CORRESPONDENCE

11/11/2026

Council Chair Daniel Salerno.

I'm writing this letter to ask that the NEFMC consider increasing the trip limits for both the Northern and Southern stocks of Silver Hake through the upcoming new specifications package for fishing years 2027-2031.

The current trip limits for the directed whiting fleet have been in place since the early 2000's although an increase in the southern limit from 30,000 lbs to 40,000 lbs was approved in 2013. The trip limit for vessels using less than 3" mesh was increased from 3,500 to 15,000 lbs during the development of the Small-Mesh Specifications for Fishing Years 2021-2023. We would like the Council to consider a 50% increase in the trip limits for vessels using 3" mesh for both areas based on the following rationale.

- There is no biological reason to keep the present trip limits at current levels when considering the present status of the stocks. The 2025 Fishery Performance Report states that neither stock is overfished and overfishing is not occurring. In the Northern Area catch was 4% of the ACL, down from 5% in 2024 and 14% in 2023. In the Southern area catch was 28% % of the ACL, up from 8% in 2023 and 16% in 2024. This increase is most likely associated with the trip limit increase for vessels using less than 3" mesh . The present trip limits for vessels using 3"mesh at this point appear to be economically based on a "not flooding the market" mentality which would be in direct violation of National Standard Five of the MSA.

- We must compete with Canadian imports of whiting at certain times of the year or when the price is high enough for them to truck them down which then brings our price down. We are competing with Canadian vessels that do not have trip limits but have an annual quota that lets

them flood the NY whiting market whenever they want to. An increase in our trip limits would allow us to get some of the market share back

- Diesel fuel is our number one expense, the present fuel prices are making it extremely hard to run a profitable operation at this point. Most of the year we have to steam for 15 to 24 hours to get to the fishing grounds while burning up to 30 gallons of diesel an hour. An increase in the trip limits would help make each trip more profitable.

- An increase in the trip limits would be in line with the present administration's America First Seafood Strategy Policy which strives to expand domestic seafood production and also keep foreign products from undercutting American seafood businesses.

I would like to point out that an increase doesn't automatically mean that every directed whiting trip will land the full amount, it would just allow us to catch more whiting on any given trip where the weather and fishing are both cooperating. It could also allow these vessels to possibly do one longer trip instead of two shorter trips in any given week and save on the fuel costs associated with the time spent steaming back and forth to the grounds.

I appreciate the Council considering this action.

Thank you,

Dan Farnham

Blue Water Fisheries

Silver Dollar Seafood