated 61% of the PRFC's total quota. Of all the gear types harvesting striped bass, the gill

net fishery utilizes the greatest proportion of their quota thereby placing the Commission in a position to potentially overharvest if commercial quotas are reduced by a significant amount. To try to combat this, when the ASMFC Striped Bass Board motioned to revise the 2025 commercial quota in October 2024, the PRFC had opted to withhold 5 tags from each gear type until after the Board's final decision in December 2024. Pre-emptively withholding tags due to the potential board action created great confusion with the stakeholders and required harvesters to return to the PRFC to retrieve the 5 withheld tags previously. If final decisions are made by the October Annual Meeting, the PRFC can act to reduce tag allocations within a few weeks.

- 2. For states who tag at the point of sale: Since Draft Addendum III includes an option to require tagging at point of harvest, identify any major challenges the state's commercial tagging program may encounter by transitioning to point of harvest.**

Not applicable.

#### ***D. Program Successes***

- 1. Identify how challenges are being addressed/resolved and any other major successes the state would like highlight from the past ten years.**

Since the beginning of the program, the PRFC has worked to create a more efficient tagging program by using color-coded sequenced tags, switching to a split year gillnet season and exploring new vendors to reduce cost of materials. For other details about overcoming challenges, see the above section 'Program Challenges and Changes'.

- 2. Would the state deem its current tagging program as a success in minimizing illegal harvest? Are there ongoing sources of illegal commercial harvest?**

Yes, the current tagging program is seen as a success in minimizing illegal harvest. The use of tamper-proof sequenced tags has allowed law enforcement to trace individual fish back to the harvester. Additionally, the use of different colored tags for each gear also aids law enforcement as a visual way to inspect harvester behavior from a distance. The tag auditing process has allowed the PRFC to hold each harvester accountable from year to year. The PRFC is not aware of any sources of illegal commercial harvest as related to the tagging program.



# COMMONWEALTH of VIRGINIA

## Marine Resources Commission

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Building 96

Fort Monroe, VA 23651

Stefanie K. Taillon  
Secretary of Natural  
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Jamie L. Green  
Commissioner

## Virginia

### Overview of Striped Bass Commercial Tagging Program

#### A. Striped Bass Commercial Fishery Overview

1. Type of Management (e.g., ITQ, limited entry, etc.):  
Limited Entry ITQ program. The only current way to enter the program is by purchasing or leasing quota (poundage) from another participant.
2. Point of Tagging (harvest and/or sale):  
Harvest
3. Number of Participants Receiving Commercial Tags

# of Participants Receiving Tags

	Chesapeake Bay Area	Coastal Area
2020	348	26
2021	342	26
2022	339	25
2023	339	25
2024	337	25

\*These numbers are initial allocation for the season, does not include transfers. \*

4. Gears Used (please indicate which are most common):

Most common gears are gill net and pound net. Virginia also has harvest from Hook & Line (rod and reel), fyke net and a small amount from fish pot. Anyone who holds Virginia Commercial striped bass quota can harvest striped bass from any gear they are licensed for.

*An Agency of the Natural and Historic Resources Secretariat*

[www.mrc.virginia.gov](http://www.mrc.virginia.gov)

Telephone (757) 247-2200 Information and Emergency Hotline 1-800-541-4646

5. 2024 Commercial Measures:

VIRGINIA CHESAPEAKE BAY FISHERY

GEAR	SIZE LIMIT	TRIP LIMIT	QUOTA	OPEN SEASON
ALL GEAR	18" MIN	NONE	983,393	JAN 16 THROUGH DEC 31
	MAX SIZE 28" FROM MARCH 15 THROUGH JUNE 15			

VIRGINIA COASTAL  
FISHERY

GEAR	SIZE LIMIT	TRIP LIMIT	QUOTA	OPEN SEASON
ALL GEAR	28" MIN	NONE	116,282	JAN 16 THROUGH DEC 31

6. *Optional:* Provide any additional information about the commercial fishery the state would like to explain.

***B. Biological Metric, Number of Tags, and Program Operation***

1. Describe the biological metric used to determine the number of tags printed and issued to participants:

For the purposes of assigning tags to a person for commercial harvest in the Chesapeake Bay area and the coastal area, the individual commercial harvest quota of striped bass in pounds shall be converted to an estimate in numbers of fish. Using this average weight of striped bass harvested by the permitted person during the previous fishing year, the number of striped bass tags issued to each person will equal the estimated number of fish to be landed by that individual for the following year. Staff will then add 10% of the individual allotment for each person.

For any person whose reported average coastal area harvest weight of striped bass in the previous fishing year was less than 12 pounds, a 12-pound minimum weight shall be used to convert that person's harvest quota of striped bass, in pounds of fish, to harvest quota in number of fish.

