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North Pacific Fishery Management Council
1007 West 3rd Street, Ste. 400 Anchorage, AK 99501

Date: September 24, 2025

Dear Chair Drobnica,

I submit these comments on behalf of the Alaska Longline Fishermen's Association (ALFA) to address B Reports and Council consideration of removing or simplifying regulations in response to the **Executive Order 14276** to improve the competitiveness of US fisheries.

Before addressing specific regulations, I will first state that ALFA considers the regulatory framework in which the Council operates to be integral to meeting the Magnuson Stevens Act objectives and National Standards that keep our fisheries sustainable. Likewise, while NEPA can be cumbersome at times, the Act also facilitates important public engagement in a complex process in ways that the MSA does not, and these public engagement steps are central to the appropriate execution of NPFMC's various mandates. We are not advocates for blanket deregulation and believe this EO directed review should be approached with both caution and a renewed commitment to science-based resource management that incorporates local and traditional knowledge and safeguards the health of Alaska's fisheries and fishing communities.

ALFA helped draft and is signatory to a letter submitted to Secretaries Lutnick and Rollins on March 4th that was provided to you as the first attachment in B1 NMFS Correspondence on EO14276, OCTOBER 2025. ALFA strongly supports the recommendations included in that letter, and in particular calls to your attention the following two sections:

“Provide stability and predictability: Our industry relies on accurate fish population surveys and their timely interpretation. The current stakeholder-driven system is anchored by the Regional Fishery Management Councils, which enable bottom-up engagement from fishing and seafood businesses. Additionally, U.S. fisheries are heavily dependent on the regulatory process to open fishing seasons and implement reasonable management measures, and any delays or inconsistencies can have immediate and severe consequences for our fishermen's livelihoods. **ALFA urges the Council to reiterate support for the existing fishery management process.**

Invest in Stable and Prosperous Fishing Businesses and Communities. All too often, commercial fishermen experience fishery management and agency governance as happening to us, not with us. Our industry works hard to make American fishing and seafood

processing businesses both strong and innovative. Federal agency reform should prioritize managing fisheries effectively and increasing access to U.S. seafood. Research and development operations such as Sea Grant provide significant benefits to fishing businesses in the form of job creation and workforce development, efficient fishing practices, economic development, and significant return on investment. Other programs that support vessel construction, permit and quota purchases, workforce development and safety at sea, fishery disaster response, and infrastructure development are also important to our continued prosperity. To achieve these goals, we request the following:

- USDA and NOAA focus on boosting domestic wild seafood production and investing in and prioritizing research that benefits our industry.
- NMFS reforms be focused on strengthening participatory governance and management of our great ocean resources, with priority for stability, fixing broken fish survey systems, integration of fisherman-generated cooperative research data, and strong fiscal investments in the success of our industry.
- Congress and NOAA ensure that fishery disaster responses keep our fishing families afloat and that new investments in port and harbor infrastructure are made to support vital fishing and maritime commerce.
- Congress and NOAA ensure the fishing industry's continued access to life-saving weather data, crew safety training programs, workforce development initiatives including the Young Fishermen's Development Act and Sea Grant.

International Commissions

Many Alaska and west coast fisheries also depend on management by international bodies, namely the International Pacific Halibut Commission and the Pacific Salmon Commission. Because halibut and salmon migrate from California to the Bering Sea, agreements between the US and Canada are critically important to sustaining healthy fish stocks and healthy fisheries. ALFA strongly supports US investment in these international bodies through NOAA and the State Department to ensure oversight and effective advocacy for US fishing interests.

