

# CORRESPONDENCE



October 16, 2025

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

Dear Dr. O'Keefe,

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

Recommendation #1:

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

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

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

*I Blackburn Center*  
*Gloucester, MA 01930*  
*Tel: (978) 283-9992 [www.northeastseafoodcoalition.org](http://www.northeastseafoodcoalition.org)*

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

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

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

#### Recommendation #2:

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

#### Additional Comments:

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

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

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

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

Sincerely,

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

Vito Giacalone, Policy Director, Northeast Seafood Coalition

**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515-3902**

October 27, 2025

Dr. Cate O'Keefe  
Executive Director  
New England Fishery Management Council  
50 Water Street, Mill 2  
Newburyport, MA 01950

Dear Dr. O'Keefe:

Earlier this year, the Council Coordination Committee (CCC) responded to my inquiry outlining the impacts of reductions of personnel and funding at the National Oceanic and Atmospheric Administration (NOAA) on our nation's fisheries. The CCC noted that the reduction in NOAA resources and uncertainties about near-term and sustained funding caused disruptions to Council activities.

As the impacts of these cuts have unfolded, I would like to further understand how the New England Fishery Management Council's (NEFMC) ability to sustainably manage fisheries has changed. Specifically:

1. Given that the 2025 stock assessment schedule was altered in response to staffing and budget constraints at NOAA's Northeast Fisheries Center, how has this shift changed the timeline for fishers on the water and their ability to harvest on a routine schedule?
2. How have cuts to NOAA impacted your ability to implement Executive Order 14276, entitled "Restoring American Seafood Competitiveness?"
3. Are there any specific NOAA programs or public data that NEFMC relies on that no longer operate or function in an optimal manner?
4. Do you anticipate that the science, policy, and implementation of fisheries management will continue to be influenced by the cuts to NOAA?

Since September of 2024, NOAA has lost over 1,000 employees from its workforce, in part due to layoffs and early retirements. Given the NEFMC's reliance on sound science to balance competing interests, we in Congress and the public rely on your expertise to understand how our nation's fisheries will be impacted by these changes.

I appreciate your time and attention to these questions.

Yours,



Seth Magaziner  
Member of Congress



## New England Fishery Management Council

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

November 6, 2025

Mr. Michael Pentony  
GARFO Regional Administrator  
NMFS/NOAA Fisheries  
55 Great Republic Drive  
Gloucester, MA 01930

Dear Mike:

On November 6, 2025, Council staff electronically submitted the Omnibus Management Flexibility Amendment to the Council's Fishery Management Plans (FMP) to staff in the Sustainable Fisheries Division at the Greater Atlantic Regional Fisheries Office. This omnibus action is Amendment 26 to the Northeast Multispecies FMP, Amendment 22 to the Atlantic Sea Scallop FMP, Amendment 9 to the Monkfish FMP, Amendment 11 to the Atlantic Herring FMP, Amendment 9 to the Northeast Skate Complex FMP, and Amendment 7 to the Red Crab FMP. The amendment to the Northeast Multispecies FMP applies to large-mesh (groundfish) and small-mesh (whiting) multispecies. The NEMFC consulted with the Mid-Atlantic Fishery Management Council (MAFMC) on the amendment to the Monkfish FMP, as the FMP is jointly managed by the NEFMC and MAFMC.

The proposed action includes administrative changes to specifications frequency, specifications setting process, in-season adjustment authority, and preparation of Council reports/reviews. In general, the proposed action would increase management flexibility and consistency across the FMPs. The synergistic effects of the proposed action include expanded tools to prevent fishery delays, improved planning of Council final actions throughout the year, ability to respond to new information in a timelier way, and improved allocation of Council resources.

Upon review of the amendment document, please communicate any comments and/or need for further document revision directly to me. Please contact me if you have questions.

