



Gulf Reef Fish Quota Bank

2026 Operations Plan and Agreement

The Gulf of America Reef Fish Shareholders' Alliance (Shareholders' Alliance) launched the first Quota Bank in the Gulf in 2015 to reduce red snapper discards in the eastern Gulf and to support the next generation of commercial red snapper fishermen. We're excited that 2026 will be our twelfth year of operation. Here's how the program works:

1. The Gulf Reef Fish Quota Bank leases red snapper allocation to eligible:
 - o Grouper fishermen that need red snapper allocation to cover some of their discards.
 - o "Next generation" (replacement entrant) red snapper fishermen that are entering the fishery.
2. In exchange for leasing this allocation, Members commit to acting as leaders in the reef fish fishery; holding themselves to a high standard of accountability and participating in program requirements including electronic reporting, Best Practices, and policy advocacy.
3. The Quota Bank is the only program of its kind in the Gulf that is generating multiple benefits for your fishery and commercial fishing business by:
 - o reducing red snapper discards,
 - o increasing profitability of your fishing businesses,
 - o providing you access to exclusive Shareholders' Alliance membership benefits (i.e., regular newsletters, policy updates)
 - o supporting the next generation of fishermen, and
 - o involving more fishermen in solving their management and regulatory problems.

To apply for the 2026 Quota Bank:

- 1) Review this Operations Plan.
- 2) Complete the Application.
- 3) Submit electronically to the Quota Bank by the appropriate quarterly deadline.
 - a. **December 30th, 2025 for Q1 (January - March)**
 - b. **March 30th, 2026 for Q2 (April-June)**
 - c. **Late June 2026 (Exact Dates TBD) for Q3 (July-September)**
 - d. **TBD 2026 for Q4 (October-December) if there is allocation available.**

Thank you for your interest in the Reef Fish Quota Bank.

Eric Brazer, Deputy Director
Gulf of America Reef Fish Shareholders' Alliance

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December 16, 2025

By submitting a Reef Fish Quota Bank application, the applicant affirms that they have read, understand, and agree to all program rules in this Operations Plan, and acknowledge that non-compliance with these rules may result in suspension or removal from the program.

VISION

The Reef Fish Quota Bank is a replicable, financially solvent program that encourages fishery leadership, promotes sustainable fishing practices and supports the next generation of fishermen.

MISSION

The Reef Fish Quota Bank leases fishery allocations to qualified Members to reduce wasteful discards and improve the economic viability of fishing businesses. We help give fishermen a voice in the regulatory process and position them to solve fishery problems.

GOALS AND OBJECTIVES

- **Conservation:** *Red snapper discards and discard mortality are reduced.*
 - Grouper fishermen lease red snapper allocation to account for red snapper bycatch.
 - Appropriate techniques and/or devices are used to reduce discard mortality.
- **Social:** *The next generation of reef fish fishermen are supported.*
 - “Next generation” fishermen lease red snapper allocation to support their businesses.
 - “Next generation” fishermen network and build relationships that support their business.
- **Economic:** *Reef fish businesses experience improved profitability.*
 - Participating fishing businesses increase their per trip/annual net income.
- **Management:** *Fishermen are active in improving the regulatory process.*
 - Participating fishermen contribute to policy discussions
 - Participating fishermen provide accurate and timely catch data.
- **Operations:** *A fiscally-healthy, defensible, and replicable model is developed.*
 - Quota Bank operations and rationale are identified, documented, and made available.
 - The Quota Bank operates in a professional, transparent, and impartial manner.
 - The Quota Bank is financially responsible.

Program Operations

I GEAR REQUIREMENTS

- Members agree to use the following approved gear for harvesting reef fish in the Gulf in accordance with all applicable gear regulations:
 - Bottom longlines
 - Bandits
 - Handgear
 - Buoy gear
 - Spear
- Applications will be ranked by gear type (among other criteria) as follows:
 - **Tier I** – bottom longline (highest priority for allocation)
 - **Tier II** – bandit/rod and reel/handgear
 - **Tier III** – spear (lowest priority for allocation)
- Tier I will be given highest priority for allocation. If any allocation remains after being distributed to approved applicants in Tier I, allocation may be made available to Tier II applicants. If any allocation remains after being distributed to approved applicants in Tier II, allocation may be made available to Tier III applicants.

II PERMIT REQUIREMENTS

- Members confirm that they own an active commercial Gulf reef fish permit and are compliant with all applicable permit requirements.

III IFQ ACCOUNT REQUIREMENTS

- Members confirm that they maintain an active and compliant IFQ account with NOAA Fisheries.

