NORTH PACIFIC FISHERY MANAGEMENT COUNCIL



Angel Drobnica, Chair | David Witherell, Executive Director 1007 W. 3rd Avenue, Suite 400, Anchorage, AK 99501 Phone 907-271-2809 | www.npfmc.org

September 16, 2025

Mr. Eugenio Piñeiro Soler Assistant Administrator, NOAA Fisheries 1315 East-West Highway Silver Spring, MD 20910 Via email: eugenio.e.pineirosoler@noaa.gov

Dear Mr. Eugenio Piñeiro Soler:

The North Pacific Fishery Management Council (NPFMC) appreciates the opportunity to partner with NOAA Fisheries in the implementation of Executive Order 14276 Restoring American Seafood Competitiveness, and in particular, Section 4(a)(i) of the Executive Order pertaining to the Regional Fishery Management Councils.

The NPFMC has identified a list of recommended actions to reduce burdens on domestic fishing and to increase production within sustainable fisheries, including actions that stabilize markets, improve access, enhance economic profitability, and prevent closures. A detailed workplan is attached, which describes each action, the rationale for how it meets the goals of the Executive Order, and a proposed plan and schedule for implementation. The NPFMC list includes eleven priority actions which are currently under evaluation in the NPFMC process, as well as seven priority actions on which the NPFMC has already taken final action and which await NMFS rulemaking.

Additionally, the NPFMC prioritized a series of new actions related to recordkeeping and reporting, monitoring, and streamlining of regulations which will reduce burden on fishermen and increase flexibility, and which also are consistent with the intent of Executive Order 14192 *Unleashing Prosperity through Deregulation*. In order to be as efficient and timely as possible, the NPFMC has recommended that where possible, the agency use its Secretarial authority under Section 305(d) of the Magnuson-Stevens Act (MSA) for implementation. Some new actions will, however, require Council action due to the need to amend Council Fishery Management Plans; the Council intends to consider initiating action on these items at the October Council meeting.

On a national level, the NPFMC also continues to recommend that the agency remove the NOAA Fisheries Policy 01-119 specifying the need for regular allocation reviews. The Council retains the ability to review allocations at any time, and requiring a fixed review schedule is burdensome and unnecessary. Since the policy directive was issued in 2016, the NPFMC has completed (at great expense) four standalone allocation reviews, as well as six allocation reviews in conjunction with MSA-mandated limited access privilege program reviews, and none have resulted in further amendments to the allocations.

Due to the timing of NPFMC meetings, the June 2025 meeting was the only opportunity for the NPFMC to discuss a response to this Executive Order before the September 30th deadline for comments. The NPFMC meets again at the beginning of October, and will provide a supplemental letter following discussion on October 2-3, 2025. The June 2025 meeting provided limited opportunity for constituents and Council members to fully consider the implications and opportunities afforded by the Executive Order, and additional public comment and NPFMC discussion at the October meeting may result in supplemental recommendations.

We also note and appreciate the agency-wide <u>effort</u> to gather direct public input on fishery-related barriers, fisheries management, science, and other priority needs identified in the Executive Order, which is available through October 14, 2025. Based on communications during the June 2025 NPFMC meeting, we understand that NOAA Fisheries plans to coordinate with individual Councils on any region-specific recommendations received through the public comment solicitation. The NPFMC supports this approach.

Again, we appreciate the opportunity to provide comments on NPFMC priorities, and we are committed to working closely with you and NOAA Fisheries in maintaining and building a robust fisheries management program for the nation that provides sustainable fisheries, based on science and using a public collaborative process to engage with State and Federal agencies, Tribal representatives, fishermen, and other key stakeholders.