Chapter 4 VAC 20-252, "Pertaining to Atlantic Striped Bass" Section 150 C,D,E

2. Number of Tags Issued and Tags Not Accounted For:

	# OF CHESAPEAKE TAGS ISSUED*	PERCENT OF BAY TAGS NOT ACCOUNTED FOR	# OF COASTAL TAGS ISSUED*	PERCENT OF COASTAL TAGS NOT ACCOUNTED FOR
2020	176,900	6.4	8,450	5.3
2021	184,250	2.7	7,650	4
2022	190,900	2.4	7,500	6.5
2023	191,250	3.4	7,300	0.84
2024	181,600	2	7,100	1.5

\*This number does not include additional tags which were issued later in the season (upon request) to commercial striped bass quota owners who have not achieved their quota.

3. What is the process and timing for tag distribution?

- Tags are ordered from the manufacture July/August of the previous year.
- Tags are delivered early October.
- Tags are bagged up for each harvester by VMRC staff approx. mid November.
- Tags are distributed in the second week of January of the fishing year. Season opens January 16.

4. Are tags allowed to be transferred between individuals? If so, how are transfers monitored?

Yes, tags are allowed to be transferred between harvesters/quota holders. When quota transfers take place, the participating individuals are required to bring any allocated tags to the office. Staff then reallocates the tags to go with the reallocation of quota. All transfers take place in front of VMRC staff, and a notarized form is required.

5. Does the state require data about the use of each tag to be reported back to the state?

Yes, the VMRC requires that each harvester reports daily harvest, in pounds, of striped bass and number of tags used.

6. Describe the process for returning and auditing unused tags.

- Each harvester/quota holder is required to turn in any unused tags within 30 days of harvesting their quota or by the second Thursday in January. Tags may be returned in person or by mail.
- Harvesters are sent a letter in October of each year stating their current tag accounting for that year. At this time, they can contact VMRC if they have any discrepancies in their records before the fall season begins.
- Harvester reports are audited using striped bass buyer reports. Any Virginia licensed buyer that wishes to purchase striped bass directly from a harvester must also get a Striped Bass Buyer Permit. One of the requirements for this permit is a monthly report that contains the ID number, date, pounds and number of tags purchased from each harvester.

7. Describe how the state responds to non-compliance with commercial tagging or reporting requirements.

- Any unused tags that cannot be turned in to the commission shall be accounted for by the harvester submitting an affidavit to the commission that explains the disposition of the unused tags that are not able to be turned into the commission. Each person shall be required to pay a processing fee of \$25, plus \$0.13 per tag, for any unused tags that are not turned in to the commission.
- Any harvester requesting a quota transfer or additional tags must be up to date on their mandatory harvest reports. If they are not, staff will deny the transfer until the reports are turned in.

### ***C. Program Changes and Challenges***

1. Identify any major changes and challenges with the commercial tagging program over the past ten years. Feel free to use the following categories to organize various issues or modify/add categories as needed.

#### Tag Procurement/Distribution:

- Over the past ten years the timeline for procurement has been challenging, longer processing and ship times have pushed the dates for ordering tags earlier in the past few years. Virginia has a bid process that allows companies with production overseas, transit times have been difficult. We have also seen a price increase.
- Preparation of tags has been challenging especially over the past few years due to late Board decisions on commercial reductions.

#### Tag Accounting/Return of Unused Tags:

- This process has historically been difficult in Virginia due to the short time between the season closure and the next season opening. (closed Dec 31 and reopens Jan 16)
- Difficulties arise due to our small staff and the number of harvesters. (Approx 400)
- Month to month tag accounting has improved due to improved computer databases and online reporting.

#### Enforcement:

- VMRC operates on a harvester-based reporting system. Currently the only check and balance to this is monthly striped bass buyer reporting. Unfortunately, this does not capture the fish that are sold out of state or retail sales.
- In Virginia, one challenge is the close jurisdictions of PRFC, Virginia and Maryland. Per Virginia regulation, harvesters cannot have other jurisdictions tags on board the vessel but this is an issue that Law enforcement runs into.

2. For states who tag at the point of sale: Since Draft Addendum III includes an option to require tagging at point of harvest, identify any major challenges the state's commercial tagging program may encounter by transitioning to point of harvest.

N/A



#### ***D. Program Successes***

1. Identify how challenges are being addressed/resolved and any other major successes the state would like highlight from the past ten years.
  - Better communication between VMRC fisheries staff and Law Enforcement in the field.
  - VMRC law enforcement has worked with federal partners over the past ten years to prosecute Lacey Act cases involving illegal Virginia harvested striped bass being sold over state lines into Maryland.
  
2. Would the state deem its current tagging program as a success in minimizing illegal harvest? Are there ongoing sources of illegal commercial harvest?

