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New England Fishery Management Council Holistic Strategic Plan - Discovery and Gap Analyses

1 Executive Summary

The New England Fishery Management Council (NEFMC), in partnership with The Parnin Group and Lynker, has initiated a multi-phase strategic planning effort to address overarching challenges associated with management uncertainty and ecosystem changes. Driven by species shifts, stock variability, and increasing need for responsive fisheries management approaches, this project aims to develop a holistic strategic plan for resilient fishery management. The overarching objective is to position the Council to make timely, science-based decisions that are durable, agile, equitable, and aligned with emerging realities. The project is currently in the Analysis Phase, engaging in a Gap Analysis to diagnose the root causes of challenges identified during the initial Discovery Phase.

Data collected through interviews, focus groups, and workflow assessments reveal that while the Council system is scientifically grounded and participatory, it is structurally overburdened and operationally reactive. Four cross-cutting themes emerged: **Governance & Efficiency, Trust & Engagement, Workforce & Resources, and Adaptation & Resilience.** To move from symptoms to root causes, the analysis examines alignments across strategy, structure, systems, staffing, skills, style, and shared values.

The Gap Analysis identifies specific intervention areas to be discussed at the upcoming Strategic Planning Workshop in January 2026. Opportunities to turn these gaps into strengths include:

- **Improve transparency and understanding** by developing visual pathway maps that clarify how actions progress, where decisions occur, and how priorities align across committees and advisory bodies.
- **Strengthen coordination and focus** with clear short- and long-term prioritization processes and more deliberate workload balance.
- **Expand staff capabilities** by investing in training and tools that can expand analytical capacity and reduce burden.
- **Enable adaptive management** capacity by establishing “triggers” that drive responses to real-time economic and environmental changes.
- **Reinforce trust and enhance stakeholder engagement** by creating consistent feedback loops that show participants how their input informs decisions and by offering plain language updates between meetings.

A final report, including the Strategic Plan and implementation roadmap, will be delivered by April 1, 2026.

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2 Introduction

2.1 Background and Context

The New England Fishery Management Council (NEFMC, or the Council) operates in a complex, dynamic, and rapidly changing marine and regulatory environment. Shifts in species distribution, increased variability in stock conditions, and rising uncertainty in both ecological and socioeconomic systems are influencing the Council's decision-making process. At the same time, industry stakeholders, scientists, and the public expect greater transparency, responsiveness, and clarity in how the Council system and agency partners develop and implement management.

Against this contextual backdrop, NEFMC initiated a multi-phase effort in partnership with The Parnin Group and Lynker (the Parnin Team) to assess the Council's current approaches, identify opportunities to strengthen management, and develop a holistic strategic plan for resilient fishery management approaches in the New England region. The effort builds on a significant body of ongoing related work, including NEFMC Inflation Reduction Act (IRA) projects, its Climate and Ecosystem Steering Committee (CESC) process-mapping and communications initiatives, and other related efforts to modernize fisheries management.

2.2 Goals and Objectives

This project seeks to:

1. Document existing approaches and processes utilized by the Council, including those used to address unpredictable changes to fishery trends, cycles, and a changing management landscape;
2. Identify key drivers of successful and unsuccessful approaches, and link drivers to existing and alternative processes; and,
3. Develop a holistic strategic plan to guide Council approaches and activities for resilient and responsive fisheries management initiatives.

The overarching objective is to position the Council to make timely, science-based decisions that are durable, agile, equitable, and aligned with emerging environmental and economic realities.

As part of the development of this project, the Council assigned an Oversight Team (OST) to help guide our work. The Parnin Team presented a preliminary Discovery Analysis to the OST on October 16, 2025. Our Team revised the document based on their feedback and then conducted another review with the OST on November 25, 2025. The team provided essential feedback aimed at refining the report's clarity and focus. Based on their feedback, we synthesized the findings into cross-cutting themes, utilized quantitative data to help anchor findings and gaps, and explicitly linked findings and gaps to the Council's IRA initiatives. We also included Council successes, focus group/interview/questionnaire participant details and statistics, executive summaries, and sample success metrics.

2.3 Project Progress

The project is structured into three sequential phases:

Discovery Phase (Complete):

- **Activities**: Gathered insights through interviews, focus groups, advisory group questionnaires, benchmarking, and document review. Conducted SWOT (Strengths, Weaknesses, Opportunities, Threats) and PESTLE (Political, Economic, Economic, Social, Technological, Legal, Environmental) analyses.
- **Outcomes**: Identified key challenges, captured participant perspectives, and mapped where processes operate efficiently or break down.

The Discovery Phase examined the current state of the Council's fishery management process and related challenges/successes through research and interviews with key staff, leadership, and active participants in the process.

We highlight several overarching "Findings" that currently shape and challenge the Council's organizational operations, efficiencies, and adaptive approaches to management (see Section 2: Discovery Findings). During this phase, we also distributed online questionnaires to gather insights regarding the Council's advisory bodies with the goal of improving efficiency, efficacy, coordination, and clarity of purpose.

Finally, we began our benchmark analysis, and the preliminary analysis can be found in Appendix A. This analysis is ongoing and will include a high-level comparison of the NEFMC to other U.S. Fishery Management Councils to identify best practices for addressing regulatory and ecosystem challenges through comparative insights on governance, strategic planning, and performance.

Analysis Phase (Current)

- **Activities**: Translating the discovery findings into deeper insights by identifying gaps, including misalignments and root causes.
- **Outcomes**: Diagnosing system-level drivers for identified symptoms and clarifying how different factors shape Council effectiveness.

During this phase, we identify key drivers of inefficiencies and potential improvements from data and information collected in the Discovery phase. We are also linking key drivers to specific challenges and highlighting trends to paint a comprehensive picture of the organization and its processes. This is a critical step in our process; we want to ground truth our findings, drivers, and identification of gaps in critical information needed to conduct the final phase.

Recommendations and Strategic Planning (December 2025-April 2026)

- **Activities**: Conduct additional inquiries, as needed, through a broad participant questionnaire, focus groups/interviews, and Council feedback based on the Gap Analysis. Conduct strategic planning workshop to draft potential plan.
- **Outcomes**: Final report on recommended changes, strategic plan, and roadmap for implementation.

The Recommendation Phase of the project will begin with the development of draft, actionable recommendations that can enhance the Council's resilient and responsive fisheries management process as well as inform the development of its strategic plan. In December 2025, based on feedback from additional data collection and feedback, we will begin formulating draft recommendations in preparation of the January 2026 strategic planning workshop with Council members (see Section 4: Strategic Planning Process).

Following the workshop, the refinement of the draft plan will include additional reviews and feedback from the Council members and the OST. By April 1, 2026, the Parnin Team will provide the Council with a final report and a draft Strategic Plan, including an implementation roadmap and associated performance metrics. We note that the Council will finalize and implement the plan as desired.

3 Discovery Analysis

3.1 Overview

The Discovery Phase drew from multiple inputs, including interviews, focus groups, questionnaires, benchmarking, workflow analysis, document review, and the SWOT and PESTLE analyses. When the Parnin Team synthesized these sources of information, a clear set of patterns emerged across four major topic areas. Although each input described challenges from different perspectives, many underlying themes are consistent across information streams. The findings reflect both participants' experience and the factors driving these experiences. The Analysis Phase will build on the breadth of inputs collected during Discovery.

Sources of Input:

- **Interviews** and **focus groups** with Council members, staff, Plan Development Teams (PDTs), Advisory Panel (AP) members, Scientific and Statistical Committee (SSC) members, Greater Atlantic Regional Fisheries Office (GARFO), Northeast Fisheries Science Center (NEFSC) personnel, industry representatives, Non-governmental Organizations (NGOs), and partner agencies.
- Advisory Body **questionnaire** responses (NEFMC Staff and AB Chairs/Vice Chairs).
- **Document** and **policy reviews**, including Council meeting materials, technical documents, and regulatory deadlines.
- Alignment with **parallel initiatives**, such as IRA.
- **Benchmarking** data, providing comparative insights on staffing levels, budgets, governance structures, and process timelines across regional councils (Appendix A).
- Current **written approaches and processes** to document and implement changes in response to unpredictable fishery trends, cycles, and the evolving management landscape (Appendix B).

Table 1 lists the number of participants in interviews, focus groups, and questionnaires, categorized by the groups they represent in the Council process.

Table 1. Number and type of respondent to interviews, focus groups, and questionnaires.

Role	Number of Respondents
Atlantic States Marine Fisheries Commission	1
Climate and Ecosystem Steering Committee	7
NEFMC Council Staff	20
Greater Atlantic Regional Fisheries Office	6
Fishing Industry	4
Council and NOAA Leadership	10
Northeast Fisheries Science Center	9
Non-government Organizations	10
Scientific and Statistical Committee	4
State Government	2
Unknown (Questionnaire)	5
Grand Total	78

Grounding Our Findings

To ensure accuracy and transparency, the Parnin Team highlights patterns that appear across inputs and supports findings with relevant examples or specific data points. Benchmarking data are incorporated to reinforce or clarify emerging themes, while divergent perspectives are noted along with contributing factors to ensure a balanced view.

Limitations

There are a few limitations to Discovery, including that some participant groups were underrepresented in the process due to scheduling constraints and varying levels of voluntary participation, such as SSC members, National Oceanic and Atmospheric Administration (NOAA) staff of Protected Resource Division, and Habitat and Ecosystem Services Divisions (due to shut down). Furthermore, benchmarking data that was publicly available was inconsistent across peer Regional Fishery Management Councils and their respective Fishery Management Plans (FMPs), which limited the ability to make a fully comparable assessment.

3.2 Discovery Findings

- When analyzed holistically, data collected during the Discovery Phase cluster into four cross-cutting topics that characterize the Council's current state:
- **Governance & Efficiency**: The findings related to Council decision-making architecture, prioritization, and workflow complexity.
- **Trust & Engagement**: Findings related to transparency, feedback loops, and representation that may undermine or reinforce participant confidence and engagement.
- **Workforce & Resources**: Capacity and resource limitations that burden staff, restrict innovation, and delay strategic progress.
- **Adaptation & Resilience**: Findings related to the system's ability to anticipate and respond to shifts due to data cycles and required processes.

