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New England Fishery Management Council

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Daniel Salerno, *Chair* | Cate O'Keefe, PhD, *Executive Director*

July 28, 2026

Mr. Michael Pentony
Regional Administrator
NOAA Fishery Service
Greater Atlantic Regional Fisheries Office
55 Great Republic Drive
Gloucester, MA 01930

Re: Advancing the Use of Electronic Monitoring in the Scallop Fishery.

Dear Mike:

Please consider the following comments regarding the exempted fishing permit (EFP) application submitted by the Coonamessett Farm Foundation (CFF) entitled, "Advancing the Use of Electronic Monitoring (EM) in the U.S. Atlantic Sea Scallop Fishery." The New England Fishery Management Council (Council) has reviewed the proposal as described in the Federal Register notice and offers the following comments from the perspective of Atlantic sea scallop fishery management. The Council supports continued exploration of electronic monitoring (EM) technologies and recognizes their potential to improve the efficiency and flexibility of fishery-dependent data collection programs. The proposed project would evaluate the ability of EM systems to verify fishing activity and support biological data collection in the Atlantic sea scallop fishery. The Council believes these objectives are relevant to ongoing discussions regarding future monitoring approaches and fishery data needs. Regarding the requested exemption to allow participating vessels to transit through scallop rotational management areas with gear properly stowed, the Council has no objection to the exemption as proposed. Regarding alternative DAS calculation as an incentive for EM program participation, the Council has no objections. The Council requests that you consider the following comments when evaluating this proposal.

With respect to the requested day-at-sea (DAS) accounting exemption, the Council acknowledges that incentives can encourage participation in EM programs and that harvest from a single DAS can produce tens of thousands of dollars in revenue. The Council also notes that excluding transit time from open bottom trips would effectively increase efficiency by reducing the DAS that are charged. As a result, these vessels would realize higher LPUE and be able to land more scallops per DAS. At the fleet level, the revised DAS counting method could have important implications for scallop management, specifically DAS calculations, estimated fishing mortality, and overall fishing effort. These results would be important for evaluating the management implications of this incentive approach.

The Council notes that an earlier pilot of this project completed 36 trips. The CFF is requesting 48 total trips, while keeping the number of participating vessels the same. In the prior iteration of this project, the notice explains that vessels "saved" roughly 1.18 DAS per trip across 36 trips. If fishing under this EFP provides the additional 28.32 DAS as stated, approximately 38,900

additional pounds of scallop meats would be landed (28.32 DAS * 1,373 lb/day ([Scallop Framework 40](#))). The project should clarify that the additional DAS would not be applied in the current fishing year and explain why this additional effort is required to meet the objectives given the results of the pilot project. Additionally, the applicant notes that the “EFP could potentially result in an approximately 0.26-percent increase to maximum fleetwide DAS use for the year.” However, this does not reflect the current approach to calculate DAS, which includes transit time in determining total fleet DAS allocated. In other words, if transit time is not included in DAS calculations, total DAS allocated would be reduced, not increased.

The Council is particularly interested in the project's evaluation of EM data for determining the start and end of fishing activity. The information generated through this project may help inform future discussions regarding EM monitoring program design and operational efficiencies within the scallop fishery. The Council encourages CFF and Greater Atlantic Regional Fisheries Office to provide project results to the Council's Scallop Plan Development Team. The outcomes of this project may provide useful information regarding future electronic monitoring approaches and potential incentives for EM adoption within the scallop fishery.

In summary, the Council supports the objectives of this project and has no objection to issuance of the requested EFP. The Council encourages careful documentation of the performance of the EM systems, the effectiveness of the proposed incentives, and any management implications associated with alternative DAS accounting and rotational area transit provisions. Thank you for the opportunity to comment on this proposal.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cate O'Keefe".

Cate O'Keefe
Executive Director