Yes, Virginia's administrative tag accounting, regulations and Law enforcement work in the field all lends itself to a successful commercial striped bass program. Monthly online harvester reporting allows LE and staff a more real time view of what's occurring in the fishery.

#### Sources of illegal commercial harvest

- Commercial sale of untagged fish.
- Incorrect reporting of weights, especially to out-of-state buyers.

# Atlantic Striped Bass Commercial Tagging 10-Year Review - Summer 2025

## [NORTH CAROLINA]

### Overview of Striped Bass Commercial Tagging Program

#### ***A. Striped Bass Commercial Fishery Overview***

1. Type of Management (e.g., ITQ, limited entry, etc.):

Other than a cap on the maximum number of commercial licenses available in NC there are no limits to who can participate in any fishery if you have a NC Standard Commercial Fishing License (SCFL) or a Retired SCFL (RSCFL). For fiscal year 2024 there were 3,922 SCFLs and 1,354 Retired SCFLs licenses sold or issued. Of those licenses issued, 1,851 licenses were used to land seafood at a licensed seafood dealer.

2. Point of Tagging (harvest and/or sale):

At the point of sale. Licensed seafood dealers must also obtain a free Striped Bass Dealer Permit each year in order to buy striped bass from a licensed SCFL or RSCFL holder.

3. Number of Participants (i.e. dealers) Receiving Commercial Tags

*If a state has gear-specific tags, it is optional to list participants by gear type. At a minimum, please provide some insight into the prevalence of different gears in question #4.*

*Maryland and Virginia please separate Ocean vs. Chesapeake Bay.*

North Carolina issues striped bass commercial tags to the dealers to affix at the point of sale. NC does not have gear specific tags. No striped bass have been landed from the Atlantic Ocean since 2012, although dealers still get the free Striped Bass Dealer Permit just in case. NC no longer gives dealers striped bass tags for the Atlantic Ocean, although we buy them and have them on hand in the event striped bass are present in NC coastal waters 0-3 miles and we open the harvest season.

Year	Atlantic Ocean # Participants (dealers) Receiving Tags	ASMA # Participants (dealers) Receiving Tags
2000	25	43
2001	39	43
2002	38	37
2003	33	37
2004	51	27
2005	57	35
2006	34	37
2007	46	33
2008	40	34
2009	21	29

## Atlantic Striped Bass Commercial Tagging 10-Year Review - Summer 2025

2010	19	32
2011	21	26
Year	Atlantic Ocean # Participants (dealers) Receiving Tags	ASMA # Participants (dealers) Receiving Tags
2012	4	22
2013	0	25
2014	0	31
2015	0	29
2016	0	30
2017	0	28
2018	0	28
2019	0	28
2020	0	27
2021	0	23
2022	0	18
2023	0	15
2024	0	0

4. Gears Used (please indicate which are most common):

**Atlantic Ocean:** Gill net, beach seine, and trawl. When the fishery was still active the gill net gear had the most participants due to the inexpensive nature of constructing gill nets compared to the expense of trawls and the beach seine gear.

**ASMA:** In 2023 gill nets accounted for 88%, pound nets 10%, and other gears 2% of the striped bass harvest.

5. 2024 Commercial Measures:

NC did not open the Atlantic Ocean to the harvest of striped bass. If NC did, the measures that would have been implemented are below.

**Atlantic Ocean**

Gear	Size Limit	Trip Limit	Quota	Open Seasons
Beach seine	28" min	50 fish per day	91,603 lb	Was usually December
Gill net	28" min	10-20 fish per day	91,603 lb	Was usually January
Trawl	28" min	50-100 fish per day	91,603 lb	Was usually February

6. *Optional:* Provide any additional information about the commercial fishery the state would like to explain.

None.

**B. Biological Metric, Number of Tags, and Program Operation**

## Atlantic Striped Bass Commercial Tagging 10-Year Review - Summer 2025

1. Describe the biological metric used to determine the number of tags printed and issued to participants:

Average pounds per fish harvested based off previous year divided by the quota. We order extra tags because we never know how many tags each individual dealer is going to use.

