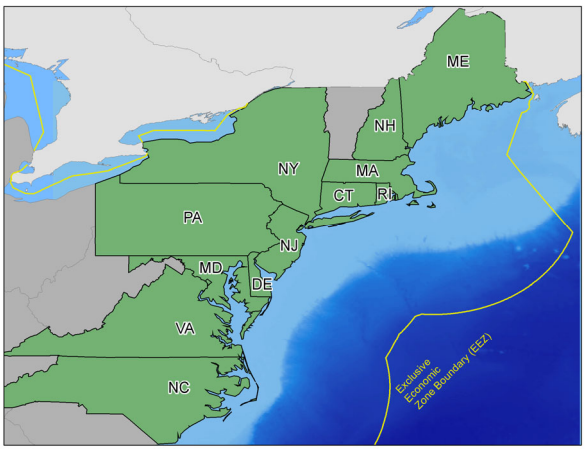
NORTHEAST REGION COORDINATING COUNCIL

Fall 2026 Meeting
November 19-20, 2026
Providence, RI



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2026 FALL NRCC MEETING AGENDA

All times are approximate

Thursday, November 19

9:00 AM - 9:15 AM

1. Welcome, Introductions, Announcements (Hare, Deighan)
   Desired Outcomes: Set expectations, confirm agenda, and finalize dinner logistics

9:15 AM – 9:35 AM

2. Updates on Previous Action Items (All)
   Desired Outcomes: Receive updates on previous action items that are not discrete agenda topics

9:35 AM – 10:05 AM

3. Inflation Reduction Act and East Coast Coordination Project Updates (All)
   Desired Outcomes: Receive update on East Coast Coordination Group and Inflation Reduction Act projects relevant to NRCC organizations

10:05 AM – 10:35 AM

4. Northeast Stock Prioritization (Kelly)
   Desired Outcomes: Receive final Northeast Stock Prioritization document and products

10:35 AM – 11:05 AM Morning Break

11:05 AM – 12:05 PM

5. Assessment Process Changes (O'Keefe, All)
   Desired Outcomes: Receive results of Assessment Evaluation questionnaire; Discuss use of feedback to inform improvements; Discuss research light/management heavy assessments; Discuss assessment flexibilities (e.g., terminal year, peer-review timing)

12:05 PM – 1:20 PM Lunch (individually)

1:20 PM – 1:50 PM

6. Transition from ASAP to WHAM (NEFSC)
   Desired Outcomes: Revisit pause on WHAM transitions, determine decision needs and timing (candidates include scup, SNE/MA winter flounder, summer flounder, white hake, and pollock)

1:50 PM – 2:10 PM

7. Peer Reviewer Solicitation Process (O'Keefe, Muffley)
   Desired Outcomes: Receive update on solicitation status and results

2:10 PM – 2:40 PM

8. Assessment Schedule for 2027 and 2028 (NEFSC)
   Desired Outcomes: Confirm the 2027 and 2028 assessment schedules

2:40 PM – 3:00 PM Afternoon Break

3:00 PM – 4:30 PM

9. Recommendation for Developing 5-Year Assessment Schedule (NEFSC)
   Desired Outcomes: Review and discuss proposed long-term assessment schedule for management track and research track stock assessments, and data updates

4:30 PM – 4:50 PM

10. End of Day 1 Housekeeping (Deighan)
    Desired Outcomes: Confirm decisions and action items; adjust Day 2 agenda as needed

4:50 PM Recess Day 1

6:30 PM Dinner, TBD

Friday, November 20

9:00 AM - 9:15 AM

11. Housekeeping (Hare, Deighan)
    Desired Outcomes: Address any changes or updates from Day 1

9:15 PM – 10:00 AM

12. Deregulatory fishery management actions/EO response and SI use and policies (O'Keefe, Moore, all)
    Desired Outcomes: Receive a progress update from the Councils on deregulatory management actions; Discuss current use of SI and plans for SI policies

10:00 AM – 10:30 AM Morning Break (Check out by 12 PM)

10:30 AM – 11:00 AM

13. MRIP Changes/RAPID (Hare)

    Desired Outcomes: Receive an update on the rapid progression of RAPID; Receive an update on newly released MRIP data

11:00 AM - 11:20 AM

14. Vessel Baselines (Moore, O'Keefe)

    Desired Outcomes: Receive an update on potential vessel baseline action and discuss coordination

11:20 AM - 11:50 AM

15. Review Action Items and Decisions (Deighan)

    Desired Outcomes: Confirm decisions made during meeting and agree on action items

11:50 AM Adjourn Meeting

Color code key:
ASMFC
AWG **GARFO**
MAFMC

2026 Summer NRCC Meeting: Decisions and Action Items

August 27, 2026 (Virtual)

Decisions:

1. Refer to the regional risk-value effort as the 'Northeast Stock Prioritization.'
2. NRCC principals can share the current *Northeast Stock Prioritization Summary* draft, with some additions discussed today, including 'draft' markings, with their respective organizations.

Action Items:

1. Item: Add to the *Northeast Stock Prioritization Summary* draft under 'Next Steps' to include a small suite of options for what steps the Councils may take for stocks under each category.
   Lead: **GARFO**
   Appointees needed: Regional Prioritization Work Group
   Next step(s): Revised document sent out via correspondence. Determine whether the topic is complete or necessary on the Fall NRCC agenda.
   Due date(s): October 30, 2026

2. Item: Add definitions of risk and value in the *Northeast Stock Prioritization Summary* draft, with a focus on explaining the composite risk metric.
   Lead: **GARFO**
   Appointees needed: Regional Prioritization Work Group
   Next step(s): Revised draft shared via correspondence.
   Due date(s): September 4, 2026

3. Item: Develop a visual tool for the *Northeast Stock Prioritization Summary* that depicts the continuum of where each stock falls relative to others within each quadrant.
   Lead: **GARFO**
   Appointees needed: Regional Prioritization Work Group
   Next step(s): Visual tool shared via correspondence.
   Due date(s): October 30, 2026

4. Item: Create sortable Excel-format tables of where each stock falls on the *Northeast Stock Prioritization's* risk-value classification, with the ability to filter by Council and other relevant categories.
   Lead: **GARFO**
   Appointees needed: Regional Prioritization Work Group
   Next step(s): Tables shared via correspondence.
   Due date(s): October 30, 2026

5. Item: Revisit the *Northeast Stock Prioritization Summary* to consider if stock categorizations need to be adjusted for changing conditions.
   Lead: **NRCC**
   Appointees needed: none

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AWG GARFO
MAFMC

Next step(s): Determine a process for revisiting the *Northeast Stock Prioritization Summary* and its connection to AWG's assessment planning process.
Due date(s): TBD based on Council input

6. Item: Share *Northeast Stock Prioritization Summary* with AWG.
   Lead: **GARFO**
   Appointees needed: Ms. Kelly
   Next step(s): none
   Due date(s): August 28, 2026

The **NEFSC** will host the fall 2026 NRCC meeting. **NEFMC** will host the spring 2027 meeting.

Fall: November 19-20, 2026; Providence, RI.
Spring: Proposed: May 25-26, 2027; location TBD.

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NRCC

2026 Spring NRCC Meeting: Decisions and Action Items

May 27-28, 2026 (Providence, RI)

Decisions:

1. The NRCC will continue to receive updates on vessel baseline work at upcoming NRCC meetings.
2. The [regional risk-value matrix] working group should continue its work and present the outcomes at an intersessional NRCC meeting in summer 2026, followed by updates to the Councils at their fall meetings. States should continue to connect with this process through their roles on their respective Councils.
3. The NRCC agrees to the 2027 stock assessment schedule as proposed, but requested clarification around potential models for witch flounder and mackerel.
4. The NRCC supports expanding the pool of peer review panelists and NEFMC's proposed approach to solicit additional peer reviewers to support the effort.
5. The NRCC supports the proposed clarifications of the peer review solicitations process and agrees this topic is complete.
6. The NRCC agreed not to restart research track assessments at this time.
7. The NRCC decided that management track assessments can be used to transition stocks from ASAP to WHAM.

Action Items:

1. Item: Schedule a summer 2026 NRCC intersessional meeting to 1) hear the outcomes of the [regional risk-value matrix] working group's process; 2) discuss proposed applications of the results; 3) discuss intersections and proposed plans for engagement with state management; and 4) discuss how the proposed application of the results intersects with the Magnuson-Stevens Act and how General Council and NOAA Headquarters should be engaged. After the intersessional, update the Councils at their fall meetings.
   Lead: **GARFO**
   Appointees needed: Ms. Kelly, Ms. Deighan, Dr. Trudeau
   Next step(s): Ms. Kelly will coordinate a working group meeting to summarize progress and begin next steps. NRCC support staff will coordinate the NRCC intersessional.
   Due date(s): Fall Council meetings (NEFMC in September, MAFMC in October)

2. Item: NRCC member organizations will share any AI policies and training with the group and follow up with a discussion at the Fall 2026 NRCC meeting.
   Lead: **NRCC**
   Appointees needed: None
   Next step(s): Share any relevant materials via email.
   Due date(s): Fall 2026 NRCC meeting

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NRCC

3. Item: Form a working group, with 1-2 representatives from each NRCC member organization, to develop Recreational Demand Model (RDM) standard operating procedures outlining pathways for future changes to the model and outreach procedures around those changes.
   Lead: **NRCC**
   Appointees needed: None
   Next step(s): Identify delegates.
   Due date(s): End of June 2026

4. Item: NEFSC will provide updates to NRCC on any planned changes to the RDM between now and November.
   Lead: **NEFSC**
   Appointees needed: Dr. Hare
   Next step(s): Provide RDM updates.
   Due date(s): June 12, 2026

5. Item: Describe staff and computing resources necessary to support the RDM.
   Lead: **NEFSC**
   Appointees needed: Dr. Hare
   Next step(s): Identify resources and funding sources needed to run the RDM.
   Due date(s): Fall 2026 NRCC meeting

6. Item: Develop a plan for training non-NEFSC staff in using the RDM.
   Lead: **NEFSC**
   Appointees needed: Dr. Hare
   Next step(s): Propose options for training non-NEFSC staff.
   Due date(s): Fall NRCC meeting

7. Item: Communicate clarification of data update categories (standard, standard with projections, nonstandard) in online assessment materials and alert public to materials when presenting stock assessment schedule for 2027.
   Lead: **NEFSC**
   Appointees needed: Dr. Simpkins
   Next step(s): Council update.
   Due date(s): June Council meetings

8. Item: Share 2027 stock assessment schedule with John Foster. Note Atlantic cobia and striped bass as priorities.
   Lead: **NRCC**
   Appointees needed: Dr. Hare.
   Next step(s): Share schedule by email.
   Due date(s): June 3, 2026

9. Item: NEFMC will develop a solicitation for those interested in being peer reviewers for management track assessments.
   Lead: **NEFMC**
   Appointees needed: Dr. O'Keefe

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NEFMC NEFSC
NRCC

Next step(s): Develop solicitation based on the regular peer reviewer process with potential to expand as the process is refined.
Due date(s): August 1, 2026

10. Item: NEFSC will meet with NEFMC to discuss multistock area and market category designation and sampling opportunities.
    Lead: **NEFSC**
    Appointees needed: Dr. Hare
    Next step(s): Schedule meeting.
    Due date(s): August 1, 2026

11. Item: NRCC will review a proposed 5-year assessment schedule (2028-2032) at its Fall 2026 meeting, with the goal of approving a schedule for 2028, at a minimum. Once the results of the [regional risk-value matrix] are available, the AWG will consider that information in the schedule development. The AWG will also consider additional flexibility to 1) allow assessments that fall somewhere between how we currently frame management track and research track assessments; and 2) allow changes to choice of terminal years and/or timing of peer reviews.
    Lead: **AWG**
    Appointees needed: Dr. Simpkins
    Next step(s): AWG meets to develop a 5-year schedule.
    Due date(s): Fall 2026 NRCC meeting

12. Item: NEFMC will send out a questionnaire for the NRCC member organizations to assess what has worked well and where there is opportunity for improvement for management track and research track assessments.
    Lead: **NEFMC**
    Appointees needed: Dr. O'Keefe
    Next step(s): Develop questionnaire.
    Due date(s): August 1, 2026

13. Item: NEFSC will discuss witch flounder and mackerel assessments with the Population Dynamics branch and then update the Councils.
    Lead: **NEFSC**
    Appointees needed: Dr. Simpkins, Dr. Hare
    Next step(s): Discuss assessments with the Population Dynamics branch.
    Due date(s): June 15, 2026

14. Item: NEFSC will meet with ASMFC to discuss recommendations from the state-Federal port sampling workshop. Report will be posted on NRCC website.
    Lead: **NEFSC**, **NEFMC**
    Appointees needed: Dr. Hare
    Next step(s): Discuss workshop with ASMFC.
    Due date(s): June 15, 2026

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NRCC

The NEFSC will host the fall 2026 NRCC meeting. NEFMC will host the spring 2027 meeting.

Fall: November 19-20, 2026; Providence, RI.

Spring: Proposed: May 25-26, 2026; location TBD.

Color code key:
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NRCC

2026 Winter Intersessional NRCC Meeting: Decisions and Action Items

January 13, 2026 (Webinar)

Decisions:

1. Refer to the matrix in the Framework for Narrowing the Scope of NMFS Management and Science as the "risk-value matrix."
2. Tentatively approve the 2027 stock assessment schedule as proposed by the AWG, and plan to consider additions to the schedule at the May 2026 NRCC meeting.
3. Accept the AWG's proposed 2026 schedule for stock assessment meetings that avoid scheduling conflicts.
4. Continue to pause the activities of the Assessment Oversight Panel and Research Track Steering Committee through 2026, which will simplify the stock assessment process.
5. As part of the stock assessment simplification discussion, revisit the discussion of transitioning from ASAP to WHAM at the May 2026 NRCC meeting.

Action Items:

1. Item: NRCC agreed to identify a regional working group in support of the Framework for Narrowing the Scope of NMFS Management and Science and schedule an intersessional meeting to approve membership and next steps for the Working Group.
   Lead: **GARFO**, **NRCC**
   Appointees needed: Ms. Deighan, Dr. Trudeau, NRCC Principals
   Next step(s): Ms. Deighan and Dr. Trudeau schedule an intersessional NRCC meeting. NRCC principals to consider appropriate representation on the regional working group.
   Due date(s): February 2026

2. Item: NRCC agreed to discuss a return to a five-year stock assessment planning cycle at the May 2026 NRCC meeting.
   Lead: **AWG**
   Appointees needed: Dr. Simpkins
   Next step(s): Develop a proposal for a return to a 5-year planning cycle for NRCC discussion.
   Due date(s): May 2026 NRCC meeting

3. Item: NRCC agreed to revisit the 2027 stock assessment schedule at the May 2026 NRCC meeting.
   Lead: **NEFMC**, **AWG**
   Appointees needed: NEFMC members and staff, Dr. Simpkins
   Next step(s): Identify candidate stocks for consideration (NEFMC). Assess feasibility of adding stocks and prepare materials for NRCC discussion (AWG).
   Due date(s): May 2026 NRCC meeting

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NEFMC NEFSC
NRCC

4. Item: NRCC tasked AWG with preparing a proposal on the optimization of the assessment workload with consideration of stock assessment priorities, research track planning, stakeholder engagement, and the transition from ASAP to WHAM for NRCC discussion at the May 2026 NRCC meeting.
   Lead: **AWG**
   Appointees needed: Dr. Simpkins
   Next step(s): AWG prepares a proposal, with consideration of the interconnectedness of these topics, for NRCC consideration.
   Due date(s): May 2026 NRCC meeting

The **NEFSC** will host the spring and fall 2026 NRCC meetings:

Spring: May 27-28 2026; Location TBD. The meeting will be two full days.

Fall: November 2026; Date and location TBD. NEFSC to propose dates and GARFO to send poll with the goal of setting a date prior to the May 2026 meeting.

Northeast Region Coordination Council Meeting
November 19-20, 2026

New England Fishery Management Council document links:

Agenda #3: Inflation Reduction Act and East Coast Coordination Project updates

- Inflation Reduction Act Project Briefs
  - Risk Policy
  - Dynamic Reference Points Workshop
  - Ecosystem Component Species Draft Guidance for Designation
  - Holistic Strategic Plan

Agenda #5: Assessment Process Changes

- Included with Briefing Book
  - DRAFT NRCC Stock Assessment Evaluation Report
  - 260824 Black Point Maritime Law to NRCC re Comments on Stock Assessment Evaluation
  - Presentation

Agenda #7: Peer Reviewer Solicitation Process

- Call for Applications: Stock Assessment Peer Reviewers

Agenda #12: Deregulatory fishery management actions/EO response and AI use and policy

- Executive Order 14276
  - 260930 NEFMC to NOAA – Executive Order 14276 NOAA Priorities
- NEFMC AI Use
  - Presentation

Agenda #14: Vessel Baselines

- Evaluation of Vessel Baseline Restrictions

Greater Atlantic Region
2026 Stock Prioritization

The Greater Atlantic Region 2026 Stock Prioritization summary document captures the process and decisions made to complete a risk/value matrix tool in support of regional stock prioritization (*formerly known as the "Risk/Value Evaluation*[1]*"*) in the Greater Atlantic Region. This tool is intended to provide management partners and NOAA Fisheries a way to visualize our managed stocks and prioritize them relative to value and risk factors. The Northeast Region Coordinating Council (NRCC; comprising the Atlantic States Marine Fisheries Commission, Mid-Atlantic Fishery Management Council, New England Fishery Management Council, NOAA's Greater Atlantic Regional Fisheries Office, and the Northeast Fisheries Science Center) formed a Working Group to conduct the risk/value evaluation, following a request from NOAA Fisheries and input from the Council Coordination Committee.

Objectives and Definitions

The overarching objective of this exercise is to visualize our collective managed species, while recognizing the differences in the overall economic and social value and the biological, ecological, and social impacts of management on stocks and fisheries. The results are intended to provide additional information for the Councils, Commission, Regional Office, and the Science Center to prioritize science product timing and complexity, staff resource allocation, and assess whether a stock in a fishery management plan is still in need of conservation and management, among other uses.

For the purposes of this exercise, the Working Group used these definitions:

Value is defined as the estimated economic value added to the regional economy for the commercial and recreational fisheries.

Risk is defined as the possibility that an event will occur that affects the achievement of fisheries management objectives (which covers ecological, economic, social, food production, and management goals)**. Risk** occurs at the biological and ecological stock levels (*e.g.,* susceptibility to overfishing, vulnerability to changing environmental conditions), as well as at the fishery management level (*e.g.*, fishery dependence, the impact of not meeting objectives).

Some stocks may be at high risk biologically, but investment in science or management may not meaningfully mitigate those risks, as fisheries interactions may not be the primary cause of those risks. Further, some stocks may be biologically/ecologically low risk (*e.g.,* due to a robust stock

[1] NOAA Fisheries leadership initially requested all regional/council partners to develop a risk/value matrix to support national discussions regarding better aligning Federal fisheries science and management resources with the highest priorities. However, during the development of the matrix, and in response to requests from the Council Coordinating Committee, the exercise was shifted to a regional process, without the national view originally proposed.

size), but the risk of management underperformance may be significant and warrant consideration as high risk to emphasize the importance to the fishery as a whole. For example, black sea bass is impacted by changing environmental conditions, but in a positive direction. The risk for that stock could be considered high due to the possibility that the management objective of maximum sustainable yield would not be achieved.

Greater Atlantic Region Approach

Step 1 - Current Organizational Investment

For the Greater Atlantic Region, our first step was to create a baseline summary of the relative investment each organization is currently making for each stock, on a scale of *0-none* to *3-high*. Because the tool is intended primarily to focus on federally supported resources, stocks where the Atlantic States Marine Fisheries Commission was the only involved NRCC partner were removed from further consideration. Several Commission-led stocks remain in the exercise, namely American lobster, American shad, Atlantic sturgeon, Jonah crab, Northern shrimp, river herring, and striped bass.

Step 2 - Value Considerations

The second step involved summarizing the calculated value added of each stock remaining after step 1. Total value added was provided for both 3- and 7-year horizons. For commercial fisheries, ex-vessel value at the year-stock level was pulled from available GARFO and NEFSC databases and value added was calculated by multiplying the ex-vessel value by a national value-added multiplier from the Input-Output models, used regularly for the annual *Fisheries Economics of the United States* reports[2]. For recreational fisheries, total trips were constructed at the year-state-mode-stock level. Trips were assigned to stocks using the target-species field and the intercept site, and for species with multiple stock areas, trips were assigned to the nearest stock area. Recreational expenditure survey data were used to estimate recreational expenditures at that level. Similar to the commercial fisheries, value added was constructed by multiplying recreational expenditure by the value-added multiplier from the Input-Output models. The combined commercial and recreational value added was used in this process.

Step 3 - Risk Factors

In 2017, the NRCC finalized[3] an assessment prioritization process to facilitate a longer term stock assessment schedule. The prioritization process consisted of NRCC partner organization representatives scoring each stock using the factors listed in Table 1. The scores were then averaged across the organizations and combined to assist in prioritizing the frequency of stock assessments. Because many of the factors recommended for risk consideration by NOAA Fisheries headquarters staff overlapped with this prior NRCC effort,

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[2] From FEUS 2023 Methods: *The NOAA Commercial Fisheries and Seafood Industry Input-Output Model uses an IMPLAN platform to estimate the economic impacts associated with the harvesting of fish by U.S. commercial fishermen and other major components of the U.S. seafood industry. The NOAA Recreational Fisheries Input-Output Model, which also uses an IMPLAN platform, estimates the economic impacts generated by expenditures made by marine (saltwater) anglers.*

[3] A description of the 2017 process can be found beginning on page 5 of the *Description of New England and Mid-Atlantic Region Stock Assessment Process*.

the Working Group decided to use scores from this prior, extensive effort, rather than start over.

Table 1. Factors considered by the NRCC during the 2017 stock assessment prioritization process.

1. **Management Needs** a. Specification timing	3. **Stock Status and Trend** a. Relative abundance /trend b. Relative fishing mortality/trend	**5. Assessment information** a. Unexpected changes to stock indicators b. New type of information c. Research readiness d. Years overdue for assessment e. Model performance
2. **Fishery Importance** a. Commercial fishery b. Recreational fishery c. Rebuilding status d. Constituent demand	4. **Ecosystem Importance** a. Trophic importance b. Climate vulnerability	6. **Stock biology** a. Mean age in the catch (or proxy) b. Maximum age c. Stock variability

The final stock assessment prioritization scores from 2017 consisted of the averages of factors 1a, 2a-d, 3a-b, 4a, 5a and 5d. Because of the potential overlap with the value added calculations, the Working Group also considered using only the "biological" scores from the prior effort (*i.e.*, 3a-b, 4a-b, 6a-c). However, because the value component of step 2 included *only* the economic value, the Working Group decided it was appropriate to use the final 2017 score because of the incorporation of the social factors in "commercial importance" and "recreational importance" that better align with management risk considerations. In some cases, the 2017 score was unavailable for a few stocks. Where possible, inferences were made to assign an appropriate score (*e.g.*, using the prior Georges Bank cod scores for the new Georges Bank and Southern New England cod stocks) or the Working Group's best professional judgement was used to assign a stock to a risk category (*e.g.*, blueline tilefish).

Step 4 - Quadrant Placement

The value and risk scores for each species/stock were plotted with value after a lognormal transformation due to the range of values (*i.e.*, from $0 to $2.7 billion) on the horizontal axis and risk on the vertical axis (Figure 1). Visualizing the data in this way illustrated the threshold between "high" value and "low" value stocks at approximately $2 million, and a dividing line at ~2.2 for the risk scores. The Working Group's initial consideration of risk characterization primarily reflects inherent risk to each stock.

Figure 1. Initial quadrant placement, reflecting Steps 1-4.

High Risk/Low Value	High Risk/High Value	
Atlantic Sturgeon American Shad Chub Mackerel EGOM Cod GOM Winter Flounder Offshore Hake River Herring Smooth Skate Thorny Skate	American Lobster Atlantic Mackerel Bluefish Butterfish GB Cod GB Winter Flounder Golden Tilefish Herring *Illex* Squid Jonah Crab Little Skate Longfin Squid	Scup SNE Cod SNE/MA Winter Flounder Spiny Dogfish Striped Bass Summer Flounder WGOM Cod Winter Skate Witch Flounder GB Haddock
Low Risk/Low Value	**Low Risk/High Value**	
Atlantic Wolffish Barndoor Skate CC/GOM Yellowtail Flounder Clearnose Skate GB Yellowtail Flounder GOM/GB Windowpane Flounder N. Red Hake Northern Shrimp Ocean Pout Rosette Skate SNE/MA Windowpane Flounder SNE/MA Yellowtail Flounder	American Plaice Atlantic Halibut Black Sea Bass Blueline Tilefish Deep-Sea Red Crab GOM Haddock NFMA Monkfish N. Silver Hake Ocean Quahog	Pollock Redfish Scallop SFMA Monkfish S. Red Hake S. Silver Hake Surfclam White Hake

Because the risk factor scores were completed nearly a decade ago, the Working Group used its best professional judgment to consider how the risk score might change with updated information. Generally, the stocks were adjusted to account for more up-to-date understanding of stock conditions, climate vulnerability, fishery dependency, and risks to the management enterprise (*e.g.*, the management enterprise is poorly informed or that management objectives may not be fully realized; Table 2 and Figure 2). Specific descriptions for each stock are provided in the Appendix. In addition, the working group determined that it was appropriate to split American lobster by stock area (GOM/GB and SNE). Both stocks remain in the "high risk, high value" category.

Table 2. Stocks where quadrant placement was adjusted to account for recent information.

Stock	Original Quadrant	Final Quadrant	Justification Summary
Black Sea Bass	Low Risk, High Value	High Risk, High Value	Updated stock status Risk to management
Atlantic Sea Scallop	Low Risk, High Value	High Risk, High Value	Updated stock status, climate vulnerability
White Hake	Low Risk, High Value	High Risk, High Value	Updated stock status, climate vulnerability Risk to management
Illex Squid	High Risk, High Value	Low Risk, High Value	Updated understanding of less climate vulnerability Low exploitation
Longfin Squid	High Risk, High Value	Low Risk, High Value	Updated understanding of less climate vulnerability Low exploitation
Blueline Tilefish	Low Risk, High Value	High Risk, Low Value	Value estimate included SAFMC region, Correction to risk score
CC/GOM Yellowtail Flounder	Low Risk, Low Value	High Risk, Low Value	Updated stock status, climate vulnerability Risk to management
SNE/MA Winter Flounder	High Risk, High Value	High Risk, Low Value	Updated stock status, climate vulnerability
Chub Mackerel	High Risk, Low Value	Low Risk, Low Value	Likelihood of low exploitation
Northern Shrimp	Low Risk, Low Value	High Risk, Low Value	Updated stock understanding Lack of species specific fishery independent data may delay recognition of rebuilding

Figure 2. Final Quadrant Placement; steps 1-4, with adjustments for recent information.

High Risk/Low Value	High Risk/High Value	
Atlantic Sturgeon American Shad Blueline Tilefish CC/GOM Yellowtail Flounder EGOM Cod GOM Winter Flounder Northern Shrimp River Herring Smooth Skate SNE/MA Winter Flounder Thorny Skate	Atlantic Herring Atlantic Mackerel Black Sea Bass Bluefish Butterfish GB Cod GB Winter Flounder Golden Tilefish GOM/GB American Lobster Jonah Crab Little Skate Scallop	Scup SNE American Lobster SNE Cod Spiny Dogfish Striped Bass Summer Flounder WGOM Cod White Hake Winter Skate Witch Flounder GB Haddock
Low Risk/Low Value	**Low Risk/High Value**	
Atlantic Wolffish Barndoor Skate Chub Mackerel Clearnose Skate GB Yellowtail Flounder GOM/GB Windowpane Flounder N. Red Hake Ocean Pout Rosette Skate SNE/MA Windowpane Flounder SNE/MA Yellowtail Flounder	American Plaice Atlantic Halibut Deep-Sea Red Crab *Illex* Squid GOM Haddock Longfin Squid NFMA Monkfish N. Silver Hake Ocean Quahog	Pollock Redfish SFMA Monkfish S. Red Hake S. Silver Hake/Offshore Hake Surfclam

Lead Management Partner:
ASMFC
MAFMC
NEFMC

Moved from their original placement

Next Steps

NRCC partner organizations are encouraged to compare the current investment level (***step 1***, above) with the final results and to consider if staff resources and time are aligned with the results. These activities and other responses to the final results are most appropriately applied at the individual partner level, with consideration to the shared resources at the Regional Office and Science Center and existing joint governance structures.

The Working Group strongly recommends against assigning default management reactions to quadrant placement. The characterizations are intended to provide an additional data point for potential management responses and prioritization processes, including consideration of stock complexes. The Councils are encouraged to consider the prioritization exercise in reviewing which stocks require full Federal management and if any stocks might be more appropriately characterized as ecosystem component species. This may be particularly important for those stocks where management interventions are unlikely to result in meaningful changes to status. For low risk/low value stocks, one Council may choose to redesignate a stock as an ecosystem component species and another Council may choose to set specifications on a longer time horizon. Other management responses might include revising regulations that require frequent action (by the Council, the Regional Office, or the Science Center) to better align with current resources and appropriate investment levels. The resource savings from these approaches to addressing low risk/low value stocks could be redirected into investment in high risk/high value stocks in terms of prioritizing research needs and annual Council priorities/workplans.

In addition to regionally focused uses, the Working Group noted that there may be circumstances where the NRCC or a partner organization would include the placement of a stock or stocks in the regional prioritization process as information to support a request of NOAA Fisheries. For example, if there were a request to increase funding for a specific scientific survey or project that would benefit multiple stocks in the high risk/high value quadrant, that could bolster the recommendation to NOAA Fisheries for funding or other resources. The NRCC or a partner organization could also consider the regional prioritization results to respond to proposals from NOAA Fisheries. Proposed revisions to data collection systems or fishery-independent survey methods (*e.g.*, monitoring and sampling levels, use of advanced technology, etc.) should consider investment levels related to the collective risk and value of regional fishery resources.