IV BEST PRACTICES

Members of the Quota Bank are committed to operating their fishing businesses in a manner that promotes conservation and accountability, including agreement to the following “Best Practices:”

- I agree to adhere to all Quota Bank requirements.
- Unless otherwise specified, I agree to use red snapper allocation only for discards in the red grouper fishery, not for a targeted fishery.
- I agree to land and account for all legal-sized red snapper caught (i.e., no highgrading) to the extent possible.
- I agree to minimize the mortality of the released sublegal snapper to the extent possible using appropriate techniques and/or devices.
- I agree that I cannot lease out any red snapper allocation I receive as part of my participation in the Quota Bank unless expressly approved by Shareholders’ Alliance Board of Directors (Board) and Staff. I understand that the Shareholders’ Alliance has a Right of First Refusal on any unused Quota Bank allocation, not to exceed initial lease price.
- I agree to carry approved rigged and ready-to-use descending devices and/or venting tools on my vessel and use them to reduce discard mortality when necessary.¹
- I agree to work with the Shareholders' Alliance to improve the Quota Bank as it continues to grow,

¹ The Shareholders’ Alliance and the Reef Fish Quota Bank supports measures that reduce or eliminate discards and discard mortality. We continue to advocate for additional scientific research on the use and effectiveness of descending devices and venting tools, and will provide access to educational and outreach materials to educate captains on proper use of these tools and their conservation benefits.

and I commit to supporting the Quota Bank in public. I agree to voice any concerns or questions I have directly with Quota Bank Staff in a timely, transparent, and constructive manner.

V MEETING PARTICIPATION

- Please note - **it is solely the responsibility of members to complete the meeting requirements below**. Members are encouraged to reach out to Staff if they need support or information to help them complete these requirements. While Staff will track Members' attendance at meetings and submission of trip tickets, it is ultimately the responsibility of Members to document and prove their own completion of these requirements.
- **New for 2026:** Quota Bank Members are required to participate meaningfully in the policy process. This means:
 - Attend at least one in-person Gulf Council meeting.
 - Give at least one public comment at a Gulf Council meeting either virtually or in-person.
 - Attend at least one meeting of the Shareholders' Alliance (i.e., quarterly membership calls, membership meetings that take place at Gulf Council meetings, or annual membership meetings of the Shareholders' Alliance or the Quota Bank) either virtually or in-person.
- Attendees at the Quota Bank Annual Meeting will act as a *de facto* Advisory Committee that provides the Board with additional advice, guidance and input on improving the Quota Bank.
- **New for 2026:** No other meetings (i.e. Fish and Wildlife Commission, Gulf Council Advisory Panel, Gulf Council Scientific and Statistical Committee) are accepted as replacements for Gulf Council meetings in the meeting requirements listed above.
- Consequences of failing to achieve meeting attendance requirements:
 - An approved returning Member must fulfill the program requirements of the last year they participated before receiving allocation in the year for which they are approved..
 - Failing to achieve the meeting attendance requirement in any given year will mean that the Member must become compliant with that year's meeting attendance requirement before receiving allocation in a subsequent year.
 - Failing to achieve meeting attendance requirements in multiple years may impact eligibility requirements in the future.

VI MEMBERSHIP AND PARTICIPATION

- Participation in the Quota Bank is voluntary.
- Members agree that they have the authority to enter into this Agreement on their behalf and on behalf of the Participating Vessel they represent.
- Anyone who meets the eligibility criteria and believes in the mission and purpose of the Quota Bank and the Shareholders' Alliance is encouraged to join.
- Members agree to participate in the Quota Bank for the **2026 fishing year**, therefore this agreement will be valid through December 31, 2026.
- Members agree to join the Shareholders' Alliance prior to receiving allocation from the Quota Bank. The purpose of this membership is to help cover the costs of operating the Quota Bank and to enable the Quota Bank to continue to provide fishermen with access to red snapper allocation.
- Membership dues to the Shareholders' Alliance for Quota Bank Members is **\$0.20/lb. up to a maximum of \$1,000** (i.e., 5,000 lbs. of allocation).
- If you are already a current Shareholders' Alliance Member who is not already a Member of the Quota Bank, the amount of your existing membership will be credited toward the \$0.20/lb. dues.
- Payment is preferred by electronic means (i.e., electronic transfer, wire or PayPal), however payment by check will be accepted. Members agree to cover all costs associated with payment (i.e., wire and PayPal fees, USPS charges, etc.).

- Shareholders' Alliance Membership dues must be paid separately from allocation payment.
- The Board believes it is valuable for a fisherman to have a business plan, and that solid business plans support successful businesses. To this end, the Quota Bank commits to working on providing this type of support and services to Quota Bank Members over time. Future Quota Bank eligibility criteria may include measures of business and/or fiscal health.