The following sections summarize the themes and patterns that emerged from interviews, focus groups, and questionnaire input during Discovery. The overall system seems to be structurally overburdened and operationally reactive. While there is a desire for high-quality, science-based management, the actual mechanics of the Council management process are hindered by structural and workflow complexity, resource scarcity, and a growing disconnect between participants and decision-makers. This causes challenges in being adaptive and resilient to outside influences that disrupt the management process.

Figure 1 illustrates the total number of mentions for each topic area, segmented by data sources (interviews, focus groups, and questionnaires).

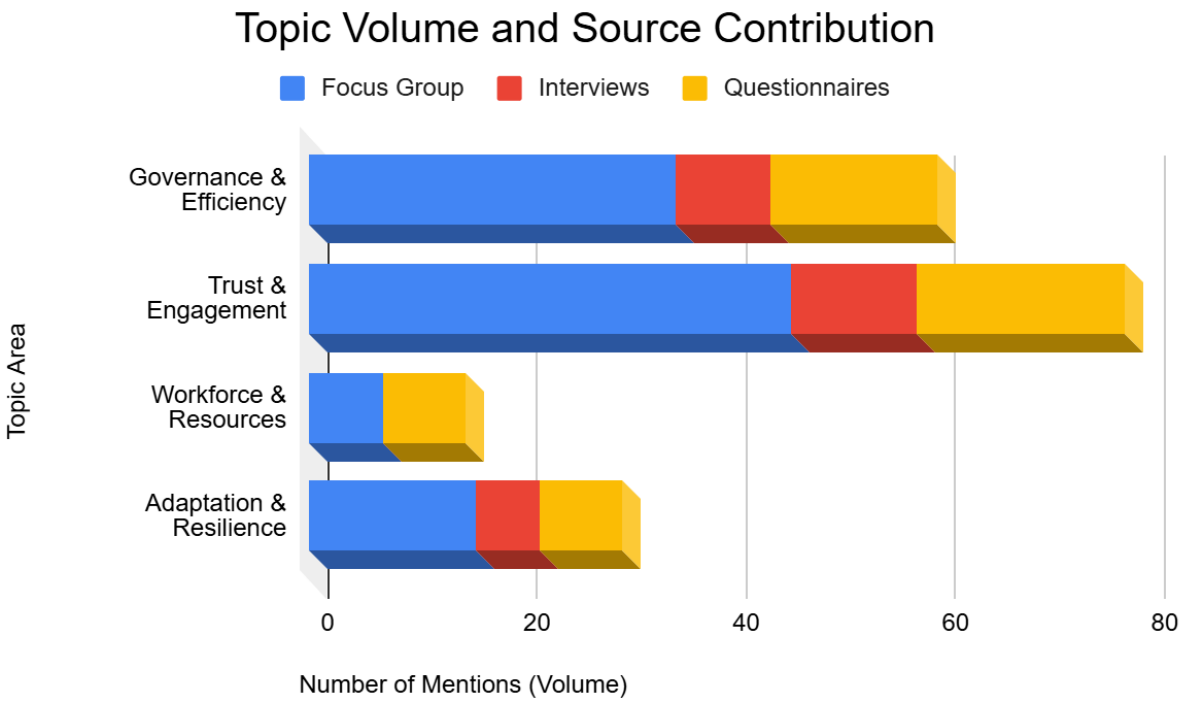


Figure 1. Volume and source of statements that supported main topics areas of Governance & Efficiency, Trust & Engagement, Workforce & Resources, and Adaptation & Resilience.

Table 2 outlines a hierarchy of concerns, identifying the dominant feedback channels and primary insights for each topic. Topic areas were priority-ranked based on the volume of comments that pertained to a topic area. Although dominant sources were identified, these insights were identified across multiple data collection sources (interviews, focus groups, and questionnaires).

Table 2. Prioritization of Key Topic Areas by Feedback Volume and Source.

Topic Area	Overall Priority (by Volume)	Dominant Source of Feedback	Primary Insight
Trust & Engagement	Highest Priority	Focus Group	Feedback is driven primarily by direct participant/stakeholder input, indicating widespread, ground-level concern.
Governance & Efficiency	Second Highest Priority	Focus Group	A significant and broad concern, with Focus Groups providing the clearest, most detailed direction on structural and process improvements.
Adaptation & Resilience	Third Highest Priority	Focus Group	Feedback volume is moderate, but the mix includes significant input from both Interviews and Questionnaires.
Workforce & Resources	Lowest Priority	Focus Group & Questionnaires	The lowest-volume topic, with its input primarily coming from written submissions (Questionnaires), supplemented by input from Focus Groups.

3.2.1 Governance & Efficiency

Governance & Efficiency challenges are primarily related to the architecture of the process and how the Council establishes priorities. Challenges stem from structural constraints (e.g., statutory mandates) and overlaps that accumulate across steps in processes. Respondents consistently describe a system that is participatory but complex, lacking nimbleness in areas, and difficult to navigate at times. High-level findings from interviews, focus groups, and questionnaires are described below.

Challenges to efficient decision-making vary.

- The organizational structure, particularly its effective committee system and bottom-up, grassroots approach (utilizing Advisory Panels, Plan Development Teams, and the SSC), is highlighted as a successful way to facilitate detailed decision-making and ensure a wide range of input.
- The process is noted for numerous opportunities for public comment and engagement in the process.
- PDTs are praised for acting as effective intermediaries, which enhances the quality of recommendations and incorporates Council risk policies earlier in the management process. The memos they produce are described as extremely helpful for Council members.
- Most advisory bodies are described as well-balanced, representative, and successful at including a broad range of stakeholders across different geographic areas and industry sectors.

- Council and science center leadership are actively working to make requests clearer and define a process for who receives requests (e.g., through supervisors) to better manage staff workloads. This effort is described as "a work that is in progress" and "positive".
- Participants cited that there are unclear hand-offs or defined ownership of a task or action item within and between certain groups which leads to delays and creates a sense that no one is “officially tasked” to support management actions. This leads to a system where accountability for timeliness is spread over many people, often leading to inefficiency and inaction.
- At times, issues being scoped for action circulate across advisory bodies and into the Council forum then back to advisory bodies without resolution.
- A lack of an educational component between the Council process and the managed fisheries can lead to misinformation, complicating the Council's ability to identify and develop management solutions for true risks.
- A structural disconnect exists between scientific production and policy application. This misalignment creates a translation gap, where raw scientific outputs are often incompatible with management realities, rendering them difficult for the Council or participants to interpret or utilize effectively.
- Specific challenges were identified in the internal agency review, where the lack of clear coordination between the regional office (GARFO) and the Science Center led to a complex process for obtaining various reviews (e.g., economic, social science) from different staff members for each action.
- At times requests for information and guidance from the council or plan development teams to science staff are often "not clear" and lack specific purpose or timelines.
- Issues being scoped for action circulate across advisory bodies and into the Council forum then back to advisory bodies without resolution.

Procedural steps require significant time and attention.

- Stakeholders appreciate that the Council’s regulatory process reflects a genuine commitment to scientific rigor and public transparency, indicating strength in the governance process even though burden is high.
- The herring fishery's use of non-discretionary, trigger-based quota adjustments is cited as a successful model for an efficient, automatic regulatory response that increases predictability for the industry.
- The scallop survey system is considered one of the best in the world due to collaboration between multiple groups, consistent communication, and the use of different sampling tools to ensure the entire survey area is covered annually.
- The sheer volume of management alternatives and the multi-layered nature of the review process create a system that is difficult to navigate.
- Decision-making for regulatory actions is described as "labor intensive and demanding in short windows.”
- The time it takes for the NEFSC to run key analyses, such as a management track assessment, is too long and minor delays in data can throw off the action timeline. The volume of mandated actions prevents the Council from experimenting with adaptive management frameworks or utilizing expedited legal reviews.
- Rigid statutory requirements prolong delays, preventing participants from seeing meaningful movement in the short term. This causes process fatigue, inhibits ongoing engagement, and ultimately prevents stakeholders from feeling collective ownership over outcomes.

- The review and approval process after the Council's final action often introduces delays, unexpected hurdles, and inconsistency in decision-making at NOAA's regional offices.
- Overly complicated regulations that make adaptation difficult for fishermen.
- The timing of stock assessments and regulatory approvals creates inefficiencies, particularly at the end of the year when multiple actions are submitted simultaneously.
- The regulatory change process is viewed as overly formal and slow, often requiring years to materialize into actionable results.

Priorities shift based on emerging issues and requirements.

- Participants noted a positive shift in recent years toward the Council being more successful in sticking to its long-term priorities, reducing the tendency to frequently change course due to unexpected issues.
- The annual prioritization process is often derailed by "emergency issues" and external pressures, limiting the ability to follow a predictable plan and changing the course of management issues without clear, stable reasoning.
- The strict annual specification process for certain species (like scallops and groundfish) forces "rushed decision-making" due to short windows for data collection and assessment, indicating the process is too rigid to handle the real-world constraints of data and science.

3.2.2 Trust & Engagement

Trust and Engagement challenges are driven by how information moves through the system, how participant input is reflected, and how communication shapes perceptions of the Council's work. Feedback consistently described gaps in transparency, limited feedback loops, and a sense that engagement does not lead to outcomes. In addition, distrust in the system and decision-making hinders meaningful engagement and collaborative governance. Perceived challenges stem from uneven communication paths, representation gaps, and varying experiences across different advisory bodies (e.g., PDTs, APs, Committees). High-level findings from interviews, focus groups, and questionnaires are described below.

Perceptions of representation and participation vary across bodies.

