



October 16, 2025

Dr. Cate O'Keefe
Executive Director
New England Fishery Management Council
50 Water Street
Newburyport, MA 01950

Dear Dr. O'Keefe,

The Northeast Seafood Coalition (NSC) offers the following recommendations to the Scientific and Statistical Committee (SSC) as they discuss OFLs and ABCs for a host of newly assessed groundfish stocks and the Transboundary Management Guidance Committee (TMGC) recommendations for U.S. / Canada transboundary stocks. NSC comments specifically focus on the OFL/ABC recommendation for white hake and TMGC guidance recommendations. NSC also offers some general commentary and concerns in regards to the continued lack of using fishery catch and fishery performance to assist in decision-making.

Recommendation #1:

NSC urges the SSC to reconsider the OFL/ABC being recommended by the Groundfish PDT for white hake. The recommendations set forth do not take into account fishery catch data, which portrays consistency in abundance and high availability to the fishery. Since fishing year 2020, the utilization Sector sub-ACL of white hake has ranged between 89% and 97% (93% average). This utilization is occurring while the number of participating vessels is shrinking. Sector vessels are collectively using approximately 6,000 Days at Sea annually. At the time Sectors began in 2010 the fully active groundfish fleet was 4 times larger and the fleet Days at Sea use was also 4 times greater. While the data is available if someone were to know where to find it, it really should be a standard item in every report to peer reviewers and to the SSC.

Effort is down by as much as 75% yet this fractional fleet is consistently harvesting the 13 year average catch of 1,873 mt. White hake is and has been one of the highest utilized stocks in the groundfish sector program. With effort so low, how can catch continue to be at the historical average if the stock has declined as the assessment and PDT suggest?

High utilization rates drive lease costs upward. Contrary to the Quota Change Model's foundational approach, lease prices are not driven by ex-vessel values at the dock. Instead, they are driven by the relationship between ABC's and true stock size. When an assessment is overly pessimistic and is not ground-truthed with data external to the model (ie fishery dependent indicators) and resulting in multi-year ABC's that are not remotely reflective of the truth, lease prices on quota will skyrocket as fishermen compete to secure sufficient quota to account for incidental catches while targeting other stocks such as monkfish, American plaice, witch flounder and pollock. This has been precisely the case with white hake throughout the period and now steadily since 2020 to today.

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The lease price quite often exceeds the ex-vessel price for white hake. Leased quota is purchased and transferred in “live weight”. White hake are headed and gutted at sea. The landed weight to live weight conversion factor on white hake is approximately 1.33. See page 31 of the PDT report for 2012 to 2024 Sub-ACLs, catches, utilization rates and revenues from white hake. Also, a graph of 2020-2024 lease prices. If the Sub-ACL is reduced as recommended by the PDT the reduced GROSS revenues resulting from lease price and landed to live weight conversion will be near net zero.

The Council’s newly adopted Risk Policy recognizes the need for fishery performance and socio-economic considerations. The Risk Policy also addresses the need for stability in annual catch specifications to avoid abrupt shifts in fisheries management and impacts to communities. Annual catches of White hake in the groundfish sector program have ranged between 1,800 and 2,000 mt.. The ABC of 1,393 mt for 2026 proposed by the Groundfish PDT is a 350 mt reduction from recent catches and 500 mt lower Sub-ACL. Future years having a further reductions in the ABCs. There appears to be noise or other variables contributing to this surprising assessment. As described above, there haven’t been any negative or corroborating signals in the fishery.

Additionally, NSC has grave concerns with setting such a low catch on a highly utilized stock for up to five years to allow for “management flexibility”. In the case of white hake, setting such low limits in an assessment that does not remotely reflect the signals from the fishery would be disastrous for the entire groundfish sector program.

Recommendation #2:

NSC supports the TMGC guidance recommendations for Georges Bank cod and Georges Bank haddock. We encourage the SSC to support this recommendation. However, we strongly advise the SSC to request a more thorough investigation into the biomass apportionment methodology. This methodology has been completely disconnected from fishery catch information and has resulted in a far greater loss to the United States fishery than had been adequately presented to the SSC during its July 2024 meeting. (See NSC letter to the TMGC).

Additional Comments:

NSC continues to be dismayed over the lack of attention to fishery performance and fishery catch data in the science and management process.

For example, the biomass apportionment for Georges Bank haddock recommended and approved for this current 2025 fishing year resulted in a fishery disaster on Georges bank. It was subsequently learned that the apportionment methodology did not use the full list of survey strata used for the total Georges Bank haddock assessment. In fact, the very strata where most of the US fishery catches of Georges Bank haddock occur were the very strata omitted from the 2025 method used for apportioning the Total Georges Bank haddock biomass. This resulted in a 0% West to 100% East biomass apportionment. Such little quota has remained for the entire United States fishery for this 2025 fishing year. For the first time, since the start of the sector program, there is now a lease price for Georges Bank haddock.

NSC fishing members have been operating under the groundfish sector program since 2010. Sectors have operations plans, weekly reporting, yearly ACE reconciliation with GARFO, annual report and monitoring plan requirements. Sectors have governance structures, Board of Directors, and staff, Sector Managers. Fishermen enrolled under the sector program have been fishing with high levels of monitoring, with up to 100% at sea monitoring (cameras and humans) since 2023.

Catch accounting under the groundfish sector program far exceeds most fisheries in the region and nationally. Yet, the scientific and management process continues to not use fishery dependent information to ground truth assessment model results. We urge the SSC in their decision-making to consider important fishery metrics such as days at sea, numbers of highly active vessels, spatial and temporal catches and their respective relevance toward seeking agreement, or not, with an assessment that indicates a significant change in scale.

Sincerely,

A handwritten signature in black ink that reads "Vito Giacalone". The script is cursive and fluid, with the first name "Vito" and last name "Giacalone" clearly legible.

Vito Giacalone, Policy Director, Northeast Seafood Coalition