Working Group Membership

Atlantic States Marine Fisheries Commission
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Appendix

Summary Table

Stock	Management Lead	STEP 1 GARFO	STEP 1 NEFSC	STEP 1 NEFMC	STEP 1 MAFMC	STEP 1 ASMFC	STEP 2 Value Score	STEP 3 Risk Score
Acadian redfish	NEFMC	3 - High	3 - High	3 - High	0 - None	0 - None	$29,555,013	1.50
American plaice	NEFMC	3 - High	3 - High	3 - High	0 - None	0 - None	$15,165,780	2.11
Atlantic deep-sea red crab	NEFMC	3 - High	2 - Moderate	1 - Small	0 - None	0 - None	$19,122,873	2.00
Atlantic halibut	NEFMC	2 - Moderate	2 - Moderate	1 - Small	0 - None	0 - None	$2,633,164	2.11
Atlantic herring	NEFMC	3 - High	3 - High	3 - High	1 - Small	1 - Small	$40,289,315	2.26
Atlantic wolffish	NEFMC	2 - Moderate	2 - Moderate	1 - Small	0 - None	0 - None	$53,874	2.11
Barndoor skate	NEFMC	3 - High	2 - Moderate	1 - Small	1 - Small	0 - None	$478,853	1.83
CC/GOM yellowtail	NEFMC	3 - High	3 - High	2 - Moderate	0 - None	0 - None	$116,160	2.61
Clearnose skate	NEFMC	1 - Small	2 - Moderate	1 - Small	1 - Small	0 - None	$189,648	1.67
Eastern Gulf of Maine cod	NEFMC	3 - High	3 - High	3 - High	0 - None	0 - None	$44,412	3.03[4]
Georges Bank cod	NEFMC	3 - High	3 - High	3 - High	0 - None	0 - None	$3,812,187	3.28[5]
Georges Bank haddock	NEFMC	3 - High	3 - High	3 - High	0 - None	0 - None	$43,995,298	1.94
GB winter flounder	NEFMC	3 - High	3 - High	2 - Moderate	0 - None	0 - None	$8,680,633	3.28
GB yellowtail flounder	NEFMC	3 - High	3 - High	2 - Moderate	0 - None	0 - None	$103,142	2.31
Gulf of Maine haddock	NEFMC	3 - High	3 - High	3 - High	0 - None	0 - None	$35,877,084	1.94
GOM winter flounder	NEFMC	3 - High	3 - High	2 - Moderate	0 - None	1 - Small	$50,797	2.56
GOM/GB windowpane	NEFMC	2 - Moderate	2 - Moderate	2 - Moderate	0 - None	0 - None	$123	2.47
Little skate	NEFMC	3 - High	2 - Moderate	1 - Small	1 - Small	0 - None	$6,315,703	2.22
NFMA Monkfish	NEFMC	3 - High	2 - Moderate	2 - Moderate	2 - Moderate	0 - None	$31,453,833	1.86
Northern red hake	NEFMC	2 - Moderate	2 - Moderate	2 - Moderate	1 - Small	0 - None	$228,181	1.86
Northern silver hake	NEFMC	2 - Moderate	2 - Moderate	2 - Moderate	1 - Small	0 - None	$15,469,759	1.89
Ocean pout	NEFMC	2 - Moderate	2 - Moderate	1 - Small	0 - None	0 - None	$807	2.58

[4] *applied original GOM cod score*
[5] *applied original GB cod score*

Stock	Management Lead	STEP 1 GARFO	NEFSC	NEFMC	MAFMC	ASMFC	STEP 2 Value Score	STEP 3 Risk Score
Offshore hake	NEFMC	2 - Moderate	2 - Moderate	2 - Moderate	1 - Small	0 - None	$6,365	1.89[6]
Pollock	NEFMC	3 - High	3 - High	3 - High	0 - None	0 - None	$33,510,578	1.83
Rosette skate	NEFMC	1 - Small	2 - Moderate	1 - Small	1 - Small	0 - None	$202	1.33
Scallop	NEFMC	3 - High	3 - High	3 - High	1 - Small	0 - None	$2,321,997,768	1.86
SFMA Monkfish	NEFMC	3 - High	2 - Moderate	2 - Moderate	2 - Moderate	0 - None	$21,109,532	2.03
Smooth skate	NEFMC	1 - Small	2 - Moderate	1 - Small	1 - Small	0 - None	$859,798	2.17
SNE cod	NEFMC	3 - High	3 - High	3 - High	0 - None	0 - None	$2,277,863	3.28[7]
SNE/MA windowpane	NEFMC	2 - Moderate	2 - Moderate	2 - Moderate	0 - None	0 - None	$352,393	1.64
SNE/MA winter flounder	NEFMC	3 - High	3 - High	1 - Small	0 - None	1 - Small	$3,307,215	2.83
SNE/MA yellowtail	NEFMC	3 - High	3 - High	1 - Small	0 - None	0 - None	$56,313	2.97
Southern red hake	NEFMC	2 - Moderate	2 - Moderate	2 - Moderate	1 - Small	0 - None	$2,142,146	2.53
Southern silver hake	NEFMC	2 - Moderate	2 - Moderate	2 - Moderate	1 - Small	0 - None	$27,281,618	1.89
Thorny skate	NEFMC	1 - Small	2 - Moderate	1 - Small	1 - Small	0 - None	$8,277	2.50
WGOM cod	NEFMC	3 - High	3 - High	3 - High	0 - None	0 - None	$10,168,312	3.03[8]
White hake	NEFMC	3 - High	3 - High	3 - High	0 - None	0 - None	$21,332,826	2.25
Winter skate	NEFMC	3 - High	2 - Moderate	2 - Moderate	1 - Small	0 - None	$21,337,925	2.00
Witch flounder	NEFMC	3 - High	3 - High	3 - High	0 - None	0 - None	$10,634,917	2.19
Atlantic bluefish	MAFMC	3 - High	3 - High	0 - None	3 - High	2 - Moderate	$172,635,844	2.78
Atlantic mackerel	MAFMC	3 - High	3 - High	2 - Moderate	3 - High	0 - None	$36,578,241	2.61
Atlantic surfclam	MAFMC	3 - High	3 - High	1 - Small	3 - High	0 - None	$127,387,055	1.53
Black sea bass	MAFMC	3 - High	3 - High	2 - Moderate	3 - High	3 - High	$154,634,641	2.03
Blueline tilefish	MAFMC	2 - Moderate	1 - Small	0 - None	3 - High	0 - None	$2,710,346	*high risk*

[6] *applied S. silver hake score*
[7] *applied original GB cod score*

[8] *applied original GOM cod score*

Stock	Management Lead	STEP 1 GARFO	NEFSC	NEFMC	MAFMC	ASMFC	STEP 2 Value Score	STEP 3 Risk Score
Butterfish	MAFMC	2 - Moderate	3 - High	1 - Small	2 - Moderate	0 - None	$15,549,199	2.03
Chub mackerel	MAFMC	1 - Small	0 - None	0 - None	1 - Small	0 - None	$126,680	*low risk*
Golden tilefish	MAFMC	3 - High	2 - Moderate	0 - None	3 - High	0 - None	$28,267,827	2.39
Illex squid	MAFMC	3 - High	3 - High	1 - Small	3 - High	0 - None	$90,689,538	2.89
Longfin squid	MAFMC	3 - High	3 - High	1 - Small	3 - High	0 - None	$186,045,130	2.61
Ocean quahog	MAFMC	3 - High	3 - High	1 - Small	3 - High	0 - None	$97,953,764	1.53
Scup	MAFMC	3 - High	3 - High	1 - Small	3 - High	3 - High	$141,662,536	2.06
Spiny dogfish	MAFMC	3 - High	3 - High	2 - Moderate	3 - High	2 - Moderate	$13,230,077	2.17
Summer flounder	MAFMC	3 - High	3 - High	1 - Small	3 - High	3 - High	$626,749,242	3.28
American shad	ASMFC	2 - Moderate	1 - Small	2 - Moderate	2 - Moderate	2 - Moderate	$1,027,143	3.31
Atlantic sturgeon	ASMFC	1 - Small	1 - Small	2 - Moderate	1 - Small	1 - Small	$0	2.17
GOM/GB lobster	ASMFC	3 - High	3 - High	1 - Small	0 - None	3 - High	$2,709,069,887	1.61
Jonah crab	ASMFC	1 - Small	0 - None	1 - Small	0 - None	1 - Small	$23,560,236	2.03
Northern shrimp	ASMFC	1 - Small	1 - Small	0 - None	0 - None	1 - Small	$132,360	2.58
River herring	ASMFC	2 - Moderate	1 - Small	2 - Moderate	2 - Moderate	2 - Moderate	$61,315	3.53
SNE American lobster	ASMFC	3 - High	3 - High	1 - Small	0 - None	3 - High	$74,569,368	2.28
Striped bass	ASMFC	1 - Small	3 - High	0 - None	0 - None	3 - High	$794,897,822	2.36
American eel	ASMFC	0 - None	0 - None	0 - None	0 - None	2 - Moderate	*not included*	*not included*
Atlantic croaker	ASMFC	0 - None	0 - None	0 - None	0 - None	2 - Moderate	*not included*	*not included*
Atlantic menhaden	ASMFC	0 - None	0 - None	0 - None	0 - None	3 - High	*not included*	*not included*
Black drum	ASMFC	0 - None	0 - None	0 - None	0 - None	1 - Small	*not included*	*not included*
Coastal sharks	ASMFC	0 - None	0 - None	0 - None	0 - None	1 - Small	*not included*	*not included*
Cobia	ASMFC	0 - None	0 - None	0 - None	0 - None	3 - High	*not included*	*not included*
Horseshoe crab	ASMFC	0 - None	0 - None	0 - None	0 - None	3 - High	*not included*	*not included*
Red drum	ASMFC	0 - None	0 - None	0 - None	0 - None	2 - Moderate	*not included*	*not included*
Spanish mackerel	ASMFC	0 - None	0 - None	0 - None	0 - None	2 - Moderate	*not included*	*not included*

Stock	Management Lead	STEP 1 GARFO	NEFSC	NEFMC	MAFMC	ASMFC	STEP 2 Value Score	STEP 3 Risk Score
Spot	ASMFC	0 - None	0 - None	0 - None	0 - None	1 - Small	*not included*	*not included*
Spotted sea trout	ASMFC	0 - None	0 - None	0 - None	0 - None	1 - Small	*not included*	*not included*
Tautog	ASMFC	0 - None	0 - None	0 - None	0 - None	2 - Moderate	*not included*	*not included*
Weakfish	ASMFC	0 - None	0 - None	0 - None	0 - None	1 - Small	*not included*	*not included*

Quadrant Adjustment Justification Details

Scallop - High Risk/High Value (shifted from Low Risk/High Value)

- 2025 Research Track Assessment - TOR #1
    - The most important environmental driver of the U.S. sea scallop fishery in recent years has been increasing bottom temperatures in the Mid-Atlantic Bight area that has resulted in a reduction in the productivity of scallops in this region.
    - Surveys indicate a gradual truncation of the southern and inshore range of Atlantic sea scallop in the Mid-Atlantic Bight (MAB) and increasing adult mortality in these areas.
    - Analyses showed a decrease in baseline thermal habitat from 1993 to 2023 with a shift in suitable habitat offshore. The spatial extent and duration of heat stress events also increased over this time, particularly in September and October.
    - Additional risk factors include observed increases in predators (e.g., sea stars and crabs) and infectious disease (e.g., resulting from Apicomplexa and Sulcascaris), and decreases in food supply, which impact scallop growth at depth.

White Hake - High Risk/High Value (shifted from Low Risk/High Value)

- 2025 Management Track Assessment - Special Comments
    - The rebuilding target date for White Hake is 2031 fishing at a F-rebuild of 70% F40%. Population projections are not well determined since rebuilding of the stock does not seem to be occurring as predicted from past assessments. Survey indices continue to show declining trends and recent recruitment estimates are also near time series lows.
- 2026 SSC Recommendations - January 26, 2026 SSC Memo to NEFMC
    - The SSC discussed that recommended ABC at 70% FMSY could be expected to have meaningful socioeconomic short-term costs borne by the industry (estimated by the PDT at ~$2M and as described per public comment and inferred per recent utilization data) and that it was likely that the stock would not be rebuilt under 70% FMSY by the rebuild date, unless there was an unexpected increase in recruitment.

SNE/MA Winter Flounder - High Risk/Low Value (shifted from High Risk/High Value)

- 2025 Management Track Assessment - Special Comments
    - During the 2022 management track assessment, an important and impactful change was made to the stanza of recruitment used in the projections. The new recruitment stanza used the last 20 years of estimates (2002-2021) for both short term projections, and to estimate the biomass target (SSBMSY) from a long term (100 year) projection. This was a shift from previous assessments that used the entire time-series of recruitment (1981-present), which included historical recruitment estimates that were overly optimistic for the recent stock size and productivity. Some of the early recruitment estimates are 20 times the levels seen in recent years.
- Framework 72 to Northeast Multispecies Plan - Landings and Revenue

    - Stock-level commercial (sector and common pool) revenue:
    - Most recent 5-year (2020-2024) average = ~$300,000
    - Most recent 3-year (2022-2024) average = ~$200,000

CC/GOM Yellowtail Flounder - High Risk/Low Value (shifted from Low Risk/Low Value)

- 2025 Management Track Assessment - Special Comments
    - The current WHAM model results suggest that Cape Cod-Gulf of Maine Yellowtail Flounder stock remains below the new SSBMSY proxy even though fishing pressure has been at historically low levels in recent years. Recruitment has been generally weak to moderate over the past decade, with no large year classes to accelerate rebuilding. While catches have been very low largely because of reduced market demand constraints, this has not led to rapid biomass growth, as recruitment has not provided the necessary boost. As a result, SSB is still below the long-term reference point, and the stock is considered overfished, even though overfishing is not currently occurring.

Black Sea Bass - High Risk/High Value (shifted from Low Risk/High Value)

- Complex life history with a high climate vulnerability, in a positive directional effect, with the current assessment model including bottom temperature as an environmental covariate informing recruitment.
- Significant ecosystem role - impacting predator/prey dynamics
- Significant advances in stock assessment methods and modeling that have performed well, but short-term projections have performed poorly.
- Stock is well above biomass target and overfishing is not occurring, but recent catches (last 10 years) have exceeded the ABC in many years and OFL in some years.
- Overall. ecosystem/biological risks are likely minimal and/or in a positive direction and, similar to scup, the stock has been robust to recent high catch and likely little risk to the stock becoming overfished and stock status changing quickly and in the short-term. Quadrant placement is consistent with similar highly abundant Mid-Atlantic stocks with sound stock assessments (e.g., scup and butterfish)

Illex Squid - Low Risk/High Value (shifted from High Risk/High Value)

- Complex life history and data limited stock, but climate vulnerability indicates low biological sensitivity to climate change.
- Environmental drivers likely play a much more significant role in driving stock dynamics and availability than the fishery.
- No approved assessment model, but current methods to evaluate stock suggest stock is lightly exploited at current catches/fishing levels.

Longfin Squid - Low Risk/High Value (shifted from High Risk/High Value)

- Complex life history and climate vulnerability indicates low biological sensitivity to climate change.
- For the first time, two brand new assessment models (likely to have passed peer review) and available to inform management and catch advice. Initial outputs suggest current ABC and recent catches are very low and stock is lightly exploited.

Blueline Tilefish - High Risk/Low Value (shifted from Low Risk/High Value)

- Value added estimates range from $2.3 million (3 year) to $2.7 million (7 year) but includes the total value added along the Atlantic coast (MAFMC and SAFMC jurisdictions). The total value added is already near the $2 million value threshold used by the Working Group and is likely below if just accounting for MAFMC jurisdiction.
- A long-lived, relatively slow growing life history with a high biological climate sensitivity to climate change.
- Very data limited stock and data limited tool based on recent catch used to determine catch limits. Some new survey information may improve understanding of stock in future.
- New commercial markets are opening and a growing and targeted recreational fishery is emerging. Recent catches are at or exceeding catch limits.
- Complicated management and ABC allocation with the MAFMC and SAFMC.

Chub Mackerel - Low Risk/Low Value (shifted from High Risk/Low Value)

- A warmer water, pelagic, and highly migratory species found around the globe that likely has a low climate vulnerability to climate impacts (not included in 2016 Hare et al CVA).
- While limited information is available, expert judgement of the SSC indicates the stock is likely lightly exploited and at sustainable levels.
- Catches have been at 6% or less of the implemented catch limits. Catches do not appear to be impacted by management but more likely driven by other factors (e.g., squid availability, fleet/gear capacity).

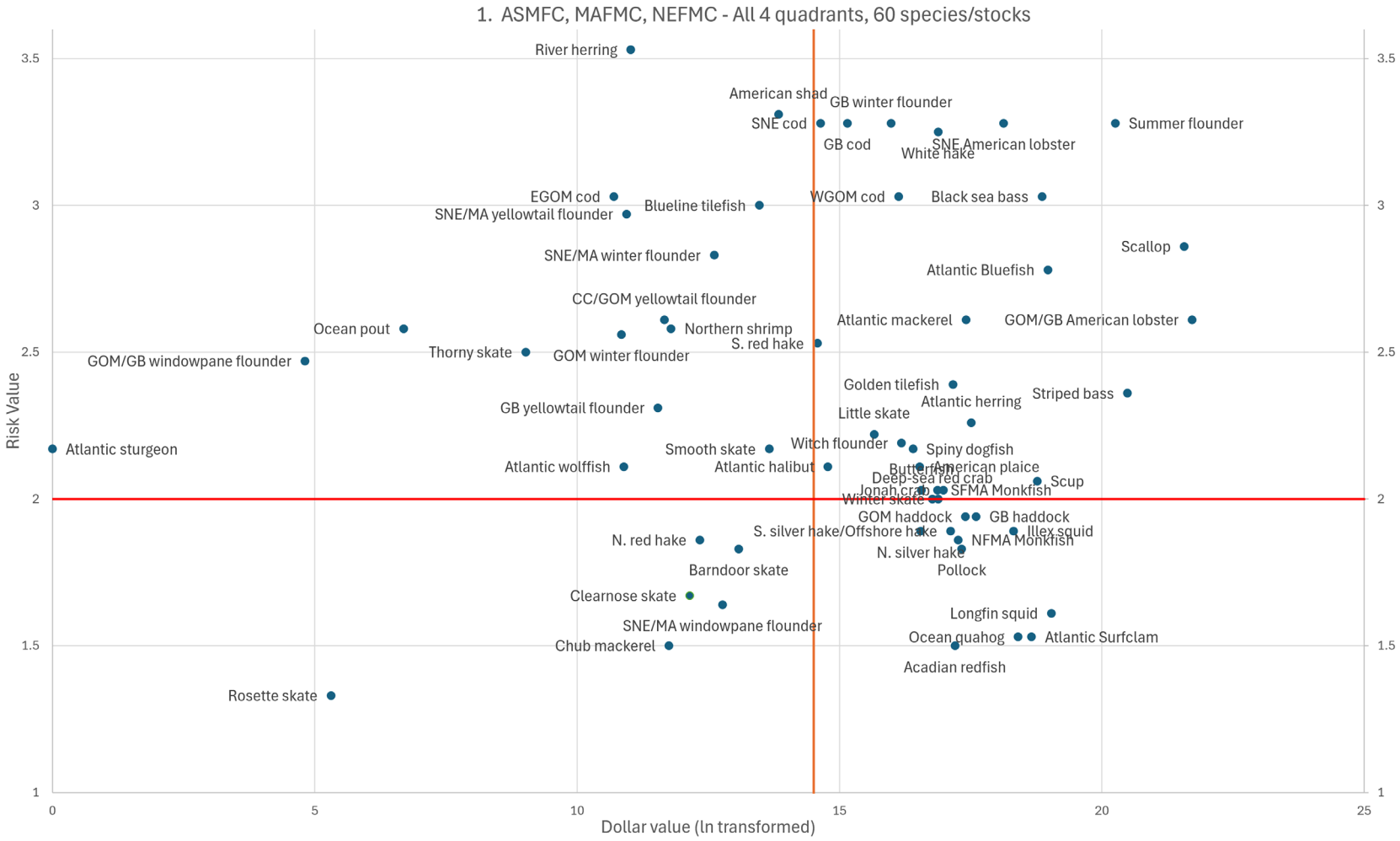
American Lobster - split by stock region

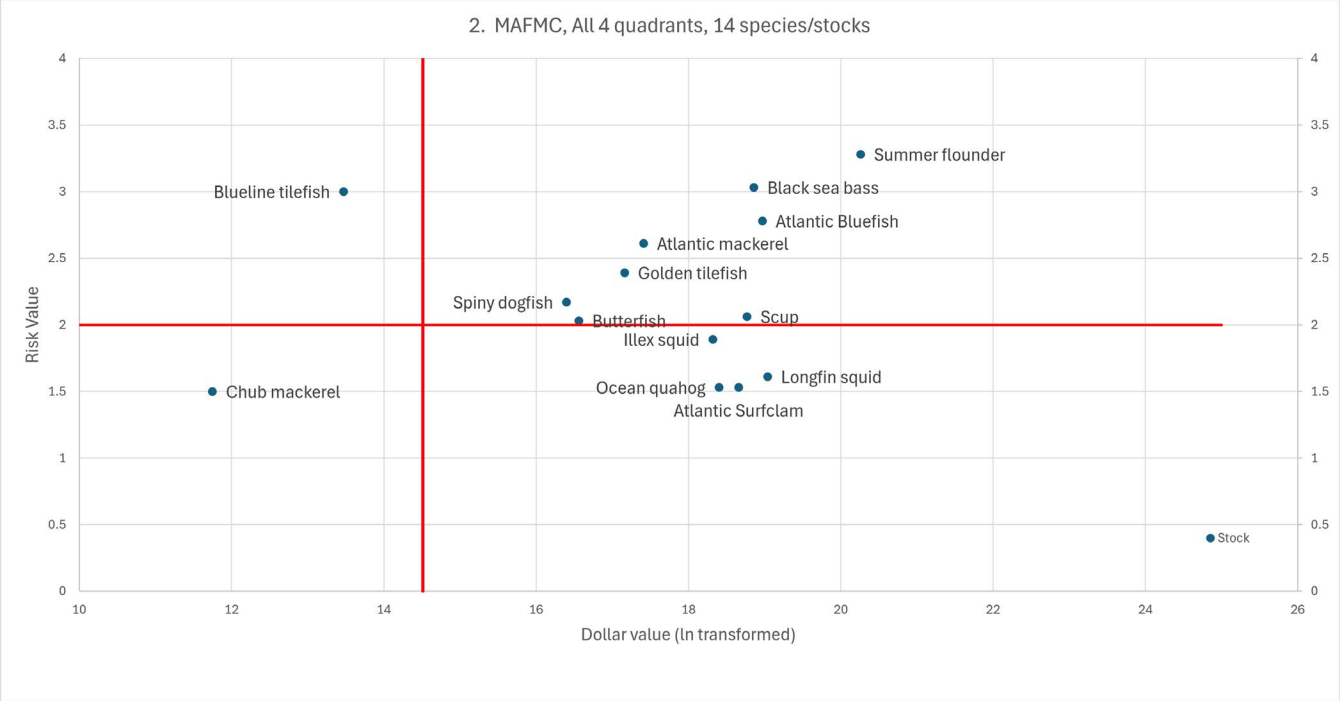
Lobster should be done by stock so there would be two quadrant placements one for GOM/GBK and one for SNE

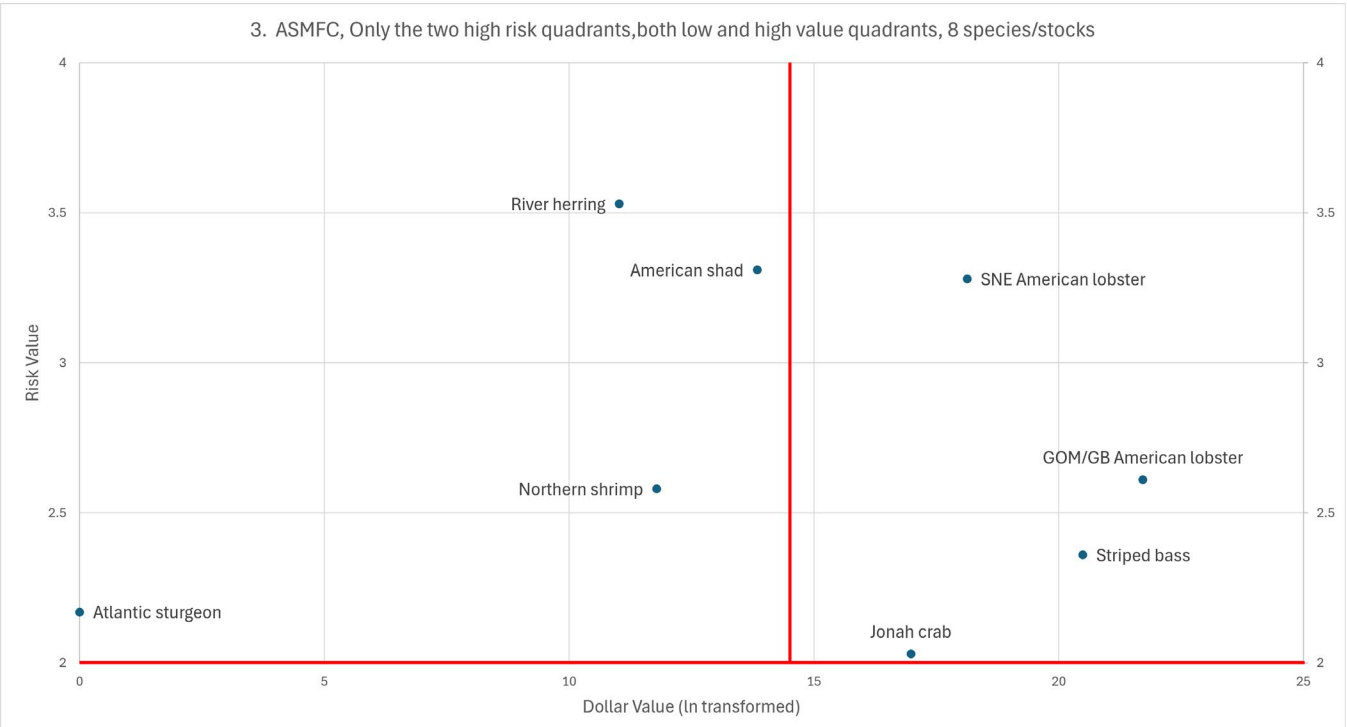
Northern Shrimp High Risk/Low Value (move from Low Risk/Low Value)

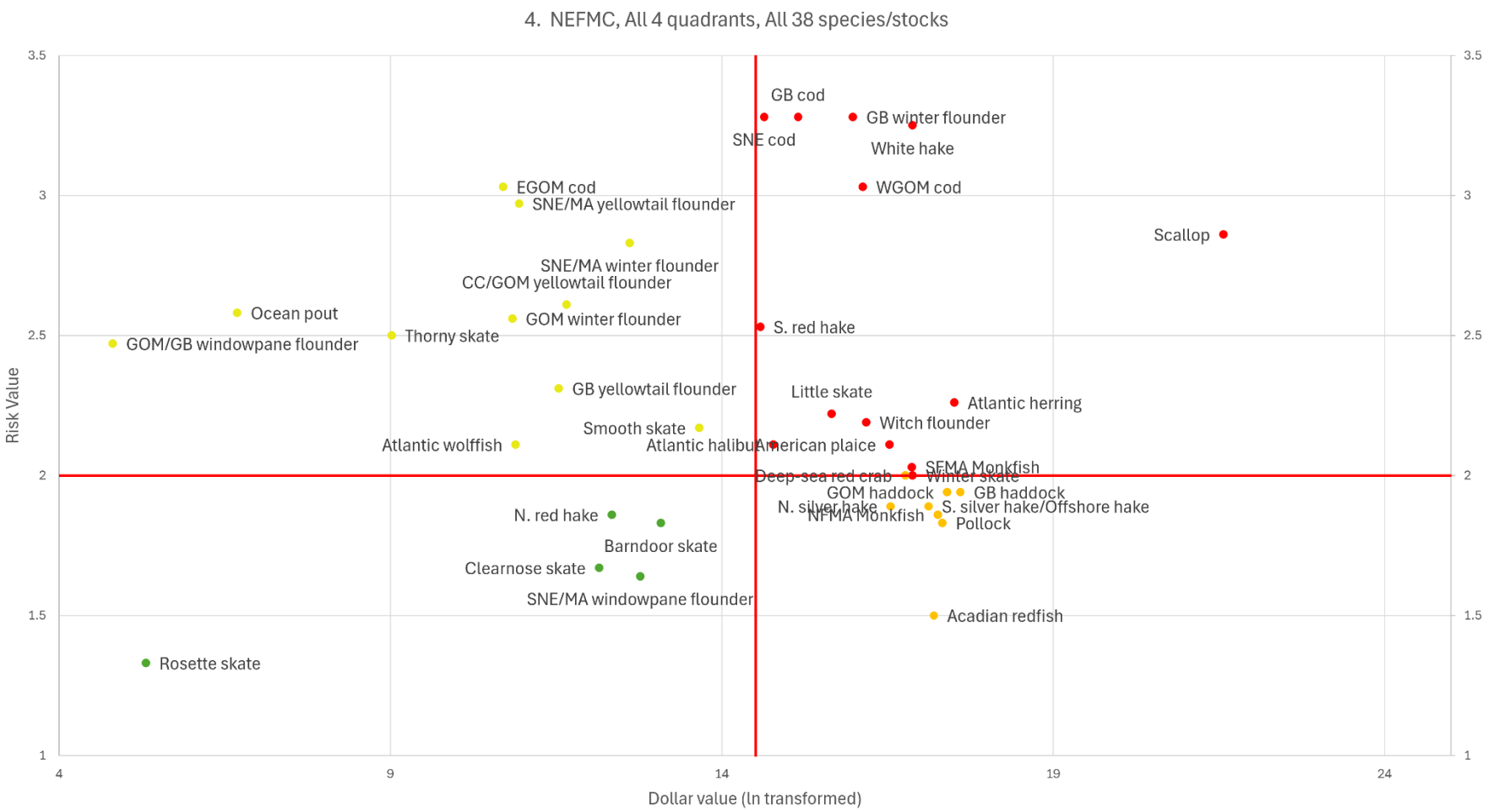
- Stock is depleted and has been under a moratorium for 13 years and has not responded
- Indices are at historic lows

Appendix: Figures 1-8. Graphical representations of risk and value by species/stock




2. MAFMC, All 4 quadrants, 14 species/stocks
Risk Value
Dollar value (ln transformed)
Summer flounder
Blueline tilefish
Black sea bass
Atlantic Bluefish
Atlantic mackerel
Golden tilefish
Spiny dogfish
Butterfish
Scup
Illex squid
Longfin squid
Chub mackerel
Ocean quahog
Atlantic Surfclam
Stock

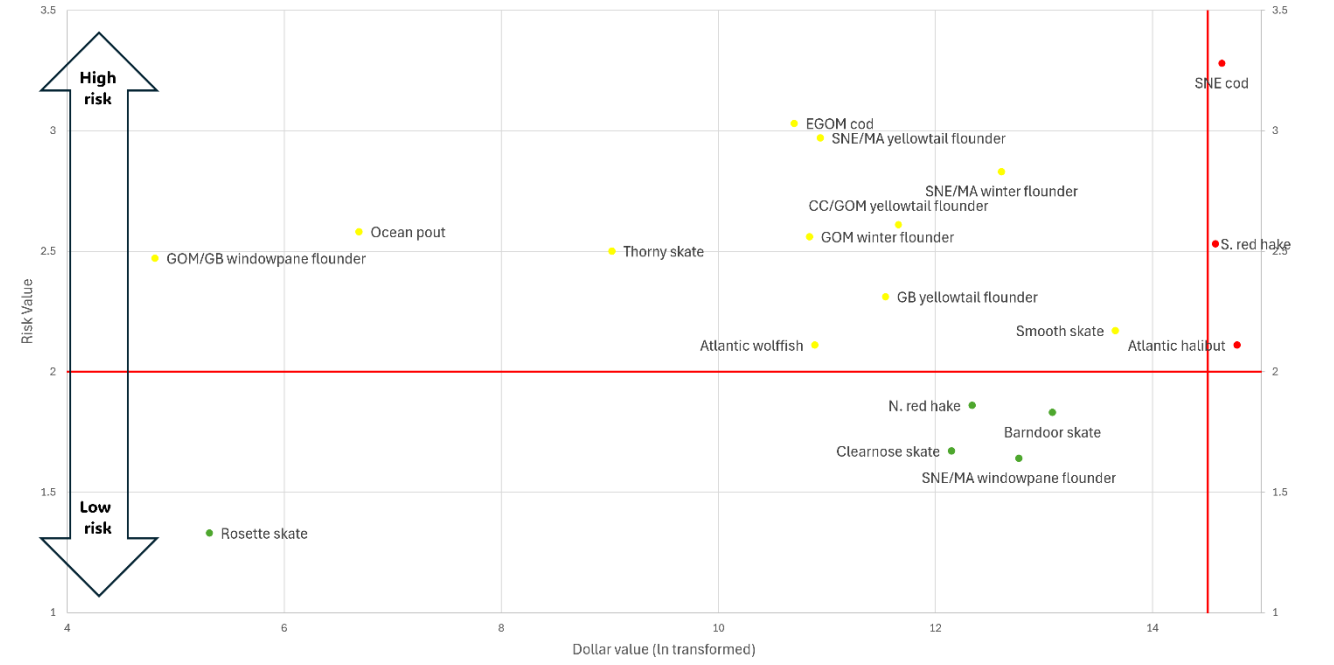

3. ASMFC, Only the two high risk quadrants,both low and high value quadrants, 8 species/stocks
Risk Value
Dollar Value (ln transformed)
River herring
American shad
SNE American lobster
GOM/GB American lobster
Northern shrimp
Striped bass
Atlantic sturgeon
Jonah crab


4. NEFMC, All 4 quadrants, All 38 species/stocks
Risk Value
Dollar value (ln transformed)
3.5
3
2.5
2
1.5
1
4
9
14
19
24
GB cod
GB winter flounder
SNE cod
White hake
EGOM cod
WGOM cod
SNE/MA yellowtail flounder
Scallop
SNE/MA winter flounder
CC/GOM yellowtail flounder
Ocean pout
GOM winter flounder
S. red hake
Thorny skate
GOM/GB windowpane flounder
GB yellowtail flounder
Little skate
Atlantic herring
Witch flounder
Smooth skate
Atlantic wolffish
Atlantic halibut
American plaice
SEMA Monkfish
Deep-sea red crab
Winter skate
GOM haddock
GB haddock
N. silver hake
S. silver hake/Offshore hake
NFMA Monkfish
Pollock
N. red hake
Barndoor skate
Clearnose skate
SNE/MA windowpane flounder
Acadian redfish
Rosette skate