- Critical gaps exist in current body composition, specifically regarding social science, economics, analytical support, and climate expertise. Diverse stakeholder groups, including recreational interests, Indigenous communities, specific industry sectors, and geographically diverse representatives, are frequently absent.
- Concerns exist regarding the objectivity of summary reports when presented to the oversight committee and Council by the Advisory Panel Chair who may hold inherent political biases. Participants suggest that neutral staff members should present summary reports to ensure an accurate depiction of the group's consensus rather than individual viewpoints.
- "Surprise" findings or decisions may foster adversarial relationships between participants and management. Additionally, issues often circulate among different groups without resolution due to a lack of cross-functional collaboration.
- Variable attendance and the infrequency of joint meetings hinder the advancement of cross-cutting issues, preventing the sharing of practical knowledge required to solve complex problems.
- There is noticeable apathy toward engaging in the process and a decline in public meeting attendance due to the perceived inability to enact meaningful change.
- Smaller or newer participants and groups find the process difficult to navigate.

Participants report different experiences with how input is collected and reflected in decisions.

- There is overwhelming respect for and a positive attitude towards Council staff – their collaboration is seen as critical and readily available to all those involved in the process.
- Participants characterize engagement efforts as administrative "box-checking."
- There is a pervasive frustration that despite attending workshops and panels, stakeholders rarely see evidence that their feedback shapes final outcomes. Specifically, APs cite that they are “too late in the process" suggesting that by the time their official feedback is solicited, the main policy direction has already been set, and "Committees often do the real work.”
- Disillusionment towards Committees grows when final management actions routinely diverge from AP consensus/recommendations without clear communication or justification. Some feel that industry representation is rarely given deference, leading to a perception that their input is systematically ignored.
- Declining staff capacity undermines participant trust, as limited resources prevent staff from providing the timely responses or clear explanations necessary to maintain confidence. Participants emphasize the need for plain language explanations and immediate follow-up when feedback is collected.

Perceptions of inclusivity and fairness vary across FMPs.

- A persistent perception exists that larger, high-profile management plans dominate the Council’s time and resources. Participants representing smaller or less prominent fisheries report that their specific needs are deprioritized, leading to calls for a more equitable distribution of attention and scheduling.
- Current engagement structures tend to amplify the voices of well-organized, established groups while marginalizing smaller operators and new entrants. This disparity contributes to the feeling that the system favors those with existing influence rather than fostering broad inclusivity.
- There is a marked contrast in activity levels across different oversight bodies. Members of committees managing smaller plans describe their groups as significantly less active compared to those handling major stocks, creating a "tiered" system of management focus.
- Stakeholders perceive that feedback from fishery-specific participants is often disregarded unless it aligns with the views of environmental or external interest groups.
- Certain bodies are perceived as unbalanced or overly political, leading to skepticism regarding the objectivity of their outputs and the fairness of the resulting management actions.

Collaboration and levels of trust vary across stakeholder groups.

- There is generally strong and effective communication between the Council staff and the Regional Office, which is supported by regular meetings and dedicated staff assignments. There are also strong communications between FMP-specific committees and advisory panels as well as between PDTs and other advisory bodies.
- Staff are looking to be more proactive with communication and outreach. Tools and approaches being discussed include:
    - Developing a strategic approach to public engagement.
    - Leveraging social media and brief video presentations.
    - Creating web forms and interactive approaches to facilitate public comment.

- Although weak or misunderstood communication between the Council and the Science Center has been a source of frustration and inefficiency, the groups have been actively taking steps to strengthen coordination.
- Some industry stakeholders express growing distrust in stock assessments and data accuracy, citing perceived disconnects between scientific models and on-the-water realities, which reduces public buy-in for management decisions.
- A "black box" perception of governance exists where key regulatory decisions are viewed as occurring behind closed doors, potentially undermining the Council's commitment to open governance.
- Some disconnects between the Council and Science Center lead to regulatory delays and surprises, while highly technical presentations are, at times, unsuccessful at translating complex data into actionable policy insights for non-scientific audiences.

Adversarial dynamics and instances of disrespectful behavior within Council forums have degraded the collaborative environment.

3.2.3 Workforce & Resources

Workforce & Resources challenges relate primarily to the capacity and capabilities of staff, availability of technical support, and the tools needed to manage expanding expectations. Respondents consistently described a dedicated workforce operating under strain with limited resources to support ongoing obligations and emerging needs. Challenges may stem from resource constraints, rising analytical demands, and systems that increase administrative burden. High-level findings from interviews, focus groups, and questionnaires are described below.

Staff capacity is shaped by statutory and analytical demands.

- Despite a heavy workload, staff are motivated to thoroughly analyze the issues within the allotted timeframe and to support the Council in making informed decisions.
- Council staff are considered accessible and collaborative.
- NOAA and Council staff are overburdened by rigid procedures and review requirements for analytical document development and a dense schedule of meetings. This heavy workload consumes available bandwidth, leaving virtually no time for strategic planning or process innovation.
- The sheer volume of required analysis, documentation, and advisory activity exceeds current organizational capacity, leading to delays in action development and preventing the streamlining of operations.

3.2.4 Adaptation & Resilience

Adaptation & Resilience challenges center on the ability to respond to environmental, ecological, economic, and other changes at the pace required. Inputs consistently described a management process that struggles to adjust quickly to shifting conditions and priorities due to long data cycles, fragmented information, and limited flexibility. Challenges step from lagging inputs, slow timelines, and constraints in current management tools. High-level findings are outlined below.

Policy timelines progress at a different pace than environmental shifts.

- Council leadership is actively trying to structure the council to be more forward-thinking, addressing the resiliency of the fishery and managing for the fishery that exists today.
- Ecosystem shifts are outpacing management cycles. There is often a three-to-four-year lag between observation and regulation, meaning decisions are implemented based on conditions that no longer exist.

- The timing of stock assessments and regulatory approvals creates end-of-year congestion. These workflow bottlenecks and lengthy agency reviews impede progress, preventing the rapid adjustments required for climate resilience.
- The current regulatory environment provides little room for piloting adaptive frameworks or experimental models, leaving managers without tested alternatives when conditions change abruptly.

Regulatory frameworks and permitting structures define the boundaries of operational flexibility.

- Stakeholders express optimism that with thoughtful changes, the permit system could maintain conservation goals while promoting greater mobility.
- The Council system is viewed as having the "building blocks in place for long standing resilient fisheries," and is engaging in efforts to provide greater flexibility, such as thinking about the risk policy framework or revising ground fish ABC control rules, to be adaptive to the current ecosystem and socioeconomic changes (See Appendix B).
- Management processes remain reactive, focusing on short-term crisis fixes rather than deliberate, long-term reforms. This approach leaves the Council constantly chasing shifting priorities rather than executing a strategic vision.
- The current permit system is viewed as costly, rigid, and complex. This prevents operators from diversifying their business models to target abundant species when their primary stocks shift or decline.
- Industry participants observe abundant species on the water but are legally unable to harvest them due to management provisions rooted in outdated geographic or biological data.
- Overly complex rules and burden-heavy compliance measures limit the industry's ability to adapt dynamically.
- The density of regulations makes it difficult to implement simple, nimble adjustments like in-season rollovers or automatic triggers.

Data availability and timing differ across systems and sources.

- There is a willingness among participants to partner in data collection if feedback is recognized and valued, as seen in Scallop fishery management.
- There is widespread interest in shifting towards a more holistic management approach that integrates environmental, economic, and social factors (i.e., EBFM).
- Existing data systems are fragmented and siloed, preventing efficient cross-agency coordination. Disconnects between science centers and decision-making bodies cause delays, surprises, and inefficiencies in regulatory actions.
- Stock assessment review cycles significantly lag behind real-time conditions. This forces decision-makers to rely on outdated information, reducing confidence in science and leading to wide uncertainty bounds.
- The system currently lacks adequate mechanisms to integrate environmental indicators or "ecosystem scorecards" into standard decision-making, leaving managers without the necessary context to make climate-aware adjustments.

3.3 Conclusion of the Discovery Phase

Discovery findings show a system that is highly participatory and scientifically grounded, but it faces increasing demands and expectations as well as growing complexity. While individual challenges vary across fisheries and functions, there are many underlying issues that trace back to misalignments in strategy, structure, systems, and people. Taken together, these findings show a

system facing several pressures: increasing complexity, growing expectations from participants, and operational demands that exceed available (and funded) capacity.

4 Gap Analysis

4.1 Purpose and Scope

.The Discovery Phase captured a range of perspectives and data that describe symptoms across fisheries, committees, advisory bodies, and other processes. The purpose of the Analysis Phase is to move beyond what was discovered and examine why the system functions as it does.

Specifically, the Gap Analysis aims to:

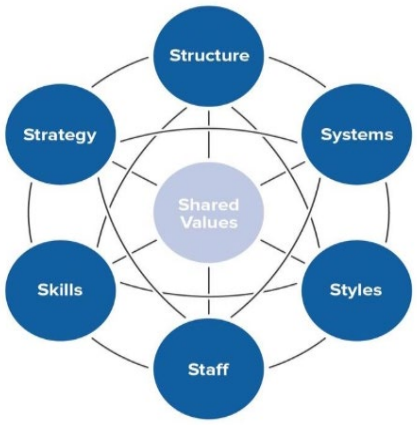
- **Distinguish between symptoms and gaps** (or root causes and misalignments).
- **Integrate discovery inputs** not captured SWOT/PESTLE analyses, such as benchmarking, timeline assessment, and questionnaire results.
- **Identify cross-cutting findings** that may reflect system level issues rather than isolated operational challenges or problems.
- **Diagnose gaps** that lead to challenges in efficiency, trust, responsiveness, and proactive planning across Council operations.
- **Provide the foundation for strategic planning and solutioning** by highlighting potential solutions so that the Council enters the January workshop with a shared understanding of challenges and drivers.

This analysis does not offer final recommendations. Instead, we attempt to create the clarity needed to evaluate tradeoffs, set priorities, and provide supporting information and the potential structure for decision-making leading into the Strategic Planning and Recommendations Phases.