VII COMPLIANCE AND CRIMINAL LIABILITY

- Members confirm they are compliant with federal, state, and local laws and regulations, including U.S. Coast Guard requirements, and confirm they are not a party to any criminal proceedings.
- Compliance with regulations and laws by all fishermen is important to the credibility of the Quota Bank. Members that are not compliant with laws and regulations, and/or who may be party to criminal proceedings, may risk the stability and growth of the Quota Bank and pose a liability to the program, its Members, and the Shareholders' Alliance.

VIII REPORTING

- **New for 2026:** Members will provide complete copies of federal trip tickets or vessel logbooks electronically to Quota Bank Staff before the end of the Quarter in which the allocation was leased. For those applying for additional allocation during the following Quarter, trip tickets or logbooks are due before the final application deadline for that following Quarter. Failure to do so may impact the ability to lease additional allocation.
- Allowable forms and methods of submission include a scan or photo emailed or texted to Quota Bank Staff, or through use of an electronic logbook program.
- The purpose of reporting is to allow Quota Bank Staff to enforce program requirements and ensure that red snapper allocation is being used for its intended purpose.
- If a Quota Bank Member is selected by NOAA Fisheries to submit Supplemental Discard and Gear Interaction Reports, they must also submit them to the Quota Bank along with their federal trip tickets or vessel logbooks.
- If you're a new member of the Quota Bank, you agree to provide trip tickets or logbooks for the previous year of operation, if you fished during that year.
- Members authorize the release of information to Quota Bank Staff regarding the catch of various species of fish associated with the Participating Vessel.
- Quota Bank Staff will use these data to analyze catch and allocation usage. These data will be considered **confidential** and will not be shared with other individuals or entities, including the Shareholders' Alliance Board.

IX APPLICATION

The Quota Bank seeks high-caliber fishermen to join and promote this program. Membership details are as follows:

- Eligible and interested fishermen should submit a complete and signed application to Quota Bank Staff.
- Applications will be accepted on a **quarterly basis** and processed up to four times per year, contingent upon sufficient allocation being available. Applications for the 2025 fishing year may be submitted at any time prior to the quarterly deadline identified below, on or about:
 - **December 30th, 2025 for Q1 (January - March)**
 - **March 30th, 2026 for Q2 (April-June)**
 - **Late June 2026 (Exact Dates TBD) for Q3 (July-September)**
 - **TBD 2026 for Q4 (October-December) if there is allocation available.**
- The Board will review applications as soon as practicable after each quarterly deadline. Applications will be evaluated based on compliance with eligibility criteria, commitment to best practices, prioritization of gear and meeting attendance, allocation availability, and historical compliance with

Quota Bank requirements (if applicable).

- Upon evaluation, the Board will approve or deny applications - no conditional approvals will occur.
- Any applicants that have been approved for allocation in prior quarter(s) but which have never successfully leased that allocation will be considered new applicants for the purposes of the application and approval process.
- Approved Members can reapply for allocation during the year if they are compliant with program requirements and have fully harvested the allocation received from the Quota Bank earlier that year.
- Any reapplications (presently, Members must reapply if they use up their allocation and want to apply for more) would be processed on the same application schedule (i.e., quarterly).
- The Board and/or Deputy Director reserve the right to adjust the application timeline in order to facilitate full utilization of Quota Bank allocations.

X ALLOCATION

● **Lease Amount**

- The Quota Bank will lease red snapper allocation to eligible participating Members. The exact amount will be determined by a formula developed by the Board and run by the Deputy Director based on requested amount, compliance with eligibility criteria and commitment to best practices, prioritization of gear and meeting attendance, allocation availability, and historical compliance with Quota Bank requirements (if applicable).
- Allocation will be leased in increments of no less than 1,000 pounds.
- Allocation is first-come, first-served; the Quota Bank will not hold allocation in reserve.
- Allocation is intended to be used in the Quarter in which it is leased. Stockpiling of allocation over multiple quarters is not permitted.
- It is the intent of the Quota Bank to lease out 100% of its annual allocation by **October 15** of each year.
- Compliance with eligibility criteria and submission of a complete application does not guarantee allocation.

● **Lease Price**

- It is the intent of the Quota Bank to lease allocation to eligible Members at or near fair market value using an objective and predetermined formula.
- The Board has determined that the Deputy Director should have sole responsibility and authority to run the approved formula that determines the lease price for allocation without the involvement of the Board or its individual Members in accordance with a formula that relies solely on publicly available data.
- The Deputy Director shall undertake this survey of publicly available sources of data without informing the Board of the timing or results of that survey. Until such time, Board Members shall not inquire about or discuss the survey of publicly available sources of information, the results of that survey, or the resulting lease price with the Deputy Director or other Staff, and the Deputy Director or other Staff shall not discuss any such topics with any Board Member, until at least 60 days have passed.
- Lease price may be subject to change over the course of the year in response to changes in market conditions.
- The Deputy Director shall notify the Member of the lease price at the time the Member is notified that they are approved for the program if such information is available, or as soon as practicable thereafter.