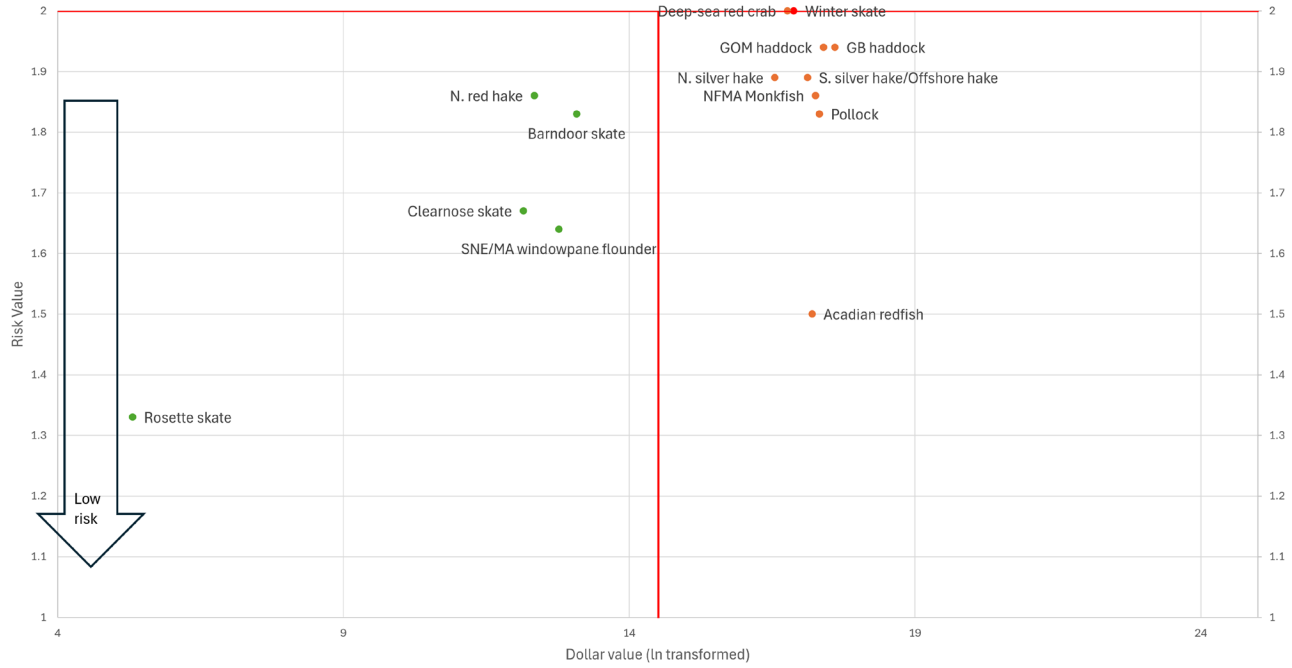
5. NEFMC, High value stocks, Both high and low Risk Quadrants



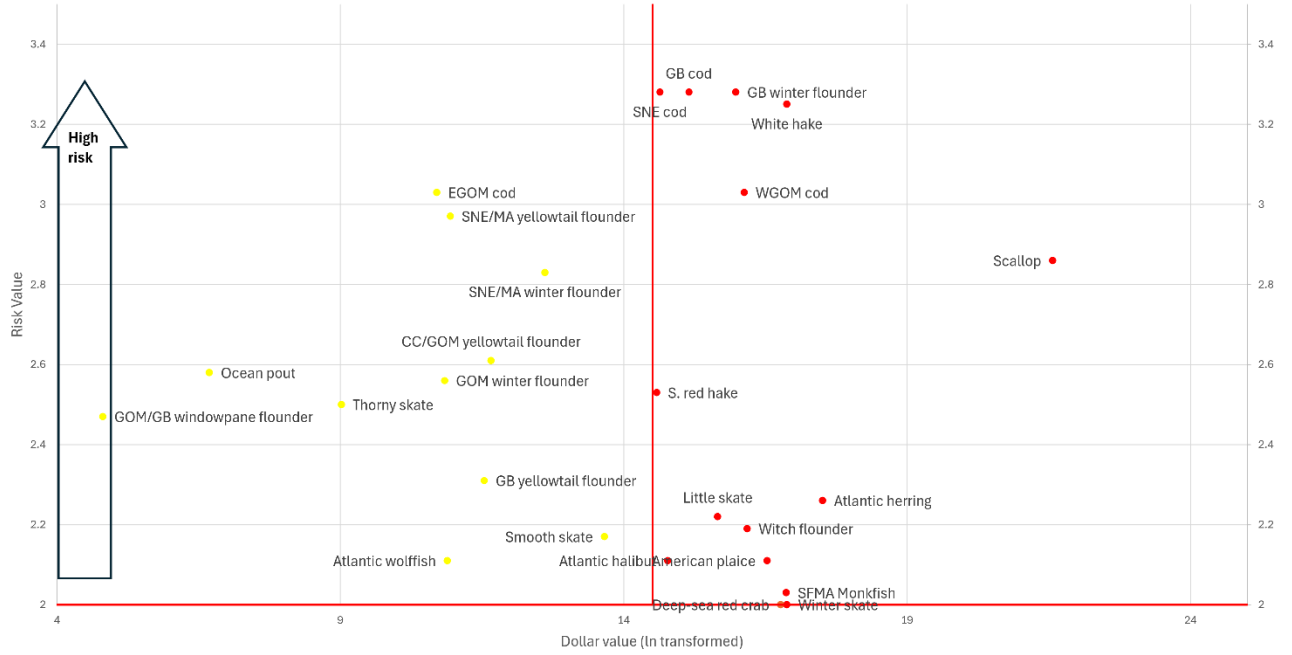
6. NEFMC, Low value stocks, Both high and low Risk Quadrants



7. NEFMC, Low risk stocks, Both high and low value quadrants



8. NEFMC, High risk stocks, Both high and low value quadrants



Northeast Region Coordinating Council

Stock Assessment Process Evaluation

DRAFT

Summary and Synthesis

November 3, 2026

DRAFT Prepared by staff from the

New England Fishery Management Council

For review by the

Northeast Region Coordinating Council

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Executive Summary

The Northeast Region Coordinating Council (NRCC) administered a questionnaire, *NRCC Stock Assessment Process Evaluation*, in the fall of 2026 to solicit broad stakeholder feedback about the Research Track and Management Track stock assessment framework. The goal of the evaluation was to assess how well the current dual-track system meets its core objectives, including scientific rigor, predictability, timely advice, stakeholder engagement, and efficient resource allocation, and to identify areas for improvement.

The questionnaire was distributed to all NRCC partner networks, and fifty-five individuals responded, including members of the fishing industry and science and management communities. All responses were combined and summarized for each question and synthesized into an overarching evaluation of the stock assessment framework, peer review process, and public engagement strategies with recommendations to meet core objectives and improve the regional system.

Overall, the evaluation indicated that the Research Track – Management Track framework meets objectives for scientific rigor and timely advice for management, but the system suffers under structural and procedural constraints. The Research Track process was primarily viewed favorably related to dedicated time for scientific exploration, integration of environmental and ecosystem information, and rigorous peer review, while also suffering from extended duration and analyst/working group burnout. The Management Track process had mixed reviews highlighting success in the timely delivery of advice for management and challenges with rigid procedural structure and divergent perspectives on the peer review process. Respondents shared several ideas for process change and improvement and provided recommendations ranging from data treatment efficiencies to system overhaul.

<u>Recommendations</u>

- **Management Track Flexibility and Governance**
  - **Allow Intermediate Model Adjustments:** Replace strict assessment update rules with defined guardrails allowing minor to moderate parameter changes and alternative model structures during routine updates.
  - **Predefine Protocols for Failed Terms of Reference (TORs):** Establish clear, standardized action plans and fallback options when a Management Track assessment fails to meet a TOR or passes peer review with major caveats.
  - **Re-Align Spring Review Timelines:** Shift spring (June) Management Tracks to later in the calendar (e.g., August/September) or back up the terminal data year to prevent analysts from being rushed by late-arriving survey and catch data.

- **Bridging Research Tracks to Management Advice**
  - **Evaluate Catch Advice and Projections in Research Tracks:** Request Research Tracks to evaluate reference points, projections, and catch advice implications during model development, rather than approving models in the abstract that can lead to surprises during subsequent updates.

    - **Tighten and Focus TOR Scope:** Shift from broad Research Track TORs to prioritized TORs targeted at a stock's primary scientific uncertainties.
    - **Streamline Meeting Structures:** Replace frequent whole-group Research Track meetings with smaller, targeted technical sub-teams, reserving full working group meetings for major milestones.

- **Peer Review Governance and Accountability**
    - **Screen for Model-Specific Expertise:** Match reviewer expertise to specific modeling platforms, especially advanced state-space frameworks like WHAM, and conduct pre-review orientation sessions.
    - **Enforce TOR Scope Guardrails:** Ensure panels do not relitigate previously accepted baseline decisions unless new scientific evidence is presented.
    - **Maintain Reviewer Continuity:** Assign Management Track chairs who observed or participated in the preceding Research Track to preserve institutional knowledge across cycles.
    - **Ensure Report Integrity:** Provide post-review guidelines so panels understand what may be reflected in peer review reports.

- **Workload Delegation and Regional Partnerships**
    - **Dismantle the Assessment Monopoly:** Formally delegate specific Research Track working group tasks, data preparation, and modeling runs to state agency scientists, academic postdocs, and graduate students.
    - **Automate Data Compilation Pipelines:** Automate data extraction and QA/QC workflows to free up analyst time for modeling and diagnostics.
    - **Prioritize Cross-Cutting Methodological Tracks:** Focus research capacity on region-wide, multi-stock methodological challenges (e.g., state-space diagnostics, climate covariates, dynamic reference points/projections) before returning to single species Research Tracks.

Introduction

Background

The Northeast Region Coordinating Council (NRCC), comprising leadership from the Atlantic States Marine Fisheries Commission (ASMFC), Greater Atlantic Region Fisheries Office (GARFO), Northeast Fisheries Science Center (NEFSC), Mid-Atlantic Fishery Management Council (MAFMC), and New England Fishery Management Council (NEFMC), is tasked with prioritizing, communicating, and coordinating marine fisheries science and management resources across the Greater Atlantic region. In 2025, changes in federal priorities interrupted the NRCC's routine stock assessment scheduling process, including pausing most Research Track assessments and altering the schedule of Management Track assessments. In response, the NRCC initiated a regional evaluation to solicit stakeholder feedback about the effectiveness of the dual-track Research Track and Management Track framework prior to adopting a new five-year assessment schedule.

In May 2026, the NRCC established an Action Item directing member organizations to distribute a questionnaire to evaluate operational successes and identify opportunities for structural improvement across both assessment tracks. The NEFMC was designated as the lead entity to draft, distribute, and compile the findings.

The *NRCC Stock Assessment Process Evaluation* was broadly distributed in mid-August 2026 across all NRCC partner networks. The distribution pool encompassed voting members and staff from ASMFC, MAFMC, and NEFMC; staff from NEFSC and GARFO; members of regional Scientific and Statistical Committees (SSCs) and the Assessment Science Committee (ASC); chairs, panelists, and working group members from past Research and Management Track peer reviews; and broader state, federal, and international partners. Recipients subsequently forwarded the questionnaire within their professional networks, further expanding respondent reach. Developed in Google Forms, the questionnaire structure was vetted and refined by all NRCC partner agencies. Individual submissions were directed confidentially to NEFMC staff. While the primary submission deadline was September 30, 2026, all responses received through the final closing date of October 6, 2026, were incorporated into the final analytical dataset.

Compilation, Analysis, and Synthesis of Responses

NEFMC staff compiled all submissions received between August 17 and October 6, 2026. Submissions included Personally Identifiable Information (PII) in the form of email addresses, which were gathered solely to verify respondent authenticity as active process stakeholders; this information was excluded from all analyses and summaries. The questionnaire analyst was not a respondent.

The dataset was compiled in Microsoft Excel. Quantitative metrics were evaluated using standard Excel analytical tools, while open-ended qualitative responses were analyzed using Google Gemini AI software. All AI-assisted analytical tasks are explicitly documented throughout this report, including the prompt structures and execution tasks utilized.

The final dataset comprises 55 individual responses representing a broad cross-section of regional fisheries stakeholders, including federal, state, and independent scientists, fishery managers, and fishing industry members. To provide the NRCC with an overarching baseline of regional sentiment regarding process efficiency, application, and advisory outputs, primary synthesis was conducted at an aggregate level across all respondent categories without segmenting specific user groups. Granular sub-group analyses remain feasible using this dataset, including targeted comparative analyses across specific respondent groups. NRCC may consider additional analyses under Next Steps.

Report Structure

This report directly mirrors the structure and sequential heading framework of the evaluation questionnaire. All graphical representations reflect the complete respondent dataset. Each section features AI-assisted qualitative syntheses categorized into **Key Takeaways**, **Common Themes**, and **Unique Perspectives**.

Qualitative summaries were generated using standardized AI prompts applied consistently across all open-ended questions. Specifically, the Gemini prompt stated, "*Summarize information by identifying "Key Takeaways", "Common Themes", and "Unique Perspectives".* Because identical qualitative prompts were executed systematically across separate survey sections, certain overarching themes and observations are repeated throughout the document. Automated outputs were manually audited and edited strictly to:

- Correct clear typographical, spelling, or acronym errors;
- Consolidate duplicative entries where respondents repeated statements across multiple fields; and
- Strip subjective emphasis or unprompted modifiers (e.g., removing terms like "extremely" or "significant") to ensure neutral reporting.

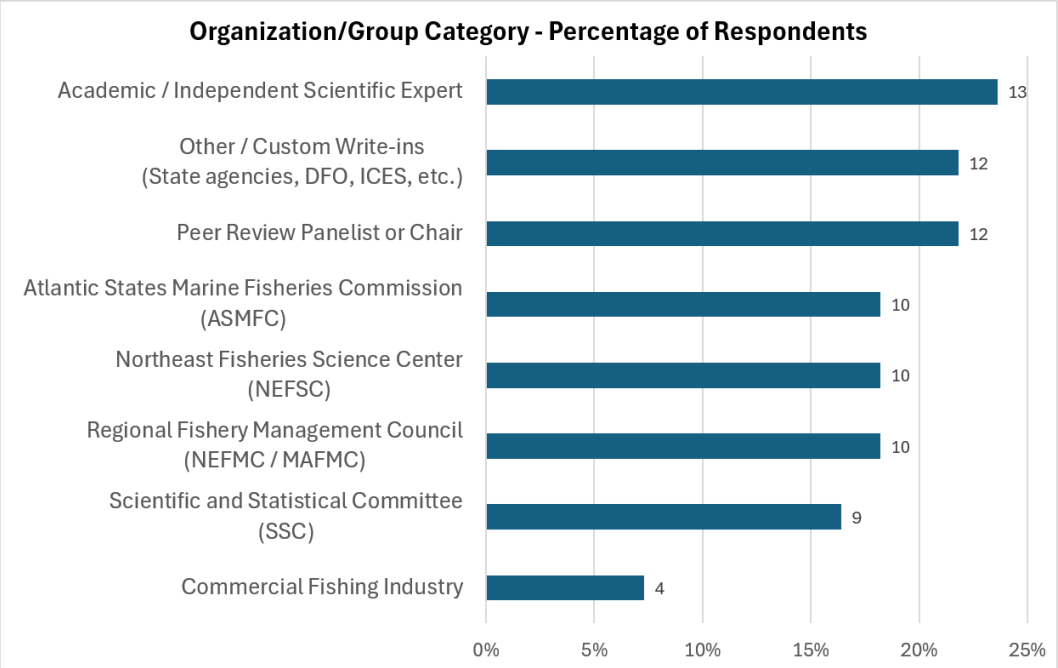
Interpretation and Applications

This evaluation and synthesis report provides high-level, region-wide information to support upcoming NRCC strategic discussions regarding stock assessment process, priorities, products, and multi-year scheduling. The 55 responses provide a wealth of information that can be further analyzed to address specific NRCC questions, inform multiple topics ranging from process reform to building better partnerships, and improve the overarching industry-management-science approaches in the Greater Atlantic region.

Respondent Profile

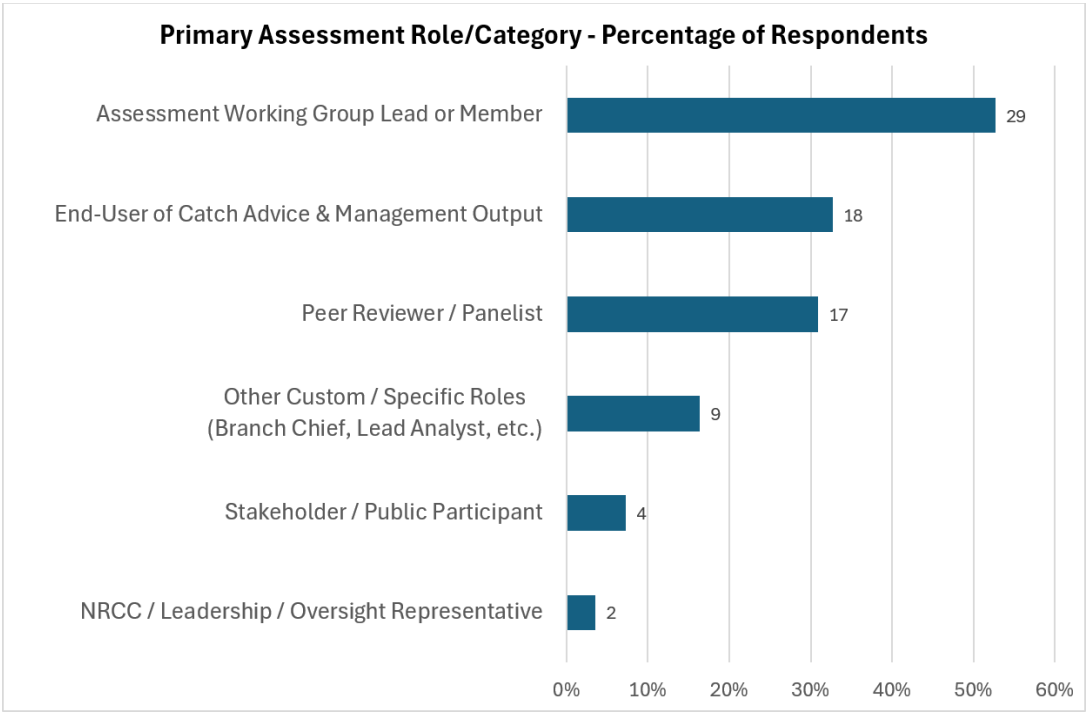
Question 1

Which primary group or organization do you represent? *(Select all that apply)*



Question 2

What has been your primary role in the stock assessment process over the past 3-5 years? *(Select all that apply)*



Key Takeaways

- **Strong Interest in Topic:** There were 55 individual responses to the questionnaire between August 11 and October 6, 2026.

- **High Representation of Working Group Members:** Over half of all respondents served as Assessment Working Group Leads or Members.

- **Balanced Organizational Diversity:** Response representation across NRCC entities, (e.g., Councils (10), NEFSC (10), and ASMFC (10)), is evenly distributed. Additionally, there were high response rates from Academic/Independent Experts (13) and Peer Review Chairs/Panelists (12).

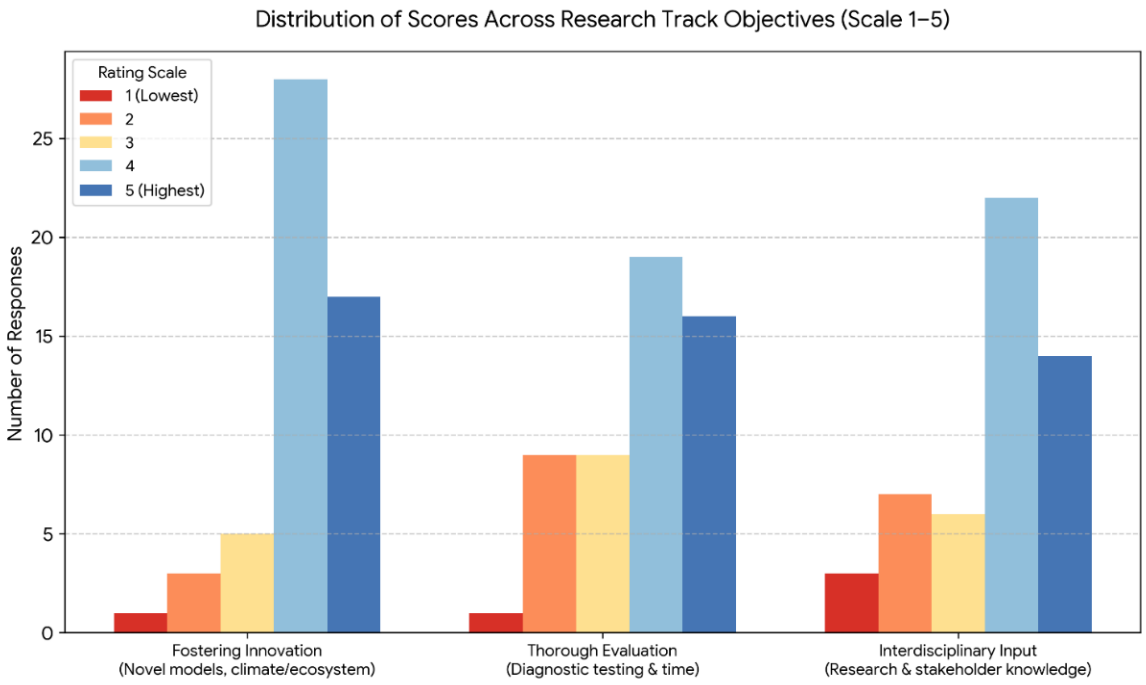
- **Multi-Role Participation:** Many respondents selected multiple roles and organizational affiliations, reflecting significant overlap between research, review, and management participation.

Research Track Assessments

Question 3

On a scale of 1 to 5 (1=Poor, 5=Excellent), how effectively do Research Track assessments achieve the following:

- **Fostering Innovation:** Exploring novel and complex model structures, ecosystem drivers, or climate variables
- **Thorough Evaluation:** Allowing sufficient time for diagnostic testing and data evaluation
- **Interdisciplinary Input:** Incorporating scientific research and stakeholder knowledge into advancing model development and/or understanding of stock dynamics



Key Takeaways

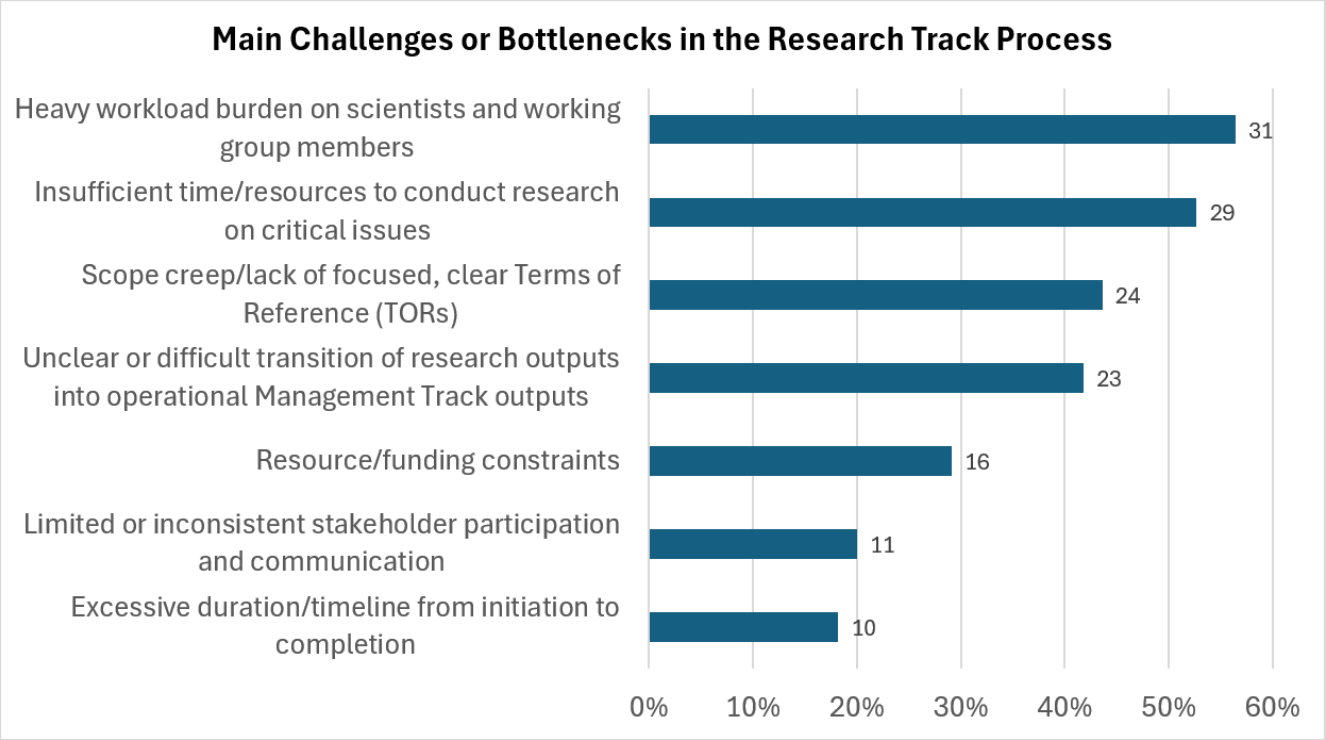
1. **Fostering Innovation received the highest score for Research Track effectiveness:**
   - **Mean Score: 4.06 out of 5.0**.
   - **Strong Consensus: 83.3%** of respondents rated this topic as either a 4 or 5. Only four respondents gave it a low rating (1 or 2), demonstrating satisfactory views that the Research Track process is effective at exploring novel and complex model structures, ecosystem drivers, or climate variables in assessment approaches.

2. **Strong Overall Support Across All Categories:**
   - All three topics received positive evaluations with average scores above 3.5.
   - A majority of respondents rated every objective as a 4 or 5, ranging from **64.8%** to **83.3%**.

3. **Greater Divergence on Time and External Input:**
    - While still favored overall, **Thorough Evaluation** and **Interdisciplinary Input** showed lower satisfaction, with **~19%** of respondents rating Research Tracks less effective in achieving these objectives (1 or 2).
    - Interdisciplinary Input had the highest number of "No Opinion" responses (3).

Question 4

What are the main challenges or bottlenecks in the Research Track process? *(Select top 3)*



Key Takeaways

1. **Workload Burden & Capacity Deficits Top the List:**
    - #1 Bottleneck: Over half of respondents (56%, 31 responses) cited heavy workload burdens on scientists and working group members as a major issue.
    - Time Constraints: 53% (29 responses) reported insufficient time/resources to conduct research on critical issues, indicating operational constraints that may be related to scope creep and/or lack of focused TORs.

2. **Process Clarity & Scope Issues Are Widespread:**
    - Scope Creep: 44% (24 responses) pointed to scope creep and unfocused TORs as major challenges. Additional respondent comments specifically noted that data acquisition and compilation has taken substantial time for some Research Tracks, which has constrained time for model development and explorations.

- Operational Transition Gap: 42% (23 responses) emphasized the unclear transition of Research Track outputs into operational Management Track outputs, pointing to a gap between experimental research and routine management application.

3. **Funding, Stakeholder Engagement, and Timeline Rank Lower:**
    - General resource/funding constraints (29%), stakeholder communication (20%), and excessive overall project duration (18%) were selected less frequently, indicating that human resource constraints and workflow structure are considered greater bottlenecks than budget or duration alone.

Question 5

What specific aspects of the Research Track process are working best? Please highlight key success or effective practices.

Key Takeaways

- **High Value on Dedicated Innovation Time:** Comments indicated that the single greatest asset of the Research Track process is providing dedicated, protected calendar time for scientists and experts to deep-dive into complex stock assessments, experiment with novel model structure, and perform diagnostic tests.

- **Methodological Advancement and Transition (WHAM/State-Space):** Respondents commented that the Research Track process has successfully modernized stock assessment methodology across the region. Topical research tracks, such as the State-Space Modeling and Index-Based Methods, are cited as successes that address broad, cross-cutting challenges, and are viewed as efficient because their outputs apply across multiple stocks rather than just one.

- **Effective Multi-Institutional Collaboration:** Comments suggested that Research Tracks serve as a forum for bringing together diverse scientists from NOAA/NEFSC, regional Fishery Management Councils, ASMFC, state agencies, and academic institutions.

- **Substantial Progress on Climate and Ecosystem Drivers (TOR 1):** Many comments praised the Research Track approach to address Term of Reference 1 as providing a structured, consistent mechanism to incorporate environmental, oceanographic, and ecosystem factors into assessments (directly and indirectly).

- **Process Effectiveness is Dependent on Leadership and Group Dynamics:** Commenters suggested that successful Research Tracks rely on assertive, well-organized Working Group Chairs who set clear expectations, manages scope, and actively delegates tasks early.

Common Themes

1. Innovation, Methodological Rigor, and Deep-Dives

- **Dedicated Scientific Inquiry:** Allows researchers space away from routine management deadlines to evaluate candidate models, perform diagnostic runs, and evaluate long-term research questions.
- **Integration of New Data Sources:** Facilitates the introduction of novel data inputs, including spatial dynamics, environmental variables, and industry-collaborative datasets.

2. Broad Expertise, Inclusivity, and Transparency

- **Interdisciplinary and Cross-Institutional Teams:** Enlist expertise beyond federal science centers, incorporating academic faculty, students, state scientists, and Council staff.
- **Public and Stakeholder Openness:** Regular public meetings foster buy-in, transparency, and collaboration with commercial industry and regional partners.
- **Vetted Peer Review:** Independent peer review panels and intensive review weeks provide scrutiny, quality control, and scientific credibility.

Unique Perspectives

- **Divergent Views on Efficiency / Sustainability:**
  - One respondent stated that the Research Track process is an unsustainable heavy drain on resources and recommended exploring alternative structures.
  - Another respondent noted that the Research Track process feels no different than the former Benchmark/Update system, because the indirect pipeline to Management Track assessments keeps management pressures attached.
- **European / ICES Comparative Praise:** An international respondent was impressed with the depth and extent of Research Track analyses compared to ICES benchmark processes, which are more limited in scope.
- **Socioeconomic Gaps:** A respondent highlighted that despite progress on climate and ecosystem drivers, socioeconomic inputs remain lacking in applications.
- **Post-Acceptance Disconnect with Management Output:** A participant noted a disconnect where a Research Track was accepted, but the resulting Management Track forecast uncertainty surprised management bodies, complicating decision-making.
- **Lack of Process Synthesis:** A participant pointed out that while considerable innovation occurs during individual Research Tracks, there has been little synthesis of lessons learned across working groups to refine the overall process and Terms of Reference over time.

Question 6

What concrete changes would help address challenges and bottlenecks? Please indicate the challenges and your suggested changes.

Key Takeaways

- **Narrow and Prioritize Terms of Reference (TORs):** Respondents strongly advocate shifting from broad, "turn over every rock" TORs to tightly focused, prioritized TORs targeted strictly at a stock's primary scientific uncertainties.

- **Shift Burden Off Lead Assessment Scientists:** Comments suggested that Working Group Chairs and leads need clear authority to delegate tasks to external members, recruit active contributors, and rely on existing, previously reviewed data products rather than re-evaluating baseline data inputs from scratch.

- **Bridge the Research Track to Management Track Transition:** Respondents commented that the gap between Research Track completion and Management Track implementation causes delays and post-review surprises. Recommendations include removing the immediate Management Track update, including reference points and catch advice/projections directly in the Research Track, or providing a "dry run" / longer buffer period before Management Track implementation.

- **Streamline the Meeting Structure and Administrative Process:** With some Research Tracks holding over 40 public meetings, respondents urge replacing whole-group administrative webinars with smaller, targeted technical sub-teams while reserving full working group meetings for major decisions and milestones.

- **Mandate Early Partner and Stakeholder Engagement:** Comments suggested that institutional partners, such as Council committees, ASMFC, and states, as well as stakeholders, must engage during early Research Track development rather than raising fundamental objections during subsequent Management Track reviews.

Common Themes

1. Scope Control and Data Reuse

- **Protect Core Priorities:** Comments recommended that working groups should avoid routinely reopening previously resolved data processing, survey standardization, or baseline parameters unless new scientific evidence warrants it.
- **Focus on Modeling over Data Management:** Several respondents emphasized streamlining data assembly early through centralized data systems, so working groups can devote time to evaluating variables, model development, and diagnostic testing.

2. Workload Distribution and Resource Allocation

- **Active Working Group Contribution:** Participants recommended addressing the issue of passive working group participation by setting clear expectations, delegating explicit tasks, and formally funding academic or student involvement.

3. Transition and Governance Efficiency

- **Clear Policy on the "Pause":** Comments requested clear, upfront communication regarding the status, schedule, and potential unpausing of the Research Track process.
- **Standardized Reporting and Visualization:** Participants requested standardized templates and visual diagnostics to summarize complex model runs (e.g., WHAM outputs).

Unique Perspectives

- **Abandon the Research Track Model Entirely:** A respondent from another region noted they are moving away from the Research Track – Management Track approach because all

assessments fall on a spectrum between simple updates and deep-dives; they advocated for strict TORs and fixed deadlines.