4.2 Approach and Methodology

We applied the McKinsey 7-S Framework, which examines how strategy, structure, systems, and people (e.g., staffing, skills, and leadership style) interact within the Council's current operating model. This enables to provide a better understanding of where the gaps are, why they exist, and what drivers reinforce them, enabling the development targeted solutions. The McKinsey 7-S Framework (Figure 2), examines alignment across seven core organizational dimensions:

- **Strategy & Shared Values**: The Council's overarching direction, priorities, and core principles that guide how decisions are made and how tradeoffs are interpreted. This dimension reflects both what the organization aims to achieve and the values that shape its approach to fulfilling its mission.
- **Structure**: The formal roles, responsibilities, and governance models that determine how authority, decision-making, and coordination occur across the Council, Committees, PDTs, staff, and advisory bodies.
- **Systems**: The processes, workflows, tools and technologies, and informal practices through which work is planned, communicated, and conducted across the Council's operations.
- **Staffing, Skills, and (Leadership) Style**: The capacity, capabilities, and leadership behaviors that influence how effectively and efficiently the organization performs its work, including workforce composition, competencies, and dynamics.



The 7-S lens enables us to translate findings into a view of where the Council's current model supports its mission and where gaps hinder it. Gaps may reflect **mandates versus processes, needs versus capacity**, or **expectations versus actual performance**. These gaps often cut across multiple dimensions, reflecting the interconnected nature of governance, workflows, participant engagement processes, and workforce capacity.

Together, the Discovery and Gap Analyses clarify both strengths and areas that may be limiting efficiency, trust, and responsiveness.

Figure 2. McKinsey 7-S Framework

Purpose of Defining Intervention Areas at this Stage

The intervention areas emerging from this analysis serve three core functions:

1. **Provide organized information for strategic planning**
   Rather than approaching strategic planning with a broad list of issues, the Council now has a focused set of intervention areas that reflect cross-cutting challenges, root causes identified in the 7-S analysis, system-level drivers, and areas of misalignment. These provide an outline for discussion, supporting the Strategic Planning Workshop to focus on where strategic choices are needed most.
2. **Establish boundaries of feasible recommendations**
   Some gaps surfaced in the assessment may be structure, where others are operational, relational, or cultural. Identifying these differences can ensure that our recommendations address areas within the Council's control, sequence recommendations appropriately, recognize dependencies, and align interventions with capacity and resources.
3. **Support prioritization and decision-making**
   The potential intervention areas identified here offer a starting point for determining which challenges require strategic attention, where the Council has leverage, what should be addressed in the short or long term, and where additional analysis may be needed. This prevents premature solutioning while preparing the Council to enter strategic planning with clarity and a shared understanding.

Organizing intervention areas using the 7-S Framework provides a structured way to consider how changes in strategy, shared values, structure, systems, staffing, skills, and leadership style might collectively strengthen Council operations. Of course, listed intervention areas do not represent formal recommendations but instead reflect areas that warrant exploration during the strategic planning workshop and the subsequent Recommendations Phase.

4.3 Analysis

The following sections synthesize the gaps using the 7-S Framework, linking observed **symptoms** to organizational **gaps** that hinder execution of strategic objectives. We also suggest potential ongoing IRA projects that may be incorporated as desired to examine these issues further and/or provide solutions in the future as these projects progress. When information becomes available, consideration could also be given to the findings of the Climate and Ecosystem Steering Committee's 'communication' and 'process mapping' projects.

4.3.1 Strategy & Shared Values

The Council's overarching direction, priorities, and core principles that guide how decisions are made and how tradeoffs are interpreted. This dimension reflects both what the organization aims to achieve and the values that shape its approach to fulfilling its mission.

The Strategy and Shared Values dimensions are deeply interconnected, as these shape long-term goals and the principles that guide day-to-day work. While there is a strong desire for a comprehensive Strategic Plan that refines operations fosters the Council's transition toward Ecosystem-Based Fisheries Management (EBFM), the system currently prioritizes short-term fixes over deliberate reforms due to capacity strains and resource limitations. This reactive approach, described by participants as an approach that chases declines, highlights the need for strategic clarity and resilience. At the same time, a significant trust deficit compounds these challenges. There is a growing adversarial relationship between participants and federal scientists and managers, fueled by a belief that scientific assessments do not align with observations on the water. Amid these tensions, a couple of shared values persist: there is an "internal commitment to collaboration and reform" and widespread respect for the hard work of Council staff. Together, these dimensions reveal that strengthening strategic foresight and shared responsibility must occur in tandem to enable adaptive management. Table 2 describes gaps and their related symptoms across the strategy and shared values dimensions.

Table 3. Gaps in Strategy & Shared Values

Gap	Symptom(s)	Topic(s)	Applicable IRA Project(s)?
There is a lack of mechanisms to prioritize long-term strategy over reactive decision-making.	* The Council focuses on "chasing declines" rather than strategic opportunities. * Focus is often on short-term fixes rather than deliberate reforms.	* Adaptation & Resilience * Governance & Efficiency	* IRA 5 Holistic Strategic Plan: Aims to develop a plan to address overarching challenges and support resilient/responsive fisheries management, which includes a roadmap and performance metrics.

Gap	Symptom(s)	Topic(s)	Applicable IRA Project(s)?
Management plans are not designed to adjust to dynamic ecosystems.	* Management actions consistently lag behind environmental shifts. * Fishery participants have difficulty diversifying operations in response to changing conditions.	* Adaptation & Resilience * Governance & Efficiency	* IRA 3.1 Integrate Ecosystem Considerations: Seeks to directly connect ecosystem information to management decisions, with explicit consideration of dynamic environments. * IRA 3.2 Dynamic Reference Points: Will develop practices for integrating dynamic reference points (which change over time in response to non-stationarity) into management plans.
There is insufficient integration of ecological, social, and economic information to operationalize EBFM.	* Social and economic data is rarely incorporated into management decisions.	* Trust & Engagement * Adaptation & Resilience	* IRA 3.1 Integrate Ecosystem Considerations: Works to source data for Risk Policy factor scoring and improve information flow into the specifications setting process. * IRA 4.4 Portfolio Analysis: Will evaluate species to identify opportunities for increased yield and revenue while minimizing risks and considering biological constraints, leading to permit adjustments.
There is no strategy in place to communicate scientific uncertainty in a way that builds trust.	* Widespread "lack of trust" due to ineffective communication and negative findings delivered as surprises. * Belief that science is slow and unreflective of dynamic conditions.	* Trust & Engagement	* IRA 6.1 and 6.2 Enhancing Participatory Processes: Aims to create new communication channels and streamline processes to reduce barriers.

Gap	Symptom(s)	Topic(s)	Applicable IRA Project(s)?
There are no safeguards in place in the management process to ensure balanced and equitable influence across participant groups.	* Perception that political influences undermine fairness. * Participants perceive the system as inequitable, with legacy groups seen as having more influence than smaller or newer groups.	* Trust & Engagement * Governance & Efficiency	* IRA 6.1 and 6.2 Enhancing Participatory Processes: Aims to align services with community characteristics. * IRA 4.1 and 4.2 Cross Jurisdictional Governance: Will evaluate advisory body structure and consider representativeness of membership given shifting species distributions.
Technical complexity creates barriers to participation when not translated for non-specialists.	* Not all participants understand stock assessment modeling and rationale. * Empirical knowledge of fishers is discounted, widening the gap between industry and science.	* Trust & Engagement	* IRA 6.1 and 6.2 Enhancing Participatory Processes: Aims to develop tools for enhancing participatory processes and streamline the preparation and use of written materials like FMP documents and white papers.

4.3.2 Structure

The formal roles, responsibilities, and governance models that determine how authority, decision-making, and coordination occur across the Council, Committees, PDTs, staff, and advisory bodies.

The Structure dimension evaluates how the Council's organization, committees, and hierarchy facilitate or hinder decision-making. Discovery findings highlight that the Council's multi-layered committee system is a potential source of inefficiency. Advisory bodies serve as important spaces for collaboration but could benefit from regularly updating their goals and objectives to ensure they are addressing current issues. Structural misalignment and coordination challenges between the Council, GARFO, and NEFSC lead to delays in data delivery and decision-making. Table 3 describes gaps and their related symptoms across the structure dimension.

Table 4. Gaps in Structure

Gap	Symptom(s)	Topic(s)	Applicable IRA Project(s)?
There is no formal structure in place to ensure direction, coordination, and resolution across committee workflows.	* Issues circulate among groups without resolution or action. * There are bottlenecks throughout processes.	* Governance & Efficiency	* IRA 4.1 and 4.2 Cross Jurisdictional Governance: Will explore solutions for improving consistency and clarity of processes for maintaining joint or cooperative management plans. * IRA 5 Holistic Strategic Plan: Aims to identify improvements to programs, policies, and practices that would foster efficiency.
Interagency structures are not aligned to support synchronized timelines.	* There is late data arrival as timelines between Council, GARFO, and NEFSC differ. * Participants experience confusion and roles, responsibilities, and accountability across agencies are unclear.	* Governance & Efficiency * Workforce & Resources	* IRA 4.3 Regional Operating Agreements: Will update the 2014 operating agreement between NEFMC, GARFO, NEFSC, and OLE, reviewing terminology, general/specific roles, and processes.
Current advisory structures do not guarantee balanced representation across participant groups.	* Advisory panels may suffer from uneven representation. * Perception that well-organized groups are amplified while smaller operators are marginalized.	* Trust & Engagement	* IRA 4.1 and 4.2 Cross Jurisdictional Governance: Includes an evaluation of advisory body structure, use, and decision-making, and will consider the representativeness of membership given shifting species distributions.

4.3.3 Systems

The processes, workflows, tools and technologies, and informal practices through which work is planned, communicated, and conducted across the Council's operations.