2. Number of Tags Issued and Tags Not Accounted For:

Fishing year	Fishery	Number of participants	Number of tags printed	Number of tags issued	Number of tags used	Number of tags returned	Number of tags missing
2023	Ocean	36	25,000	0	0	0	0
	ASMA	39	15,000	6,560	4,322	2,238	0
	CSMA	26	0	0	0	0	0
2022	Ocean	40	25,000	0	0	0	0
	ASMA	41	15,000	9,000	4,824	4,256	20
	CSMA	28	0	0	0	0	0
2021	Ocean	40	25,000	0	0	0	0
	ASMA	45	12,000	10,480	6,552	3,919	9
	CSMA	27	0	0	0	0	0
2020	Ocean	42	25,000	0	0	0	0
	ASMA	46	40,000	30,000	26,900	3,073	27
	CSMA	28	0	0	0	0	0
2019	Ocean	40	25,000	7,500	0	7,500	0
	ASMA	49	40,000	40,000	33,229	6,749	22
	CSMA	36	10,000	0	0	0	0
2018	Ocean	38	25,000	8,300	0	8,300	0
	ASMA	49	40,000	33,890	27,735	6,119	36
	CSMA	38	10,000	5,850	3,788	2,014	48
2017	Ocean	40	25,000	4,140	0	4,140	0
	ASMA	50	40,000	29,085	17,659	11,408	18
	CSMA	39	10,000	7,100	4,386	2,694	20
2016	Ocean	44	18,000	4,140	0	4,140	0
	ASMA	51	33,000	36,013	31,141	4,814	58
	CSMA	41	8,000	5,942	4,166	1,769	7

The two reasons for tags not getting returned are they broke and dealer threw them away or they were lost.

*\*Tags not accounted for refers to unused tags that were not returned/not reported as lost.*

## Atlantic Striped Bass Commercial Tagging 10-Year Review - Summer 2025

3. What is the process and timing for tag distribution? E.g., tags distributed by mail during the month of November before the fishery opens on January 1.

Tags are delivered by hand directly to dealers by either Marine Patrol or Fisheries Management staff. Dealers are brought more tags if they need them throughout the year. We do not give a dealer all the tags they may use throughout the season all at one time.

4. Are tags allowed to be transferred between individuals? If so, how are transfers monitored?

We normally order enough extra tags so we do not have to do that. When dealers receive tags, they have to sign documentation that lists the tag numbers that they were issued. Those data (tag numbers issued to each dealer) are maintained in a database.

5. Does the state require data about the use of each tag to be reported back to the state? This could include sale date, poundage of each fish tagged, etc.

NC requires each dealer to report the number of tags used and the pounds landed on a daily basis throughout the harvest season.

6. Describe the process for returning and auditing unused tags.

Once the harvest season concludes, DMF staff return to each dealer to collect any leftover tags. They then reconcile these retrieved tags with the initial delivery numbers and the number of tags used. In most years, there are minimal discrepancies.

7. Describe how the state responds to non-compliance with commercial tagging or reporting requirements (e.g., failure to return unused tags, submit mandatory reports, etc.)?

Marine Patrol will issue citations for failing to report striped bass tags used and pounds landed on a daily basis. Dealers report each day for the previous day. Each Monday they report for tags used Fri-Sun.

### ***C. Program Changes and Challenges***

1. Identify any major changes and challenges with the commercial tagging program over the past ten years. Feel free to use the following categories to organize various issues or modify/add categories as needed.

Tag Procurement/Distribution: None

Tag Accounting/Return of Unused Tags: None

Enforcement: None

## Atlantic Striped Bass Commercial Tagging 10-Year Review - Summer 2025

Other: As striped bass have been absent from North Carolina's coastal ocean waters (0-3 miles) since 2012, we respectfully request that the next tag order for this species be produced without the year indicated. This would provide a cost saving measure by negating the need to purchase new tags each year when there are no landings. If landings occur, then for the following year we would either order tags with the year on it tags that were a different color from the previous year.

2. For states who tag at the point of sale: Since Draft Addendum III includes an option to require tagging at point or harvest, identify any major challenges the state's commercial tagging program may encounter by transitioning to point of harvest.

Requiring striped bass to be tagged at the point of harvest would be a major challenge for NC, especially when the A-R stock recovers and harvest is reopened. NC currently does not have a way to limit the number of participants in a fishery. That action would require legislative approval and there would likely be considerable push back from the industry. Therefore, we would have to develop a tag dispersal and accounting system for SCFL and RSCFL holders that meets the commercial tagging requirements and uses staff time and resources efficiently.

### ***D. Program Successes***

1. Identify how challenges are being addressed/resolved and any other major successes the state would like highlight from the past ten years.

None.

2. Would the state deem its current tagging program as a success in minimizing illegal harvest? Are there ongoing sources of illegal commercial harvest?

Yes, NC deems the current tagging program a success. NC does not feel there is any significant commercial harvest of striped bass that are illegally sold (i.e. sold and not reported through the tagging program) to either individuals, seafood dealers, or restaurants. There is currently no rule or statute in place that requires seafood harvested in a commercial fishing operation to be sold. A person holding a SCFL or RSCFL can legally harvest striped bass at the allowed commercial trip limit and take them home to keep for personal consumption. So there is a possibility of some unreported harvest. If it is not sold to a licensed seafood dealer that harvest will go unreported. However NC feels this situation is minimal. Starting December 2025, a new state law will require all fish that are commercially harvested to be reported to a dealer, regardless of if that fish is sold or not. <https://ncleg.gov/Sessions/2023/Bills/House/PDF/H600v8.pdf>.