Maintain Ecosystem and Community Resilience

In addition to engaging with NOAA to encourage them to take specific action, we strongly encourage you to advise on what *not* to do. Several harmful aspects of the Trump Administration's deregulatory agenda are well known to us and to you, including the closure of NMFS facilities and those of other key agencies, termination of knowledgeable staff performing mandatory regulatory functions, reduction of critical survey and environmental assessment capacity, and development of proposed budgets that would devastate NMFS capacity to execute its core fishery management mission. Of particular importance to our membership is recognition that climate shifts are bringing unprecedented change to both marine and coastal ecosystems. The ecosystems that support our fisheries are stressed; creating resilience demands an extra measure of caution and increased management responsiveness. ALFA strongly supports conservation measures designed to promote resource and fishing community health, including maintaining areas closed to some or all fishing to maintain habitat productivity, bycatch limits designed to protect fish stocks or fishery

dependent communities, and frame-worked actions that allow a more rapid response to change. Accomplishing these goals requires long-term modeling of ocean conditions and active integration of local knowledge through applied social science—measures we strongly support. The Council should express in no uncertain terms that the agency should not reduce its capacity in this regard in response to the directives of EO 14276.

Seafood and the USDA

Investment in working waterfront infrastructure, workforce and product develop, and domestic seafood marketing is critical to boosting seafood competitiveness. A recent study funded by the Alaska Sustainable Fisheries Trust found that .52 percent of USDA marketing grants are awarded to the seafood sector between 2018 and 2023, and of that only 3% went to wild capture fisheries. Seafood is nutritious and heart healthy; USDA investment in this important American industry will return economic benefits to rural coastal communities and health benefits to Americans more broadly. ALFA requests that the Council express support for fishing and seafood industry eligibility for USDA programs, including Farm Credit, marketing, and expanded/more diverse commodity purchases. This can be achieved through expanded and revised USDA mandates and discretion to increase investment in seafood harvesting and processing, with particular attention paid to the small-scale fisheries that sustain rural economies and regional food security.

Alaska Focus - Simplifying the Regulatory Environment and Increasing Efficiency

Relative to specific Alaska regulations that might be simplified or eliminated without compromising the conservation goals detailed above, ALFA suggests that the Council and Agency expedite action on the issues described below.

Sablefish/Halibut IFQ fisheries

- Eliminate the weight deduction for bled sablefish at the time of delivery. This deduction disincentivizes bleeding sablefish at sea, which has a negative effect on product quality, without providing meaningful benefits to catch accounting.
- Eliminate the requirement for residents of CQE communities to hold a Transfer Eligibility Certificate (TEC) to harvest CQE -held quota. Residents of many CQE communities have limited or no opportunity to gain the required 150 sea days to obtain a TEC but have experience with subsistence fishing and are eager to harvest CQE quota. (scheduled and commented on under the D-2 agenda item).
- Allow in-season transfer of CQE quota between CQE residents within the same community under the oversight of the CQE (i.e., without requiring NMFS review/approval) (also scheduled under D-2 for Council review)
- Expand the number of IFQ designated landing areas that allow tenders to collect IFQ and CQE fish from isolated and remote communities.
- Waive the three-hour Prior Notice of Landing and 6 am to 6 pm unload hours for IFQ or CQE landings under 2000 pounds.