The Systems dimension covers formal and informal procedures, including data systems, regulatory workflows, and communication channels. Findings indicate that outdated systems and rigid legal frameworks (MSA, NEPA) create significant "regulatory burdens." There is a critical lag in data systems, where stock assessment outputs often trail real-time conditions by one to two years. Additionally, the permitting system is viewed as a rigid economic barrier that stifles profitability and flexibility. Table 4 describes gaps and their related symptoms across the systems dimension.

Table 5. Gaps in Systems

Gap	Symptom(s)	Topic(s)	Applicable IRA Project(s)
Data systems are not equipped for real-time or responsive management.	* Participants are frustrated that stock assessments lag 1-2 years behind real-time conditions. * Data cannot be shared or evaluated quickly enough to inform management.	* Adaptation & Resilience * Governance & Efficiency * Trust & Engagement	* IRA 3.1 Integrate Ecosystem Considerations: Will work to automate preparation of Annual Monitoring Reports and map action development processes to identify specific on-ramps for climate and ecosystem information. * IRA 6.1 and 6.2 Enhancing Participatory Processes Will integrate modern tools and advanced technologies (AI initiative) to more efficiently and effectively analyze and share information.
Regulatory procedures generate excess burden with low utility.	* Staff spend months on options created only to satisfy procedural requirements that are never realistically considered. * Permit holders/seekers face high costs and limits on access due to the	* Governance & Efficiency * Workforce & Resources	* IRA 5 Holistic Strategic Plan: Aims to identify improvements to practices that would foster efficiency. * IRA 4.4 Portfolio Analysis: Will examine permit system adjustments to optimize yield across species and minimize risks.

Gap	Symptom(s)	Topic(s)	Applicable IRA Project(s)
	current permitting process.		
There is no standardized protocol to ensure participants routinely receive information early and clearly.	* Participants are surprised by regulatory actions based on methodologies they had not reviewed. * Negative scientific findings are often delivered as a "surprise".	* Trust & Engagement	* IRA 6.1 and 6.2 Enhancing Participatory Processes: The public communications initiative aims to create new channels for sharing information and remove barriers to communication.
There is no framework in place for managing risk that allows for adaptive management testing within regulatory constraints.	* Uncertainty leads to precautionary restrictions rather than experimentation with adaptive frameworks. * Managers report making decisions with heightened caution to avoid perceived litigation vulnerability.	* Adaptation & Resilience * Governance & Efficiency	* IRA 1 Acceptable Biological Catch Control Rules: This project modifies the ABC control rules in the context of the Council's revised Risk Policy, aiming to make management more transparent and predictable in the face of uncertainty.

4.3.4 Staffing, Skills, and (Leadership) Style

The capacity, capabilities, and leadership behaviors influence how effectively and efficiently the organization performs its work, including workforce composition, competencies, and dynamics.

This dimension analyzes the Council's human resources, capabilities, and decision-making culture. While there is overwhelming respect for the dedication and technical expertise of Council staff, the workforce is described as "overburdened" by statutory requirements and a diverse suite of meetings, leaving little bandwidth for innovation. The volume of required analysis and coordination strains capacity, leading to delays in action development.

Regarding skills, while scientific capacity is high, there are gaps in integrating non-biological data. Participants noted a "lack of adequate incorporation of social and economic data," often referred to as the "second rail of information." Finally, the leadership style is perceived by some as "risk-averse," believing that uncertainty translates into precautionary restrictions that participants find unfairly burdensome. Table 5 describes gaps and their related symptoms across staffing, skills, and leadership style dimensions.

Table 6. Gaps in Staffing, Skills, and (Leadership) Style

Gap	Symptom(s)	Topic(s)	Applicable IRA Project(s)?
Operational demands exceed workforce capacity.	* Staff are stretched thin by volume of documentation for low-probability options. * Heavy workload limits bandwidth for strategic planning.	* Workforce & Resources * Governance & Efficiency	* IRA 6.1 and 6.2 Enhancing Participatory Processes: Aims to streamline routine tasks using advanced technologies/AI to save time for complex work. * IRA 5 Holistic Strategic Plan: Aims to identify improvements to programs, policies, and practices that would foster efficiency.
Federal support levels limit responsiveness and are insufficient to meet current and future demands.	* Declining workforce in the Federal Government space undermines the ability to provide timely responses to changes or emerging crises. * Workshop fatigue and bottlenecks due to multi-modal compliance requirements (i.e., MSA/NEPA, ESA, MMPA, NMSA, EOs, etc.).	* Workforce & Resources	* IRA 4.3 Regional Operating Agreements: Aims to consider the current political, funding, and resource landscape to make the operating agreement robust to future changes.
Lack of expertise to analyze and integrate socio-economic data.	* Inability to analyze and use robust social/economic data leads to distrust. * Science is viewed as unreflective of fishery operations/realities.	* Trust & Engagement * Adaptation & Resilience	* IRA 4.4 Portfolio Analysis: Involves desktop modeling and stakeholder engagement to identify opportunities for increased yield and revenue, explicitly considering the economic component. * IRA 2 Atlantic Cod Management Transition: Will address fishery

Gap	Symptom(s)	Topic(s)	Applicable IRA Project(s)?
			allocation issues and changes to the Sector management system, which are socio-economic management applications.
Engagement processes are procedural and not designed to support collaboration.	* Engagement is characterized as "box checking." * Feedback is rarely viewed as shaping outcomes, leading to engagement fatigue.	* Trust & Engagement	* IRA 6.1 and 6.2 Enhancing Participatory Processes: This initiative is focused on enhancing participatory processes and creating new channels for sharing information.

The gaps identified across the 7-S dimensions reflect an organization that is committed and capable yet constrained by what the environment demands and what the current operating model enables. Several implications emerge from this analysis, portraying an organization where friction points lead to delays, mistrust, bottlenecks, and missed opportunities for strategic focus.

4.4 Summary of Gaps

Here we synthesize the most significant gaps across strategy, shared values, structure, systems, staffing, skills, and leadership style.

1. *There is a lack of mechanisms to prioritize long-term strategy over reactive decision-making.*

The Council's focus on urgent, short-term crises crowds out the space needed for deliberate planning and adaptive management. The system's design and workload patterns leave little room for strategic sequencing or scenario planning. As a result, the Council's ability to anticipate ecological change, advance resilience, or align operations with more strategic intent is limited.

2. *Management plans are not designed to adjust to dynamic ecosystems.*

Management actions lag behind environmental shifts, and existing plan structures inhibit timely adaptation. Fishermen described limited ability to diversify operations due to rigid permitting systems, while scientific partners noted that emerging ecological changes cannot be incorporated mid-cycle. The design mismatch limits the Council's ability to pursue adaptive approaches.

3. *There is insufficient integration of balanced ecological, social, and economic information to holistically manage risk and realize desired outcomes.*

There are some gaps in socioeconomic analysis, limited use of social and economic data in management decisions, and a perception that science does not reflect real-world conditions on the water. Without a consistent approach to integration, holistic management remains difficult to operationalize. This gap contributes to skepticism and a management system overly reliance on just biological inputs.

4. *There is a need for a strategy to communicate scientific uncertainty in a way that builds trust.*

Stakeholder interpretation of scientific information can be distorted by gaps in technical knowledge, complex concepts, or misinformation. Surprise results and limited plain-language communication compound perceptions of misalignment between assessments and lived experience. This dynamic deepens the trust deficit, which reduces support for science-based decisions and undermines confidence in the management process.

5. *Operational demands exceed workforce capacity.*

The volume of required meetings, analyses, documentation, and coordination outpaces available capacity. The system depends heavily on a small number of highly specialized staff with limited redundancy for critical roles. This creates bottlenecks, delays, fatigue, and reduced bandwidth for innovation and proactive planning.

These gaps do not exist in isolation – they appear across different organizational dimensions and often reinforce one another. Limited capacity and long processes restrict the ability to plan strategically, creating a cycle where reactivity replaces foresight. Further, communication challenges deepen distrust, making it harder for information to be interpreted as legitimate. Not only that, rigid management, combined with insufficient capacity, slows the ability to adapt. The gaps are interconnected, describing a system that is scientifically grounded and highly collaborative, yet increasingly strained by growing complexity and rising expectations.

4.5 Turning Gaps into a Path Forward

While the Gap Analysis highlights misalignments that limit efficiency, responsiveness, and participant confidence, these gaps also reveal opportunities to strengthen the Council's management system. Through interviews, focus groups, and questionnaires, we saw overwhelming optimism that targeted improvements or changes could meaningfully enhance decision-making and engagement. The opportunities outlined below are potential areas where small but deliberate adjustments could lead to positive outcomes.

Several opportunities emerged from our engagement:

- **Improve transparency and understanding** by developing visual pathway maps that clarify how actions progress, where decisions occur, and how priorities align across committees and advisory bodies.
- **Strengthen coordination and focus** with clear short- and long-term prioritization processes and more deliberate workload balance.
- **Expand staff capabilities** by investing in training and tools that can expand analytical capacity and reduce burden.
- **Enhance adaptive management** capacity by establishing "triggers" that drive responses to real-time economic and environmental changes.
- **Reinforce trust and enhance stakeholder engagement** by creating consistent feedback loops that show participants how their input informs decisions and by offering plain language updates between meetings.

4.5.1 Success Metrics

As the Council considers how to address these opportunities during the Strategic Planning Phase, it may be helpful to begin considering possible success metrics. These do not represent proposed targets, but rather examples of the types of indicators that could help the Council assess progress, monitor improvement, and evaluate the effectiveness of future recommendations. A sampling of success metrics the Council may consider during strategic planning is provided in Table 6.

