CAPE COD COMMERCIAL
FISHERMEN'S ALLIANCE
Small Boats. Big Ideas.

October 12, 2025

Mr. Eugenio Piñeiro Soler
Assistant Administrator, National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

Mr. Samuel Rauch III
Deputy Assistant Administrator for Regulatory Programs, National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

Ms. Kelly Denit
Director, Office of Sustainable Fisheries, National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

Submitted electronically to nmfs.seafoodstrategy@noaa.gov

Re: EO 14276 Notice Response (90 FR 41818)

Dear Mr. Piñeiro Soler, Mr. Rauch, and Ms. Denit,

The Cape Cod Commercial Fishermen's Alliance (CCCFA) appreciates the opportunity to provide comments to the National Marine Fisheries Service (NMFS) in response to your agency's solicitation for input from the public as called for in Section 4(ii) of Executive Order 14276 on *Restoring American Seafood Competitiveness*. The Cape Cod Commercial Fishermen's Alliance is a member-based nonprofit organization representing 150 fishing businesses and over 300 fishing families, working to build lasting solutions that protect our marine ecosystem and sustain the future of our fisheries. As the leading voice for Cape Cod's commercial fishermen, we represent a diverse group of commercial fishermen, seafood processors, and shoreside support businesses who depend on access to healthy fish stocks and a vibrant marine environment. This Executive Order comes at a critical time for our nation's fisheries as they face rapid and unprecedented changes from a warming ocean to evolving regulations and markets, and declining trust in the scientific process. We encourage NOAA to use this opportunity to strengthen U.S. fisheries science, modernize management, invest in real-time data systems, revitalize working waterfronts, and expand domestic seafood markets to ensure long-term competitiveness and sustainability.

Modernize Fisheries Science and Management

NOAA's fishery surveys and stock assessments need modernization to keep pace with rapidly changing ocean conditions. Current federal trawl surveys are limited in space and time, and therefore cannot fully capture shifts in fish distribution, abundance and ecosystem conditions. Without an immediate and

1566 Main Street, Chatham, MA 02633 (508) 945-2432 info@capecodfishermen.org www.capecodfishermen.org

sustained investment in fisheries science, particularly through long-term, industry-based surveys that produce robust, reliable and trusted data, we risk losing not only a vital domestic food resource, but also the working waterfronts, and cultural heritage that define our coastal communities. The Agency needs to develop more analytical tools and staff with specific areas of expertise to model and include cooperative research data. For example, increased capacity at the Northeast Fisheries Science Center, could include specific training for modeling approaches that will bring new survey integration and data together.

We urge NOAA to use this Executive Order to strengthen and modernize fisheries management and science by expanding cooperative and industry-based research programs that allow fishermen to directly contribute to stock assessments, gear testing, and habitat monitoring.

The Cape Cod Commercial Fishermen's Alliance recommends that NOAA:

1. **Expand cooperative and industry-based surveys** that leverage fishermen's expertise and improve spatial and temporal coverage beyond traditional state and federal surveys
2. **Integrate cost-effective, real-time technologies** such as electronic monitoring, vessel-based video/optical surveys, and environmental sensors into assessments
3. **Develop protocols and frameworks** to allow verified, industry-collected data to be incorporated into stock assessments and models.
4. **Build trust in collaborative science** by treating fishermen as equal research partners

Collaborative research must be a cornerstone of modern fisheries science. Fishermen, scientists and managers should jointly design sampling protocols to ensure that industry-collected data can be easily integrated into management systems without adding undue burden on fishing operations. Equipping fishermen with tools to collect biological and environmental data at sea in real time empowers them to better understand ocean conditions and refine fishing practices, while scientists gain access to valuable data from areas and times of year not covered by traditional surveys. Exempted fishing permits are another tool that can provide valuable information to managers and scientists to test new approaches, new technology, that can advance sustainability and allow fishermen to continue fishing.

When fishermen are treated as equal partners, confidence in science grows. Historically, a disconnect has existed between researchers and fishermen, with fishermen's insights often dismissed as anecdotal. Yet, when they collect and share their own data, they take ownership of the process, building mutual trust and improving the accuracy and credibility of assessments. More participation means more data; more data leads to stronger, more reliable stock assessments which is the foundation of sustainable fisheries management and sound policy. A perfect example of this successful collaboration is the Commercial Fisheries Research Foundation's Lobster and Jonah Crab Research Fleet that since 2013 has provided data from areas and times of year not traditionally covered by existing surveys. The data collected by commercial fishermen has been used in the American Lobster Benchmark Stock Assessments.

To modernize the science that supports sustainable management, NOAA should establish a clear pathway for incorporating shorter, validated cooperative research datasets into stock assessments. This includes developing standardized review criteria for data quality, calibration methods to compare cooperative surveys with federal indices, and pilot assessments that test integration of emerging datasets. By allowing cooperative research data to inform assessments sooner than the current 7 -to-10 year threshold, NOAA can support more responsive, science-based decisions. It is imperative that the Agency ramp up their analytical capacity and commit to integrating survey data into assessments.

Finally, industry-collected data must be recognized as valid scientific data and fully integrated into assessments and management decisions by NOAA and the Regional Fishery Management Councils. Fishermen are on the water every day, observing changing conditions firsthand. Collaborative research should be the norm, not the exception, and a core part of how NOAA Fisheries fulfills its mission to manage sustainable, resilient fisheries for the future.