Sincerely,

Angel
Drobnica

Chair, NPFMC

Enclosure

Cc: Mr. Sam Rauch

Ms. Kelly Denit Mr. Jon Kurland

NPFMC Workplan of Recommended Actions in response to E.O. 14276

	Α	В	С	D	E	F
	Council	Action type	Relevant CFR Citation under	https://www.tings.nnfma.org/Adopting/Datails/2005	Rationale of how the recommended action(s) reduce burdens on domestic fisheries, increase production, stabilize markets, improve access, enhance economic profitability, and prevent	Council's proposed plan and schedule for implementation
1			Title 50		closures	
2	NPFMC	Regulation change	§ 679	Modification to maximum retainable amount calculations	Makes MRA calculations easier for vessel operators to comply with, reduces regulatory discards and potential for medical, mechanical, or weather issues to impact compliance	Council analysis of regulatory change underway. Council final action in October 2025.
3	NPFMC	Regulation and FMP change	§ 680	Crab Program arbitration report and information requirements	Create more transparency about arbitration process to benefit future participants, remove redudant requirements	Council analysis of regulatory change underway. Council final action in December 2025.
4	NPFMC	Regulation and FMP change	§ 679, 680	Removal of Economic Data Reporting requirements	Reduces burden of additional paperwork	Council analysis of regulatory change underway. Council initial/final action in October 2025.
5	NPFMC	Regulation change	§ 679, 680	Adjust annual timing and administrative processes for cost recovery and fee collection programs	Minimize incremental costs billed to industry	NMFS to prepare discussion paper for Council consideration. Council discussion in June 2026.
6	NPFMC	Regulation and FMP change	§ 680	Modification to eligibility requirements and use caps for crew quota shares in the BSAI Crab Program	Remove repetitive documentation requirements for C share holders	Council analysis of regulatory change underway. Council initial review in October 2025, final action in December 2025 or 2026.
7	NPFMC	Regulation change	§ 679	Allow use of NMFS approved scales in the sablefish fishery	Vessels already have scales onboard for other ifsheries	NMFS preparing discussion paper for Council consultation once options from scale vendors are available.
8	NPFMC	Regulation and FMP change	§ 680	Evaluate earlier Aleutian Islands (AI) golden king crab fishery start date	Align Al golden king crab fishery and season dates with market opportunities available earlier in the summer	NMFS intends to provide an assessment of potential options in the Cost Recovery Process Streamlining discussion paper. Discussion paper scheduled for Council review in June 2026.
9	NPFMC	Regulation change	§ 679	Changes to pot gear regulations to improve consistency across pot gear fisheries	Increases operational flexibility for vessels using new gear designs	Council review of discussion paper not yet scheduled.
10	NPFMC	Regulation change	§ 679	Individual Fishing Quota (IFQ) transfer, Community Quota Entity (CQE), and beneficiary changes (includes waiving or reducing the transfer eligibility requirements for CQE eligible community residents fishing CQE-held quota share)	Allow more fishermen to become eligible for quota share transfers	Council review of discussion paper underway. Council to review in October 2025.
10	NPFMC	Regulation and FMP change	§ 679	GOA Rockfish Program EM	Reduce burden and costs for Rockfish Program vessel opeartors	Council Committee discussing development of Exempted Fishing Permit and collaborative process, leading eventually to a Council analysis. Industry lead on EFP application still to be determined.

NPFMC Workplan of Recommended Actions in response to E.O. 14276

	Α	В	С	D	Е	F
	Council	Action type	Relevant	Description of recommended actions	Rationale of how the recommended action(s)	Council's proposed plan and schedule for
			CFR		reduce burdens on domestic fisheries, increase	implementation
			Citation	Additional description under agenda B1 at	production, stabilize markets, improve access,	
			under	https://meetings.npfmc.org/Meeting/Details/3095	enhance economic profitability, and prevent	
1			Title 50		closures	
	NPFMC	•	§ 300	Streamline the charter halibut	Longer time horizon provides stability and	Council review of discussion paper not yet
		change		management measures timing	increases opportunity for charter businesses to	scheduled.
12					market client trips	
	NPFMC	•	§ 300 <i>,</i>			Two avenues - Council will discuss and finalize list
		FMP change	679, 680		burdens on fishery participants, and/or increases	
				regulations, also consistent with EO	operational flexibility	1. Suite of measures identified for NMFS
				14192, Unleashing Prosperity Through		development and implementation through MSA
				Deregulation		305d authority.
						2. Suite of measures that require an FMP
						amendment, for which Council will initate analysis
13						in October.
	NPFMC	Regulation	§ 679	Modification to the pelagic trawl gear	Streamlines procedures and requirements, allows	Proposed rule in development at NMFS. Council
14		change		definition	flexibility for gear innvoation	final action occurred in June 2025.
	NPFMC	Regulation	§ 300	Recreational Quota Entity Funding	Provides stability to charter business through tool	Final rule issued in July 2025, effective 2026. Fisher
		change		(charter halibut stamp)	to avoid restrictive measures such as day of week	education and stamp infrastructure underway at
15					closures	NMFS for 2026 launch.
	NPFMC	•	§ 679		• • • • • • • • • • • • • • • • • • • •	BSAI Groundfish FMP Amendment 125 approved in
		FMP change		for small vessels using hook- and-line or	to harvest cod, potential new participants	September 2025, final rule in development at
				pot gear		NMFS. Council final action occurred in October
16	1105146	D 1 .: 1	r c=0	S	A 1 100 1 10 10 1 10 10 10 10 10 10 10 10	2022.
	NPFMC		§ 679	Small Sablefish Release – Operational	Additional limited operational flexibility to	Proposed rule in development at NMFS. Council
47		FMP change		flexibility for fixed gear to carefully	carefully release sablefish may increase the value	final action occurred in April 2025.
17	NIDEMC	Regulation	§ 679	release small sablefish Area 4 Halibut IFQ Vessel Use Caps -	of the commercial harvest. Provide additional harvest opportunities for	Proposed rule in development at NMFS. Council
	INFIIVIC	change	30/3	Provide additional harvest opportunities	vessels that were constrained by the previous	final action occurred in April 2025.
		Change		for vessels that were constrained by the	vessel use cap.	miai action occurred in April 2023.
18				previous vessel use cap	vesse, ase cap.	
	NPFMC	Regulation	§ 679	Sablefish Season Start Time - Provide	Provide additional flexibility for NMFS to set the	Proposed rule in development at NMFS. Council
		change		additional flexibility for NMFS to set the	time of day annually for the sablefish IFQ season,	final action occurred in April 2025.
		_		time of day annually for the sablefish IFQ	to line up with concurrent halibut fishery	·
19				fishery to open	<u> </u>	
	NPFMC	Regulation	§ 679	Standardize the reporting time limit for	Provides vessels with clarity about assigning hauls	Proposed rule in development at NMFS. Council
		change		assigning a management program to a		consultation occurred in April 2019.
				haul, including Community Development		
				Quota (CDQ) Program if applicable		
20						