Table 7. Example Success Metrics

Success Metric	How To Measure	What It Tells Us
Percent of staff time spent on strategic initiatives	Time coding or regular survey to determine % hours spent on strategic work	Whether long-term planning is gaining dedicated time
Number of issues that move cleanly through committees/PDTs without rework	Track issue pathways and time to resolution	How clearly roles and pathways are defined and whether structural bottlenecks are improving
Number of hours staff spend on low-probability alternatives or procedural tasks	Time coding or regular survey via time coding or regular survey to estimate hours	Whether regulatory processes are becoming more “right-sized”
Frequency of early briefings, plain-language summaries, or “no surprise” scientific updates	Number of communication products; click rates; pulse check stakeholders on communications	Whether communication is seen, improving stakeholder trust, and reducing surprises
Percent of staff workload by function	Time coding or regular survey to understand quarterly workloads	Whether operational demands still exceed capacity and where relief is needed
Number of actions using triggers, interim data, or mid-cycle adjustments	Count of adaptive tools/processes in action development	Whether adaptive management readiness is increasing in response to changes

It will be essential for the Council to agree on success metrics during the Strategic Planning and Recommendations phases, as shared measures of success enable consistent tracking of progress and strengthen accountability. The examples above are not prescriptive but are intended to 1) orient the Council toward the types of outcomes they may want to prioritize and 2) provide a sense of the time and effort it will take to both drive and demonstrate progress. As the Strategic Plan takes shape, the Council will need to define a formal performance framework that connects long-term goals to clear success metrics and aligns with the Council’s capacity.

5 Positioning the Council for Strategic Planning and Recommendations

It is critical to understand that gaps are challenges, of course, but also points of opportunity; they provide the foundation needed to help participants evaluate tradeoffs and make informed decisions about where to intervene. The Strategic Planning Phase will build on this analysis by:

- Clarifying the Council's long-term direction and/or desired future state.
- Prioritizing the most significant or impactful intervention areas.
- Identifying what changes could produce the most meaningful, sustainable improvements.
- Establishing criteria for evaluating options and sequencing action steps.
- Determining quick wins builds momentum while planning for longer-term changes.

The Recommendations Phase will then translate these strategic priorities into actionable steps, such as governance improvements, workflow enhancements, participant engagement approaches, or workforce adjustments. Ultimately, the Council will receive a roadmap that connects what we learned during the Discovery Phase to clear options for change and an actionable path forward that supports the Strategic Plan.

5.1.1 Strategic Planning Workshop Overview

The Council will hold a dedicated Strategic Planning Workshop (January 2026) to leverage the Gap Analysis. During this workshop, Council members will clarify the long-term vision and draft the Mission Statement and Strategic Plan.

This 1.5-day intensive closed session with Council members will be led by an experienced facilitator with support from Parnin Team staff. The workshop is designed to move the Council from assessing their current reality to defining a visionary future. The goal is to build consensus on realistic, actionable priorities that address near-term needs (1-2 years) and long-term goals (5+ years), leaving participants with a concrete draft plan and a shared sense of optimism for change.

5.1.2 Key Steps for Development

1. Preparation (Pre-Workshop)

- **Alignment:** The internal team, facilitator and key NEFMC Staff will dedicate preparation time to aligning methods, specific outcomes, and meeting logistics.
- **Participant Briefing:** A "Current State" report, encompassing Discovery and Gap Analysis findings (challenges and successes) and a list of potential strategic topics are distributed to Council members 7-10 days prior to the session.

2. Workshop Execution (The 1.5-Day Process)

- **Assess & Vision:** Review the "Current State" and collaborate to define the "Desired Future State" regarding Council results and operations (people, processes, technology).
- **Gap Analysis & Prioritization:** Through break-out groups, members identify the major gaps between the current and future states. They drill down into specific issues to prioritize work that is realistic and accomplishable.
- **Drafting:** The facilitator guides the group in developing a draft Mission and Vision statement that aligns with these priorities.

3. Outputs & Outcomes

By the end of the session, the Council will produce a Draft Holistic Strategic Plan that includes:

- Draft Mission and Vision Statements.
- **3-4 Core Goals** to close identified gaps.
- Success Measures and Priority Initiatives for each goal.

5.2 Key Questions for the Council to Consider

Here are four key questions designed to move thinking **from operational needs to strategic vision**.

1. **The "Core Purpose" Question (Mission):**
   Is the mission of conserving and managing fishery resources still valid? What if any changes to our current mission statement are necessary to clarify the value or promise to deliver?

2. **The "Future State" Question (Vision):**
   If we look ahead 10 years from now and say we have successfully transitioned from 'reactive' to 'resilient,' what will be the most significant changes or improvements to have occurred in the New England marine ecosystem?

3. **The "Agility" Question (Structure & Systems):**
   Where are the best opportunities to increase flexibility and speed in our plans? What decisions or actions are the best candidates for automation?

4. **The "Trade-off" Question (Strategy & Capacity):**
   What specific current activities, processes, or low-priority tasks are we willing to stop doing or streamline to create bandwidth for a new strategic vision and plan?

6 Appendix A: Benchmarking Analysis

As part of the broader review of the New England Fishery Management Council (NEFMC) to inform the strategic planning process, the Parnin Group carried out a series of benchmarking inquiries. With iterative feedback from NEFMC staff members and the guiding Oversight Team (OST) supporting our work, we concentrated our efforts on four Fishery Management Councils – the NEFMC, Mid-Atlantic Council (MAFMC), Pacific Council (PFMC), and South Atlantic Council (SAFMC). In total, these councils represent over 500,000 square miles of managed territory.

6.1.1 Staffing and Budget Analysis

Key takeaways: While Fishery Management Councils manage vastly different territories, they operate with similar staffing resource levels.

- **Resource Parity:** Despite different management requirements, all four councils (NEFMC, MAFMC, SAFMC, PFMC) operate with similar staff sizes (14–19 employees).
- **NEFMC Staffing:** NEFMC has the largest staff size (19) among the benchmarked group. However, the organization is considered "lean," presenting potential operational risks in the event of staff illness or departure.
- **FMP Support Ratios:** NEFMC falls in the middle of the pack regarding dedicated support, with a ratio of one staff member for every 1.2 Fishery Management Plans (FMPs).
- **Structural Differences:** While most roles are similar, SAFMC is distinct for having a large communications team and a dedicated finance role but lacking dedicated IT/Data staff.

When examining the benchmarked councils, staffing and budget data established that, though they have vastly different territories and management requirements, Fishery Management Councils (FMCs) operate within the same general budget and staff sizes. In 2025, the FMCs had an average staff size of 16, with NEFMC having the largest staffing level at 19 including one recent new hire. MAFMC had the smallest at 14.

Many of the FMCs have very similar staffing distributions and roles. All FMCs analyzed had between 45% and 65% of their staff allocated to roles directly managing and supporting their FMPs. During interviews it was made clear that all FMC staff have cross-cutting and wide-ranging duties, but direct and focused FMP support is indicative of organizational capacity. The number of dedicated support staff per FMP ranged from 1:1, where SAFMC had just one dedicated staff member for each of the 8 FMPs they manage, to 1.4:1 where PFMC had 7 staff members to support their 5 FMPs. NEFMC was in the middle, with 12 dedicated staff supporting 10 separate FMPs for a ratio of 1.1:1. Notably, these ratios only cover staff whose roles are specifically listed as supporting one or more FMPs, doubtless there is additional support garnered throughout the organization. This finding does, however, highlight potential gaps, particularly in coverage in case of illness or departure, for an organization that is as lean as NEFMC.

Every FMC reviewed has an Executive or Director at the head of the organization, but there was some difference in other leadership roles below them. PFMC has a Deputy Director while MAFMC has an Operations Officer. Further, NEFMC has an Administrative Officer while SAFMC has two Deputy Directors of Science and Management, respectively (Table 7).

The remaining staff were allocated to administrative and support roles with some notable differences in how these were organized. SAFMC was the only council reviewed with a dedicated finance role, listed as a Finance Secretary, captured below in the Administrative category. SAFMC has a significantly larger number of staff dedicated to communications with a Public Information Officer, a

Best Fishing Practices Outreach Specialist, and a Digital Media & Communications Specialist. Simultaneously, SAFMC was the only council reviewed that did not have at least one dedicated IT or Data science role.

Table 8. Staffing Across FMCs

	NEFMC	MAFMC	SAFMC	PFMC
Executive Director	1	1	1	1
Deputy Director/Operations Officer	0	1	2	1
Fishery Management Specialist/ Analyst	12	9	8	7
IT/ Data Specialist	1	1	0	2
Communications	1	1	3	0
Administrative	3	1	3	4

6.1.2 Organizational Structure and Governance Analysis

Key takeaways: NEFMC is characterized by high organizational complexity but relies on smaller, agile working groups compared to its peers.

- **High Complexity:** NEFMC has the highest degree of organizational complexity, maintaining 44 sub-bodies–significantly more than the other councils (28–34 sub-bodies).
- **Mission Focus:** NEFMC sub-bodies have the highest "mission focus," with 70% explicitly dedicated to supporting FMP subject areas.
- **Small Team Size:** Despite having the most groups, NEFMC has the smallest average membership per group (7 members) compared to peers like SAFMC (15 members)[8].
- **Risks and Benefits:** While smaller groups allow NEFMC to be more nimble and agile, they create risks regarding succession planning and volunteer engagement. There is a concern that inactive panels or low participation could hinder operations.

The structure of an FMC involves significant coordination between various organizations and government bodies. In addition, there is a high degree of participation by the fishing industry (stakeholders) and the public. Benchmarked FMCs showcased the degree to which opportunities for public input and contributions are solicited through the various sub-bodies they convene that support the council. In addition to the numerous international bodies and government entities at the federal, state, and local levels, FMCs also often convene community members represented by recreational fishers, commercial fishers, non-governmental organizations (NGOs), conservation advocates, and science and research experts, among others. Throughout the analysis, investigation was conducted amongst benchmarked councils to better understand how they composed and guided the various committees, advisory bodies, observation groups, work groups, operational teams, and mandated components of the broader FMC infrastructure.