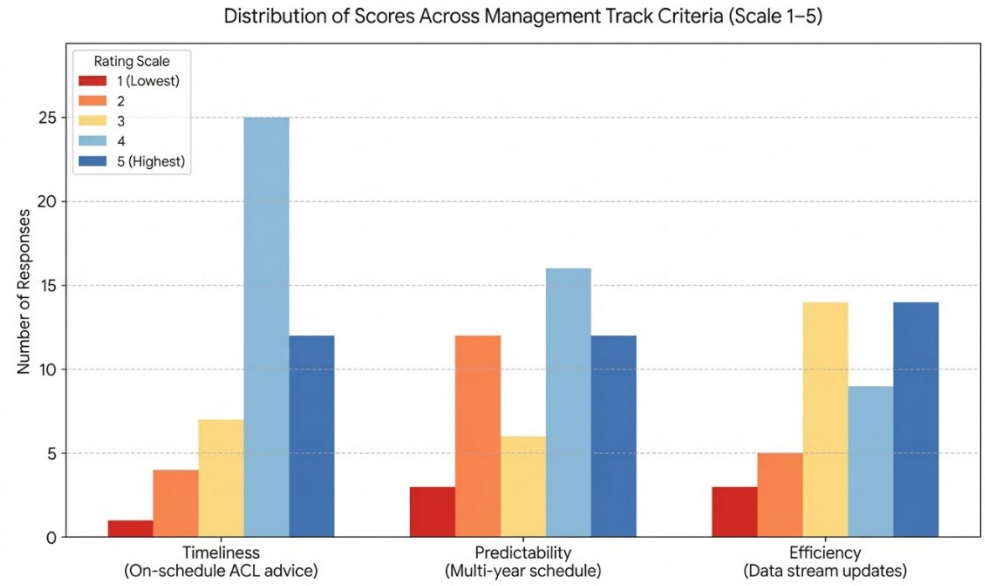
- **Subject-Based (Thematic) Working Groups:** Instead of organizing working groups solely by individual species, a participant recommended creating permanent subject-based working groups (e.g., dedicated groups for environmental variables, spatial modeling, or model-based indices) to build regional cross-stock expertise.
- **Academic/Graduate Student Funding Pipelines:** A respondent suggested formal grant and funding structures to support graduate students and postdocs engaging in Research Track activities, creating a direct workforce pipeline for stock assessment science.

Management Track Assessments

Question 7

On a scale of 1 to 5 (1=Poor, 5=Excellent), how effectively do Management Track assessments achieve the following:

- **Timeliness:** Delivering management advice on schedule for setting annual catch limits
- **Predictability:** Maintaining a clear, multi-year assessment schedule for regional planning
- **Efficiency:** Updating data streams without excessive workloads



Key Takeaways

1. **Timeliness received the highest score for Management Track effectiveness:**
   - **Mean Score:** 3.88 **out of 5.0**.
   - **Broad Consensus: 76%** of respondents with an opinion rated this topic as either a 4 or 5, indicating general satisfaction with the effectiveness to deliver management advice on schedule for setting Annual Catch Limits (ACL).

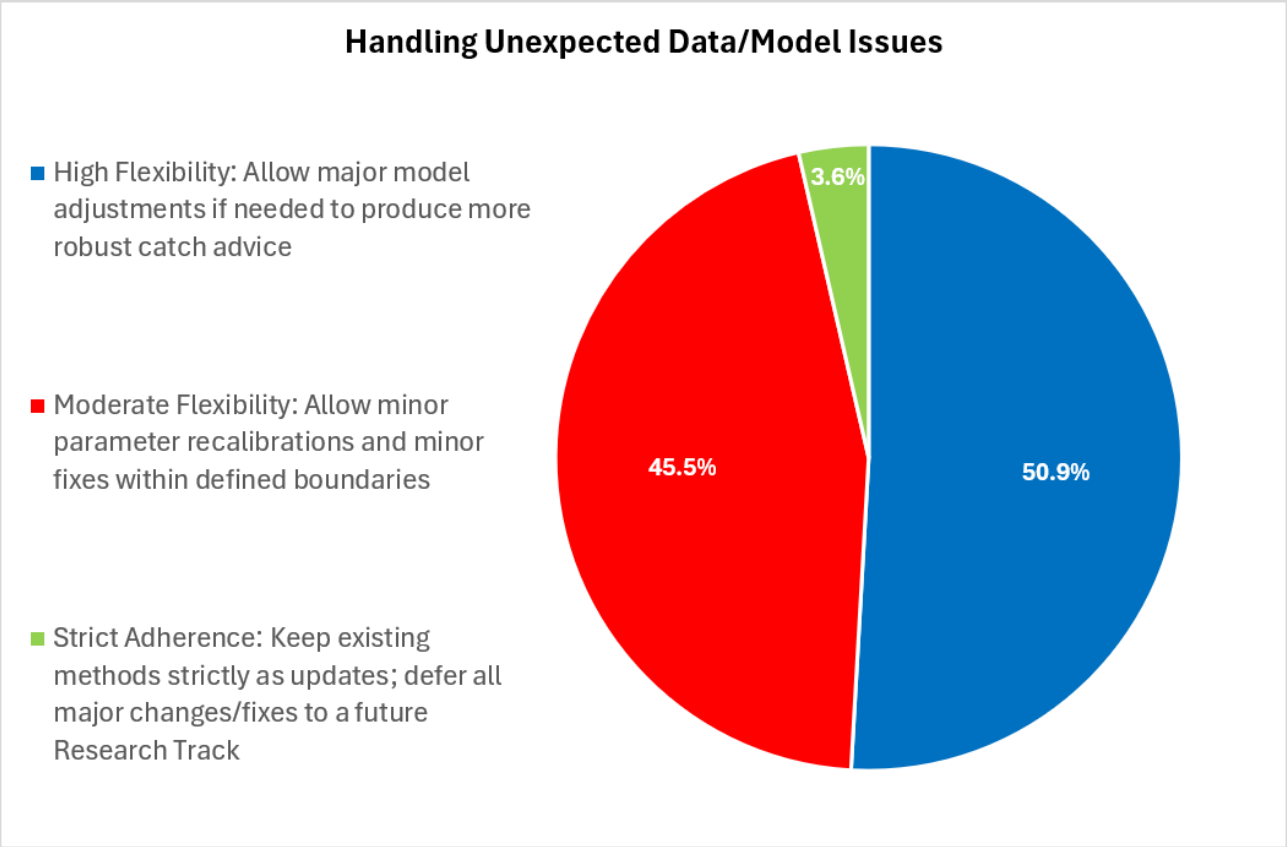
2. **Predictability showed regional dissatisfaction**
   - **Highest Conflict/Divergence:** Over **30%** (15 respondents) rated Predictability poorly (1 or 2), representing the largest concentration of dissatisfaction across all three Management Track evaluation criteria.

3. **Efficiency reflected ambiguity or neutrality**
   - **High Neutrality:** Over **31%** (14 respondents) selected a neutral rating of 3, and **18%** of all total survey participants (10 out of 55) selected "No Opinion", which was the highest non-response rate in the dataset.
   - **Response Variation:** The high proportion of neutral and "No Opinion" responses may indicate that the efficiency of updating data streams (landings, survey indices, age structure) varies widely depending on the specific stock, data availability, or participant role.

Question 8

How much flexibility should assessment teams have during a Management Track update when unexpected model performance issues or data anomalies arise?

- **Strict Adherence:** Keep existing methods strictly as updates; defer all major changes/fixes to a future Research Track
- **Moderate Flexibility:** Allow minor parameter recalibrations and minor fixes within defined boundaries
- **High Flexibility:** Allow major model adjustments if needed to produce more robust catch advice



Key Takeaways

1. **Strong Support for Adaptability (96% Combined):**
    - A vast majority of respondents (53 out of 55) favor giving assessment teams some degree of flexibility (either High or Moderate) to resolve unexpected issues during Management Track updates rather than forcing strict adherence to procedural guidance around Research Track and Management Track allowances.

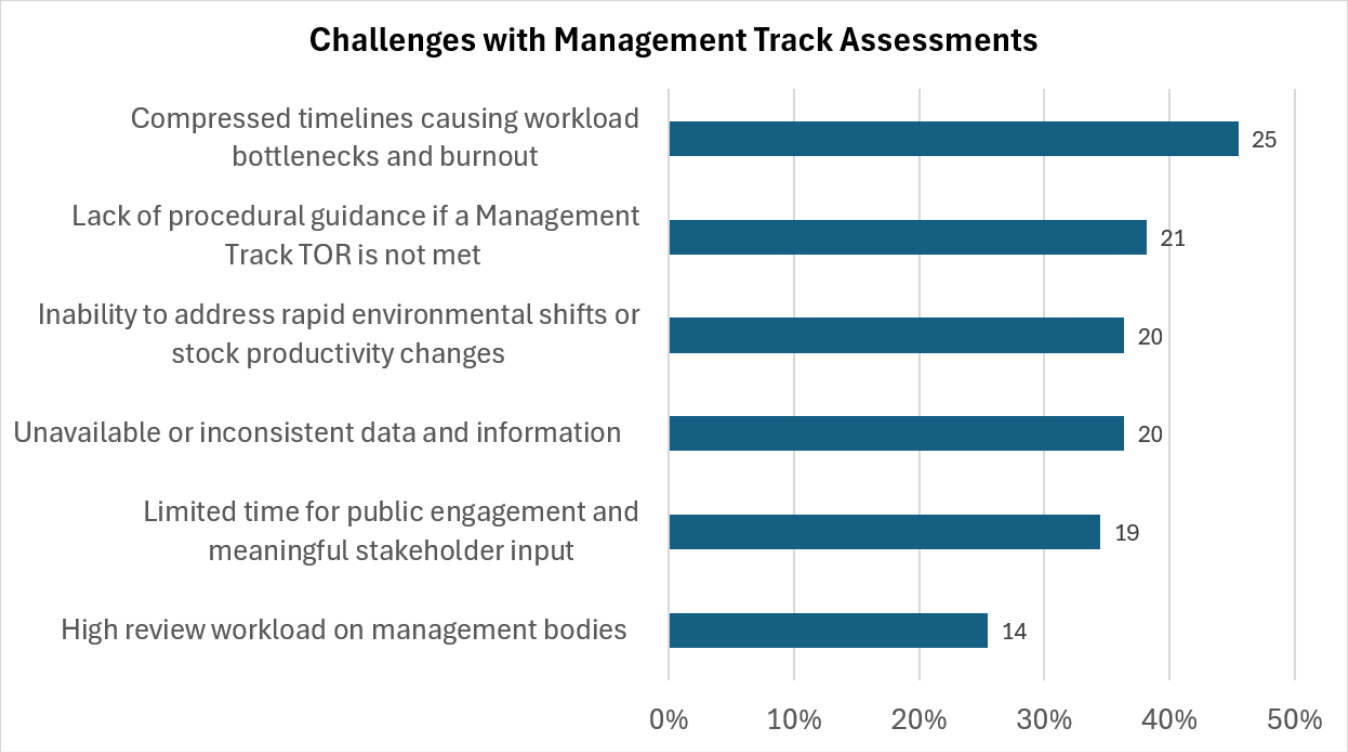
2. **Slight Preference for High Flexibility:**
    - **51%** (28 respondents) support **High Flexibility**, allowing major model adjustments during updates if doing so produces more scientifically robust catch advice.

- **46%** (25 respondents) prefer a more structured **Moderate Flexibility**, allowing minor parameter recalibrations and fixes only within clearly defined guardrails.

3. **Rejection of Rigid Process Boundaries:**
   - Only **4%** (2 respondents) support **Strict Adherence** to existing methods. Deferring all fixes to a future Research Track is viewed as impractical when immediate management advice is required.

Question 9

What challenges have you encountered with Management Track assessments? *(Select top 3)*



Key Takeaways

- **Timeline Compression and Workload Burnout Top the List:** Almost half of all respondents (**46%**, 25 responses) cited **compressed timelines causing workload bottlenecks and burnout** as the primary challenge in Management Track assessments.

- **Procedural Ambiguity When TORs Fail: 38%** (21 responses) pointed to a critical procedural gap: the **lack of predefined guidance or actionable protocols** when an assessment fails to meet its TORs.

- **Rigidity vs. Environmental Realities: 36%** (20 responses) emphasized challenges with Management Tracks adequately addressing **rapid environmental shifts or stock productivity changes**.

- **Data Availability and Stakeholder Constraints:** Data issues (**36%**) and limited windows for stakeholder involvement (**35%**) were reported as challenges.

Common Themes from Write-in ("Other") Comments

1. **"Handcuffed" Analysts and Strict Rule Constraints:**
    - Respondents expressed frustration with rigid rules governing what can be altered during a Management Track.
    - Review panel respondents indicated challenges associated with binary **pass/fail options** with insufficient scope or time to investigate underlying model anomalies that emerge during peer review.

2. **Peer Review Quality and Interaction Dynamics:**
    - Several respondents raised concerns regarding **peer reviewer qualifications, inconsistent review quality, and inflexible team dynamics** during review meetings.
    - Comments indicated that modest model tweaks or suggestions for improvement during review meetings are frequently ignored unless they are so severe that they trigger model rejection.

3. **Isolation and External Collaboration Deficits:**
    - Commenters noted a **lack of external (non-NEFSC) input** prior to peer review, placing the entire burden on individual science center assessment leads working in isolation.
    - Comments also suggested that concurrent assessment schedules create competing analytical demands when the same individual supports multiple stock assessments simultaneously.

Question 10

What features of the Management Track process are most useful in meeting regulatory and management needs? Please highlight key successes or effective practices.

Key Takeaways

- **High Value on Predictable, On-Time Advice Delivery:** The primary strength and core success of Management Track assessments noted by respondents is providing predictable, regular, and timely scientific catch advice and reference points required for setting ACLs and meeting statutory regulatory deadlines.

- **Data Availability Bottleneck for Spring Management Tracks:** The timing of spring (June) Management Tracks was cited as a critical operational friction point; required survey, catch, and biological data are often not available until May at the earliest. This leaves assessment leads only weeks to process data, run models, conduct sensitivity analyses, and draft reports, increasing the risk of errors and preventing research recommendations from being addressed.

- **Tradeoff in Terminal Year Adjustments:** Proposals to move back the terminal data year in Management Tracks were cited as a science-management tradeoff: increasing the lag between the terminal year and management advice gives analysts more preparation time but also increases projection uncertainty and reduces forecast reliability.

Common Themes

1. Predictability, Workload Planning, and Scope Control

- **Advance Planning:** Respondents indicated that published multi-year assessment schedules allow federal/state agencies, Council staff, and scientific bodies to plan data provision and balance analytical workloads in advance.
- **Focused Scope:** Also indicated was that standardized NEFSC report formats, a tiered system of assessment levels, and strictly defined TORs may keep assessments focused and prevent scope creep.

2. Operational Efficiency ("Turn of the Crank")

- **Streamlined Timelines:** Participants noted that Management Tracks achieve efficiency by eliminating lengthy data workshops, multi-day webinars, and extended peer review panels required for Research Tracks.
- **Rapid Check-Ins:** Similarly, comments suggested that limiting major structural model redesigns enables rapid "turn of the crank" updates across a high volume of regional stocks.

3. Incremental Scientific Progress

- **Bridging Science and Management:** Participants commented that Management Tracks serve as a structured mechanism to adopt incremental advances (e.g., new indices, biological inputs, ecosystem covariates) while maintaining continuity with peer-reviewed frameworks.

4. Pragmatic Action Over "Perpetual Perfectionism"

- **Enforcing Deadlines:** Commenters noted that the rigid schedule compels timely advice delivery for management, preventing scientists from postponing advice due to endless model tweaking.

Unique Perspectives

- **SSC Overreach and Late-Stage Stakeholder Friction:** One respondent noted that when primary models underperform unexpectedly, fallback empirical methods are triggered, leading SSCs to function as secondary reviewers. Additionally, stakeholder engagement often occurs late at the SSC stage rather than early, stimulating debate late in the process.
- **Major Data Recalibration Barriers (e.g., MRIP):** A respondent highlighted that overly rigid update rules hinder "Best Available Science" when major data recalibrations occur, such as MRIP survey recalibrations, which require adjustments beyond minor parameter tweaks.

Question 11

What concrete changes would help address challenges and bottlenecks?

Key Takeaways

- **Fix Data Availability and Adjust Assessment Timing:** Spring (June) Management Tracks suffer from data availability bottlenecks, as survey and landings data are often not ready until May. Respondents strongly recommend shifting timelines (e.g., to August/September) or automating data compilation and QA/QC pipelines to give analysts sufficient time to process data, run models, and conduct diagnostic testing.

- **Expand Flexibility During Management Tracks:** Participants noted that rigid adherence to prior rules prevents analysts and peer reviewers from addressing unexpected model performance issues or rapid environmental shifts. End-users and scientists urge allowing greater flexibility to incorporate minor-to-moderate model adjustments, alternative structures, or intermediate "Plan B" models without needing to wait multiple years for a Research Track.

- **Bridge the Disconnect Between Research and Management Tracks:** A noted point of failure occurs when Research Tracks evaluate models purely in the abstract without examining projections, reference points, or catch advice implications. Recommendations included testing management outputs directly during the Research Track to eliminate late-stage "surprises" during subsequent Management Tracks.

- **Improve Peer Review Governance and Accountability:** Respondents highlight several review-stage breakdowns, including peer reviewers relitigating previously accepted decisions (e.g., natural mortality), reviewers lacking specialized modeling expertise (e.g., state-space/WHAM), and panels making post-review report edits without public discussion. Proposed solutions include establishing a reviewer rating system, enforcing strict rules of engagement, and maintaining reviewer continuity across cycles.

Common Themes

1. Process Flexibility and Procedural Guidance

- **Predefined Protocols for Failed TORs:** Commenters suggested establishing clear procedural guidelines for what happens when a TOR is "not met" or "partially met," including predefined contingency plans and fallback options.
- **Relitigating Settled Decisions:** Commenters suggested enforcing pre-review guidance, so peer reviewers focus on new data and changes since the last assessment, rather than reopening previously accepted baseline assumptions without new scientific evidence.

2. Communication and Stakeholder Engagement

- **Preemptive and Realistic Communication:** Moving away from poorly attended early webinars in favor of hosting public webinars within six months of reviews was recommended. Similarly, preemptive communication of model platform changes that

cause scale shifts to was cited as an approach to manage stakeholder expectations before catch advice is delivered.

- **Demystifying Internal Center Processes:** Some NEFSC respondents recommended increased internal education and outreach among leadership and staff to clarify the roles of administrative bodies like the Assessment Oversight Panel and Assessment Working Group, which were referred to as "black boxes" to many scientists and managers.

3. Report Quality and Transparency

- **Detailed Reports Over Excessive Streamlining:** Respondents recognized that while streamlined reports save time, excessive brevity excludes critical context. Standardizing reports to include full time-series data tables (SSB, Recruitment, Fishing Mortality) and detailed descriptions of methodology may be useful.
- **Tracking and Acting on Reviewer Suggestions:** Respondents recommended establishing a formal system to log modest reviewer recommendations rather than dismissing them as "out of scope" or diluting them into generic research recommendations that get lost before the next cycle.

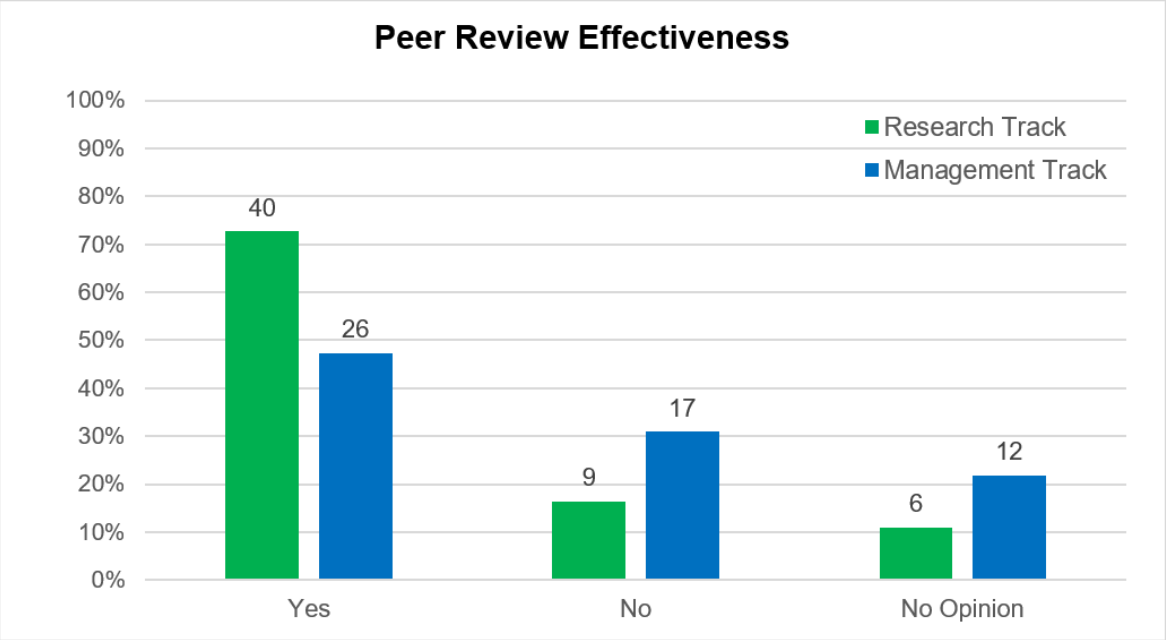
<u>Unique Perspectives</u>

- **Reviewer Behavior and Post-Review Changes:** One respondent pointed to instances where peer review panels altered TOR determinations or added new concerns in their final report *after* the public review session had concluded, calling for internal Chairs to enforce strict guardrails against such practices.
- **Reviewer Rating System:** A participant suggested implementing a formal rating system for peer reviewers to filter out unqualified or unconstructive panelists and retain high-performing, knowledgeable experts.
- **Rejection of the Entire Research Track – Management Track System:** One contributor argued that the current Research Track - Management Track - Data Update framework has failed and should be completely abolished in favor of putting all stocks on a set, predictable rotation with built-in flexibility for model changes.
- **Explicit Management Input Mapping:** A respondent suggested that when Councils set catch limits, managers should explicitly cite which specific model runs and products informed their decision, preventing analysts from wasting scarce resources on unutilized sensitivity runs.

Peer Review Process

Question 12

Is the peer review process efficient, objective, and proportional to the level of methodological changes being reviewed?



Key Takeaways

- **Strong Consensus on Research Track Peer Reviews:** Nearly three-quarters (**73%**, 40 out of 55) of respondents view Research Track peer reviews as efficient, objective, and proportional. When excluding "No Opinion" responses, approval reaches **82%**, demonstrating high confidence in the thoroughness and scientific rigor of in-depth Research Track reviews.

- **Significant Division over Management Track Peer Reviews:** Under half of respondents (**47%**, 26 out of 55) approve of Management Track peer reviews. Negative ratings nearly doubled from **16%** in Research Track to **31%** in Management Track, reflecting frustration with compressed review windows, tight timelines, and rigid update rules.

- **Uncertainty for Management Tracks:** Twice as many participants selected "No Opinion" for Management Tracks (**22%**, 12 responses) compared to Research Tracks (**11%**, 6 responses). This higher non-response rate aligns with Respondent Categories, which included more Research than Management Track reviewers.

Question 13

If you answered "No" for either assessment peer review process, please explain why.

Key Takeaways

- **Relitigating Previously Accepted Decisions:** The most significant identified bottleneck in Management Track peer reviews was panels spending time reopening and debating baseline model decisions that were already vetted and approved during a prior Research Track.

- **Reviewer Qualification and Model Familiarity Deficits ("Reviewer Roulette"):** Respondents report variable reviewer quality. Panels frequently lack familiarity with complex modeling platforms (e.g., state-space/WHAM) or regional fishery context, leading to time spent educating reviewers rather than evaluating recent methodological changes.

- **Time Constraints and Rushed Reviews:** Participants cited abbreviated review windows for Management Tracks as forcing panels to rush, increasing the risk that data errors or inconsistencies slip through.

- **Disconnect Between Research Track Method Approval and Management Track Advice:** Respondents noted that Research Tracks often approve modeling methods in the abstract without evaluating their downstream management implications. Consequently, when Management Track panels encounter issues, they are told the baseline model is "out of scope" for re-evaluation.

- **Perceived Bias and Institutional Conflict of Interest:** Some participants perceive an institutional bias that favors NEFSC data, legacy methods, and standard operating procedures over valid alternative modeling approaches. Others raise concerns about close professional familiarity between assessment scientists and recurring peer reviewers.

Common Themes

1. Inefficiency and Scope Drift in Management Track Reviews

- **Re-evaluating Settled Baseline Assumptions:** Reviewers frequently spend limited review time questioning unchanged data preparation or model structures rather than focusing on recent data updates.
- **Superfluous Reviewer Input:** Panelists expressed frustration when assessment leads display a reluctance to act on modest suggestions during review, leaving reviewers feeling their participation is superfluous.

2. Reviewer Engagement, Preparedness, and Accountability

- **Infrequent Research Tracks vs. Frequent Management Tracks:** Comments mentioned that Research Track reviews benefit from dedicated 1-week sessions where reviewers prepare thoroughly, whereas frequent Management Track reviews draw from fatigued reviewer pools who may not fully grasp procedures or TORs.

- **Subjective Determinations:** Concerns were noted regarding reviewers making determinations based on subjective "feelings of discomfort" rather than objective diagnostics.

3. Institutional Dynamics and Meeting Management

- **Defensive Dynamics and Disregard for Broad Science:** There were comments suggesting that peer review meetings sometimes include defensiveness, and topics outside core stock assessment modeling (e.g., shifting life history parameters, species ranges) can be deprioritized.
- **Multi-Layered Oversight:** Comments suggested that the Management Track process creates an excessively burdensome, multi-layered review chain, moving from Working Groups and PDTs to SSCs and the Council.

Unique Perspectives

- **Overriding Agreed Council Protocols:** A commenter noted that despite NRCC agreements permitting Council staff to speak outside formal public comment periods, sometimes the process has been inconsistent.
- **Conflating Academic Conflicts of Interest:** A participant pointed out that close professional relationships between assessment teams and recurring peer reviewers would be flagged as direct conflicts of interest in academic journal or grant reviews, suggesting credentials sometimes outweigh new scientific ideas.
- **Call to Ban Model Rejection for Accepted Baseline Methods:** A contributor argued that while research recommendations on previously accepted methods are valid, peer review panels should be prohibited from rejecting previously approved methods during routine updates to eliminate the "reviewer roulette" effect.
- **Lumping Distinct Concepts:** A respondent noted that the questionnaire lumped efficiency, objectivity, and proportionality together, arguing that a process can easily be efficient without being objective or proportional.

Question 14

Please share any suggestions to improve efficiency and/or transparency in the peer review process.

Key Takeaways

- **Specialized Reviewer Expertise is Essential:** Matching peer reviewer qualifications directly to the specific modeling platform, especially advanced state-space models like WHAM, was identified as the single most critical factor for review efficiency and quality.

- **Separation of Peer Review from Downstream Management Advice:** Respondents suggested that peer review panels must evaluate scientific rigor and logical consistency without feeling pressured to "pass" flawed models due to fears over management fallout or the absence of a "Plan B" catch advice framework.

- **Resolution of TOR Ambiguity:** Participants recommended clearer guidance and standardized protocols for instances where TORs are "partially met" or "unmet," providing predefined fallback pathways when an assessment fails peer review.

- **Sufficient Time for Post-Review Diagnostics:** Recommendations indicated that scheduling reviews earlier in the management cycle, or implementing a two-phase review structure, provides assessment leads with the time needed to produce requested sensitivity runs, address reviewer suggestions, and resolves model issues before finalizing reports.

Common Themes

1. Reviewer Selection, Preparation, and Qualification Recommendations

- **Earlier Material Distribution:** Distributing assessment reports, code/data packages, and historical technical documents well in advance prevents reviewers from spending review time catching up on prior working group decisions.
- **Model-Specific Familiarity and Screening:** Panels require pre-review orientation on specific assessment frameworks to prevent basic educational discussions from consuming review time.
- **Reviewer Selection and Continuity:** There was some support for appointing chairs with complementary expertise, maintaining reviewer continuity across cycles (e.g., assigning Management Track chairs who observed the prior Research Track), and balancing external CIE experts with regional contextual knowledge.

2. Scope Discipline and TOR Alignment

- **Enforcing Scope Boundaries:** Respondents cited the need for Review Chairs to have explicit authority to enforce scope boundaries, preventing panels from expanding discussions beyond the established TORs.
- **Direct TOR-to-Science Mapping:** Commenters suggested that assessment documents should explicitly map analytical sections to specific TORs to ensure key scientific findings are not overlooked during review.

3. Process Integrity and Transparency

- **Alignment Between Meetings and Reports:** One category of respondents emphasized that final panel summary reports must accurately reflect the discussions and conclusions reached during the public meeting, avoiding post-review edits or unvetted additions.
- **Shared Issue-Resolution Logs:** Others suggested that establishing shared logs to record deferred reviewer comments ensures past recommendations are not lost between assessment cycles.
- **Proportionality of Review:** There were mixed comments about routine Management Track updates undergoing a streamlined, less burdensome review, compared to intensive multi-day panels for more substantial methodological shifts.

Unique Perspectives

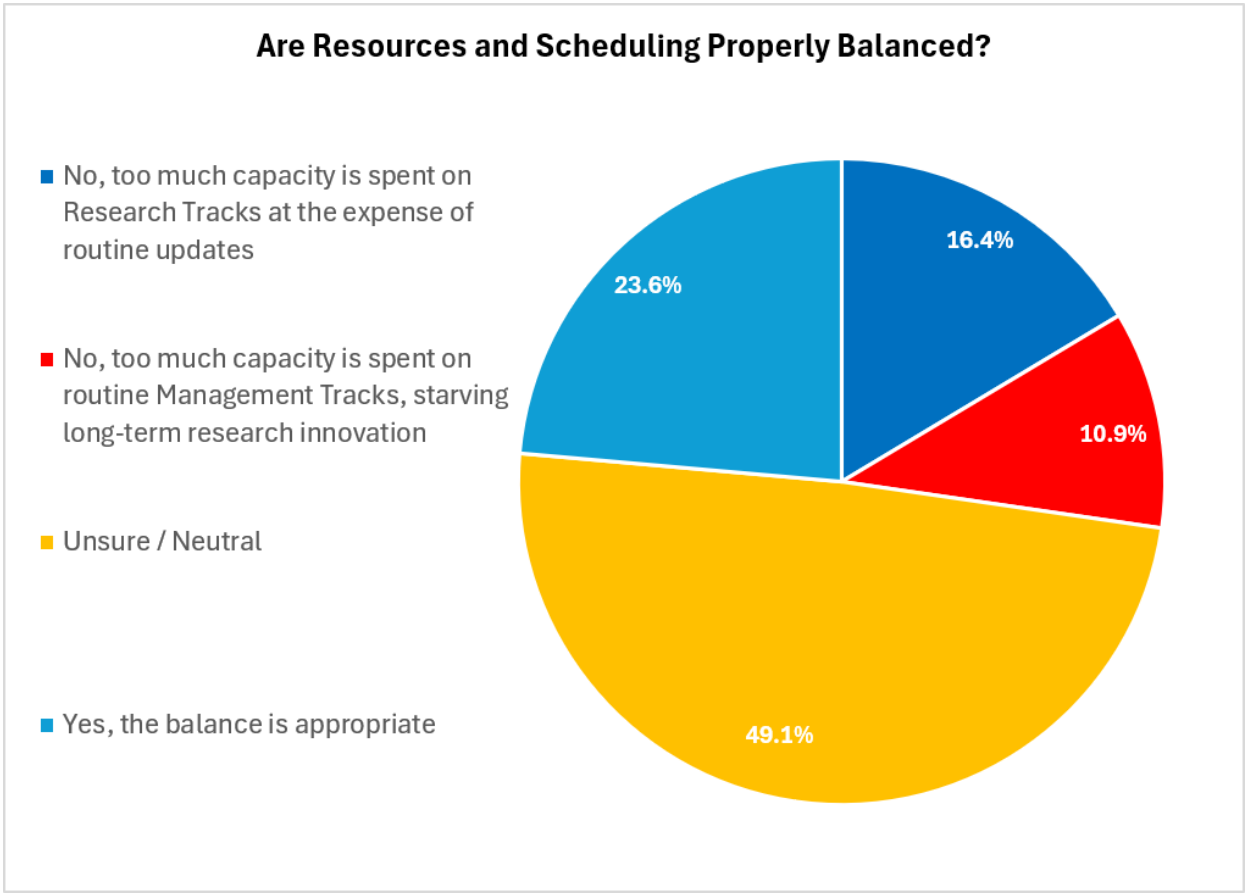
- **Neutral Third-Party Review Coordination:** A respondent proposed hiring an independent, neutral contractor funded by the NRCC (with rotating institutional funding) to coordinate reviews and draft summary reports, eliminating science center bias or defensive coordination.
- **Reviewer Performance Rating System:** A participant suggested implementing a reviewer rating system to retain high-quality panelists and filter out unprepared or disruptive reviewers, combined with pre-review interviews on core concepts.
- **Two-Phase Review Model:** To foster iteration between analysts and reviewers, one contributor proposed a two-phase review: an initial online session to request specific modifications or sensitivity runs, followed by an in-person meeting to evaluate outputs and finalize advice.
- **"Peer Review is Not Definitive Truth":** A commenter highlighted a fundamental misunderstanding across the region: peer review denotes methodological rigor and internal consistency, not absolute truth. Conflating peer review with final truth prematurely halts scientific inquiry and iterative model improvement.
- **Independent Data Review Committees:** To prevent selecting data inputs based on model fit, a respondent recommended establishing independent Data Review Committees to pre-determine datasets for inclusion.
- **Non-Technical Primers for Stakeholders:** To elevate public engagement beyond emotional commentary, a respondent suggested publishing non-technical educational primers for each model type, explaining how input data is translated into stock size and mortality estimates.
- **Enforcement of Meeting Decorum Rules:** A participant highlighted specific distractions during public review meetings and urged enforcing strict meeting decorum rules or requiring formal accommodation disclosures from all participants, including scientists, reviewers, and public observers.