● **Payment**

- Members will pay for allocation prior to receiving allocation from the Quota Bank.
- If approved for allocation in Quarters 1, 2, or 3, Quota Bank Members agree to lease 25% of the approved allocation within two weeks of the start of the Quarter. If approved for allocation in

Quarter 4, Quota Bank Members agree to lease 100% of allocation within two weeks of the start of the Quarter.

- o Payment is preferred by electronic means (i.e., electronic transfer, credit card, wire), however payment by check will be accepted. Members agree to cover all costs associated with payment (i.e., wire fees, USPS charges).
- o The Deputy Director will electronically transfer the appropriate amount of allocation to the Member's IFQ account upon receipt of full payment. Allocation will not be transferred prior to a confirmation that the payment has been received.
- o Allocation payment does not include membership payment, and the latter must be paid separately from the former.
- **Allocation Management**
 - o Members will not lease out any red snapper allocation they received as part of the Quota Bank program unless expressly authorized by Quota Bank Staff.
 - o The Shareholders' Alliance has a Right of First Refusal on any unused allocation, not to exceed initial lease price.
 - o The Member is responsible for preventing individual allocation overharvest.
 - o Approved Members can reapply for allocation during the year on the Quarterly application timeline if they are compliant with program requirements and have harvested the allocation received from the Quota Bank.
 - o All other Quota Bank requirements still apply.

XI HARDSHIP AND GRIEVANCES

- Members may appeal to the Board by emailing the Deputy Director if they feel a decision was unfairly or unjustly made, or if extreme circumstances, such as hurricanes or other natural or man-made disasters, intervened that resulted in noncompliance with the program.
- Eligible Members are encouraged to communicate concerns and feedback to Quota Bank Staff and the Board in a timely, transparent, and constructive manner.

XII ADMINISTRATION

- The role of the Shareholders' Alliance Deputy Director is to oversee the daily operations of the Quota Bank, including but not limited to tracking, accounting for, and transferring red snapper allocation; analysis of catch reporting; management of allocation lease price and Quota Bank finances; program development; and outreach.
- The role of the Shareholders' Alliance Lead of Business Development is to assist in overseeing daily operations of the Quota Bank including but not limited to management of applications, management of members' meeting and trip ticket requirements, program development; and outreach.
- The role of the Shareholders' Alliance Board is to manage and oversee the Quota Bank program, including but not limited to program admission and operations; enforcement of program policies, Best Practices, and this Agreement; and addressing of grievances.

XIII ENFORCEMENT

Enforcement of program policies and this Agreement is necessary to maintain the integrity of the Quota Bank and to promote the long-term stability of this program.

- Members participating in the Quota Bank must comply with all applicable requirements and conditions of this Agreement and other applicable state, federal and other regulations.
- Members agree that the Board and/or the Deputy Director will enforce this Agreement, and that they have the authority to invoke sanctions ranging from letters of warning to reductions in allocation to fines to expulsion from the Quota Bank.
- Members are encouraged to report alleged infractions in writing to the Quota Bank for review by the Board. The Board may assign penalties if it is determined that an infraction did occur.

- All appeals from such Board action shall be made in writing to the Board for review and consideration within 7 calendar days of the Board action in question. Members agree to cooperate fully with the Board and the Deputy Director in such procedures.
- Members acknowledge that the Quota Bank is a program of the Shareholders' Alliance and agrees not to hold the Shareholders' Alliance or its affiliates liable for violations of the law, applicable regulations, and this Agreement committed by Quota Bank Members.
- Members in violation of this Agreement and/or other local, state or federal regulations, agree to indemnify, defend and hold harmless the other Members of the Quota Bank, the Shareholders' Alliance Board, Staff, Members; and any other affiliates of the Quota Bank and/or the Shareholders' Alliance.

XIV OUTREACH AND COMMUNICATIONS

- The Quota Bank is committed to being competitive, inclusive, unbiased and transparent.
- Quota Bank Staff will communicate program requirements, operations, and performance through a variety of methods including but not limited to:
 - Shareholders' Alliance Quota Bank website: <https://shareholdersalliance.org/quota-bank>
 - Regular Shareholders' Alliance newsletters and emails
 - Shareholders' Alliance and Quota Bank meetings
 - Phone calls and in-person conversations
- Personal information (e.g., individual catch data) is considered **confidential** and will not be shared.
- Data will be aggregated in a way to protect confidentiality of Members.
- Shareholders' Alliance Staff and Board welcome questions, concerns, and feedback about Quota Bank operations.