At a high level, many FMCs had very similar organizational designs for these sub-bodies, with some notable differences in naming conventions (Tables 7 and 8). Particularly, this is the case for the PFMC where Committees, Monitoring Committees, and Advisory Panels were replaced with Management Teams, Advisory Sub-Panels, and Subcommittees. The similarities are, in large part, because of mandates and legal requirements that dictate necessary components and forums for stakeholder

engagement that are universal to the fishery management process under the MSA, regardless of geographical location.

However, some discrete differences were observed between the benchmarked groups. NEFMC showcased a high degree of organizational complexity, with the largest number of sub-groups across all benchmarked FMCs. In addition, these sub-bodies had the highest degree of mission focus, as nearly 70% of them were explicitly dedicated to supporting FMP subject areas. The tables on the next few pages showcase the summary information about sub-bodies as well as a detailed and discrete view of how these sub-bodies are organized, with a specific focus on how sub-bodies are organized to support FMPs in each of the four benchmarked councils. Areas with zero as their count represent potential data limitations or groups that did not report active members.

Table 9. Organization of Sub-Bodies and FMP Support Across FMCs

Council	NEFMC	PFMC	SAFMC	MAFMC
FMPs	10	5	8	7
Number of Sub-Bodies	44	28	32	34
FMP Supporting Sub-Bodies	31	17	17	20
Percentage of Sub-Bodies Supporting FMPs	70%	60%	53%	58%
Total Members*	299**	281	479	431
Average size of Sub-bodies	7 Members	10 Members	15 Members	12 Members

Table 10. Committees and Advisory Groups Across FMCs

		Committee	Monitoring Committee	Management Team	Advisory Panel	Advisory Sub Panel	Workgroup	Technical Team	Sub-committee	Plan Devel Teams
PFMC	1. Groundfish			1		1	1		1	
	2. Salmon			0		1	2	1	1	
	3. Coastal Pelagic Species			1		1			1	
	4. Highly Migratory Species			1		1			1	
	5. Fishery Ecosystem Plan			0		1	1		1	
MAFMC	1. Summer Flounder, Scup, Black Sea Bass	1	1		1					
	2. Mackerel, Squid, Butterfish	1	1		1					
	3. Atlantic Surfclam and Ocean Quahog	1	0		1					
	4. Bluefish	1	1		1					
	5. Golden and Blueline Tilefish	1	1		1					
	6. Spiny Dogfish	1	1		1					
	7. Monkfish	1	0		0					
NEFMC	1. Northeast Multispecies/groundfish	1			2					1
	2. Sea Scallop	1			1					1
	3. Monkfish	1			1					1
	4. Atlantic Herring	1			1					1

		Committee	Monitoring Committee	Management Team	Advisory Panel	Advisory Sub Panel	Workgroup	Technical Team	Sub-committee	Plan Devel Teams
	5. Essential Fish Habitat	1			1					1
	6. Skates	1			1					1
	7. Small-Mesh Multispecies (Whiting)	1			1					1
	8. Red Crab	0			0					1
	9. Spiny Dogfish	1			1					1
	10. Atlantic Salmon	0			0					1
SAFMC	1. Coastal Migratory Pelagics (Mackerels)	1			1					
	2. Coral and Live Bottom Habitat	1			1					
	3. Dolphin and Wahoo	1			1					
	4. Golden Crab	0			1					
	5. Sargassum	0			0					
	6. Shrimp	1			1					
	7. Snapper Grouper	1			3					
	8. Spiny Lobster	1			1					
	TOTALS	21	5	3	24	5	4	1	5	10

A potential area of opportunity for further investigation for NEFMC could be the membership numbers of these organizations. Among benchmarked councils, NEFMC had the smallest average number of members in these support bodies at just 7 per group. Additionally, it was observed that several advisory bodies within NEFMC reported no active members and were inoperable.

Given NEFMC's comparably large number of FMPs and complex coordination requirements, a more robust group of involved members in support bodies could help to better share the load of support activities. Further, building out these groups would help address risks associated with membership turnover and disengagement. Larger bodies are better able to address succession and departure, which is natural in primarily volunteer roles.

However, the smaller advisory bodies may be an asset for NEFMC, as smaller groups are generally more nimble, agile, and flexible – all traits needed in the dynamic field of fishery management. This is supported by the efficiency that NEFMC has in executing actions, particularly framework actions, which are elaborated upon in the section below. NEFMC may owe much of its efficiency to the manageable size of its committees, advisory groups, and other sub-bodies, so adjustments to the current levels would need to be assessed with care, as some efficiencies gained in organizational continuity and size/scope may not ultimately be worth the potential losses in efficiency derived from agility and leanness, particularly in FMP supporting sub-bodies.

Another important element of these supporting sub-bodies is not just the reported membership, but the levels of engagement therein. Additional benchmarking analyses are planned to examine two key factors of these groups – the frequence and format in which they meet, and the participation rates and attendance of their members.

6.1.3 Process Efficiency and Timeline Analysis

Key takeaways: There is a sharp dichotomy in NEFMC's efficiency: it is the fastest council for Framework actions but the slowest for Amendment actions.

- **Framework Speed:** NEFMC is the leader in efficiency for Framework actions, completing them in an average of 16 months, significantly faster than the SAFMC (21 months) and MAFMC (24.5 months).
- **Amendment Delays:** Conversely, NEFMC takes the longest to complete Amendment actions (58 months on average), which is nearly double the time taken by PFMC.
- **The "Initial Stage" Bottleneck:** The primary cause for amendment delays is the "Initial Stage/Alternatives Development," where NEFMC takes an average of 36 months, compared to an average of 23.5 months across all councils.
- **Rulemaking Bottleneck:** NEFMC also faces delays during the rulemaking stage, specifically a 10-month average gap between the final council action and publication of the proposed rule.

On average, NEFMC's action item timelines are comparable to the MAFMC, SAFMC, and PFMC across most stages of the action development process (Table 10). The initial stage of action item development is generally faster at NEFMC than at any other evaluated council, mainly due to NEFMC's frequent use of Framework adjustments, which tend to be smaller in scope and move more quickly. On the other hand, the average overall time that NEFMC items take in the rulemaking stages (from final council action to the NMFS publication of a final rule) is substantially higher than at other councils, suggesting that NEFMC action items may undergo a lengthier revision and negotiation process following transmittal to NMFS. Though after final action the process is handed over to NMFS, there is possibly an opportunity to focus on creating documents that are primed and well prepared to expedite NMFS' processing. NEFMC actions, on average, take less time than at SAFMC and PFMC,

and are comparable to the average duration of a MAFMC action. Both MAFMC and NEFMC use framework actions more frequently, which helps bring down their average time to completion.

NEFMC uses framework actions very effectively, having a 16-month action timeframe on average; this is 5 months faster than the SAFMC median and over 8 months faster than the MAFMC median. However, the NEFMC amendment process is the opposite, taking the longest on average of the four evaluated councils.

Table 11. NEFMC Action Item Timeline Overview

Stage	Average Time Taken	Range of Time Taken	Comment
Initial stage/ Alternatives development	9 months	4-44 months	Lower than MAFMC on average. Significantly lower than SAFMC and PFMC. NEFMC's use of quick framework actions explains the faster initial stage.
Public hearings and review	5 months	2-7 months	Comparable to MAFMC, SAFMC, PFMC. This stage generally takes the same amount of time for everyone.
Council Final action until NOAA proposed	10 months	1-19 months	Comparable to MAFMC, SAFMC. Notably slower than PFMC, which tends to get to a proposed rule within 4-8 months of final action.
Gap between final action and submission to NOAA	2 months	1-13 months	Comparable to MAFMC, but faster than SAFMC. Limited data for PFMC.
Time from NOAA proposed to Final	3.5 months	2-15 months	Comparable to MAFMC, SAFMC, PFMC.
Total NOAA Rulemaking	15 months	3-34 months	Higher than MAFMC, SAFMC, PFMC. Although both rulemaking stages are largely comparable to the other councils, NEFMC is held back by outliers in both NMFS decision periods.
Entire timeline	24.5 months	9-85 months	Comparable to MAFMC, it is significantly lower than SAFMC, slightly slower than PFMC. Again, NEFMC benefits significantly from a preference for rapid framework actions.

Table 11 provides a quick visual of average times, in months, for each stage in the action process; where Green indicates the fastest analyzed council, while yellow indicates the slowest analyzed council on average in each of the periods measured. This table is specific to All actions.

Table 12. Action Item Timelines Across FMCs (# of Months taken per stage)

Council	Initial	Comment	Proposed	Final	Total Rulemaking	Total Time	Time to deliver preliminary submission to NMFS
NEFMC	9	5	10	3.5	15	24.5	2
MAFMC	12	5.5	10	3	12	25	3
SAFMC	18.5	5	10	3.5	12.5	45	4.5
PFMC	15.5	3.5	6.5	3	9.5	26.5	N/A
Average	13.75	4.75	9	3.25	12.25	30.25	3

Table 12 provides the breakdown for average times for amendment actions**.** Note that all PFMC actions were classified as amendment actions. NEFMC amendments tend to be slower on average than at other councils, notably taking the longest time in the initial stage, the proposed rule stage, and overall. A large portion of the proposed rule stage can be explained by the 9-month average gap between council final action and transmittal to NMFS, which appears to be the main bottleneck in the rulemaking process.

Table 13. Amendment Action Timelines Across FMCs

Council	Initial	Comment	Proposed	Final	Total Rulemaking	Total Time	Time to deliver preliminary submission to NMFS
NEFMC	36	6	13	3	16	58	9
MAFMC	24	6	12	3	17	42	4.5
SAFMC	19	5	12	3	14	55	5
PFMC	15.5	3.5	6.5	3	9.5	26.5	N/A
Average	23.5	5.25	11	3	14.25	45.5	6.25

Table 13 provides the breakdown for average times for framework actions. Note that PFMC actions were not included, as there were no framework actions identified. NEFMC's framework actions are much faster than MAFMC and SAFMC on average, holding the fastest average times for the initial, proposed rule, total rulemaking, and overall.