Assessment Focus and Public Engagement

Question 15

Do you feel the current division of resources and scheduling between Research Track (long-term development) and Management Track (routine advice) is properly balanced to meet the region's overall goals?

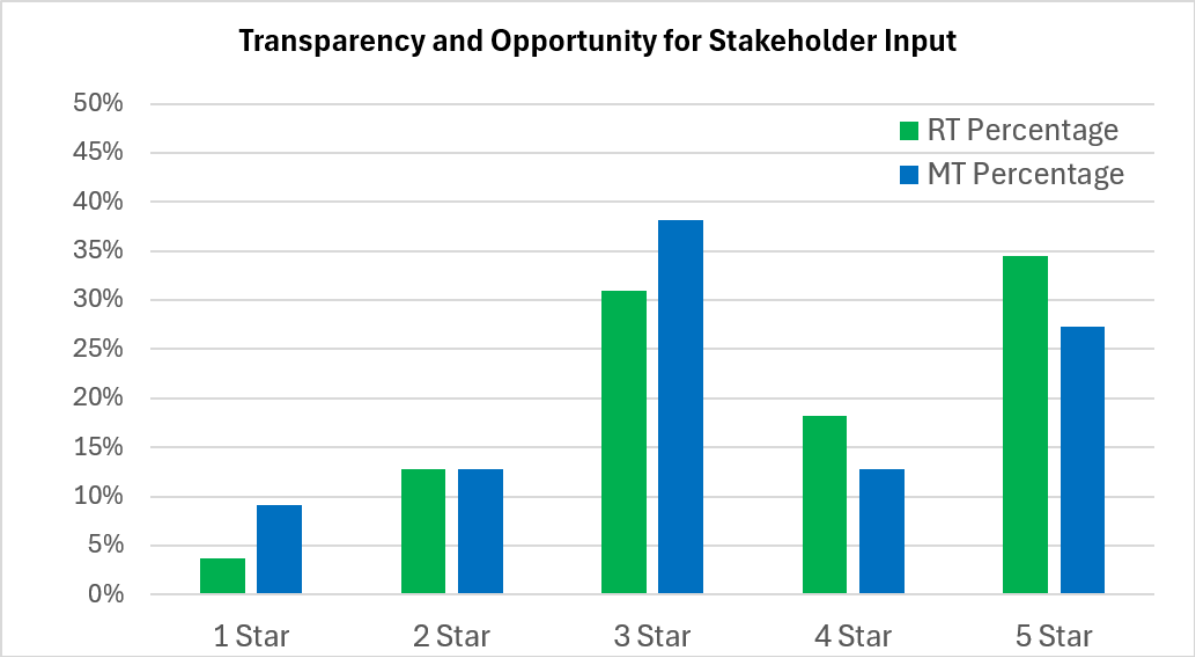
- Yes, the balance is appropriate
- No, too much capacity is spent on Research Tracks at the expense of routine updates
- No, too much capacity is spent on routine Management Tracks, starving long-term research innovation
- Unsure / Neutral



Question 16

How satisfied are you with the transparency and opportunity for stakeholder input across both assessment tracks?

- Research Track: Scale of 1 to 5 stars
- Management Track: Scale of 1-5 stars



Key Takeaways

- **High Uncertainty Regarding Resource Balance:** Nearly half of all respondents (**49%**, 27 out of 55) are **unsure or neutral** about whether resources are properly balanced between Research Tracks and Management Tracks. Only **24%** (13 respondents) explicitly agree that the current balance is appropriate.

- **Conflicting Tradeoffs Among Dissatisfied Respondents:** Among participants who feel resource allocation is unbalanced (27% combined), more respondents feel that **too much capacity is spent on Research Tracks at the expense of routine updates** (**16%**) than those who feel **Management Tracks starve long-term research innovation** (**11%**).

- **Research Tracks Outperform Management Tracks in Stakeholder Transparency:** Research Tracks achieved a slightly higher overall satisfaction rating (**3.67 out of 5.0**) compared to Management Tracks (**3.36 out of 5.0**). Over half of respondents (**53%**) awarded Research Tracks a 4 or 5 star rating for stakeholder transparency, compared to **40%** for Management Tracks.

- **Higher Dissatisfaction with Management Tracks:** Negative sentiment (1 or 2 stars) is higher for Management Tracks (**22%**, 12 responses) than for Research Tracks (**16%**, 9 responses). Additionally, 5 respondents awarded Management Tracks a 1-star rating versus only 2 respondents for Research Tracks.

Strategic Recommendations

Question 17

What operational or policy changes would most improve the overall quality, efficiency, or credibility of the stock assessment process in the Northeast region?

Question 18

Please share any additional comments or suggestions for the NRCC regarding stock assessment planning, execution, or communication.

Key Takeaways

- **Strategic Governance Realignment:** A major takeaway calls for a clear division of regional roles: Councils and SSCs should prioritize management questions and stocks, while NEFSC determines the scientific scope, assessment framework, and analytical feasibility based on available capacity and uncertainty.

- **Revising the Rigid Paradigm:** Multiple respondents advocate for overhauling or replacing the strict Research Track - Management Track system. They call for a more flexible spectrum that allows intermediate interventions or model recalibrations during Management Track updates without waiting years for a formal Research Track.

- **Capacity Expansion and Workload Delegation:** To address analyst burnout, respondents strongly recommend hiring more assessment scientists, automating input data assembly (e.g., CAMS, Catch-at-Age), and delegating Research Track working group tasks to state scientists, postdocs, and academic graduate students.

- **Methodological Prioritization Before Species Tracks:** Contributors emphasize prioritizing regional, cross-cutting methodological Research Tracks, specifically focusing on state-space (WHAM) diagnostic capabilities, projections, dynamic reference points, and climate/environmental drivers before initiating single-species Research Tracks again.

- **Restoring Regional Trust & Credibility:** Comments noted that credibility suffers when dramatic swings in catch advice occur due to model platform transitions or analyst turnover. Transparent explanations of model diagnostics, stakeholder co-learning, and collaborative research are viewed as essential to rebuilding regional trust.

Common Themes

1. Governance Streamlining and Scope Discipline

- **Reducing Process Burden:** Respondents noted the approval of TORs and schedules currently take longer than the time allocated for working groups to conduct the scientific analyses. Establishing TORs earlier with strict NRCC approval deadlines is critical.

- **Completing TOR Mandates:** Participants emphasized that working groups must fully execute assigned TORs rather than leaving core scientific questions or research recommendations unresolved.

2. Technical and Methodological Integration

- **State-Space (WHAM) Diagnostics and Projections:** As models transition to WHAM, respondents emphasized that there is an urgent need to build regional confidence in projection methodologies, dynamic reference points, and random effects applications.
- **Environmental and Socioeconomic Integration:** Rather than forcing non-traditional data into rigid modeling TORs, processes for considering ecosystem, climate, and socioeconomic information should be standardized, fostering direct collaboration between assessment leads, oceanographers, mangers, and the fishing industry.

3. Distributed Workloads and External Partnerships

- **Leveraging Regional Partners:** Commenters recommended that NEFSC should actively delegate specific tasks to state scientists and academic researchers, maintaining a strong oversight and quality control role for all assessments processes.

Unique Perspectives

- **Council Credibility vs. Scientific Advice:** One respondent drew a contrast between regional management bodies, arguing that the NEFMC damages scientific credibility by consistently selecting aggressive catch advice options and blaming science for stock declines, whereas the MAFMC maintains healthier fisheries by employing conservative catch limits.

- **Replacing Research Track Modeling with Comprehensive Review Articles:** A participant suggested overhauling the Research Track product format through joint, comprehensive peer-reviewed publications co-authored by scientists, managers, and industry members to build baseline scientific consensus before initiating complex mathematical modeling.

- **Eliminating Ineffective Off-Year Data Updates:** A respondent questioned the utility of off-year data updates for 2-year Management Track cycles, noting that regulations rarely change in response to them and suggesting their elimination to reduce unnecessary labor.

- **Neutral Third-Party Peer Review Coordination:** To eliminate perceived defensiveness or institutional bias, a respondent recommended employing neutral third-party contractors to coordinate peer reviews and draft summary reports.

Conclusions and Next Steps

Synthesis

The NRCC Stock Assessment Process Evaluation highlights a regional assessment enterprise operating under structural strain, where technical success is increasingly decoupled from operational governance. The evaluation demonstrates that while the Research Track framework successfully fosters scientific innovation and receives high approval for thoroughness and stakeholder transparency, it imposes a heavy workload burden and suffers from a difficult operational transition into routine management advice. Conversely, the Management Track successfully delivers timely catch advice but generates widespread dissatisfaction regarding schedule predictability, analyst burnout, and rigid operational rules. This rigidity forces an unsatisfying binary choice during updates, and stakeholder respondents emphasized the need for flexibility to address unexpected model anomalies and clear guidance when Terms of Reference are not met.

The operational disconnect is most acute within the peer review process, revealing a fundamental divergence in perspective between assessment scientists and peer reviewers. While Research Track reviews hold broad confidence, Management Track reviews received mixed reviews. NEFSC scientists report that compressed review windows can lead to "reviewer roulette," where panelists lacking specialized expertise improperly relitigate previously accepted baseline assumptions. Peer reviewers counter that Research Tracks approve complex models in an abstract vacuum without testing catch projections, leaving Management Track panels “handcuffed” when downstream management advice produces unexpected outcomes. Furthermore, resource allocation remains uncertain, with nearly half of respondents unsure if the current balance between tracks meets regional goals.

To restore credibility, predictability, and sustainability, the NRCC may consider evolving beyond a rigid, binary process toward a flexible, multi-institutional operational approach. Priority recommendations include replacing strict update rules with defined guardrails for intermediate model recalibrations, bridging the gap between Research and Management Tracks by evaluating projection dynamics directly within Research Tracks, and shifting spring review schedules to align with data availability timelines. Structurally, the NRCC may consider dismantling the federal "assessment monopoly" by actively delegating analytical workloads to state agencies, academic institutions, and graduate pipelines, while modernizing peer review governance through model-specific reviewer expertise, overlapping of reviewers to bridge the two tracks, and clear TOR failure protocols. Adapting to a more flexible, adaptive approach may foster a more resilient science-to-management pipeline capable of supporting sustainable fisheries.

Next Steps

To be determined by the NRCC.

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August 24, 2026

Northeast Region Coordinating Council
c/o Northeast Fisheries Science Center
166 Water Street
Woods Hole, Massachusetts 02543

Re: Comments of Black Point Maritime Law PLLC on the Stock Assessment Process Evaluation; Description of New England and Mid-Atlantic Region Stock Assessment Process, version June 2025

Dear Members of the Northeast Region Coordinating Council:

Contents

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I. Introduction and Summary of Position

Black Point Maritime Law PLLC is a maritime and fisheries law practice in Alexandria, Virginia. We represent commercial fishing interests before the New England, North Pacific, and Mid-Atlantic Fishery Management Councils, before the Atlantic States Marine Fisheries Commission, and before NOAA Fisheries and the Greater Atlantic Regional Fisheries Office. Our clients fish Atlantic sea scallop, Northeast multispecies, surfclam and ocean quahog, and Atlantic menhaden. They plan capital investment, crew employment, and vessel operations around the outputs of this process, and they live with the specifications that follow from each assessment. We submit these comments in response to the Northeast Region Coordinating Council's evaluation of the regional stock assessment process described in the June 2025 process document.

In April 2025, a peer review panel examined the Atlantic sea scallop Research Track assessment and found four of nine terms of reference only partially met, including the terms governing survey data, the

assessment model, biological reference points, and projections. The panel reported that the working group had presented its recommended model first with limited evaluation of alternatives, that it could not trace the path to that model, and that the assessment read as risk averse and closer to a management track product than a research track one. It called the work a missed opportunity to explore alternative model structures. The panel then found the reference points appropriate for providing management advice. The scallop fleet now fishes against those reference points.

Nothing in the process required anything to follow from those findings. No provision conditions the use of an output a panel has questioned. No provision obligates the assessment lead to answer a panel in writing. No provision requires a remediation plan or a deadline. The process document does not even state the test a panel should apply in deciding whether a term of reference has been met. That gap, findings that carry no consequence, runs through every section of this letter.

We do not attribute this to the panel, and we want that understood at the outset. The panel did its work and wrote down what it found. The failure sits downstream, in a framework that receives expert findings and does nothing with them.

What we are actually asking for.

Preparing these comments changed our view of the remedy. Many of the safeguards we recommend are not new. The Stock Assessment Workshop and Stock Assessment Review Committee process that preceded the current framework contained them as written requirements, and we cannot locate equivalents in the June 2025 document or in the generic terms of reference it references. The predecessor process stated the standard reviewers should apply: whether the work provided a scientifically credible basis for developing fishery management advice. It required analysts to supply model source code, executables, and input files before the model meeting. It required working groups to describe the alternatives they had rejected and to flag internal minority views so that disagreement reached the reviewers rather than dying inside the working group. It carried a standing term of reference forcing each assessment to account for what prior reviewers had recommended. It published individual reviewer reports. It produced a plain-language summary for managers and the public. And it stated on the face of the terms of reference that the agency, not the review panel, holds final responsibility for the status determination.

Each of those addresses a problem the 2025 review encountered. We identify them where they belong and collect the pattern in Section IX. The region built these safeguards, used them for years, and appears to have let them lapse in the transition without recording a decision to do so.

We say all of this about a framework that works well in important respects, and Section II says so in detail. The two-track structure solved a real problem, the graduated review levels let assessments improve without waiting years for a benchmark, and the Management Track delivers specifications on a calendar our clients can plan against. We recommend repair, not replacement.

II. What the Two-Track Framework Does Well

The graduated peer review level structure is the framework's most successful feature, and it solved a real problem. Under the prior arrangement, an analyst who wanted to improve an assessment faced a choice between leaving a known deficiency in place and waiting years for a benchmark. The three-level structure lets the science improve incrementally, with scrutiny scaled to the size of the change, on a schedule management can rely on. The scallop assessment moved through Level 3 treatment in 2020 to accommodate a new approach to modeling selectivity in reference points, which the prior process would have deferred.

The design principle underlying that structure deserves explicit protection: review intensity should scale with the consequence of a change, and no change should escape review by virtue of the calendar. Two provisions embody it particularly well. The automatic upgrade rule moves a Level 1 assessment to Level 2 expedited review when it produces a change in stock status, even after the Assessment Oversight Panel has met. That is a self-correcting rule keyed to the significance of the result rather than to the classification of the input, and it is the best-drafted provision in the document. The instruction that the Assessment Oversight Panel consider cumulative impacts recognizes that several individually minor changes can aggregate into a substantial one. Several recommendations in this letter ask the NRCC to extend that principle, not to abandon it.

The Management Track terms of reference require sequential bridge runs documenting each change from the previously accepted model. This is the strongest documentation requirement anywhere in the current process, and it gives a peer review panel, and the industry participants watching, an auditable path from the last accepted assessment to the current one. The requirement that the analyst present lower-level options alongside the proposed plan forces articulation of alternatives before the Assessment Oversight Panel rather than after. Appending the Assessment Oversight Panel report to the published summary report puts the level determination and its rationale into the same document as the assessment result, which is genuinely valuable to anyone building or reviewing an administrative record.

The two-review calendar keyed to fishing year start dates works. For the scallop fishery, the September review delivers peer reviewed results in time to support the specification process ahead of the April 1 fishing year, using survey data from the same year. The fleet receives specifications on time, year after year. That reliability is easy to overlook precisely because it functions, and it is the reason this letter recommends repair rather than replacement.

On the Research Track, the greatest strength is the independence and candor of the Center for Independent Experts peer review panels. The April 2025 scallop panel was international, technically deep in size-structured invertebrate assessment, and unafraid to document what it could not verify. It reported that the working group presented its recommended model first with only limited evaluation of alternatives, that the pathway to that model was opaque, and that documentation was incomplete across surveys, growth transition matrices, reference points, and projections. It described the assessment as risk averse and closer to a management track product than a research track one, and called it a missed opportunity to explore alternative model structures. A panel willing to write that down is the process working as designed. Nearly every criticism in this letter rests on that panel's candor.

Three Research Track practices work and should be made standard rather than left to the discretion of individual review chairs. The in-person format for the April 2025 review produced far better technical exchange than a webinar would have, and the panel said so. The community engagement meeting held in advance gave industry a defined point of entry before the analytical choices had hardened, and daily public comment gave fishermen and industry scientists a chance to respond to what they were hearing. The backup approach requirement replaces the prior practice of discovering that no fallback existed only after a peer review had rejected an assessment.

The Research Track also demonstrably produces good science when given room to work. The scallop panel found the ecosystem and climate work fully met. The documentation of warming-driven exclusion of scallops from the inshore and southern Mid-Atlantic, the truncation of the size distribution off Virginia during a period of essentially no fishing, and the resulting case for a substantially higher natural mortality rate in the Mid-Atlantic represent the most useful new understanding to come out of that assessment. That is the Research Track delivering what it was created to deliver.

III. The Central Defect: Findings That Carry No Consequence

A. The process states no test for whether a working group has met a term of reference.

The Management Track and Research Track terms of reference require analysts to estimate catch, evaluate indices, produce a stock status recommendation, conduct projections, and respond to prior review panel and Scientific and Statistical Committee concerns. The process document asks panels to determine whether the resulting assessment represents the best scientific information available and whether it should be used for management. It supplies no test for what distinguishes a term of reference that has been met from one that has not.

The predecessor process supplied one. Under the Stock Assessment Review Committee, reviewers evaluated whether each term of reference had been completed successfully, and they applied a stated standard: whether the work provided a scientifically credible basis for developing fishery management advice. That is a test. It can be applied, argued about, and reviewed.

> **Recommendation:** Restore a stated evaluation standard to the terms of reference for both tracks, and require the panel to apply it term by term.

B. Nothing follows when a term of reference is not met.

The April 2025 scallop panel found four of nine terms of reference only partially met, including the terms governing survey data, the assessment model, biological reference points, and projections. It nonetheless found the reference points appropriate for providing management advice and the regional models a reliable foundation for it. Nothing in the process document connects a partially met or unmet term of reference to conditions on use, required remediation, or any follow-up obligation. The findings sit in a report and the advice moves forward unchanged. In operation, the terms of reference function as a checklist rather than as a standard.

Recommendation: Require the peer review panel, for each term found unmet or partially met, to state on the record whether the deficiency conditions the use of the associated output and what would cure it. Establish a default: where a term bearing directly on the catch advice is unmet, the reviewed backup approach applies unless the panel expressly finds the primary output usable and explains why. Require a written remediation plan with a deadline, and require the next Management Track summary report for that stock to report progress against it.

C. The binary finding forces panels into a choice they will not make.

Both tracks task panels with a binary determination: an assessment does or does not represent the best scientific information available, and should or should not be used for management. No intermediate finding exists. A panel that has identified real deficiencies but does not believe the fishery should operate without current advice has one option, which is to endorse the assessment and record its concerns in the narrative. That is what the April 2025 review produced. The result reads as endorsement. The reasoning reads as anything but. The tasking produced that contradiction, not the panel.

The predecessor process managed this more gracefully in practice. The 2018 scallop review recommended that gonad-based spawning stock biomass metrics be reported but that meat-weight biomass be used as the status criterion for that assessment, with further development to follow. That is a conditioned finding: a specific constraint on how an output may be used, stated on the record.

Recommendation: Replace the binary finding with a graduated one. Task panels to record each term of reference as met, met with conditions, or not met, requiring that any conditions be stated specifically, and to state separately whether each output may be used and subject to what constraints. This changes no schedule and requires no additional resources.

D. No one is required to respond to what a panel finds.

A panel records its concerns and the assessment proceeds to the Scientific and Statistical Committee. No provision requires the assessment lead, the Science Center, or anyone else to answer those concerns in writing, say what they will do about them, or commit to a date.

Recommendation: Before assessment results go forward to a Scientific and Statistical Committee, require the assessment lead to respond in writing to each panel finding, stating what the Science Center will do and when, and publish the response with the summary report.

E. The determination that science is best available belongs to the Council and the Secretary.

The process document frames the peer review panel's role correctly, as advisory. In practice a panel's finding on best scientific information available travels downstream as settled, which compounds every problem described above: a finding that carries no consequence nonetheless carries conclusive weight. Under 16 U.S.C. 1851(a)(2) and 50 C.F.R. 600.315 the determination rests with the Council and the Secretary.

The predecessor process said so on the face of the terms of reference. Each SAW assessment carried a footnote stating that NOAA Fisheries has final responsibility for making the stock status determination based on best available scientific information. That single sentence, printed with the terms of reference themselves, told every participant where the determination rested.

> **Recommendation:** Restore an equivalent statement to the process document and to the terms of reference, and require Councils to make and document their own determination on the record. This matters most in precisely the circumstance described above, where a panel has recorded substantial reservations and endorsed an assessment anyway.

IV. Documentation, Reproducibility, and the Record

A peer review panel can only evaluate what it can see, and an industry participant can only respond to what has been published. The 2025 scallop review illustrates what happens when the documentation requirements are thinner than the analysis. The panel reported that it could not trace how the working group moved from the 2018 benchmark to the recommended model, that evidence supporting the working group's decisions was frequently absent from the written materials, that key citations were missing, that no diagnostics were provided for the geostatistical models used to expand both optical surveys, that survey coefficients of variation were not shown on any survey plot, and that documentation for the projection model was particularly deficient. Panel time spent reconstructing an undocumented analytical path is the largest single source of inefficiency in these reviews.

A. The Research Track has no documentation standard.

The Management Track terms of reference require sequential bridge runs documenting each change from the previously accepted model. The Research Track, where the exploration matters most and where the analytical distance traveled is greatest, requires nothing comparable.

The predecessor process did. The SAW terms of reference required that anyone participating in a working group meeting who would run or present results from an assessment model supply the source code, a compiled executable, an input file with the proposed configuration, and a detailed model description in advance of the model meeting. The stated purpose was transparency and fair evaluation of the differences that emerge between models. That requirement, had it applied, would have resolved most of what the 2025 panel could not verify.

> **Recommendation:** Restore the advance submission requirement and apply it to both tracks. Add a documentation term of reference to the generic Research Track terms of reference requiring a structured, sequential presentation from the previously accepted assessment to the recommended model, identifying the alternatives considered and rejected at each step and the basis for each decision. Require model diagnostics, effective sample size derivations, and survey uncertainty estimates to accompany every data and model term of reference.

B. Nothing requires a working group to present the alternatives it rejected.

The central criticism in the 2025 peer review was that the working group presented its recommended model first and provided only limited evaluation of alternatives, leaving the pathway opaque and leaving the panel frequently unable to identify evidence supporting the working group's stated conclusions.

SAW guidance required the opposite. The guidance directed working groups to give a detailed presentation of the model selected as best, including inputs, outputs, diagnostics of model adequacy, and sensitivity analyses testing robustness, and then to describe the other models evaluated, explaining their strengths, weaknesses, and results in relation to the selected model. Where no single best model could be identified, the guidance directed working groups to present alternatives in detail with a comparison of results. The guidance further directed working groups to highlight whether any model represented a minority opinion. That last element is unusual and valuable: it forced internal disagreement to reach the reviewers rather than letting a working group resolve it silently beforehand.

> **Recommendation:** Restore both requirements, including the obligation to identify minority views within a working group.

C. Peer reviews do not necessarily cover every model in the chain producing catch advice.

The scallop quota derives from a projection model. The 2020 Management Track assessment excluded that model from review entirely. It came within scope in 2025, but the panel found its documentation particularly deficient, noted a known systemic bias in its one-year forward projections, and expressed surprise that the model had not been updated to incorporate the higher natural mortality rates the assessment itself had just established. The successor model under development was not ready for review. Public comment at the review raised these concerns directly.

> **Recommendation:** Require that every model in the chain producing catch advice be documented and reviewed within the same peer review as the assessment model, and that a model not updated to reflect the assessment's own findings not be used to generate advice until it is. Where a successor model is under development, require a status report and a schedule at the peer review.

D. No one tracks what prior reviewers recommended.

The 2025 panel could not determine whether the working group had addressed the recommendations of the 2015 independent review of the scallop survey programs, and it raised again a concern that the earlier review had already raised about the precision reported for the towed camera survey.

Under the predecessor process, every SAW assessment carried a standing term of reference requiring the working group to review, evaluate, and report on the status of the research recommendations from the most recent reviewed assessment and from prior review panel reports, and then to identify new recommendations. Both the scallop and the herring terms of reference for the 65th SAW in 2018 contained it. We cannot find an equivalent in the current framework.

> **Recommendation:** Restore the standing term of reference, and support it with a public register of research and methodological recommendations for each stock, drawn from every peer review, independent review, and Scientific and Statistical Committee report, with the disposition of each

recorded and updated. Provide the register to each working group at formation and to each peer review panel with the working papers.

E. The Science Center no longer publishes individual reviewer reports.

Under SAW and SARC, the Science Center published individual reviewers' reports alongside the consensus summary as a matter of routine, and the summary report directed readers to them by name. Individual reports are where a reviewer's unresolved concerns appear most clearly, because a consensus document necessarily smooths them. Where a panel records substantial reservations and endorses an assessment anyway, the individual reports are the documents that explain what happened.

> **Recommendation:** Publish individual reviewer reports alongside the consensus summary for both tracks, and record and post the proceedings of peer reviews.

F. The document leaves accessibility undefined, and materials reach reviewers late.

The document states only that associated data and analytical details are accessible for Management Track peer reviews and that Research Track background materials are accessible if needed. Parties who must build or evaluate a record supporting a management action need a specific commitment. Public comment is scheduled at these reviews and is genuinely useful, but it is far more useful when commenters have seen what the panel has seen.

> **Recommendation:** Post all working papers, model input and output files, versioned code, and supporting documentation a fixed number of days before each review, publicly and at the same time panelists receive them, and give the review chair authority to postpone when materials arrive incomplete. Define the retention commitment: contemporaneous posting of the assessment plan, the Assessment Oversight Panel report, bridge runs, model files, working papers, and versioned code, at a stable location, retained for a stated period.

V. Terms of Reference and the Scope of Each Track

A. The NRCC charges Research Track working groups with Management Track deliverables.

The scallop terms of reference departed from the standard Research Track terms of reference: they required the working group to produce biological reference points and a stock status determination. The peer review panel identified that requirement as a likely cause of the working group's conservatism in data analysis, model exploration, and projections.

Loading a Research Track with Management Track deliverables produces Management Track behavior. The Research Track earns its cost only when it is free to fail, and a working group that must deliver a status determination on a fixed date cannot afford to fail. This is the structural explanation for the innovation deficit that the panel described and that we have observed as participants.

> **Recommendation:** Do not assign status determination deliverables to Research Track working groups. Keep the Research Track free to explore, test, and reject approaches, and let the next scheduled Management Track assessment carry the status determination with updated data. Where

a Council or the Commission needs status advice on a compressed timeline, schedule a Management Track assessment for that purpose rather than converting the Research Track into one.

B. A Research Track panel arrives too late to redirect anything.

A Research Track panel meets once, at the end of a multi-year working group process, when the analytical path has long since hardened. It has no authority to require additional model configurations, no mechanism to send work back for a defined period, and no earlier checkpoint at which redirection would still be inexpensive. A panel in that position can accept the work or reject years of it. Predictably, it accepts.

> **Recommendation:** Authorize panels to require specified additional model runs or analyses within a defined short window, rather than forcing a choice between acceptance and rejection. Add a brief mid-course review at the point where a Research Track working group settles its candidate model configurations, so a panel can direct further exploration while doing so still costs weeks instead of years. This is the single change most likely to produce the methodological innovation the Research Track was created to deliver.

C. No route exists to correct a reference point structure a panel has already questioned.

The 2025 scallop panel supported regional assessment models because the Mid-Atlantic and Georges Bank are experiencing materially different natural mortality, growth, and exploitation. It then questioned whether combining region-specific reference points into a single stock-wide reference point is appropriate, and warned that a combined reference point risks failing to identify overfishing occurring on Georges Bank. The panel also documented that the working group's own initial Mid-Atlantic simulations produced reference points the group could not credit, that the working group then scaled recruitment by a factor of 0.41, and that the resulting yield curve was flat, indicating that the fishing mortality rate producing maximum sustainable yield is not well defined for that region.

The process document excludes stock structure from change in the Management Track, including at Level 3. We support that exclusion and do not ask the NRCC to relax it. A change to the spatial basis of an assessment or its reference points demands the kind of scrutiny the Research Track exists to supply. A half-day Level 3 review cannot supply it, and opening stock structure to Management Track revision would create precisely the unreviewed-change problem this letter objects to everywhere else. Stock structure belongs in the Research Track.

The defect lies elsewhere: the Research Track cannot reach the question in time. The framework offers only one Research Track product, a full assessment on a multi-year cycle. A panel identifies a discrete, well-specified defect in April 2025, and the region's only instrument for addressing it is another comprehensive assessment years away. In the interval the fleet fishes against reference points that the reviewing panel questioned in writing.

> **Recommendation:** Authorize the NRCC to task a scoped topical Research Track assessment addressing a specific question a peer review has identified, with its own terms of reference, its own peer review, and a defined schedule, without waiting for the stock's next full Research Track cycle. A

topical assessment on the spatial basis of scallop reference points would occupy a fraction of the effort a full Research Track requires, and it would resolve a question the panel has already framed. Separately, add a term of reference requiring working groups that adopt spatially disaggregated models to address expressly whether spatially explicit reference points are warranted, so that the question reaches a panel during the assessment rather than after it.

VI. Peer Review: Proportionality, Capacity, and Independence

A. Level 1 direct delivery covers changes that materially move the advice.

Level 1 permits recalculating biological reference points, re-estimating growth, maturity, and length-weight relationships from recent years, reapplying a retrospective adjustment to the status determination and to the starting population for projections, and evaluating the effects of delayed surveys or missing strata, all with no external review. The line between Level 1 and Level 2 treatment of survey gaps turns on whether significant analysis was required, a judgment the analyst makes about the analyst's own work. Offshore wind construction and vessel exclusion have made survey strata loss a recurring rather than exceptional condition on this shelf.

> **Recommendation:** Assign Level 2 review at a minimum to any assessment relying on gap-filled, imputed, or model-substituted survey values arising from vessel exclusion or foregone tows, regardless of the analytical effort the substitution required. More generally, establish a defined threshold on the change in resulting catch advice above which an assessment moves to the next review level regardless of how the underlying change is classified. The document already applies that logic to changes in stock status. A recalibration that looks minor on a list of change types but moves the acceptable biological catch materially is not a minor change to anyone who fishes.

B. Review levels are defined by duration rather than by substance.

Level 2 is described as approximately one to two hours and Level 3 as approximately one half to one full day. Defining the level by the clock inverts the logic: the time required should follow from what needs review. A panel that reaches the end of a two-hour window with unresolved concerns has no stated option other than to conclude. For comparison, the 65th SAW convened for four days to review two benchmark assessments.

> **Recommendation:** State the duration figures as planning guidance rather than definition, and give the peer review chair express authority to extend a review or to defer an assessment to the next window when the panel's concerns remain unresolved. Require any such extension or deferral to be noted in the summary report.

C. Management Track panels do not carry the independence that Research Track panels do.

Research Track reviews draw on the Center for Independent Experts. Management Track reviews rely on regional panels drawn substantially from the same institutions that produce the assessments, with continuity of membership encouraged across reviews. Continuity has real value for consistency in how

comparable changes are treated across stocks and years, and we do not propose abandoning it. It should not, however, substitute for independence where the stakes are highest.

> **Recommendation:** Require at least one reviewer external to the region and to the agency producing the assessment for every Level 3 Management Track review.

D. The process contains no conflict of interest standard, and reviewer selection is not visibly independent.

The process document contains no conflict of interest or recusal provision applicable to the Assessment Oversight Panel, the Research Track Steering Committee, Research Track working groups, or peer review panelists convened outside the Center for Independent Experts process. Standards exist for Center reviewers and for Scientific and Statistical Committee members through their Councils. The NRCC should close those gaps and state the applicable standard for each body in the process document.