Invest in Real Time Data Systems

Community-based fishermen need technology and data systems that fit the scale of small boat operations.

We encourage NOAA to:

1. **Support affordable vessel-based sensors and data platforms** that allow fishermen to collect and view environmental and catch data in real time.
2. **Develop streamlined, one-stop reporting systems** that combine catch, discards, and environmental data
3. **Pilot adaptive management frameworks** that incorporate near real-time information to respond quickly to shifting species and ecosystem conditions

Affordable sensors, such as those measuring temperature, salinity, dissolved oxygen, or pH can be mounted on small fishing vessels with minimal burden. Vessel-based optical tools (e.g. drop cameras, stereo cameras) can be deployed opportunistically during fishing operations, adding value without extra cost. Developing mobile applications or onboard dashboards for real-time data visualization would help fishermen adjust fishing behavior immediately while improving data accessibility for scientists.

NOAA in collaboration with the Councils should establish clear protocols and standards for verifying industry-collected data so that it can be used confidently in stock assessments. Adequate funding is essential for processing, quality assurance, and analysis to ensure data usability. Calibration models between industry-based and federal surveys should be developed to enhance confidence and consistency across data sources. We ask that you create a research track/pilot integration pathway for cooperative datasets (ones that may have a shorter time series, or testing nontraditional gear etc.) so they can be evaluated and used in assessments without needing to meet the full conventional survey time series requirements.

Real-time management requires more responsive data systems and analytical tools. NOAA should develop adaptive management models that incorporate near real-time environmental and catch data such as electronic monitoring and dynamic ocean forecasting. Currently there are many programs and external partners that collect environmental data, but we need pathways to exist to have a maximum impact. We ask the Agency to prioritize advancing science to reflect the current state of the ecosystem. Investing in practical innovation will improve the scientific outputs, reduce costs, and help small community-based fishermen remain competitive and sustainable.

Protect and Revitalize Working Waterfronts

Working waterfronts are the backbone of America's commercial fishing industry. From Cape Cod to coastal rural communities nationwide, small-boat fishermen depend on docks, offloading facilities, cold storage, and repair yards that are increasingly at risk from gentrification, rising costs and climate impacts. Each of the 15 towns on Cape Cod has a working coastline and pier. These towns are communities built on fishing and provide part-time and full-time employment for thousands of residents. Despite the many successes, fishermen face enormous challenges today. A changing ocean is reshaping our waters –warming seas, shifting fish stocks, more frequent and intense storms. Fuel costs are high, and real estate development drives up the cost of waterfront property. Despite these challenges, fishermen continue to be resilient harvesters and caretakers of their ocean environment.

The Fishermen's Alliance urges NOAA and federal partners to:

1. **Prioritize funding for working waterfront preservation and infrastructure improvements**
2. **Expand options for community-based fishermen**, including procurement from small seafood businesses
3. **Support workforce training programs** for new entrants into the fishing industry

Protecting working waterfronts sustains the infrastructure and livelihoods that make domestic seafood possible and ensures that future generations can continue this way of life.

Strengthening Domestic Seafood Markets and Address IUU Fishing

The U.S. seafood sector remains underrepresented in federal food and agriculture programs. For decades, USDA programs have provided vital support to farmers and ranchers across the country, fueling modernization, market expansion, and steady food supplies. Unfortunately, America's fishermen have been largely left out, creating inequities that limit innovation and growth.

A recent study (Stoll et al. (2025), found that of the $31.2 billion in USDA funding awarded between 2018 and 2023, only $261.7 million supported seafood related projects –just 0.52% of total grants. Of that 0.52%, wild-caught seafood received only 3%. This imbalance has left the U.S. fishing sector behind other domestic food producers, despite providing one of the most sustainable and nutritious proteins available.

To level the playing field and boost domestic competitiveness, the Fishermen's Alliance urges NOAA and USDA to:

1. **Increase investment in seafood infrastructure, processing and supply chain development**
2. **Prioritize domestic seafood in federal food purchasing programs** (including schools, hospitals and food banks)
3. **Strengthen enforcement and traceability** to prevent illegal, unreported and unregulated (IUU) imports from undercutting U.S. commercial fishermen who abide by the rules.

In 2022, the U.S. commercial fishing and seafood industry generated $183 billion in sales and supported 1.6 million American jobs (NOAA, *Fisheries Economics of the U.S. 2022*). Yet, one of the greatest threats to these jobs is unfair competition from seafood imports harvested or produced through IUU fishing. These products flood U.S. markets at artificially low prices, driving down revenues for law-abiding American commercial fishermen. We believe strengthening IUU enforcement would help restore market fairness, reduce ecological harm, and ensure that U.S. seafood remains the global gold standard for sustainability.

Conclusions

As the Administration works to restore American seafood competitiveness, it must do so in a way that strengthens not sidelines small-boat, community-based fishermen. These independent businesses deliver local, high-quality seafood, sustain coastal jobs and embody the values of stewardship and accountability that should define U.S. fisheries.

As NMFS implements Executive Order 14276, we urge a continued focus on polices that bolster cooperative research and technological advancement, strengthen working waterfronts, reduce barriers for small operators, and ensure that American seafood remains caught, landed, and sold by communities that depend on it.

We look forward to continued partnership with NOAA and other federal agencies to advance the goals of the Executive Order 14276 and to ensure a strong future for America's small-boat fishing communities.

Sincerely,

Aubrey Church

Aubrey Church
Fisheries Policy Director
Cape Cod Commercial Fishermen's Alliance