Sincerely,

Cate O'Keefe  
Executive Director

CC: Dr. Christopher Moore, MAFMC  
Dr. Jon Hare, NEFSC  
Bob Beal, ASMFC  
Moir Kelly, GARFO  
Travis Ford, GARFO



## New England Fishery Management Council

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

November 6, 2025

The Honorable Seth Magaziner  
United States House of Representatives  
2<sup>nd</sup> District of Rhode Island  
252 Cannon House Office Building  
Washington, DC 20515-3902

Dear Representative Magaziner,

Thank you for your October 27, 2025 letter inquiring about the New England Fishery Management Council's (NEFMC) ability to sustainably manage fisheries under recent reductions in NOAA's personnel and funding. The NEFMC provided feedback as part of the Council Coordination Committee's (CCC) response to your letter earlier this year, and we appreciate the opportunity to provide updated information specific to NEFMC operations and impacts on regional fishing businesses and communities. In May, the CCC noted that the impacts of the reductions were not fully known at the time but were likely to affect a broad range of programs that contribute to sustainable fisheries management. We offer the following in response to your recent questions and as examples of how the reductions have impacted the NEFMC and New England fisheries.

*1. Given that the 2025 stock assessment schedule was altered in response to staffing and budget constraints at NOAA's Northeast Fisheries Center, how has this shift changed the timeline for fishers on the water and their ability to harvest on a routine schedule?*

Stock assessments that support NEFMC-managed species are scheduled in coordination with multiple partners through the Northeast Region Coordinating Council (NRCC), which includes representatives from the NEFMC, Mid-Atlantic Fishery Management Council (MAFMC), Atlantic States Marine Fisheries Commission (ASMFC), NOAA's Northeast Fisheries Science Center (NEFSC), and NOAA's Greater Atlantic Regional Fisheries Office (GARFO). Coordinated scheduling is required as both Councils and the Commission share available regional NOAA resources. Due to the reductions in NOAA staff and funding, the NRCC negotiated a revised 2025 stock assessment schedule in May that included cancellation of several assessments and an indefinite pause in research efforts to support future assessments.

The stock assessment process directly informs the setting of annual catch limits and other management measures. In place of several 2025 scheduled assessments to support NEFMC management (monkfish, seven species in the skate complex, and four groundfish species), the NEFMC received fishery catch information and survey biomass indices from the NEFSC packaged as "Data Updates". This format of information had not been used by the NEFMC prior to this year and created challenges for the Council's Plan Development Teams (i.e., technical groups that provide options for catch advice) and the Scientific and Statistical Committee (i.e., science body that provides mandated overfishing limits and acceptable biological catch recommendations). The technical and scientific groups noted that the Data Updates did not

provide adequate information to determine stock status or forecast stock trends to inform sustainable management options. As a result, recommendations for catch advice were precautionary, which may impact economic viability of the fisheries.

In isolation, the changes to the 2025 stock assessment schedule and products may not result in changes to the timeline for fishery access at the start of the 2026 fishing year. However, precautionary measures may impact fisheries abilities to optimize seasonal harvesting and create “choke” stocks or seasons. Additionally, reductions in NOAA staffing at GARFO will likely result in delays in implementation of Council actions. We have already experienced unprecedented delays in implementation of groundfish (Northeast Multispecies Framework Adjustment 69) and Atlantic herring (2025-2027 Atlantic Herring Specifications) actions, both of which included increases of catch allocations for the 2025 fishing year but have not been implemented to date. Delays in finalizing catch advice can impact the fishing industry’s ability to plan trips, maintain crews, and align with market demand.

In anticipation of potential further NOAA staff and budget reductions, the NRCC has already revised the 2026 stock assessment schedule. This change will result in the cancellation of most planned assessments to be replaced with Data Updates. Undoubtedly, reduced capacity to conduct stock assessments will result in increased scientific uncertainty and impact the NEFMC’s ability to balance conservation and utilization objectives. Staff cuts and hiring freezes at GARFO have already and will continue to impact implementation of new management measures and could constrain fishing opportunities.