One significant gap warrants specific attention because it goes to the foundation of the peer review system. The Center for Independent Experts exists to place reviewer selection at arm's length from the institution whose science is under review. Independence from the science under review is the program's central premise and the reason its findings carry weight. Under the Center's published procedures, its Steering Committee and Coordination Team select the reviewers, and each reviewer delivers a report to that Steering Committee for approval. The Steering Committee therefore both selects the reviewers and approves their reports.

The April 2025 scallop assessment was reviewed by a panel of Center for Independent Experts reviewers, selected through that process. The chair of the Atlantic Sea Scallop Research Track Working Group, whose assessment those reviewers examined, is a member of the Center for Independent Experts Steering Committee. NOAA Fisheries publishes the working group membership, and the chair's Steering Committee service is published by his institution. The chair also appeared at the review as the assessment's principal presenter and advocate, responding to the panel's questions and defending the working group's choices.

We want to be precise about this, because it is easily misread. Presenting and defending the assessment is exactly what a working group chair should do, and we do not criticize it in the slightest. We make no allegation of impropriety. The scientists involved are accomplished and well regarded, we have no basis to believe that anyone acted improperly, and we do not believe that anyone did. Our concern is structural, and it would be identical if the individuals were different. The difficulty is that one person occupied two roles the peer review system is designed to keep apart: advocate for the science before the panel, and member of the body that selected that panel and approves the reports its members produce. The problem lies in the combination of roles, not in the performance of either one.

A peer review system that relies on the personal integrity of its participants to manage an overlap of this kind, rather than on a written rule, cannot demonstrate its own independence to the fishermen who must live with the results. If recusal occurred here, nothing in the published record of the review shows it. The matter carries more weight in this instance because of the finding at issue. Where a panel documents substantial reservations and endorses an assessment for management use anyway, the

credibility of that outcome rests entirely on the demonstrated independence of the reviewers. Where the record cannot demonstrate it, the affected industry is asked to take it on faith. That is an avoidable position to put anyone in, and it is unfair to the reviewers as much as to the fleet.

> **Recommendation:** Adopt a written recusal rule providing that no person serving as chair or member of a Research Track working group may participate in the selection of reviewers for, or in the approval of reviewer reports concerning, the assessment that working group produced, and that no member of the Center for Independent Experts Steering Committee may appear before a panel that Committee selected as an advocate for the science under review without a recorded recusal from both the selection and the report approval. Require that any recusal be recorded in the peer review summary report, so that the record affirmatively shows independence rather than leaving it to be assumed. Apply the same principle to the Assessment Oversight Panel, where a member should not participate in setting the review level for an assessment that member helped produce. We recognize that the Center for Independent Experts operates under a separate contract and that some of this lies outside the NRCC's direct control. The NRCC can nonetheless state the standard it expects, and can raise the matter with the Office of Science and Technology, which administers the program.

VII. Assessment Planning and Oversight

A. The Assessment Oversight Panel operates without notice, advance publication, or reconsideration.

The level determination decides how much external scrutiny the science underlying a specification action will receive. The document sets no minimum notice for Assessment Oversight Panel meetings, does not require assessment plans to be published before the meeting at which they are reviewed, states the requirement to document the disposition of public input in permissive rather than mandatory terms, and provides no mechanism for an interested party to seek reconsideration of a determination. The public cannot meaningfully comment on a plan it has not seen.

We note that the provision directing that assessment plans indicate what input was considered and how it will be addressed, included, or excluded is the correct design, and the document describes it as the explicit connection between public input and the assessment plan. It should be an obligation rather than an expectation.

> **Recommendation:** Post assessment plans, including the proposed level and the required lower-level options, no less than fourteen days before the Assessment Oversight Panel meeting. Convert the input-disposition provision from permissive to mandatory, and publish the disposition with the plan and again in the summary report. Establish a short reconsideration process: a written request within a stated period after the Assessment Oversight Panel report issues, a written response from the Panel Chair, and referral to the NRCC Deputies if unresolved.

B. Flexibility when unexpected data or model issues arise.

Asked how much flexibility assessment teams should have during a Management Track update when unexpected model performance issues or data anomalies arise, we answer moderate flexibility within

defined boundaries. High flexibility would permit major model adjustments under a one-to-two hour expedited review or a half-day Level 3 review, which is how reference points enter management without meaningful examination. Strict adherence is worse in the other direction: freezing a known-defective model for the years between Research Track cycles while the fleet operates on the resulting advice is not a serious answer either. The value of the moderate answer depends entirely on whether the defined boundaries mean anything. Four conditions should attach.

First, when a model fails rather than wobbles, the answer is the reviewed backup approach, not improvised repair inside an expedited review window. Stating this directly would convert the backup requirement from a paper exercise into a working part of the system, and would surface quickly where backups are inadequate, as the 2025 scallop panel found when it noted that the scallop backup did not address failure of the projection model. Second, the review level should key on the magnitude of the effect on the catch advice, as described in Section VI.A. Third, any deviation from the approved assessment plan should be documented with bridge runs showing the advice before and after the adjustment, so that the panel and the affected industry can see what the change did rather than only what it was called. Fourth, flexibility requires a functioning gatekeeper. Moderate flexibility exercised by a body operating without notice, advance publication, or a reconsideration path is not moderate flexibility. It is unreviewable discretion.

C. No one is required to ask whether the stock's productivity has changed.

This is, in our view, the most consequential omission in the Management Track after the absence of any consequence for an unmet term of reference. Level 3 already permits changes to natural mortality, changes to the recruitment stanza used in setting reference points, and incorporation of environmental covariates. The tools exist and the framework authorizes them. Nothing requires anyone to ask whether the conditions warranting their use have arrived.

The consequence is that a stock's assumed productivity can sit frozen for the entire interval between Research Track cycles while the ocean around it changes. The scallop fishery ran on a Mid-Atlantic natural mortality assumption fixed in 2018 until the 2025 Research Track established a substantially higher rate. The evidence supporting that higher rate did not appear suddenly in 2025. Warming had been excluding scallops from the inshore and southern Mid-Atlantic for years. The size distribution off Virginia had been truncating during a period of essentially no fishing. Predation and disease evidence had been accumulating. Six Management Track cycles passed without anyone being required to ask whether the assumption still held, and a fishery set specifications throughout that period on a mortality rate the region now knows was too low.

A requirement to ask the question costs an analyst a paragraph. Failing to ask it cost the scallop fishery seven years of advice built on a superseded assumption. The same exposure exists today for every stock between Research Track cycles, and neither the NRCC nor any Council has a way to know which ones.

> **Recommendation:** Require the assessment lead, at the assessment planning stage, to evaluate affirmatively whether observed shifts in productivity, natural mortality, distribution, or growth warrant a Level 3 change, and to document that evaluation and its conclusion in the assessment

plan submitted to the Assessment Oversight Panel. A negative conclusion is a perfectly acceptable outcome, and most cycles will produce one. Asking on the record every cycle is the point, because the alternative is discovering the answer years late and only when a Research Track happens to come due.

D. The terms of reference neither document nor test terminal-year catch assumptions.

The document acknowledges that stocks reviewed in June will likely require assumptions about terminal year catch because of data availability. It states no standard governing those assumptions and requires no sensitivity analysis. Terminal-year catch drives the starting population for projections, and projections drive the specifications.

Recommendation: Require the analyst to document the terminal-year catch assumption and its basis, and to present at least one sensitivity run showing how the resulting advice responds when that assumption varies across a plausible range.

E. Management bodies may proceed on science the process has flagged as improvable, without saying so.

Where a Level 1 assessment must be upgraded after the Assessment Oversight Panel meeting, delivery slips to the next review window. The document then provides that the relevant Council or Commission may prefer to hold the original delivery timeline while sacrificing the improvement. That describes a management body setting specifications on an assessment the process itself has identified as improvable. Fishermen bear the consequences of that trade and are entitled to know it was made.

Recommendation: Require any such election to be documented in writing, to identify the specific improvement forgone and its likely direction of effect, and to appear in the Management Track summary report and in the record of the resulting specification action.

F. The Science Center is building automated data updates without the decision rules that make them useful.

The document observes correctly that data updates deliver value only where a fishery management plan accounts for them formally, with clear decision rules on what action follows if an update suggests a material change in stock status, and that absent such rules an update may only highlight a concern that cannot be addressed. That observation identifies work that has not been assigned to anyone.

Recommendation: Direct each Council and the Commission to identify, for every stock operating on multi-year specifications, whether a decision rule tied to data updates is appropriate, and to develop one where it is. Sequence that work alongside development of the automated system rather than after it.

G. The assessment schedule still reflects the region's fisheries as they stood a decade ago.

The document describes the scoring and prioritization exercise the NRCC conducted during 2016 and 2017 as the basis for the initial Management Track and Research Track schedules, and it provides for

annual adjustment at the margin. It provides no mechanism for revisiting the underlying scores, and we are not aware that the NRCC has revisited them.

Those scores reflect a region that no longer exists. The 2016 and 2017 exercise weighted Northeast multispecies heavily, and reasonably so at the time. Groundfish landings and revenue have declined substantially since, while the scallop fishery has sustained its position as the highest-value fishery in the region and New Bedford has remained the highest-value port in the country on the strength of it. Meanwhile the assessment landscape itself has changed: NOAA Fisheries redefined Atlantic cod into four biological stocks, offshore wind construction and vessel exclusion have compromised survey coverage across the shelf, and distribution shifts have moved multiple stocks relative to the survey strata that track them. An allocation of assessment effort calibrated to 2016 conditions cannot be the right allocation for 2026, and the NRCC has no procedure for finding out whether it is.

> **Recommendation:** Re-score assessment priorities on a defined cycle, no less often than every five years, with public participation in the scoring and publication of the resulting scores. Separately, state a maximum interval between the close of a peer review and publication of the summary report, and publish annually the observed interval between each completed Research Track assessment and its first Management Track application.

VIII. Participation and Communication

A. Industry appears in no body's membership.

The NRCC, the NRCC Deputies, the Assessment Working Group, the Assessment Oversight Panel, and the Research Track Steering Committee are composed entirely of agency personnel, Council and Commission staff, and Scientific and Statistical Committee or Assessment Science Committee members. The process confines industry participation to public comment periods. In the scallop fishery, industry funds a substantial share of the survey work that enters the assessment through the Research Set-Aside program, and industry participants hold operational information that analysts do not have: gear changes, targeting behavior, spatial shifts in effort, and observed conditions on the grounds. The 2025 panel's observation that increasing dominance of large market categories may indicate increased targeting, and therefore increased discarding, is precisely the kind of question the fleet can answer directly.

The Research Track Steering Committee includes regional scientific representatives selected by the NRCC Deputies from applicants identified through public solicitation. The document states no selection criteria and reserves no seat for a scientist nominated by the fishing industry. That Committee identifies critical assessment research needs, monitors research progress, develops Research Track proposals, and considers whether stock structure warrants reevaluation. Every one of those functions bears directly on the fisheries our clients operate in.

> **Recommendation:** Reserve at least one Research Track Steering Committee regional scientific representative seat for a nominee submitted by industry organizations, and publish the criteria the NRCC Deputies apply in selecting among applicants. Extend to industry representatives designated

by the relevant Council advisory panels the same participation status at Assessment Oversight Panel meetings that the process document already extends to Council and Commission staff.

B. The input phase has no defined shape.

The process describes the input phase in aspirational terms and notes that the Northeast Fisheries Science Center is exploring engagement approaches and formats. The Science Center should now conclude that exploration and adopt a defined practice. The community engagement meeting held in advance of the 2025 scallop Research Track review worked, and it should not depend on the initiative of whoever happens to run a given assessment.

> **Recommendation:** Establish a standing pre-assessment input meeting for each stock in advance of the assessment planning stage, and publish the resulting input and its disposition with the assessment plan.

C. No document explains assessment results to the people who must live with them.

Management Track and Research Track summary reports are written for technical readers, and they are the right documents for that audience. Industry participants trying to understand why the advice moved must reconstruct it from bridge runs and appendices, or wait for a Plan Development Team to explain it secondhand.

The predecessor process produced two documents for each cycle: a full technical assessment report, and a substantially shorter assessment summary report written for managers and the public, including a glossary of assessment terminology, a plain statement of the state of the stock, a catch and status table, and a section of special comments recording caveats bearing on how the results should be used. For the 2018 scallop assessment those special comments told readers directly that reported fishing mortality calculated across all areas understates fishing mortality where fishing actually occurs, and that open areas could be depleted even where overfishing is not occurring on the whole stock. That is exactly the kind of statement the fleet needs and rarely receives.

> **Recommendation:** Restore a short plain-language summary published with each assessment, stating what changed from the last accepted assessment, why, what effect each change had on the resulting advice and in which direction, what caveats attach to how the results should be used, and what the peer review panel said. Two pages would do. This costs the analyst almost nothing, because it restates work the terms of reference already require, and assessments that people can follow draw less resistance than assessments that arrive as conclusions.

IX. The Pattern: Safeguards the Region Has Let Lapse

Seven of the recommendations in this letter ask the NRCC to restore something rather than to create it. Collected in one place, they are: a stated standard for evaluating whether a term of reference was met; advance submission of model source code, executables, and input files; presentation of the alternatives a working group considered and rejected, with minority views identified; a standing term of reference accounting for prior review recommendations; publication of individual reviewer reports; a plain-

language summary report for managers and the public; and an express statement that the agency, not the review panel, holds final responsibility for the status determination. Each was a written feature of the Stock Assessment Workshop and Stock Assessment Review Committee process. We cannot locate an equivalent for any of them in the June 2025 process document or in the generic terms of reference it references.

We raise this with appropriate caution. Some of these requirements may survive in operating practice, in guidance we have not seen, or in documents not published in this form. If so, the remedy is simple and we would welcome it: publish them. Our concern is that these safeguards are not currently visible to the participants who depend on them, and that we have found no record of a decision to retire any of them or of a rationale for doing so.

Taken individually, none is decisive. Taken together they describe a process that required analysts to show their work, to show what they had rejected and why, to account for what prior reviewers had asked for, and to explain the results to non-specialists, and that told reviewers what standard to apply and published what each of them individually concluded. The two-track framework improved on its predecessor in real ways, several of which we identify in Section II. But the transition appears to have carried forward the scheduling architecture more completely than the documentation and accountability requirements. That, rather than any shortage of time, funding, or expertise, is our explanation for the pattern this letter describes.

> **Recommendation:** Direct the Assessment Working Group to conduct a documented crosswalk between the requirements of the predecessor process and those of the current framework, identify every requirement that was not carried forward, and either restore it or publish the reason it was retired. We would expect that exercise to be brief, and we would expect it to answer several of the questions in this letter more efficiently and more authoritatively than any recommendation we could offer from the outside.

X. Priority Among These Recommendations

This letter offers a substantial number of recommendations, and we do not ask the NRCC to weigh them equally. Five matter most. Four cost nothing beyond drafting, and three ask the region to restore requirements it once imposed on itself.

First, attach a consequence to a peer review finding that a term of reference was not met, and restore a stated standard for making that finding. This is the single most important change available to the NRCC. A panel today can find that the terms governing survey data, the assessment model, reference points, and projections were only partially met, find the assessment usable anyway, and watch the advice move forward unchanged while no obligation attaches to anyone. Without this change, every other reform in this evaluation is drafting.

Second, replace the binary peer review finding with a graduated one, and require a published written response to what a panel finds. A panel that holds real reservations but does not want the fishery operating without current advice has exactly one option today: endorse the assessment and record its

concerns in narrative that binds no one. Graduated findings change no schedule and consume no additional resources, and the review record would begin saying what reviewers actually think.

Third, require the productivity question every cycle. Level 3 already permits changes to natural mortality and to the recruitment stanza. Nothing requires anyone to consider whether the conditions warranting them have arrived, and so a stock's assumed productivity sits frozen between Research Track cycles while the ocean changes around it. The scallop fishery set specifications for seven years on a Mid-Atlantic mortality assumption the region now knows was too low, and every stock between Research Track cycles carries the same exposure today. The fix costs an analyst a paragraph in the assessment plan.

Fourth, restore the documentation requirements the predecessor process imposed. Advance submission of model source code, executables, and input files, together with presentation of the alternatives a working group considered and rejected and identification of any minority view within it, would have resolved most of what the 2025 scallop panel could not verify. The region wrote these requirements once and can write them again.

Fifth, stop assigning Management Track deliverables to Research Track working groups, and add a mid-course peer review checkpoint. A Research Track earns its cost only when the working group is free to fail, and a group that must deliver a status determination on a fixed date cannot afford to fail. A brief checkpoint when the group settles its candidate model configurations would let a panel direct further exploration while redirection still costs weeks rather than years. Of everything in this letter, this is the change most likely to produce the methodological innovation the Research Track exists to deliver.

Two further changes cost essentially nothing, and we would welcome them at any point: publish assessment plans before the Assessment Oversight Panel meets rather than after, and publish individual reviewer reports alongside the consensus summary.

XI. Conclusion

We appreciate the NRCC's decision to open this framework to outside evaluation, and we recognize the work that has gone into building it. The two-track design solved real problems and delivers advice on a schedule the fishing industry can plan around. The recommendations above are directed at procedural definition, record quality, consequence for findings, and industry participation. None requires restructuring the design, and none requires new authority.

We encourage the NRCC to repeat this evaluation on a defined cycle rather than treating it as a one-time exercise, and to publish both the findings and the actions taken in response. The Assessment Working Group presently evaluates a process that the institution chairing it also administers. Opening the evaluation to outside input, as the NRCC has done here, is the right corrective, and we appreciate it.

A process in which expert panels document serious deficiencies and nothing follows is a process that will keep producing exactly the outcomes it has produced, no matter how carefully the rest of it is drafted.

That is the concern underlying every recommendation in this letter, and the region has demonstrated before that it knows how to address it.

We are available to discuss any of these recommendations with NRCC members or staff, and we would welcome the opportunity to participate in any working group the NRCC convenes to act on the results of this evaluation.

Respectfully submitted,

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Northeast Region Coordinating Council

Call for Applications:
Stock Assessment Peer Reviewers

The Northeast Region Coordinating Council (NRCC) is seeking applications from qualified independent subject-matter experts to serve as peer reviewers for fishery stock assessments in the Greater Atlantic region (New England and Mid-Atlantic offshore waters). Peer review is a critical component of the stock assessment process, ensuring that the scientific data, quantitative models, and biological assumptions informing fishery management decisions meet the highest standards of scientific rigor and integrity under the Magnuson-Stevens Fishery Conservation and Management Act (MSA).

Qualified applicants will be added to a pool of potential candidate reviewers and solicited for interest/availability to participate in peer reviews when needed. Management Track Peer Review Meetings are typically held twice per year in Woods Hole, MA during late June and late September.

Key Responsibilities:

- **Pre-Meeting Preparation:** Thoroughly review draft stock assessment reports, supporting data inputs, model scripts, and background technical documents prior to the review meeting.
- **Review Meeting Participation:** Attend and actively participate in a 2-to-5-day hybrid peer review meeting (in-person attendance strongly preferred).
- **Technical Evaluation:** Evaluate the assessment relative to established Terms of Reference (TORs), focusing on:
    - Data quality, sampling methodologies, and fishery-independent/dependent indices.
    - Analytical and empirical modeling approaches (e.g., state-space models such as the Woods Hole Assessment Model, size- and age-based models, index-based methods).
    - Biological assumptions (growth, natural mortality, recruitment, stock structure).
    - Stock status determination criteria and future projection methodologies.
- **Reporting:** Co-author a consensus Peer Review Panel Summary Report addressing each TOR, providing clear scientific findings, uncertainties, and recommendations for future research.

Required Qualifications

- **Advanced Degree:** Ph.D. or Master's degree in Fisheries Science, Quantitative Ecology, Biometrics, Marine Biology, Natural Resource Management, or a closely related quantitative field.
- **Quantitative Expertise:** Demonstrated expertise in population dynamics, quantitative stock assessment methodologies, statistical modeling, and risk analysis in fisheries or marine ecology.
- **Analytical Tools:** Proficiency in reviewing/evaluating statistical stock assessment frameworks.

Preferred Qualifications

- Prior experience serving on regional stock assessment peer review panels (e.g., Research Track/Management Track, SAW/SARC, SEDAR, CIE, ICES, or STAR panels).
- Specific expertise in northwest Atlantic ecosystem dynamics, life history characteristics, or survey design relevant to Greater Atlantic fish and invertebrate stocks.

Effort, Compensation & Independence

- **Level of Effort:** Approximately 4-10 days per assessment review cycle, encompassing document review, meeting attendance, and report drafting/editing.
- **Compensation:** Daily stipend and travel reimbursement will be provided in accordance with the NRCC contract protocols for peer review.
- **Conflict of Interest:** Candidates must be free from real or perceived conflicts of interest and must not have participated directly in the development of the specific stock assessment(s) under review.

Submission Instructions

Interested candidates should submit the following application materials:

1. **Curriculum Vitae (CV):** Detailed academic background, relevant publication history, quantitative research experience, and previous panel/review participation.
2. **Cover Letter / Statement of Interest (1–2 pages):** Outlining technical areas of expertise, familiarity with assessment models/tools, relevant knowledge about species/stocks, life history characteristics, and environmental information for the Greater Atlantic region (i.e., New England and Mid-Atlantic), and ability to travel to and participate in-person in Woods Hole, MA.
3. **References:** Names and contact details for two professional references in quantitative fisheries or marine science.

Materials will be accepted on a rolling basis and maintained by the NRCC. Please send via mail or email to:
Cate O'Keefe, Executive Director at cokeefe@nefmc.org
New England Fishery Management Council; 50 Water Street; Newburyport, MA 01950

For more information, please refer to the NRCC's Description of Stock Assessment Process and NEFSC's Management Track Stock Assessments website, which includes the Management Track Generic Terms of Reference. If you have questions or need further information, please contact Cate O'Keefe: cokeefe@nefmc.org.

Managed By	Stock	Product	Delivery Date
NEFMC	GB Atlantic Cod	Management Track Assessment Plan Summary	2/24/2027
MAFMC/ASMFC	Black Sea Bass	Management Track Assessment Plan Summary	2/24/2027
MAFMC/ASMFC	Bluefish	Management Track Assessment Plan Summary	2/24/2027
MAFMC/ASMFC	Scup	Management Track Assessment Plan Summary	2/24/2027
MAFMC/ASMFC	Summer Flounder	Management Track Assessment Plan Summary	2/24/2027
NEFMC	Atlantic Deepsea Red Crab	Data Update ("previous standard data reporting")	4/1/2027
MAFMC	Butterfish	Data Update (NEFSC standard)	4/1/2027
MAFMC	Atlantic Surfclam	Data Update ("typical clam data update")	4/1/2027
MAFMC	Chub Mackerel	Data Update ("typical chub mackerel data update")	4/1/2027
MAFMC	Golden Tilefish	Data Update ("typical Golden Tilefish data update")	4/1/2027
MAFMC	Longfin Inshore Squid	Data Update (NEFSC standard)	4/1/2027
MAFMC	Northern Shortfin Squid (Illex)	Data Update (NEFSC standard)	4/1/2027
MAFMC	Ocean Quahog	Data Update ("typical clam data update")	4/1/2027
MAFMC	Atlantic Mackerel	Management Track Assessment Plan Summary	5/19/2027
NEFMC	EGOM Atlantic Cod	Management Track Assessment Plan Summary	5/19/2027
NEFMC	WGOM Atlantic Cod	Management Track Assessment Plan Summary	5/19/2027
NEFMC	SNE Atlantic Cod	Management Track Assessment Plan Summary	5/19/2027
NEFMC	White Hake	Management Track Assessment Plan Summary	5/19/2027
NEFMC	Witch Flounder	Management Track Assessment Plan Summary	5/19/2027
MAFMC/ASMFC	Black Sea Bass	Management Track Materials to to Panel/Portal	6/14/2027
MAFMC/ASMFC	Bluefish	Management Track Materials to to Panel/Portal	6/14/2027

2027 NEFSC Assessment Products and Delivery Dates

Managed By	Stock	Product	Delivery Date
MAFMC/ASMFC	Scup	Management Track Materials to to Panel/Portal	6/14/2027
MAFMC/ASMFC	Summer Flounder	Management Track Materials to to Panel/Portal	6/14/2027
NEMFC/MAFMC	Spiny Dogfish	Data Update ("typical data update for spiny dogfish")	6/15/2027
NEFMC	GB Atlantic Cod	Management Track Assessment Review Meeting	6/28/2027
MAFMC/ASMFC	Black Sea Bass	Management Track Assessment Review Meeting	6/28/2027
MAFMC/ASMFC	Bluefish	Management Track Assessment Review Meeting	6/28/2027
MAFMC/ASMFC	Scup	Management Track Assessment Review Meeting	6/28/2027
MAFMC/ASMFC	Summer Flounder	Management Track Assessment Review Meeting	6/28/2027
NEFMC	GB Haddock	Data Update (NEFSC standard)	6/30/2027
NEFMC	GB Yellowtail Flounder	Data Update (NEFSC standard) and Projections	6/30/2027
NEFMC	GB Atlantic Cod	Panel Summary Report	7/14/2027
MAFMC	Atlantic Mackerel	Panel Summary Report	7/14/2027
MAFMC/ASMFC	Black Sea Bass	Panel Summary Report	7/14/2027
MAFMC/ASMFC	Bluefish	Panel Summary Report	7/14/2027
MAFMC/ASMFC	Scup	Panel Summary Report	7/14/2027
MAFMC/ASMFC	Summer Flounder	Panel Summary Report	7/14/2027
NEFMC	Ocean Pout	Data Update (NEFSC standard)	7/30/2027
NEFMC	GOM Winter Flounder	Data Update (NEFSC standard)	7/30/2027
NEFMC	Wolffish	Data Update (NEFSC standard)	7/30/2027
NEFMC	Acadian Redfish	Data Update (NEFSC standard) and Projections	7/30/2027
NEFMC	GB Winter Flounder	Data Update (NEFSC standard) and Projections	7/30/2027

Managed By	Stock	Product	Delivery Date
NEFMC	SNE/MA Winter Flounder	Data Update (NEFSC standard) and Projections	7/30/2027
NEFMC	CC/GOM Yellowtail Flounder	Data Update (NEFSC standard) and Projections	7/30/2027
NEFMC	SNE/MA Yellowtail Flounder	Data Update (NEFSC standard) and Projections	7/30/2027
MAFMC	Atlantic Mackerel	Management Track Materials to to Panel/Portal	9/6/2027
NEFMC	EGOM Atlantic Cod	Management Track Materials to to Panel/Portal	9/6/2027
NEFMC	WGOM Atlantic Cod	Management Track Materials to to Panel/Portal	9/6/2027
NEFMC	SNE Atlantic Cod	Management Track Materials to to Panel/Portal	9/6/2027
NEFMC	White Hake	Management Track Materials to to Panel/Portal	9/6/2027
NEFMC	Witch Flounder	Management Track Materials to to Panel/Portal	9/6/2027
MAFMC	Atlantic Mackerel	Management Track Assessment Review Meeting	9/20/2027
NEFMC	EGOM Atlantic Cod	Management Track Assessment Review Meeting	9/20/2027
NEFMC	WGOM Atlantic Cod	Management Track Assessment Review Meeting	9/20/2027
NEFMC	SNE Atlantic Cod	Management Track Assessment Review Meeting	9/20/2027
NEFMC	White Hake	Management Track Assessment Review Meeting	9/20/2027
NEFMC	Witch Flounder	Management Track Assessment Review Meeting	9/20/2027
NEFMC	EGOM Atlantic Cod	Panel Summary Report	10/7/2027
NEFMC	WGOM Atlantic Cod	Panel Summary Report	10/7/2027
NEFMC	SNE Atlantic Cod	Panel Summary Report	10/7/2027
NEFMC	White Hake	Panel Summary Report	10/7/2027
NEFMC	Witch Flounder	Panel Summary Report	10/7/2027

Northeast Region Coordinating Council
2027 Stock Assessment Schedule

	Stock	Management Organization
Spring Research Track	Striped bass	ASMFC
June Management Track *June 28-30*	Atlantic cod (Georges Bank)	NEFMC
	~~Atlantic mackerel~~	~~MAFMC~~
	Black sea bass	MAFMC, ASMFC
	Bluefish	MAFMC, ASMFC
	Scup	MAFMC, ASMFC
	Summer flounder	MAFMC, ASMFC
September Management Track *September 20-23*	Atlantic cod (Eastern Gulf of Maine)	NEFMC
	Atlantic cod (Western Gulf of Maine)	NEFMC
	Atlantic cod (Southern New England)	NEFMC
	Atlantic mackerel	MAFMC
	White hake	NEFMC
	Witch flounder	NEFMC

Additional 2027 Assessment Related Work

NEFSC will provide **data updates** for:

- Atlantic deep-sea red crab
- Atlantic surfclam
- Butterfish
- Chub mackerel
- Golden tilefish
- Haddock (Georges Bank)
- Longfin inshore squid
- Northern shortfin squid (*Illex*)
- Ocean pout
- Ocean quahog
- Spiny dogfish
- Winter flounder (Gulf of Maine)
- Wolffish

NEFSC will provide **data updates** and **projections updates** for:

- Acadian redfish
- ~~Golden tilefish~~
- Winter flounder (Georges Bank)
- Winter flounder (Southern New England/Mid-Atlantic)
- Yellowtail flounder (Cape Cod/Gulf of Maine)
- Yellowtail flounder (Georges Bank)
- Yellowtail flounder (Southern New England/Mid-Atlantic)

Appendix: Stock Assessment Related Definitions

Research Track Assessments
Research track assessments are complex scientific efforts focused either on assessments of individual stocks or research topics that apply to assessments of several stocks. These assessments are typically carried out over several years and may involve comprehensive evaluation of new data streams and model changes. Research track assessments are designed to directly inform future management track assessments but might not immediately inform management decisions.

Management Track Assessments
Management track assessments provide routine, scheduled, updated advice to directly inform management actions. Management track assessments are designed to be simpler, quicker, and more efficient than Research Track assessments. The management track assessment process provides scientists some flexibility to improve the science when problems arise or new data become available, without requiring a research track assessment.

Data Updates
Data updates are summaries of new data that have become available since the last management track assessment. Typically, they update (1) total U.S. catch (landings and discards) by commercial and recreational sector, as appropriate, and (2) aggregated NEFSC survey indices. Additional information may be provided in a data update as agreed to by NEFSC and the applicable management organization(s).

Projections Updates
Using the existing peer-reviewed assessment model, projections are updated by adding realized catch for recent years instead of assumed catch and re-running the projections out for a specified number of years. The updated projections do not update the assessment model or the terminal year of the assessment.

