Greater Atlantic Regional Fisheries Office
National Marine Fisheries Service
55 Great Republic Drive
Gloucester, MA 01930

October 22, 2026

Re: Atlantic halibut OFLs and ABCs for FY2027–2031, Scientific and Statistical Committee meeting, October 27–28, 2026

Dear Chair Salerno, Dr. O'Keefe, and Members of the Scientific and Statistical Committee:

On behalf of the Maine Coast Fishermen's Association (MCFA), thank you for the opportunity to comment on Atlantic halibut catch advice for fishing years 2027–2031. MCFA is an industry-based nonprofit representing Maine's small-boat, owner-operator fleet, including the groundfish vessels that encounter halibut as incidental catch and the fishermen who participate in Maine's state-waters halibut fishery.

MCFA supports the Groundfish Plan Development Team's recommendation to set a U.S.-only ABC of 125 mt, equal to the maximum U.S. catch from 2018–2025. The PDT's October 21 memo makes a strong case that halibut in U.S. waters are part of a larger, healthy transboundary stock. It also shows that the current approach, which sets aside 71 mt of a 106 mt total ABC for Canadian catch, leaves only 35 mt for the U.S. fishery. That is not enough to cover incidental catch, and it puts our fleet at risk of accountability measures that the biology does not justify.

Accountability measures would harm a groundfish fleet already under stress

Preliminary FY2025 commercial groundfish catch was 47.3 mt against a 23 mt ACL, or 205 percent utilization. That overage reflects more halibut coming up in the nets of boats that are not targeting them, not a change in fishing behavior. Federal vessels are limited to one halibut per trip; there is no directed federal fishery, and the number of groundfish trips has declined over the last five years.

The consequences of triggering AMs would fall hardest on the fleet least able to absorb them:

- **Zero possession for every federally permitted vessel for a full fishing year.** This applies to vessels with a federal permit for any fishery, not just groundfish. A groundfish fisherman would have to discard every halibut, dead or alive, while a neighbor without a federal permit could still land them in the state fishery.
- **Lost revenue on trips that are already marginal.** For a small-boat groundfish trip, one halibut can be the difference between making and losing money on the day. Halibut at the Portland Fish Exchange have averaged roughly $9 to $11 per pound since 2021, and individual fish often weigh 50 pounds or more.
- **Gear-restricted areas for trawl and gillnet vessels.** Limited access multispecies vessels would face seasonal restrictions in the halibut AM areas. The trawl gear area sits on inshore grounds around Stellwagen Bank that inshore trawlers depend on, and a separate gillnet area would restrict our gillnet fleet. These closures would push vessels off productive bottom for groundfish they are allowed to catch, compounding the lost halibut revenue.
- **More dead discards, not fewer fish caught.** Halibut are incidental catch. A possession ban does not stop fishermen from encountering them; it turns marketable fish into regulatory discards.

Maine's groundfish fleet has lost much of its capacity over the past two decades and operates under tight catch limits for most stocks. The Council's risk policy recognizes that fisheries under socioeconomic stress warrant flexibility where the biology allows it. Halibut is exactly that case.

What fishermen are telling us

We asked Maine groundfish fishermen what landing a halibut means for their trip. For a fleet operating on thin margins, a single incidental halibut can make up 10 to 50 percent of a day's revenue.

> **A Maine groundfish fisherman:** "Landing a halibut increases the value of my trip anywhere from 20 to 50 percent. Say you're grossing $2,500 on a groundfish day trip and you catch a halibut worth $1,200: you just increased it by 50 percent. If you're stocking $3,000 or $4,000 and you catch a $1,000 fish, you just increased it by 25 percent. Most of the halibut I've caught have grossed over $1,000 apiece. They're usually 75 to 125 pounds, about a 100-pound average, and we get $10 to $12 a pound. And it's not only the economic loss from the fish, it's the economic loss from the closures. The trawl area is in Stellwagen, and that's going to impact the inshore trawlers. It's loss of revenue and loss of bottom."
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> **A second Maine groundfish fisherman:** "A lot of times it's 10 to 20 percent of the daily value of the fish landed for the day trip."

What we see on the water matches the science

Fishermen across southern, midcoast and downeast Maine, as well as on Cape Cod, are reporting more halibut and larger fish, in both state and federal waters. The data we can see points the same way. Halibut sold through the Portland Fish Exchange rose from about 650 pounds in January–October 2021 to about 3,400 pounds in January–October 2026, roughly a fivefold increase, while groundfish effort has declined. The 2025 NMFS fall trawl survey also caught more halibut, and a wider range of sizes, than in any year since 2017.

These observations are consistent with the PDT's review of the best available science:

- Tagging by Maine DMR and others shows Gulf of Maine halibut migrating to spawning grounds on the Scotian Shelf and returning. Genetic work finds no difference between Gulf of Maine, Georges Bank and Scotian Shelf halibut.
- Shackell et al. (2026) estimate 94 percent of the stock is in Canadian waters. DFO's 2025 update places exploitable biomass at 51.1 kt, well above its 21.8 kt upper stock reference.
- U.S. catch advice is under 1 percent of Canada's. The PDT notes that U.S. catch at 3 to 6 percent of the Canadian TAC would be reasonable, or up to about 328 mt. The recommended 125 mt is well below that and reflects catch levels the stock has already sustained.
- The fall bottom trawl survey rarely catches halibut over 75 cm, and the assessment cannot estimate reference points or stock status.

The PDT rarely makes a recommendation for groundfish specifications. That it did so here, working with DMR's halibut experts, reflects how clearly the evidence supports a change. We also note the PDT's concern that the 74 mt average-catch option may not cover incidental catch if encounter rates keep rising, which is what our fishermen are reporting.

An interim fix, and a commitment to better data

We see the 125 mt U.S. ABC as an appropriate interim measure while the region builds a durable approach. The SSC has recommended for years that halibut needs better data on stock structure,

connectivity and size and age composition. MCFA wants to help close those gaps. We are ready to work with DMR, NEFSC and academic partners on cooperative research, and new data collection tools for the fleet. We also support the Council's plan to consider ecosystem component status or another alternative management approach for halibut.

In the meantime, we urge the SSC to adopt the PDT's recommended U.S. ABC of 125 mt for FY2027–2031. This option reflects the best available science, sustains catch levels the stock has already supported, and avoids imposing costly accountability measures on fishermen for catching a resource that is growing.

Thank you for your consideration.

Sincerely,



Ben Martens
Executive Director

Maine Coast Fishermen's Association