Table 14. Framework Action Timelines Across FMCs

Council	Initial	Comment	Proposed	Final	Total Rulemaking	Total Time	Time to deliver preliminary submission to NMFS
NEFMC	8	N/A	4	4	8	16	2
MAFMC	12	N/A	9	2.5	11.5	24.5	2.5
SAFMC	12	N/A	4.5	4	8.5	21	1.5
Average	10.5	N/A	5.75	3.5	9.25	20.5	2

When viewed in this context, NEFMC is the leader when it comes to efficiency in proposing and enacting framework actions but is among the slowest when it comes to proposing and enacting amendment actions. The largest difference among the timelines analyzed was in the initial stages of amendment actions.[1] NEFMC takes nearly twice as many months in this period, as the average was 23 months among the benchmarked groups. This is somewhat offset by NEFMC's efficiencies in developing and executing framework actions, as those are more common and a more agile and nimble response to implement changes in fishery management.

[1] *At time of authoring this appendix, NEFMC OST requested additional research and analysis into the genesis of alternatives and how that takes place among the benchmarked councils, as well as the frequency of re-working actions and the process that leads to that outcome. Due to time constraints, this analysis will be provided, based on data availability, at a later date and in an updated format.*

7 Appendix B. Current Adaptive Management Approaches

The Council utilizes several key approaches and processes to document and implement changes in response to unpredictable fishery trends, cycles, and the evolving management landscape. We reviewed and summarized how these policies and guidance documents relate to one another: the Council's *Statement of Organization, Practices and Procedures; Operations Handbook; Other Council Policies;* and the *Regional Operating Agreement*. The Council takes a multi-layered approach to addressing unpredictable changes and a shifting management landscape. It utilizes regulatory tools and written protocols to develop federal actions, which are supported by high-level strategic policies on risk and ecosystems and enacted through a formal collaborative structure with its scientific and regulatory partners.

7.1.1 Mechanisms for Scientific Adaptability and Risk Management

These processes are designed to quickly incorporate new data and account for inherent uncertainty in the marine environment and fisheries.

- **Scientific and Statistical Committee (SSC) Role:** As detailed in the *UPDATED_5_2025_Operations_Handbook-final.pdf* and the *SOPP-2023-FINAL-2-28-2023*, the SSC's primary function is to provide **ongoing scientific advice** for management decisions. This includes:
    - Recommendations for Acceptable Biological Catch (ABC).
    - Reports on **stock status and health**, bycatch, habitat status, and social/economic impacts.
    - Providing guidance to ensure Fishery Management Plans (FMPs) are based on the **best scientific information available**.
- **Risk Policy Statement:** Documented in *5a.NEFMC_Policies_2018.pdf*, this policy directly addresses the volatile nature of fisheries by:
    - Providing guidance on taking account of **risk and uncertainty** in FMPs and specification-setting.
    - Aiming to make fishery management more **transparent, understandable, and predictable** in the face of uncertain information and imperfect implementation.
- **Research Review Policy:** This policy outlines the process for the Research Steering Committee (RSC) to review and facilitate the **incorporation of new research results** into the management arena. This ensures that the Council's actions are continually updated with the latest scientific findings.

7.1.2 Management and Operational Flexibility

These are the operational procedures that allow the Council to develop and execute changes to management actions efficiently.

- **Ecosystem-Based Fishery Management (EBFM):** The *UPDATED_5_2025_Operations_Handbook-final.pdf* states that the Council's conservation and management approach is **evolving** to include the application of EBFM principles, which is a direct response to a changing management paradigm.
- **Action Plan Process:** The *5c.NEFMC_GARFO_NEFSC_OperatingAgreeement.pdf* establishes an Action Plan as a "roadmap and contract" for developing and completing management actions. The plan's design ensures a structured, collaborative, and **adaptable** process by:

- Identifying problems and objectives.
- Setting a realistic timeline that can be **updated as necessary** during the development of a management action.

- **FMP Development and Review:** The Council's core responsibilities include a commitment to **review on a continuing basis** and **revise as appropriate for** the assessments and specifications contained in each FMP, allowing for continuous adaptation to new conditions.

7.1.3 Role of Plan Development Teams (PDTs)

The PDTs are the working groups responsible for executing the analysis and documentation required for change:

- PDTs develop management **options and alternatives**, provide **technical advice and analysis**, and are responsible for writing FMPs and actions (e.g., framework adjustments).
- They work closely with Oversight Committees and are specifically tasked with **incorporating SSC recommendations** (the scientific advice on changing trends) into management alternatives.

7.1.4 Operational Structure for Integrating Science

The Council's processes rely on a formal structure for collaboration between management, science, and regulation. This ensures that new information (i.e., the "unpredictable changes") is analyzed and incorporated into management actions.

- **Operating Agreement (NEFMC, GARFO, NEFSC):** This agreement formally defines the "respective roles and responsibilities" and the "process for collaboration" between the Council (NEFMC), the Greater Atlantic Regional Fisheries Office (GARFO), and the Northeast Fisheries Science Center (NEFSC).
- **Detecting Change (NEFSC Role):** The NEFSC is responsible for providing "scientific advice and analyses" and "scientific information on…the status of fish stocks and their ecosystems". This is the formal mechanism by which new data on "fishery trends" enters the management process.
- **Developing Responses (PDT Role):** As defined in the *Operations Handbook*, **Plan Development Teams (PDTs)** are the core operational units for developing management actions. PDTs are "appointed by the Council Chair" and are critically composed of "staff from the Council, NEFSC, and GARFO". This structure ensures that scientific experts (NEFSC), policy experts (Council staff), and regulatory experts (GARFO) work together to build the framework of adjustments that respond to new scientific information.

7.1.5 Integrating Science into Management Decisions

The connection between the SSC and the PDTs acts as the primary conduit for transferring **scientific advice** (derived from detecting change) into **implementable management actions** (developing a response).

1. The Role of the SSC: Scientific Input

The SSC's role is purely advisory and focused on synthesizing the best available science from the **Northeast Fisheries Science Center (NEFSC)** and other sources.

- **Synthesis of Data:** The SSC reviews the NEFSC's scientific information on stock status, bycatch, habitat, and social/economic impacts.

- **Scientific Mandate:** Its key output is providing **recommendations for the Acceptable Biological Catch (ABC)**, which is the maximum level of catch that can be taken from a stock while adhering to the Council's **Risk Policy Statement**. This recommendation ensures that management decisions account for uncertainty.

2. The Role of the PDTs: Operationalizing Science

The PDTs are the Council's working groups responsible for the execution and documentation of management changes.

- **Composition:** PDTs are strategically composed of staff from the **Council (policy), NEFSC (science), and GARFO (regulation)**. This multi-disciplinary structure is key to integration.
- **Action Development:** They develop the actual management options and alternatives, such as framework adjustments to Fishery Management Plans (FMPs).
- Crucial Task: The PDTs are specifically tasked with incorporating SSC recommendations into these management alternatives.

3. The Link: Translating ABC into FMPs

The formal connection ensures the scientific recommendation (the **"what"**) is translated into a legally binding action (the **"how"**). In short, the **SSC provides non-negotiable scientific constraints** (like the ABC), and the **PDTs build the management structure around those constraints** using their combined expertise. This operationalizes the requirement that FMPs be based on the **"best scientific information available."**

Step	Body Involved	Action	Connection Detail
Scientific Advice	SSC	Recommends the scientifically sound **Acceptable Biological Catch (ABC)** level.	The ABC is a scientific ceiling that must be respected.
Development	PDTs	Develop management alternatives (e.g., season length, gear restrictions, quotas) designed to achieve a catch level **at or below** the recommended ABC.	The PDTs translate the ABC (science) into management measures (policy/regulation).
Review	Oversight Committees	Review the PDT's alternatives, ensuring they are technically sound and adhere to the SSC's scientific advice.	Ensures the PDTs haven't exceeded the scientific limits.

7.1.6 Core Regulatory Tools: Amendments vs. Frameworks

The Council's primary methods for responding to change are "Amendments" and "Framework Adjustments." The choice of tools depends on the scale and urgency of the change.

- Amendments (For Substantive, Long-Term Change):
    - **Process:** An Amendment is the "most formal, public process...to change a fishery management plan (FMP)".
    - **Application:** This tool is used for "substantive changes" to an FMP. This includes actions like modifying FMP objectives, changing stock status determination criteria, or implementing new, complex management systems like catch shares. This is the

primary process for addressing large-scale, structural shifts in the "management landscape."

- Framework Adjustments (For Responsive, Unpredictable Change):
  - **Process:** This is a more "streamlined" action designed to be faster than an amendment. It allows the Council to "make adjustments to FMP measures" that are already specified in the plan.
  - **Application:** This is the key tool for addressing "unpredictable changes to fishery trends and cycles." The framework process is used to implement "annual specifications" (like catch limits) and "adjustments to management measures." The *Operations Handbook* specifies that these actions are developed by a Plan Development Team (PDT) and can be used for a wide range of measures, including setting quotas, modifying time/area closures, and adjusting gear requirements.

7.1.7 Strategic Policies for Anticipating Change

The Council employs several high-level policies to guide its decision-making process, especially when facing uncertainty.

- **Risk Policy:** The Council has a formal **Risk Policy** whose objective is "to provide guidance to the Council…when faced with uncertainty and risk". This policy directly addresses "unpredictable changes" by structuring how the Council evaluates "trade-offs" and selects "management alternatives" in the face of scientific or management uncertainty.
- **Ecosystem-Based Fishery Management (EBFM) Policy:** This policy represents a proactive approach to a "changing landscape" by establishing a goal to "manage fisheries…in the context of the ecosystem as a whole". This allows the Council to consider broader environmental changes, such as shifting stock distributions or predator-prey dynamics, in its management process.
- **Habitat Policy:** The Council's habitat policy guides its response to changes in the physical environment. It has a goal to "protect, conserve, and enhance essential fish habitat (EFH)" and details procedures for how the Council develops and comments on actions "that may adversely affect EFH".