Draft NRCC Assessment Schedule | Proposed by AWG | November 2026

Stock	2027	2028	2029	2030	2031	2032	2033	2034	Frequency Years
Scallop	Mgmt Support	Management Track	Mgmt Support	Mgmt Support	Management Track	Mgmt Support	Mgmt Support	Management Track	1
Herring		Management Track		Management Track		Management Track		Management Track	2
Red crab	Data Update					Data Update			10
Cod - EGOM	Management Track			Management Track			Management Track		3
Cod - GB	Management Track	Data Update	Data Update	Management Track	Data Update	Data Update	Management Track	Data Update	3
Cod - SNE	Management Track			Management Track			Management Track		3
Cod- WGOM	Management Track			Management Track			Management Track		3
Haddock - GB	Data Update	Management Track	Data Update	Data Update	Management Track	Data Update	Data Update	Management Track	3
Haddock - GOM		Management Track			Management Track			Management Track	3
White hake	Management Track			Management Track			Management Track		3
Plaice			Management Track			Management Track			3
Pollock		Management Track			Management Track				3
Redfish	Projections		Management Track			Management Track			3
Witch	Management Track				Management Track				4
Halibut				Management Track					4
Winter - GB	Projections		Management Track			Data Update			4
Winter - GOM	Data Update		Management Track			Data Update			4
Winter - SNE/MA	Projections		Data Update			Data Update			4
Yellowtail - CC/GOM	Projections		Management Track			Data Update			4
Yellowtail - GB	Projections		Data Update			Data Update			4
Yellowtail - SNE/MA	Projections		Data Update			Data Update			4
Windowpane - North			Data Update						4
Windowpane - South			Data Update						4
Ocean pout	Data Update				Data Update				4
Wolffish	Data Update				Data Update				4
Monkfish - North		Data Update		Research Track					4
Monkfish - South		Data Update		Research Track					4
Barndoor skate		Data Update				Management Track			4
Clearnose skate									4
Little skate									4
Rosette skate									4
Smooth skate									4
Thorny skate									4
Winter skate									4
Red hake - North			Data Update		Data Update				4
Red hake - South			Management Track		Data Update				4
Silver hake - North			Management Track		Data Update				4
Silver/Offshore - South			Management Track		Data Update				4
Summer Flounder	Management Track		Data Update	Management Track		Data Update	Management Track		3
Scup	Management Track		Data Update	Management Track		Data Update	Management Track		3
Black Sea Bass	Management Track		Data Update	Management Track		Data Update	Management Track		3
Bluefish	Management Track		Data Update	Management Track		Data Update	Management Track		3
At. Mackerel	Management Track		Management Track		Management Track		Management Track		2
Butterfish	Data Update	Data Update	Management Track	Data Update	Data Update	Management Track	Data Update	Data Update	3
Illex	Data Update	Management Track	Data Update	Data Update	Data Update	Management Track	Data Update	Data Update	4
Longfin	Data Update	Data Update	Data Update	Management Track	Data Update	Data Update	Data Update	Management Track	4
Golden Tilefish	Data Update		Data Update		Management Track		Data Update		4
Spiny Dogfish	Data Update	Management Track		Data Update		Management Track		Data Update	4
At. Surfclam	Data Update	Data Update			Management Track	Data Update			6
Ocean Quahog	Data Update	Data Update	Management Track			Data Update		Management Track	6
Striped Bass	Research Track								5
Sturgeon		Research Track							5
River herring			Management Track						5
Shad				Research Track					5
Lobster				Research Track					5
TMGC support	Mgmt Support	Mgmt Support	Mgmt Support	Mgmt Support	Mgmt Support	Mgmt Support	Mgmt Support	Mgmt Support	1

Management Track	11	7	12	12	8	7	10	6
Mgmt Support	2	1	2	2	1	2	2	1
Data Update	10	5	15	4	10	16	5	4
Projections	6	0	0	0	0	0	0	0
Research Track	1	1	0	4	0	0	0	0

* Projections = data update and projections update

** Quahog Management Track in 2028 is dependent on completion of a survey in 2027

*** Monkfish Research Track in 2030 is a placeholder for Management Track plus / Research Track light with catch advice

Summary of Frequency	
2 years	2
3 years	15
4 years	29
5 years	5
6 years	2
10 years	1

New England Fishery Management Council
50 WATER STREET | NEWBURYPORT, MASSACHUSETTS 01950 | PHONE 978 465 0492
Daniel Salerno, *Chair* | Cate O'Keefe, PhD, *Executive Director*

September 30, 2026

Mr. Eugenio Piñeiro-Soler
Assistant Administrator for NOAA Fisheries
U.S. Department of Commerce
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

Dear Mr. Piñeiro-Soler:

Please accept this letter as the New England Fishery Management Council's (Council) response to your July 2, 2026, letter related to Executive Order 14276 *Restoring American Seafood Competitiveness*. The Council appreciates your acknowledgement of the work plan we developed in response to the Executive Order in September 2025 and confirmed in April 2026. As you noted, the Council conducted extensive public outreach and facilitated stakeholder engagement opportunities to develop the work plan to meet the objectives of the Executive Order, which mirror the Council's long-standing mission, including reducing burdens on domestic fishing, increasing production, stabilizing markets, improving access, and enhancing economic profitability.

The Council thoughtfully considered your request to focus on NOAA identified priorities during our prioritization and action planning processes. As you know, the Council prioritizes annual work activities to support New England's fisheries, including statutory requirements to prevent overfishing and rebuild overfished stocks by setting Annual Catch Limits, identify and conserve essential fish habitat, and support the Scientific and Statistical Committee in application of Best Scientific Information Available. In addition to statutory requirements, the Council has several ongoing management actions and initiatives that are scheduled for completion in 2027, including measures to improve area management in the scallop fishery, revise bycatch measures in the herring fishery, modernize harvest control rules in the groundfish fishery, and complete NOAA-funded projects under the Inflation Reduction Act. The Council considered NOAA identified priorities under the Executive Order in the context of all possible work priorities, accounting for system capacity, including NOAA partner resources, as well as benefits to all fishing industry stakeholders in the region. Within this context, the Council provides the following responses to each item in your July 2, 2026, letter.

Implement Rotational Access for the Northern Edge Scallop Fishery

NOAA requested that the Council "advance a Fishery Management Plan (FMP) Amendment to consider establishing a controlled, rotational limited-access scallop fishery within the Northern Edge Habitat Area of Particular Concern (HAPC)." The Council recognizes the scallop fishery's interest in this topic, as well as concerns from other fishing stakeholders in the groundfish, herring, and lobster fisheries. The Council decided to defer any decisions related to Northern Edge access until the December 2026 meeting and consider options within the broader context of potential 2027 priority topics.

Implement Scallop Permit Stacking

NOAA requested that the Council "reconsider taking on this action and working with stakeholders to ensure proper guardrails" and noted that if the Council is unable to take this up, it may be considered through development of a Secretarial Amendment. The Council concluded that we currently lack the operational capacity to initiate a scallop permit stacking action in 2027. The Council acknowledged that NOAA may pursue a Secretarial Amendment independently.

Rescind Industry Funded Monitoring (IFM) Requirements

NOAA requested that the Council "initiate an action to consider rescinding IFM requirements from the Herring FMP." The Council considered this request in June 2026 in response to your May 1, 2026, letter and further discussed options to address the Herring IFM requirements in September. The Council approved an expansion to the scope of an ongoing amendment focused on revisions to bycatch management (e.g., river herring and shad species) to consider rescission of the IFM requirements. Additionally, the expanded scope will include consideration of revisions to Atlantic herring slippage measures, which the Council identified in our September 2025 response to the Executive Order, and possible revisions to the haddock bycatch cap measures in the Atlantic Herring FMP. Incorporating IFM rescission into the ongoing action maintains an efficient administrative pathway toward achieving our target April 2027 final action timeline for bycatch management revisions.

NOAA also offered to work with the Council "to minimize costs and look at alternatives that may relieve the industry of the burden of monitoring in the groundfish fishery." The Council expressed strong interest in collaborating with NOAA to identify options to minimize monitoring costs for the groundfish fishery. The Council recently completed a review of the groundfish monitoring program included in Amendment 23 to the Northeast Multispecies FMP and will consider potential revisions to monitoring measures when discussing 2027 work priorities in December. The Council welcomes NOAA's offer to work together on this important topic.

Deprioritize Advancing Requirements for Ropeless Gear

NOAA requested that the Council "consider deprioritizing the advancement of complex gear marking for ropeless gear to mitigate operational costs for trap fisheries." The Council decided to pause additional activity related to gear marking while acknowledging NOAA's Request for Information on this topic, as well as pending Federal legislation.

Evaluate Vessel Baseline Restrictions

NOAA recommended that the Council prepare "a joint framework action with the MAFMC to consider permanently removing or adjusting the 10 percent length and 20 percent horsepower baseline upgrade restrictions currently tied to limited access permits." The Council identified this topic in our September 2025 response to the Executive Order, and as noted in your July 2, 2026, letter, conducted an evaluation of existing baseline restriction measures. In September, the Council received a final report on the *Evaluation of Vessel Baseline Restrictions* prepared by staff from the New England and Mid-Atlantic Councils in partnership with NOAA's Greater Atlantic Regional Fisheries Office. The Council will consider prioritizing joint action with the MAFMC at the December meeting.

Consider Reopening the Great South Channel Habitat Management Area (HMA) to Surfclams

NOAA requested that the Council "consider drafting a framework amendment creating adaptive, data-driven exemptions allowing surfclam dredging in the Great South Channel HMA based on updated cod spawning data." The Council independently recognized high stakeholder interest in this topic and prioritized an evaluation of the Great South Channel surfclam exemption program in 2026. In September, the Council received a report titled *Great South Channel Habitat Management Area Surfclam Exemption Program Review*. The evaluation assessed the effectiveness of surfclam exemption areas in the HMA from both habitat conservation and fishery perspectives, considering recent data and information. Based on the evaluation, the Council has the technical foundation to weigh potential HMA management activities during the December prioritization process.

Strategic EO 14276 Mandates for Council Consideration

Your July 2, 2026, letter also encouraged the Council to consider redesignating species/stocks that no longer require conservation and management as Ecosystem Component (EC) species and to collaborate with NMFS on the expanded and continued use of Exempted Fishing Permits (EFPs). Under the Inflation Reduction Act funding that the Council received in 2024, we have developed draft *Guidance for Considering an Ecosystem Component Designation for NEFMC Species*, which will be finalized this fall. Additionally, the Northeast Region Coordinating Council (NRCC) recently reviewed the *Draft Greater Atlantic Region 2026 Stock Prioritization* report, which considers risk and value factors for each managed stock to support management activities, including potential designation of EC species. The Council continues to support the use of EFPs to address important research questions and increase fishing opportunities. The Council has continually supported the use of fishery-dependent data in management and science products, including stock assessments. The Council will foster ongoing collaboration with regional and national NOAA partners, research organizations, and academic institutions to codevelop and conduct research with the fishing industry.

In summary, the Council plans to further discuss and determine priorities at our December 2026 meeting, including rotational access for the Northern Edge scallop fishery, revisions to Vessel Baseline Restrictions, and the Great South Channel HMA surfclam measures. The Council appreciates the opportunity to respond to NOAA's requests for Executive Order 14276. Please contact me if you have any questions.

Sincerely,



Cate O'Keefe
Executive Director

CC: Mr. Sam Rauch, Ms. Kelly Denit, Mr. Michael Pentony, Ms. Nicole Cabana, NOAA Fisheries
Mr. Daniel Salerno, NEFMC
Dr. Chris Moore, MAFMC

#10b
Revised

Evaluation of Vessel Baseline Restrictions

for Fisheries Managed by the New England & Mid-Atlantic Fishery Management Councils

A white paper developed by staff of the
New England and Mid-Atlantic Fishery Management Councils,
in partnership with the
Greater Atlantic Regional Fisheries Office

September 9, 2026

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1. Introduction

Vessel baseline regulations restrict the size and horsepower of vessels in many limited access fisheries managed by the New England and Mid-Atlantic Fishery Management Councils (Councils). The Councils originally implemented these restrictions at a time when effort controls were the primary tools used to limit catch, prior to the advent of annual catch limits. The intent was to limit potential increases in catch that could occur if vessels increased in size or horsepower and therefore could catch more fish for a given amount of effort than managers expected. Unchecked increases in catch could undermine the intent of limited access fisheries. Vessel baseline restrictions also served to help maintain the vessel size diversity of the fleets.

Some industry participants have reported challenges in acquiring suitable replacement vessels or engines that meet their baseline specifications, particularly for smaller vessels. In 2025, the Councils recommended reconsidering the vessel baseline restrictions in response to *Executive Order 14276: Restoring American Seafood Competitiveness*.[1] The Councils prioritized an evaluation in 2026 to inform whether to initiate a future action to consider revisions to these restrictions.[2]

This white paper compiles background information, permit and vessel data, and input from members of Advisory Panels and the public. The purpose is to inform a decision by the Councils on whether to initiate a management action to consider revising vessel baseline restrictions.

2. Current Vessel Baseline Restrictions

Under current regulations (50 CFR 648.4(a)), a fishing vessel's length cannot exceed 10% of the length overall[3] and its engine cannot exceed 20% of the horsepower of the permit's baseline vessel. The baseline vessel is the vessel that had the relevant permit during the specified baseline year, which varies by permit type (Table 1).

If a vessel is issued more than one limited access or moratorium permit, those permits are bundled together as a "permit suite." In cases where the permits in the suite have different baselines due to being previously associated with different vessels, the most restrictive baseline applies to the entire permit suite. The only way to eliminate a more restrictive baseline from a permit suite is to permanently relinquish the relevant permit(s). This is often done by requesting to have the restrictive permit(s) permanently relinquished when conducting a vessel replacement or merging permit suites.

The baseline specifications do not change when a permit or permit suite is transferred to a different vessel. For example, moving permits to a smaller vessel does not establish a new,

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[1] Mid-Atlantic Council September 30, 2025 letter to NOAA Fisheries.
New England Council September 30, 2025 letter to NOAA Fisheries.

[2] Mid-Atlantic Council 2026 Implementation Plan.
New England Council 2026 Priorities.
Based on the tasking from the Councils, this evaluation considers length and horsepower baseline restrictions. It does not consider hold capacity restrictions which exist in some Council-managed fisheries.

[3] For the rest of this document, the term "length" refers to "length overall," which is a measurement documented by the Coast Guard.

smaller baseline. Conversely, transferring permits to a larger vessel does not increase the baseline. Limited access permits may only be transferred from one vessel to another once per fishing year.[4]

Vessel baseline restrictions apply to most commercial limited access fisheries managed by the Councils, including Northeast multispecies (except Handgear A permits), Atlantic sea scallop, summer flounder, Maine mahogany quahog, longfin squid (except Tier 3 permits), *Illex* squid, butterfish, Atlantic mackerel, scup, black sea bass, monkfish, Atlantic herring, and Atlantic deep-sea red crab. The restrictions do not apply to recreational permits, commercial fisheries managed with individual fishing quotas or individual transferable quotas, open access permits, and the following limited access fisheries: General Category sea scallop, lobster, and the exceptions noted above.[5]

The current vessel baseline restrictions have been in place since 2015. The first restrictions on vessel size went into effect in the late 1970s and have evolved over time. More information about prior regulations is in Appendix I.

Table 1. Baseline year by permit type.

Permit Type	Action	Year
Northeast multispecies	Amendment 5	1994
Sea scallop	Amendment 4	1994
Red crab	Original FMP	1999
Summer flounder	Consistency Amendment	1999
Scup	Consistency Amendment	1999
Black sea bass	Consistency Amendment	1999
Longfin squid	Consistency Amendment	1999
Illex squid	Consistency Amendment	1999
Butterfish	Consistency Amendment	1999
Maine mahogany quahog	Consistency Amendment	1999
Monkfish	Original FMP	2000
Atlantic herring	Amendment 1	2007
Atlantic mackerel	Amendment 11	2011

3. Administration of Baseline Restrictions

Baseline restrictions are administered by the National Marine Fisheries Service (NMFS) Greater Atlantic Regional Fisheries Office (GARFO). When a permit holder wants to replace a vessel or engine, or modify the horsepower, a Vessel Replacement Application is submitted to the GARFO Permits Office. The Permits Office then reviews the proposed replacement or modified

[4] Except for lobster-only permits suites, which are not subject to baseline restrictions.

[5] For the rest of this document, longfin squid, sea scallop, and Northeast multispecies refers only to those permit categories subject to vessel baseline restrictions (i.e., excluding longfin squid Tier 3, General Category sea scallop, and Northeast multispecies Handgear A permits).

engine's horsepower and/or vessel's length specifications against the baselines for their permit(s) to ensure they are within the maximum allowable increase for their permit(s).

Vessel owners often conduct their own permit baseline research before buying a vessel or submitting a replacement application. The Permits Office responds to about 175 baseline requests each year from prospective buyers and vessel owners for detailed information on the permit's physical specifications. These official communications outline the currently recorded baseline dimensions and the maximum allowable specification limits under applicable permit regulations. By providing this comparative data, the Permits Office ensures permit holders have clear, transparent guidelines to maintain compliance when considering vessel or engine replacements, modifications to length or horsepower, or permit transfers.

The Permit Office uses several pieces of information to document the length and horsepower of vessels. For length, the Permit Offices uses a Certificate of Documentation (COD) from the United States Coast Guard (USGC), which the USGC requires of all commercial vessels five net tons or greater. The Permits Office uses the length measurement listed in the COD as proof of the vessel length.

If a vessel does not have a USCG COD, applicants must verify length by providing a marine survey report indicating the length and showing the name and location of the marine surveyor. GARFO uses the length from the survey and the length indicated on the State Registration in their application review. GARFO will not accept a third-party marine survey if it states that the length is less than the length stated in the State Registration.

The USGC COD does not include proof of horsepower, so all applicants must verify total engine horsepower by providing a marine survey, mechanic certification on the mechanic's letterhead, or engine manufacturer specification and proof that the engine was installed on the vessel.

All length and horsepower documentation must be dated and include the name and documentation number of the vessel. In all cases, the length and horsepower measurements must be equal to or less than the maximum allowable increase for the baseline specifications for the relevant permits, otherwise the application is rejected, even if the difference is very small (e.g., a matter of inches). However, the permit data indicate that a small percentage of vessels across most fisheries currently exceed the maximum allowable length and/or horsepower of their baseline permits (1-8% of permits depending on the fishery, except for red crab; Table 2), highlighting the challenges with enforcing the regulations.

There are two main reasons why some vessels currently exceed their maximum allowable permit baseline. First, reviewing vessel replacement applications can be complicated when vessels have more than one permit, because the baseline specifications for all permits must be identified to determine the most restrictive baseline. Therefore, in the past 30 years, processing errors may have occurred resulting in an overage on one or more baselines. Second, there are cases where previously accepted documentation recorded a replacement vessel's length or engine horsepower was lower than the maximum allowable, but subsequently other information (e.g., USCG COD) demonstrated that the maximum allowable baseline specifications were in fact exceeded.

GARFO can consider requests to correct a vessel baseline, but these are only granted in cases where it can be shown that GARFO made an error in establishing the baseline or the vessel owner has contemporaneous documentation showing a vessel's length or horsepower were different at the time a baseline was created. Processing correction requests can involve extensive research of the vessel and permit history, which may delay business decisions for the buyer or seller of a permit, or a permit holder trying to complete a vessel modification or replacement.

Because of the pre-screening process, official application denials are rare. Over the past 10 years, the Permits Office has denied 12 permit transfer applications because the replacement vessel's length or engine horsepower exceeded the maximum allowable increase for the permit suite. Applicants are typically aware if their proposed replacement or modification meets the baseline criteria prior to filing. Consequently, non-compliant configurations are usually identified and addressed during the initial inquiry stage.

Additionally, owners may relinquish one or more baseline permits to allow for a vessel replacement when the new vessel exceeds the maximum allowable baseline specifications. In the past five years, 84 permits with baselines from 26 suites were relinquished during the replacement process because the replacement vessel exceeded the maximum allowable specifications of the permits.

Some permit holders may use replacements to transfer permits to a buyer, since permits cannot be bought or sold separately from a vessel. To retain a vessel, a permit holder may transfer the permit to a skiff and then sell the skiff and permit together to a third party. Some permit holders transfer their permits to a skiff to lease out their days at sea or other allocations without the expense of maintaining a vessel. Since 2007, NMFS no longer requires additional documentation of vessel size or horsepower for replacements to vessels under 17 feet (called "non-fishing skiffs") to reduce the administrative burden to NMFS and vessel owners from processing these frequent requests.

4. Vessel Baseline Data

This section uses permit and landings data to describe the vessels subject to vessel baseline restrictions, with a focus on 2025, the most recent year of complete data.

Subset of GARFO permits are subject to baselines. In the 2025 permit year, there were 5,675 vessels issued permits by GARFO and 1,838 permit suites [6] with vessel baseline restrictions. Of those permit suites, 1,167 were issued to vessels during the year while 671 were in Confirmation of Permit History (CPH).[7] Of the 1,167 permit suites with baselines issued to

[6] Unless otherwise specified, "permit suites" can refer to a single permit or multiple permits grouped together as suites.

[7] A CPH is required when a vessel that has been issued a limited access permit has sunk, been destroyed, or has been sold to another person without its permit history. Possession of a CPH will allow the applicant to maintain the landings history of the permit without owning a vessel. In this document, the 671 permits in CPH in 2025 also includes permits which were eligible to be put on vessels in 2025 but were not renewed.

vessels, 164 had multiple baselines of length, horsepower, or both, and 1,003 had one baseline length and horsepower (Figure 1).

Increases possible, more so for length then horsepower. A substantial number of permit suites could have larger vessels or more powerful engines within existing regulations. Across all relevant fisheries in 2025, most of the 1,167 vessels with baselines were at or below their baselines for length and horsepower (Table 2). Across fisheries, 62-81% of vessels are under or at their baseline length and 51-80% are under or at their baseline horsepower. Generally, under 10% of vessels in each fishery were at or above their maximum length or horsepower. Percentages tend to be higher for horsepower relative to length which makes intuitive sense, as it is typically more feasible to replace or modify an engine than an entire vessel.

Smaller, less powerful vessels are more restricted. All vessels with baselines were grouped by horsepower and length categories to illustrate how the vessels compare to their maximum allowable horsepower and length (Figures 2 and 3). The 2025 data show that shorter vessels tended to be closer to their maximum allowed length than longer vessels. Of the 1,167 vessels with baselines, 44% were in the 31 - 60 foot category, and 59% of vessels in that category were within 5 feet of their maximum allowable length (Figure 3). This contrasts with the greater than 91 foot vessels that had just 20% of vessels within 10 feet of their maximum length. Likewise with horsepower, the vessels with lower horsepower tended to be closer to their maximum than the vessels with higher horsepower. Most vessels with baselines (76%) had engines that were 800 or less in horsepower, and 73% of those were within 100 horsepower of their maximum allowable horsepower (Figure 2). Of the vessels that were over 1,200 horsepower, 13% were within 200 horsepower of their maximum.

An aging fleet. The average age of vessels across permit types subject to baselines has increased by about 20 years across the 30 years since baselines were first implemented in the mid-1990s (Figure 4). Since about 2011, this increase has been generally consistent, suggesting that few vessels have been replaced with newer vessels during that time. However, around 2000-2010, the trends in average age were flatter. Of the permit types shown in Figure 4, *Illex* squid, longfin squid, and Atlantic mackerel had the oldest average vessel ages during 2015-2025 (e.g., 40 years for *Illex* squid and 39 years for longfin squid and Atlantic mackerel in 2025), while sea scallops had the youngest average vessel ages (e.g., 34 years in 2025).

Length and horsepower variations by permit type. When considering active[8] vessels, some permit types tended to have longer vessels and higher horsepower engines, on average, than others. For example, vessels with *Illex* squid permits had the longest average lengths in recent years (e.g., 102 feet on average in 2025) while vessels with black sea bass permits had the smallest average lengths (e.g., 53 feet on average in 2025, Table 3, Appendix II).

Stability in length and horsepower of active vessels for most permit types, though fewer active vessels. Over the past 10 years (2015-2025), average vessel length and horsepower have remained relatively stable (changes within 5%) for actively fishing vessels for most permit types with baselines, though there have been widespread declines in the number of active

[8] "Active" in this report means landing at least one pound of the relevant species for the permit type during the specified time period.

permits (Table 3). Only monkfish had a greater than 5% increase in both average length (11%) and horsepower (9%) across this time. *Illex* squid, Atlantic herring, and Atlantic mackerel had greater than 5% decreases in average vessel length and horsepower. Atlantic herring and Atlantic mackerel had the greatest decreases in average length (both 25%) and horsepower (40% for Atlantic herring and 39% for Atlantic mackerel). The number of active permits decreased across all permit types except for *Illex* squid (127% increase, 19 permits), and red crab (no change). Monkfish and Northeast multispecies had the greatest decreases in the total number of active permits (decreases of 188 and 124 active permits, respectively).[9]

Vessels can have multiple baselines, certain fisheries more restrictive. In 2025, roughly 10% of all permit suites with baseline restrictions (permits issued to vessels and those in CPH) had either multiple length and/or horsepower restrictions in the suite (Table 4). There were 186 permit suites with multiple length baselines and 191 suites with multiple horsepower baselines. In these cases, the regulations require the most restrictive baseline to be constraining (Section 2). For these multi-baseline suites, the most restrictive permits were for scup, Northeast multispecies, black sea bass, summer flounder, and/or monkfish.

Minority of permits still on the qualifying vessel. For the permits with baselines in 2025, on average, 20% across all permit types were still on the vessel that qualified for the limited access permit, 48% were on a replacement vessel, and 29% were in CPH (Table 5). The Atlantic mackerel and Atlantic herring fisheries had the highest percentage of permits that remained on the qualifying vessel (53% and 34%, respectively).

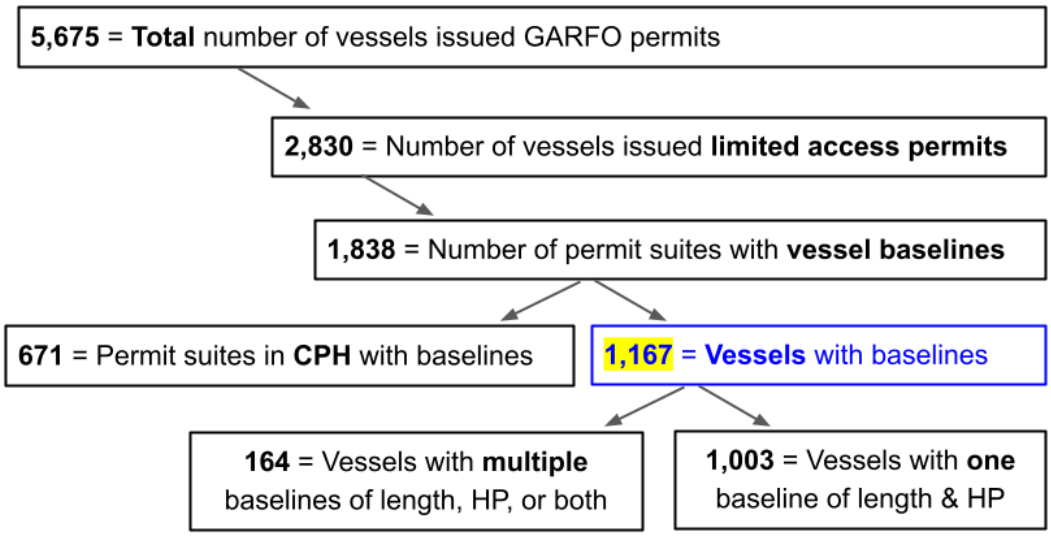

Figure 1. Categorization of permits issued by GARFO in 2025.

[9] See Appendix III for additional data.

Table 2. Length and horsepower relative to baselines for vessels with baselines in 2025 (n=1,167) by permit type.

Permit Type	Number of vessels	% of vessels under baseline	% of vessels at baseline	% of vessels above baseline	% of vessels at maximum	% of vessels above maximum
Vessel Length						
Red Crab	5	20%	60%	20%	0%	0%
Maine Mahogany Quahog	13	31%	31%	38%	0%	0%
Illex Squid	67	69%	7%	19%	2%	3%
Atlantic Herring	74	51%	24%	18%	4%	3%
Atlantic Mackerel	114	39%	42%	13%	6%	0%
Butterfish	270	65%	16%	16%	2%	1%
Longfin Squid	270	65%	16%	16%	2%	1%
Sea Scallop	345	70%	10%	18%	1%	1%
Monkfish	486	67%	14%	16%	2%	1%
Scup	525	58%	19%	17%	4%	2%
Black Sea Bass	581	56%	22%	17%	3%	2%
NE Multispecies	627	56%	22%	18%	3%	1%
Summer Flounder	655	66%	15%	16%	2%	1%
Vessel Horsepower						
Red Crab	5	20%	60%	20%	0%	0%
Maine Mahogany Quahog	13	46%	15%	31%	0%	8%
Illex Squid	67	33%	36%	22%	6%	3%
Atlantic Herring	74	34%	38%	20%	4%	4%
Atlantic Mackerel	114	26%	50%	16%	4%	4%
Butterfish	270	29%	30%	30%	7%	4%
Longfin Squid	270	28%	30%	31%	7%	4%
Sea Scallop	345	21%	30%	34%	11%	4%
Monkfish	486	30%	31%	27%	7%	5%
Scup	525	30%	28%	30%	7%	5%
Black Sea Bass	581	30%	28%	30%	6%	6%
NE Multispecies	627	33%	29%	26%	6%	6%
Summer Flounder	655	27%	29%	31%	8%	5%

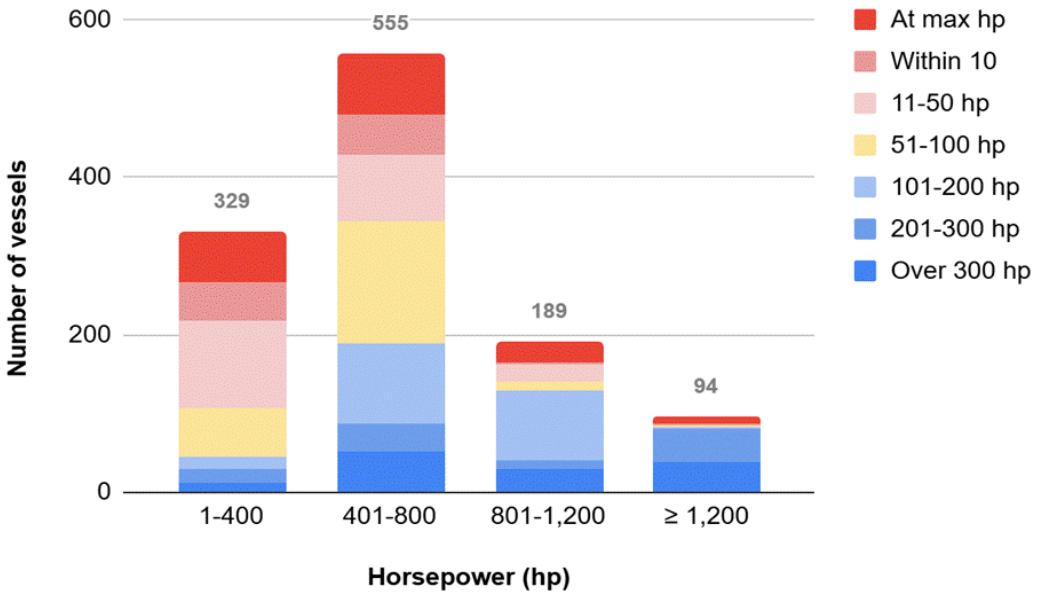

Figure 2. Horsepower of the 1,167 permit suites issued in 2025 with vessel baseline restrictions by four horsepower categories. Shading indicates how the vessels in each category compare to their maximum allowable horsepower.

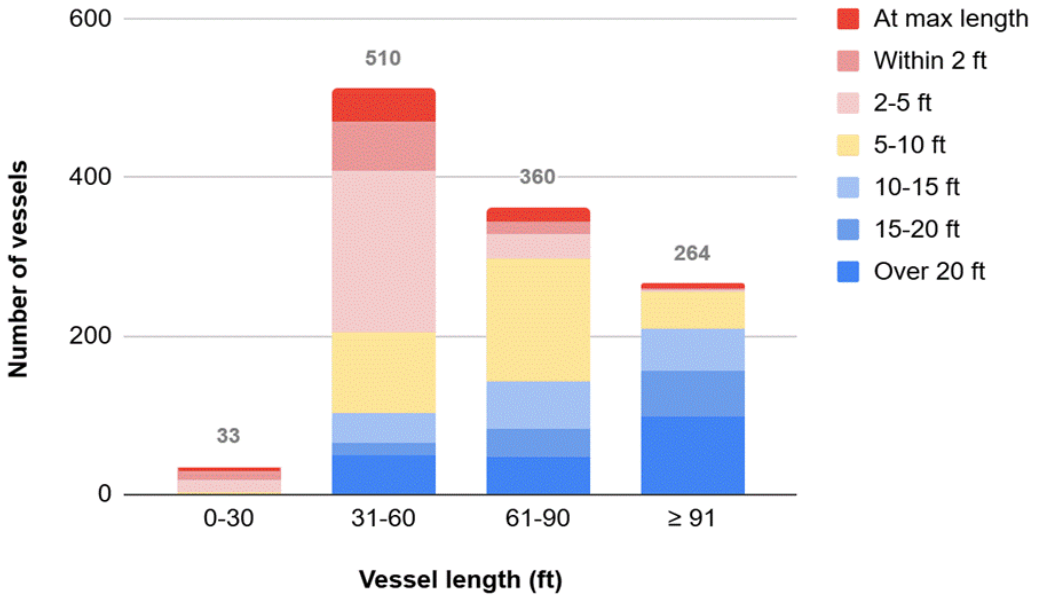

Figure 3. Length of the 1,167 permit suites issued in 2025 with vessel baseline restrictions by four length categories. Shading indicates how the vessels in each category compare to their maximum allowable length.