Reporting and Observer Program

- Revise the zero-selection pool (currently <40' fixed-gear vessels and jig gear) to include fixed-gear catcher vessels with 1-2 annual trips and/or low annual quota volume. (recommendation from: [North Pacific Observer Program 2024 Annual Report](#))
- Exempt fishermen from logging a trip with ODDS when they have less than 500lb of unfished IFQ that may be encountered during a fishing trip. Onboard observers and EM review is expensive and inefficient when required on trips targeting non federal species which may encounter federal species. If a fisherman is participating in a state water troll, jig or longline fishery and has unharvested IFQ species that could be caught incidentally, they are required to log their trip on ODDS and may have to carry an observer. Often they do not encounter any federal species, but may have an onboard observer for time periods up to 2 weeks. This is a waste of resources, time and money that could be utilized in meeting observer requirements in fisheries targeting federal species
- Suspend requirements to submit regulatory logbooks for periods in which no fishing activity is taking place. This is currently included in the B1 EO14276 NMFS Regulatory Review Discussion Paper, section 5.1 Recordkeeping and Reporting Regulations and Streamlining for which the Secretary of Commerce could use Section 305(d) Authority. Table 3 lists removing reporting requirements for active / inactive periods for Catcher/Processors (C/Ps). This should be expanded to include CV's using the Daily Fishing Logbook (DFL). In the fixed gear sablefish and halibut IFQ fishery, vessels required to use the DFL must submit the logbook during periods without fishing activity and even during periods when the season is closed. This is burdensome on the fishermen and unnecessary paperwork for the agency.
- Also relative to logbooks, we ask that NMFS work with the IPHC to streamline logbook requirements for the sablefish and halibut IFQ fishery. Real Time Data has created an electronic logbook that is accepted by both agencies and is currently permitted to be used in lieu of the paper logbooks. This pilot program should be implemented fully across the fishery to streamline data collection by both agencies as well as reduce the burden on fishermen to meet logbook requirements.
- Eliminate VMS requirements for vessels fishing sablefish or halibut with pot gear. The fishery did not have VMS requirements in place until the legalization of pot gear. Vessels fishing hook and line are not subject to VMS requirements which makes for inconsistencies in regulation in the fishery. VMS units are expensive and also require a monthly subscription fee. Many vessels in this fleet are small producers who harvest low volumes of catch over a short period of the year.
- We support the NPFMC recommendation in B1 EO14276 NMFS Regulatory Review Discussion Paper, 5.2.1: Reduce Regulatory Burden on Vessels that Catch and Process Small Amounts of Groundfish. We prefer the option suggesting exceptions for vessels less than 55 feet (ft) (16.8 meters (m)) in length overall, but we recommend amending this to vessels less than 58 ft or 60 ft, which would encompass all smaller freezer troll vessels that have IFQ and/or incidentally catch groundfish species in low volumes. We

also support the option to exempt vessels participating in a fishery in which the State is exercising management authority in federal waters and process less than 10 mt (22,046 lb) a week. This could provide an opportunity to reduce the regulatory burden while also providing a cost savings to these small vessel operators.

- Direct Marketing Federal Species

Currently there are strict regulations and barriers inhibiting fishermen from direct marketing their own catch of federally managed fish. Relaxing regulations for small scale producers who want to direct market their catch would increase market opportunities and economics for fishermen. Fishermen who participate in Alaska state managed fisheries can land and market their catch on the dock or operate as an exporter and ship their fish via air cargo or other methods. The process through the state is much less cumbersome than federally managed species and many rural fishermen, or fishermen who do have little to no access to traditional processors are able to utilize this to create more economic value. Relaxing current restrictions to match those of the state of Alaska, would allow fishermen who fish lower volumes of quota in fisheries such as halibut or sablefish to increase the economic value of their catch through more competitive market opportunities.

Summary

In closing, ALFA strongly supports fisheries management that safeguards resource health and promotes sustained participation by residents of our fishery dependent communities. This includes habitat closures and areas managed to promote opportunities for community-based fishermen. America's seafood industry will benefit first and foremost from recommitment to science-based fisheries management informed by comprehensive surveys, careful attention to ecosystem dynamics, and reliance on local and traditional stewardship. We recognize the importance of international collaboration to maintain the health of migratory stocks, and we support strong investment in the US delegations attending these international negotiations. The US has significantly under-invested in seafood as an important and nutritious domestic food, and we urge a substantial expansion of USDA programs to support the US seafood industry, particularly the rural and small-scale operations that are critical to coastal economies and food security. Finally, we offer a short list of Alaska specific regulations that we believe could be eliminated or modified to increase fishing efficiency and opportunity without compromising resource health.

Thank you for the opportunity to comment.

Sincerely,



Linda Behnken
Executive Director