## *2. How have cuts to NOAA impacted your ability to implement Executive Order 14276, entitled “Restoring American Seafood Competitiveness?”*

The NEFMC submitted their response to Executive Order 14276 (EO 14276) on September 30, 2025. The Council identified four categories for potential actions, including 1) completed Council actions that have not been implemented, 2) Council actions already being developed in 2025, 3) proposed Council activities to reduce regulatory burdens and enhance economic profitability, and 4) non-Council activities related to other Federal agencies. As mentioned above, Council actions that would increase harvest opportunities for groundfish and herring in 2025 have not been implemented, and the Council emphasized that these delays are not aligned with the objectives of EO 14276. As a swift reaction to cuts in NOAA staffing and budget, the Council developed a Management Flexibility Omnibus action in 2025 with the objective of increasing flexibility in fisheries regulations to ensure that fishing operations are not disrupted due to lack of administrative resources. This action was passed unanimously by the Council in September with expected implementation in early 2026. The Council’s new proposed measures related to objectives in EO 14276 include modernizing vessel capacity regulations, revising punitive payback measures for exceeding catch allocations when stocks are healthy, and overarching review and improvements across several Fishery Management Plans.

The Council is awaiting guidance from NOAA Fisheries on the EO 14276 response to understand expected timelines and prioritization metrics. The Council’s ability to move these proposals forward will be highly dependent on available resources and support from NOAA partners at NEFSC and GARFO. Council staff are diverting time from policy development to fill information gaps left by NOAA’s reduced analytical output and administrative review processes. Resource limitations have slowed the Council’s progress on management actions directly tied to objectives of EO 14276, such as improving access to fishing opportunities and increasing production.



*3. Are there any specific NOAA programs or public data that NEFMC relies on that no longer operate or function in an optimal manner?*

Several NOAA programs and data products that the NEFMC depend on have been scaled back, delayed, or operating below optimal capacity. Ongoing data collection that continues long-term time series is essential to stock assessment, and gaps or changes in these data streams make analyses challenging. Such gaps contribute to instability in catch advice and fisheries yield. These data collection and analytical programs require vessel and crew time, infrastructure, and the expertise of analysts, scientists, and support personnel, many of whom have left the NEFSC since February. Additionally, the Council relies on socioeconomic data and analyses to support evaluation of impacts associated with Council actions. The Social Sciences Branch at the NEFSC lost a substantial number of employees in the last year that provided critical information to support Council decisions. The New England groundfish commercial fishery sectors' reliance on real-time information to support catch accounting and quota transfers was impacted when the primary support staff at GARFO was fired during the February cuts to probationary employees. Other examples of impacts include:

- Shortened or canceled survey legs due to maintenance issues and crew shortages, which disrupts stock assessment continuity and forces the use of outdated estimates;
- Uncertain funding for maintenance of the *R/V Bigelow*, the vessel used for the NEFSC spring and fall bottom trawl surveys, which provide critical data for most stocks managed by the NEFMC;
- Delayed publication of the Notice of Funding Opportunity (NOFO) for the Scallop Research Set-Aside (RSA) program, which supports critically important annual surveys for sea scallops; this program does not include Federal funding, instead it relies on commercial harvest of scallops with a portion of sales set aside to fund the surveys and research, and it is unclear why the NOFO has not published to support the 2026 Scallop RSA program;
- Reductions in the Port Biological Sampling Program and capacity to process samples, which has caused increased uncertainty in age-based stock assessments;
- Reductions in fisheries observer coverage rates due to contractor funding gaps and reduced data review capacity, which undermines accountability and compliance confidence leading to more conservative management measures;
- Reduced capacity in the stock assessment enterprise, including an indefinite pause in research activities to advance and modernize methods and approaches;
- Shortfall in funding to support the NEFSC's Recreational Bioeconomic Model, which has impacted the Council's ability to predict effects of proposed recreational fishing measures on angler satisfaction, fishing effort, and recreational harvest and discards;
- Substantial loss of NEFSC's social scientists and economists, which has resulted in less robust socioeconomic analyses to support Council decisions;
- Marginalization of climate related research and oceanographic modeling, which has impacted the Council's approach to risk tolerance when setting catch advice;
- Reductions in GARFO's Analysis and Program Support Division staff, which has delayed data access for development of Council actions;
- Overarching loss of institutional knowledge and expertise in fisheries science and management, which inhibits the Council's ability to make well-informed decisions.