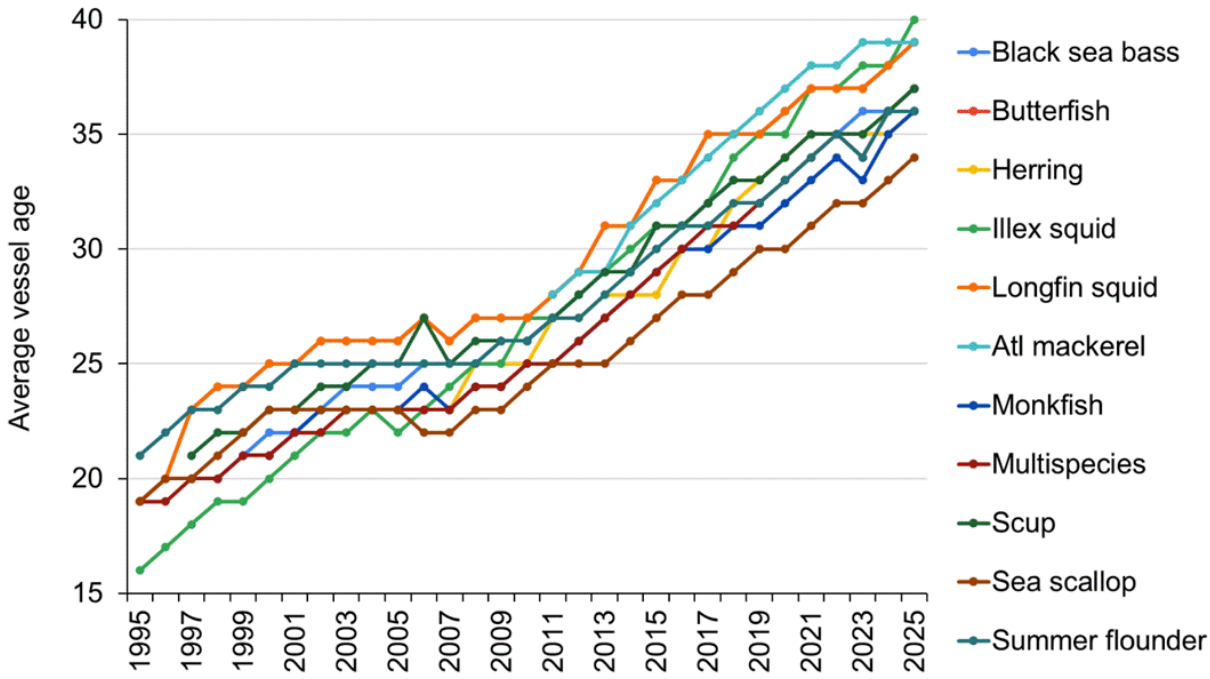

Figure 4. Average age of vessels with baselines by permit type, 1995-2025. Red crab and Maine Mahogany Quahog permits are excluded from this figure.

Table 3. Changes in average vessel characteristics and number of permits associated with actively fishing vessels with baselines, by permit type, 2015-2025.

Fishery	Average length	Average horsepower	Average age	# of active permits
Black Sea Bass	55 → 53 -4%	430 → 427 -1%	30 → 38 +27%	342 → 273 -20%
Scup	57 → 59 +4%	449 → 459 +2%	32 → 40 +25%	285 → 226 -21%
Summer Flounder	58 → 59 +2%	433 → 437 +1%	33 → 41 +24%	340 → 242 -29%
Illex Squid	114 → 102 -11%	1,443 → 1,286 -11%	27 → 36 +33%	15 → 34 +127%
Atlantic Herring	91 → 68 -25%	1,125 → 672 -40%	25 → 41 +64%	38 → 20 -47%
Butterfish	63 → 62 -2%	524 → 487 -7%	33 → 42 +27%	150 → 129 -14%
Monkfish	57 → 63 +11%	481 → 526 +9%	28 → 38 +36%	428 → 240 -44%
Northeast Multispecies	66 → 69 +5%	569 → 573 +1%	30 → 40 +33%	296 → 172 -42%
Red Crab	88 → 90 +2%	553 → 567 +3%	33 → 44 +33%	3 → 3 0%
Longfin Squid	63 → 64 +2%	531 → 538 +1%	33 → 41 +24%	181 → 150 -17%
Sea Scallop	78 → 79 +1%	742 → 754 +2%	27 → 34 +26%	331 → 330 -0.3%
Atlantic Mackerel	81 → 61 -25%	846 → 513 -39%	30 → 37 +23%	72 → 55 -24%

Note: Arrows indicate change from 2015 value to 2025 value, with percent change shown beneath. Colors indicate the magnitude and direction of change: gray is a less than 5% change in either direction; light orange/blue is 5–15% change; and dark orange/blue is a greater than 15% change. Orange indicates decreases and blue indicates increases.

Table 4. Count of permit suites with multiple baselines in 2025 (including permits in CPH and issued to vessels).

	Multiple Vessel Length Baselines (total = 186 suites)			**Multiple Horsepower Baselines** (total = 191 suites)		
Fishery	**In CPH**	**On Vessels**	**Total**	**In CPH**	**On Vessels**	**Total**
Illex Squid	0	7	**7**	1	10	**11**
Atlantic Herring	5	12	**17**	1	13	**14**
Sea Scallop	0	21	**21**	0	27	**27**
Butterfish	5	32	**37**	11	41	**52**
Longfin Squid	5	34	**39**	11	41	**52**
Atlantic Mackerel	7	36	**43**	3	19	**22**
Scup	9	41	**50**	17	57	**74**
NE Multispecies	15	36	**51**	30	55	**85**
Black Sea Bass	8	45	**53**	15	60	**75**
Summer Flounder	7	48	**55**	17	60	**77**
Monkfish	13	46	**59**	14	46	**60**

Table 5. Count of 2025 permits with baselines by fishery and percent of permits on the original qualifying vessel, have gone through at least one replacement, or in CPH.

Fishery	**Permits on the qualifying vessel**	**Permits on a replacement vessel**	**Permits in CPH**	**Total**
Red Crab	20%	80%	0%	**5**
Mahogany Quahog	12%	46%	42%	**26**
Illex Squid	33%	55%	12%	**76**
Atlantic Herring	34%	42%	24%	**97**
Atlantic Mackerel	53%	25%	22%	**146**
Butterfish	22%	51%	27%	**371**
Longfin Squid	22%	51%	27%	**371**
Sea Scallop	26%	74%	1%	**347**
Monkfish	20%	47%	33%	**724**
Scup	19%	51%	30%	**745**
Black Sea Bass	22%	54%	24%	**767**
NE Multispecies	17%	38%	45%	**1,149**
Summer Flounder	21%	52%	27%	**900**
Total	**20%**	**48%**	**29%**	**5,724**

5. Input from Advisory Panels and Public

In May 2026, the Councils held three joint public webinar meetings for all Advisory Panels and an associated written comment period to solicit input on the vessel baseline restrictions. This input is summarized below and in more detail in the public comment summary.[10]

Many commenters emphasized that the **considerations vary greatly by fishery, vessel size, and gear type** and there is **no one size fits all solution**.

For example, **safety at sea** was especially of concern for smaller vessels and lower horsepower engines. Commenters noted that larger vessels and higher horsepower engines can operate more safely further offshore and in different conditions and can more quickly return to port when needed. The baseline restrictions constrain some vessels to smaller sizes and lower horsepower engines, which limits the ability to upgrade for safety reasons. Some commenters said this has become more of an issue as some fisheries have moved further offshore compared to when the vessel baseline restrictions were first established. A few commenters noted that multiple lives have been lost because of challenges like this.

Commenters noted it is **challenging and costly to replace or modify vessels and engines** under the baseline restrictions. Several comments described how modern engines are very different from when the baseline restrictions were first established. This often requires modifying engines in ways that can negatively impact their performance to comply with the baseline restrictions. Commenters also described challenges with finding suitable replacement vessels, which is costly in general due to limited commercial fishery ship building in the U.S., and is exacerbated by the constraints imposed by vessel baselines.

Commenters noted that **relinquishing permits** is sometimes necessary to replace vessels. Vessels can have permits in multiple different fisheries. This can include a mix of permits that are subject to baseline restrictions and permits that are not. In cases when a vessel has multiple permits subject to baselines and those permits were previously associated with multiple different vessels and therefore have different baseline specifications, the most restrictive baseline applies. The **regulations prohibit permit splitting** for limited access permits (50 CFR 648.4(a)), meaning once permits are grouped together on a vessel, they cannot be split among different vessels in the future. For these reasons, permit holders will sometimes relinquish a permit with a more restrictive baseline to gain the flexibility to increase their vessel size or engine horsepower. However, in other cases, permit holders may determine it is worthwhile to retain a restrictive permit and continue fishing on a smaller vessel or lower horsepower engine than they would prefer.

Commenters described **administrative challenges** of complying with the baseline restrictions. For example, it can be costly to hire a vessel surveyor or naval architect to confirm the specifications of a vessel. In addition, a vessel's length and horsepower may not always be documented correctly, which can pose challenges when the corrected specifications do not match the relevant permits.

[10] Available at https://www.nefmc.org/library/vessel-baselines-restrictions-evaluation

Commenters who described challenges associated with vessel baselines did not always oppose maintaining these restrictions in some form, at least for some fisheries or gear types. Several commenters described benefits of the baseline restrictions. For example, the **baseline restrictions impact the value of permits**. Permits with larger baselines have a higher value. These permits can represent a substantial investment and can be an important component of retirement planning for some fishermen. Some commenters were concerned that if the baseline restrictions were eliminated, this would devalue some permits and negatively impact permit holders who have made substantial investments. Conversely, permits with smaller baselines are more affordable, which is beneficial for people looking to get into the fisheries. With time, individuals fishing on permits with lower baselines can ideally save enough money to later invest in a permit with larger baselines.

Some commenters also thought the vessel baselines restrictions continue to play a role in **conservation** and **prevention of overcapitalization** in some fisheries, particularly the sea scallop and squid fisheries. Some commenters were concerned that without the baseline restrictions, catch rates in some fisheries would increase too much or there could be too much fleet consolidation. However, other fisheries are more constrained by other measures such as possession limits and would not be impacted to the same extent if the baseline restrictions were removed. In addition, several commenters noted that the vessel baseline restrictions have less of an impact on fishing operations for fixed gear compared to mobile gear. For example, increased horsepower would allow trawl or dredge fisheries to fish harder and faster, but it would not have the same impact on pot/trap or gillnet fisheries.

6. Considerations for Changing Vessel Baseline Restrictions

If the Councils agree to initiate a management action to consider potential revisions to the vessel baseline restrictions, several considerations should be kept in mind and further evaluated.

One of many tools. An original goal of vessel baseline restrictions was to limit catch and preserve fleet diversity (Section 1). However, several major changes in fisheries management have since occurred that also achieve this purpose. Since the 2007 reauthorization of the Magnuson-Stevens Fishery Conservation and Management Act, annual catch limits (ACLs) and accountability measures (AMs) have become the primary tool for limiting fish removals, and thus, baseline restrictions may be less needed today for achieving the biological objectives of fisheries management. The data in this report indicate that vessel size and horsepower diversity exists across the fisheries generally. The vessel baseline restrictions have likely been impactful to this end, but the Councils should consider that fisheries have many other management measures such as possession limits, spatial and/or seasonal management, gear restrictions, and allocations (among seasons, sectors and/or states) that promote diversity within and among fisheries. Should a vessel baseline action be initiated, the Councils should identify if these original goals are still relevant and what other tools are in place to achieve them.

Minimize administrative burden. The administration of varying baseline restrictions across fisheries led the Councils to take prior actions to harmonize the requirements across the relevant fisheries (Appendix I). While there has been some interest identified through this

evaluation process in loosening restrictions for specific fisheries, vessels, or gear types, care should be taken to ensure that such a change would not increase administrative complication, which would ultimately add burden to fisheries and GARFO. For example, entirely removing baseline restrictions from some permit types may not increase the administrative burden. Changing the current 10% and 20% percentage caps for length and horsepower in a consistent manner across all relevant permit types would also likely not notably increase the administrative burden. However, applying different percentage maximums to different permit types, or other differences across permits, would likely increase the challenges of administering the baseline restrictions.

Omnibus approach needed. Given that many permit suites include permits for fisheries managed by both Councils, a joint omnibus action would likely be needed to consider modifications to vessel baseline regulations. For example, in 2025, of the 1,227 unique vessels with at least one permit with a baseline, 66% included permits for fisheries managed by both Councils (e.g., Atlantic mackerel and Atlantic herring permits), and just 17% of permits suites had MAFMC-only permits and 17% had NEFMC-only permits. This distribution has been similar since at least 2015. Vessel baselines is a complex topic, including different impacts by fishery, vessel size, and gear type, so it may be most appropriate to consider potential revisions through a joint omnibus FMP amendment rather than a framework adjustment, depending on the alternatives developed.

7. Recommendation and Next Steps

Based on this evaluation, Council staff recommend the Councils prioritize a joint management action to consider potential revisions to the vessel baseline restrictions. The evaluation process, including the comments received from Advisory Panels and the public, highlighted administrative and logistical challenges related to the current regulations that can vary across fisheries and vessels. The process also raised ideas for potential solutions that could be considered further, though notably some commenters were hesitant to support modifications. These issues can be more fully considered through the deliberative, public process of a Council action.

If the Councils prioritize development of a management action in 2027, a Fishery Management Action Team (FMAT) with a wide array of relevant expertise would be formed to assist Council staff in development of management alternatives and analysis of impacts. The FMAT should expand upon the expertise of the work group to also include social science/economic expertise, input from the U.S. Coast Guard, and other relevant expertise.

A future action would consider a variety of management alternatives, including a no action alternative. Specific alternatives would be developed in more detail after a public scoping period and additional analysis by an FMAT. The impacts of modifying/removing vessel baseline restrictions would be further evaluated through this action.

8. List of Preparers

The following personnel participated in preparing this document:

- ***MAFMC.*** Julia Beaty, Hayden Dubniczki
- ***NEFMC.*** Rachel Feeney
- ***GARFO.*** Travis Ford, Ted Hawes, Carolyn Iwicki, Michael Lanning

APPENDIX I. History of Vessel Baseline Restrictions

Early restrictions. The first restrictions on increases in vessel length for Mid-Atlantic or New England Council managed species were implemented for the surfclam and ocean quahog fisheries in the late 1970s. These restrictions were later rescinded when the fisheries became managed with individual transferable quotas. In 1994, baseline restrictions for vessel length, horsepower and tonnage were implemented in the Northeast multispecies and sea scallop fisheries when their limited access programs were created. Other limited access fisheries soon followed with similar restrictions, though the regulations varied across fisheries. By 1997, there were four different sets of restrictions that could apply to a single vessel, depending on the permits in its permit suite. This resulted in compliance and administration challenges as well as safety concerns.[11]

1999 Omnibus Consistency Amendment. To address the challenges with having varying regulations, the Councils collaborated on the Omnibus Consistency Amendment, which was implemented in 1999 and standardized the definitions and restrictions for vessel baselines, upgrades, and replacements across all limited access fisheries managed by both Councils (64 FR 8263). This amendment aimed to reduce complications for sales, transfers, and upgrades of vessels holding multiple limited access permits, while maintaining controls on fishing effort. It simplified regulations for vessel replacements, permit transfers, and vessel upgrades, making them consistent and, in some cases, less restrictive. Limited access programs adopted after this amendment (i.e., monkfish, Atlantic herring, and Atlantic mackerel) used these same requirements. This amendment also implemented the restriction on permit splitting, meaning that once permits are placed together on the same vessel, they are then treated as a permit suite that must stay together.

Following the Omnibus Consistency Amendment, all relevant limited access permits were allowed a one-time up to 10% increase in vessel size (based on length overall, gross registered tons, or net tons) and a one-time up to 20% increase in horsepower through a vessel or engine modification or replacement. For permits which already had these requirements (i.e., Northeast multispecies and sea scallops), the baseline against which these one-time increases were measured remained the vessel that originally obtained the limited access permit. For permits for which these restrictions were a change from the previous requirements, (i.e., summer flounder, scup, black sea bass, longfin squid, *Illex* squid, butterfish, and Maine mahogany quahogs) the baseline became the effective date of the Omnibus Consistency Amendment (i.e., March 22, 1999).

2007 Magnuson-Stevens Reauthorization Act. The Reauthorization Act mandated that councils set annual catch limits (ACLs) and accountability measures (AMs). In addition, the act promoted market-based management strategies, including catch shares, limited access privilege programs, and individual fishery quotas. Thus, both Councils set ACLs and AMs for virtually all stocks[12] and developed catch share programs in several FMPs. This shift from input-

[11] A more detailed summary of the history of the initial vessel baseline restrictions is included in Section 2.1 of the 1999 Omnibus Consistency Amendment.

[12] Longfin and *Illex* squid are exempt from the requirements for ACLs given their short life cycles.

based measures (e.g., effort controls such as days at sea, vessel capacity restrictions) to more output-based measures (e.g., ACLs, individual quotas) reduced the need for vessel baselines as a conservation measure because all stocks now had hard annual catch caps.

2015 Omnibus Vessel Baseline Amendment. Some challenges remained after implementation of the Omnibus Consistency Amendment. Therefore, GARFO and the Councils developed the Omnibus Vessel Baselines Amendment to consider how to further simplify and streamline the administration of vessel baselines, upgrades, and replacements for vessel owners and NMFS, while maintaining the function they provide for preserving fleet diversity and limiting capacity. To achieve this goal, this amendment, which was implemented in 2015, eliminated tonnages from the vessel baseline restrictions and eliminated the one time limit on increases in vessel length and horsepower (80 FR 51754).

Eliminating tonnages simplified the specifications defining the baselines. The Councils and NMFS agreed that tonnages were the most variable of the baseline specifications and had a lesser impact on limiting capacity than the restrictions on length and horsepower. Eliminating the tonnage baselines also eliminated the need for some permit holders to get a marine survey to verify their baselines (see Section 3).

Eliminating the one-time allowable increase in vessel size and horsepower allowed permit holders the flexibility to make multiple incremental increases without losing their ability to make additional future changes, if none of the changes increased beyond 10% of the length and 20% of the horsepower of the baseline specifications. This also reduced the administrative burden on NMFS, because the agency was no longer required to confirm if an increase had already occurred if the modified or replaced vessel was within 10% of the length or 20% of the horsepower of the baseline specifications.

APPENDIX II. Additional Data on Vessel Characteristics in 2025

Table 6. Vessel characteristics and number of permits associated with all vessels with baselines, all and active vessels, in 2025, by permit type.

Permit Type	Average length		Average horsepower		Average age		# of permits	
	All	Active	All	Active	All	Active	All	Active
All vessels with baselines								
Black Sea Bass	55	53	475	427	37	38	606	273
Scup	57	59	480	459	37	40	552	226
Summer Flounder	65	59	571	437	36	41	681	242
Illex squid	84	102	867	1286	40	36	67	34
Atlantic Herring	77	68	836	672	36	41	77	20
Butterfish	68	62	589	487	39	42	280	129
Monkfish	63	63	599	526	36	38	503	240
NE Multispecies	49	69	411	573	37	40	663	172
Red Crab	88	90	632	567	46	44	5	3
Longfin Squid	68	64	589	538	39	41	280	150
Sea Scallop	80	79	765	754	34	34	347	330
Atlantic Mackerel	75	61	733	513	39	37	121	55
Subset of vessels with more than one permit with baselines								
Black Sea Bass	57	54	490	428	37	38	545	243
Scup	57	59	478	460	37	40	548	225
Summer Flounder	65	59	576	438	36	41	664	239
Illex squid	84	102	867	1,286	40	36	67	34
Atlantic Herring	78	68	851	680	36	41	73	18
Butterfish	68	62	589	487	39	42	280	129
Monkfish	64	63	606	527	36	38	485	233
NE Multispecies	53	71	445	601	37	40	495	146
Red Crab	87	87	525	525	42	42	1	1
Longfin Squid	68	64	589	538	39	41	280	150
Sea Scallop	80	80	773	765	34	35	324	310
Atlantic Mackerel	75	61	733	513	39	37	121	55

APPENDIX III. Additional Data on Vessel Characteristics Over Time (2015-2025)

Table 7. Changes in average vessel characteristics and number of permits associated with all vessels with baselines, by permit type, 2015-2025.

Permit Type	Average length	Average horsepower	Average age	# of permits
Black Sea Bass	53 → 55 +4%	451 → 475 +5%	31 → 37 +19%	693 → 606 -13%
Scup	54 → 57 +6%	449 → 480 +7%	31 → 37 +19%	646 → 552 -15%
Summer Flounder	62 → 65 +5%	534 → 571 +7%	30 → 36 +20%	779 → 681 -13%
Illex squid	82 → 84 +2%	823 → 867 +5%	31 → 40 +29%	67 → 67 0%
Atlantic Herring	79 → 77 -3%	876 → 836 -5%	28 → 36 +29%	88 → 77 -13%
Butterfish	67 → 68 +2%	559 → 589 +5%	33 → 39 +18%	296 → 280 -5%
Monkfish	60 → 63 +5%	544 → 599 +10%	29 → 36 +24%	593 → 503 -15%
Northeast Multispecies	45 → 49 +9%	372 → 411 +11%	29 → 37 +28%	876 → 663 -24%
Red Crab	72 → 88 +22%	506 → 632 +25%	36 → 46 +28%	5 → 5 0%
Longfin Squid	67 → 68 +2%	559 → 589 +5%	33 → 39 +18%	296 → 280 -5%
Sea Scallop	79 → 80 +1%	753 → 765 +2%	27 → 34 +26%	337 → 347 +3%
Atlantic Mackerel	75 → 75 0%	749 → 733 -2%	32 → 39 +22%	142 → 121 -15%

Notes: Arrows indicate change from 2015 value to 2025 value, with percent change shown beneath. Colors indicate the magnitude and direction of change: gray is a less than 5% change in either direction; light orange/blue is 5–15% change; and dark orange/blue is a greater than 15% change. Orange indicates decreases and blue indicates increases.

Table 8. Changes in average vessel characteristics and number of permits associated with all active vessels with more than one permit with baselines, by permit type, 2015-2025.

Permit Type	Average length	Average horsepower	Average age	# of permits
Black Sea Bass	57 → 54 -5%	440 → 428 -3%	31 → 38 +23%	308 → 243 -21%
Scup	57 → 59 +4%	451 → 460 +2%	32 → 40 +25%	283 → 225 -21%
Summer Flounder	58 → 59 +2%	435 → 438 +1%	33 → 41 +24%	331 → 239 -28%
Illex squid	114 → 102 -11%	1443 → 1286 -11%	27 → 36 +33%	15 → 34 +127%
Atlantic Herring	97 → 68 -30%	1274 → 680 -47%	25 → 41 +64%	35 → 18 -49%
Butterfish	63 → 62 -2%	524 → 487 -7%	33 → 42 +27%	150 → 129 -14%
Monkfish	58 → 63 +9%	485 → 527 +9%	28 → 38 +36%	409 → 233 -43%
Northeast Multispecies	68 → 71 +4%	593 → 601 +1%	31 → 40 +29%	264 → 146 -45%
Red Crab	93 → 87 -7%	610 → 525 -14%	36 → 42 +17%	1 → 1 0%
Longfin Squid	63 → 64 +2%	531 → 538 +1%	33 → 41 +24%	181 → 150 -17%
Sea Scallop	79 → 80 +1%	747 → 765 +2%	27 → 35 +30%	310 → 310 0%
Atlantic Mackerel	81 → 61 -25%	846 → 513 -39%	30 → 37 +23%	72 → 55 -24%

Notes: Arrows indicate change from 2015 value to 2025 value, with percent change shown beneath. Colors indicate the magnitude and direction of change: gray is a less than 5% change in either direction; light orange/blue is 5–15% change; and dark orange/blue is a greater than 15% change. Orange indicates decreases and blue indicates increases.

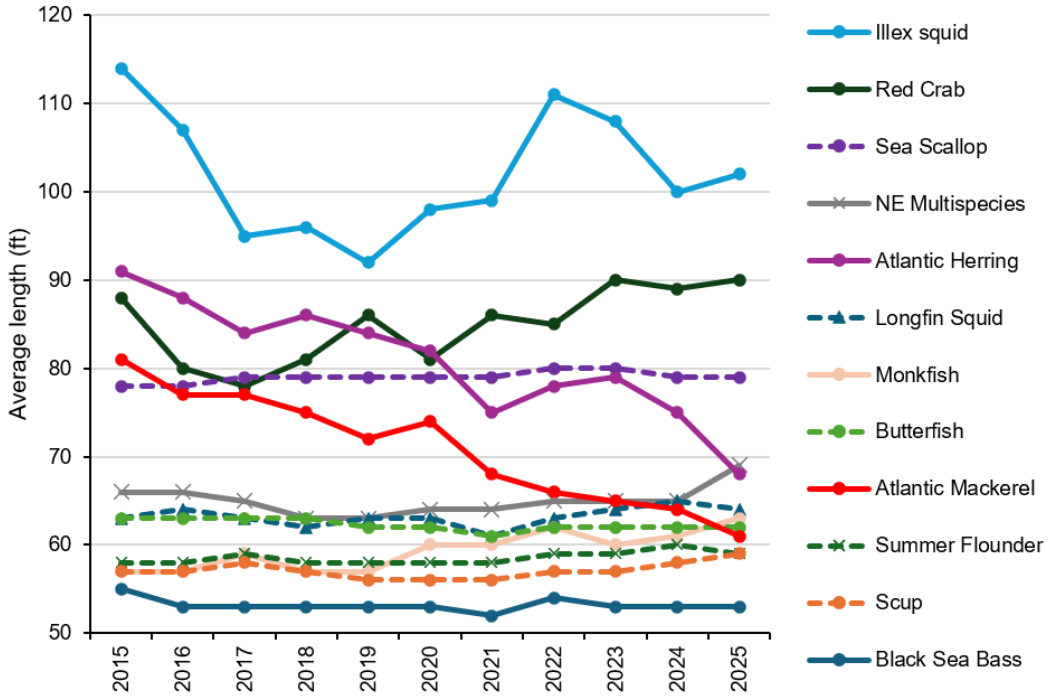

Figure 5. Average length by permit type for active vessels with baselines, 2015-2025.

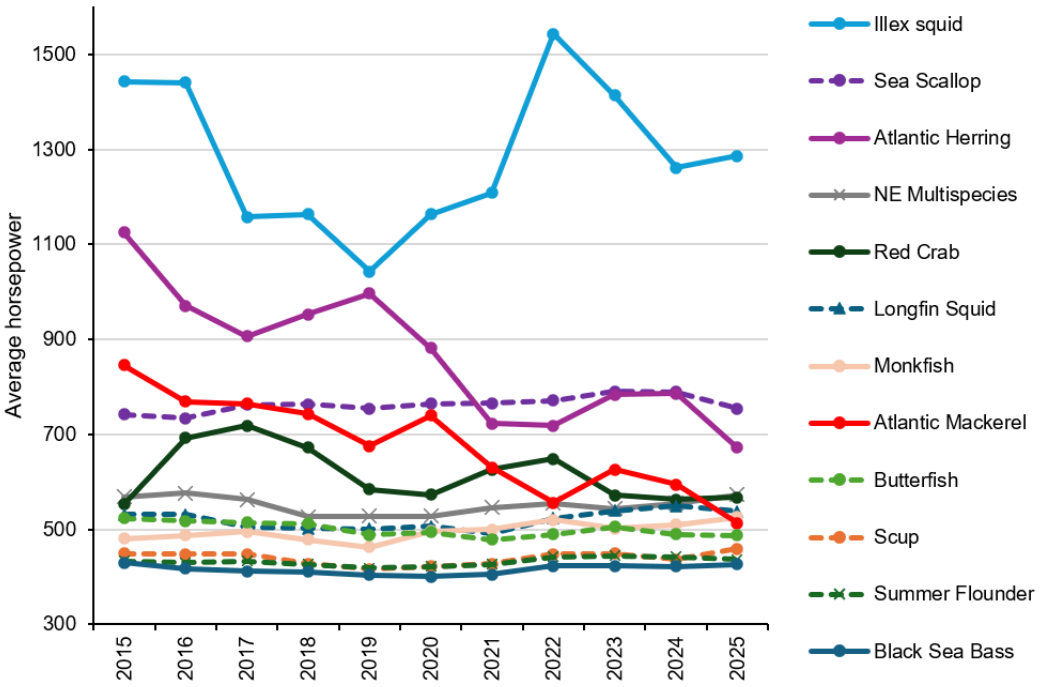

Figure 6. Average horsepower by permit type for active vessels with baselines, 2015-2025.

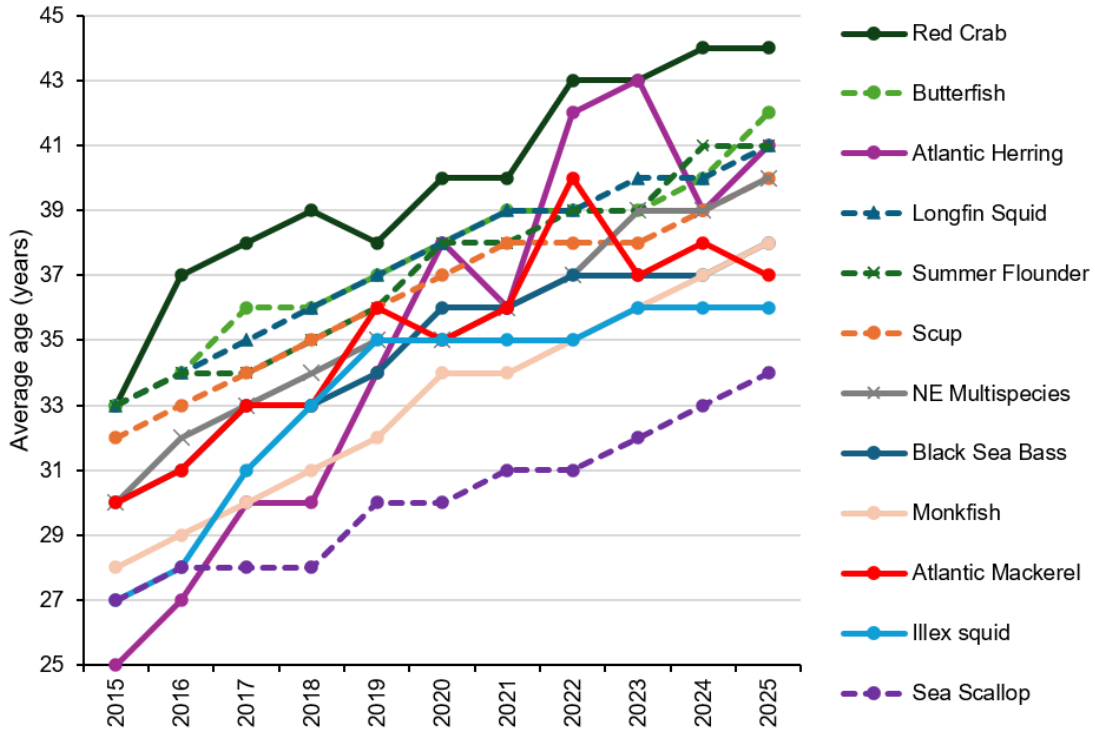

Figure 7. Average age by permit type for active vessels with baselines, 2015-2025.

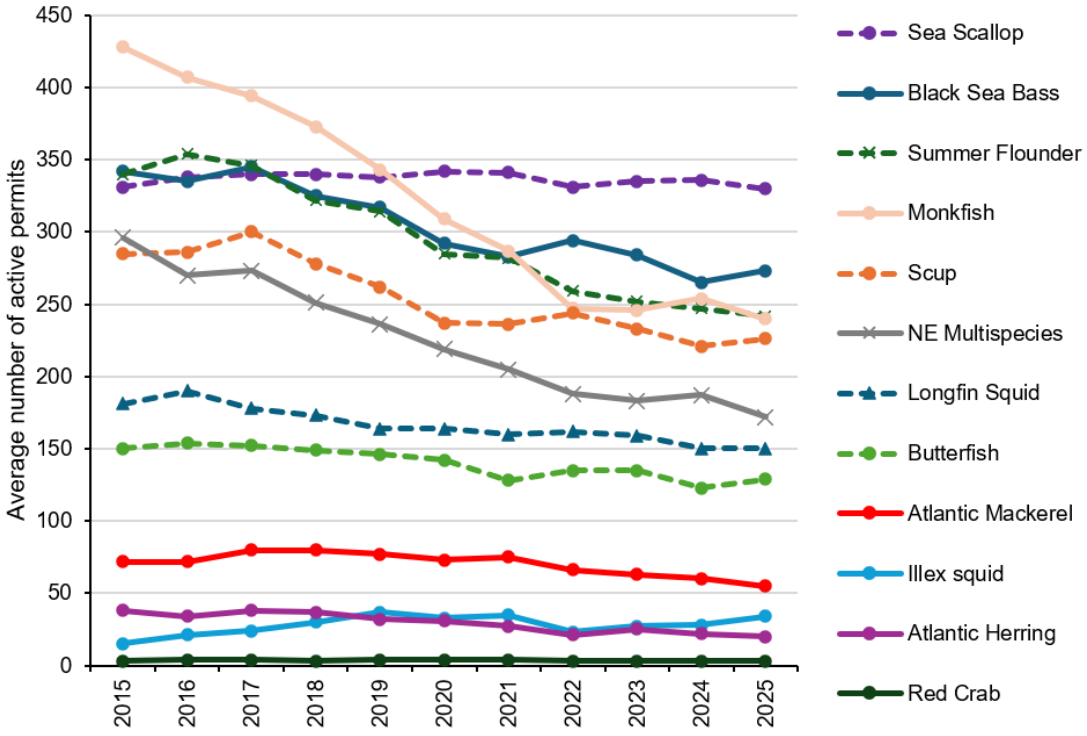

Figure 8. Number of active permits by permit type, 2015-2025.