*4. Do you anticipate that the science, policy, and implementation of fisheries management will continue to be influenced by the cuts to NOAA?*

The science and management enterprise in New England and nationally will certainly be impacted by the cuts to NOAA. The Council has been operating in a triage mode in 2025 as we gain understanding of the depth of the staff and program cuts. We anticipate that the impact of the cuts will become more evident and harmful as we move forward. As noted above, we are reliant on fishery dependent and independent information and stock assessments to sustainably manage fisheries and anticipate that reduced assessment capacity will continue for the near future. The substantial loss of social scientists and economists has and will continue to affect the Council's ability to provide adequate evaluations of impacts on fishing businesses and communities. Reductions in GARFO's capacity to review Council actions and develop fishery regulations will cause delays in implementation of management measures and lead to lost fishing opportunities. And the overall loss of institutional knowledge in the last year could take a decade or more to replace.

While the impacts that have occurred in the last year have created many challenges, the anticipated future influences of cuts to NOAA staff and funding are likely to be highly damaging to fisheries science and management in New England. The Council is proactively developing approaches to increase management flexibility and supplement scientific products through partnerships with state agencies, academic institutions, and research organizations. Adaptive management approaches to minimize disruptions to fishing operations are required to maintain public engagement and trust in the Council process, and regional NOAA leadership has been assisting the Council to advance new ideas and methods. However, sustained investment in surveys, stock assessment capacity, socioeconomic analyses, and policy development will be essential to restoring predictability and maintaining both economic stability and resource sustainability for New England fisheries.

Thank you again for your letter and continued engagement with the New England Fishery Management Council. Please let me know if I can be of further assistance.

Sincerely,



Cate O'Keefe  
Executive Director

CC:

Mr. Daniel Salerno, NEFMC  
Mr. Michael Pentony, GARFO  
Dr. Jon Hare, NEFSC  
Dr. Christopher Moore, MAFMC  
Mr. Robert Beal, ASMFC



## New England Fishery Management Council

50 WATER STREET | NEWBURYPORT, MASSACHUSETTS 01950 | PHONE 978 465 0492

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

November 14, 2025

Mr. Michael Pentony  
GARFO Regional Administrator  
NMFS/NOAA Fisheries  
55 Great Republic Drive  
Gloucester, MA 01930

Dear Mike:

Today my staff electronically submitted Amendment 25 (Revised) to the Northeast Multispecies Fishery Management Plan (FMP), including the Environmental Assessment, to your staff in the Sustainable Fisheries Division at the Greater Atlantic Regional Fisheries Office.

The measures proposed in Amendment 25 will:

- Incorporate the revised Atlantic cod stock units of Georges Bank (GB) Atlantic cod, Eastern Gulf of Maine (EGOM) Atlantic cod, Western Gulf of Maine (WGOM) Atlantic cod, and Southern New England (SNE) Atlantic cod into the Northeast Multispecies FMP,
- Set status determination criteria (SDC) for the four new Atlantic cod stock units,
- Set FY2026 specifications for GB cod,
- Set FY2026-FY2027 specifications EGOM cod, WGOM cod, and SNE cod,
- Define the apportionment method for setting the WGOM cod commercial sub-ACL,
- Establish the management uncertainty buffers for the Atlantic cod stocks,
- Set recreational sub-ACLs for WGOM cod and SNE cod,
- Adopt common pool trimester TAC distributions and TAC closure areas and establish baseline common pool trip limits for the Atlantic cod stocks,
- Set recreational fishing measures for SNE cod and,
- Establish a process for the Regional Administrator to adjust recreational measures for EGOM cod and GB cod.

This resubmission of Amendment 25 addresses NOAA's May 19, 2025, decision letter<sup>1</sup> to include the elements necessary for the action to be consistent with the National Standards and required provisions of the Magnuson-Stevens Act (i.e., the SDCs, distribution of ABCs, and accountability measures for the four cod stocks, as developed and included in Framework 69), by reformatting and combining the measures previously submitted in Amendment 25 and cod-specific measures submitted in Framework 69. To align with NEPA page limit requirements, we have included the Affected Environment and Cumulative Effects sections as appendices to the Amendment.

---

<sup>1</sup> <https://d23h0vhsm26o6d.cloudfront.net/20250515-A25-Council-Decision-Letter-0648-XE237-v2-Signed.pdf>

Upon review, please provide a “track changes” version of the document to us that identifies suggested revisions and contact me if you have questions. We will address any necessary corrections and submit a formal submission.

Sincerely,

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

Cate O'Keefe  
Executive Director