



SOUTHEASTERN FISHERIES ASSOCIATION

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Southeastern Fisheries Association (SFA) Recommendations and Comments in Support of Executive Order 14276 Restoring American Seafood Competitiveness

The Southeastern Fisheries Association (SFA), established in 1952, is the oldest commercial seafood association in Florida. We proudly represent numerous historical small, family-owned businesses that have long served the American public by harvesting, processing, and distributing fresh, local seafood. We respectfully submit the following recommendations and comments in strong support of Executive Order 14276. The issues outlined below are of critical concern to our membership and the survival of the domestic commercial fishing industry.

1. Balanced Representation on Regional Fishery Management Councils

The 2007 reauthorization of the Magnuson-Stevens Fishery Conservation and Management Act included a requirement for balanced representation among voting members of regional fishery management councils. This provision—requiring equitable representation from the commercial, recreational, charter, and academic sectors—expired in September 2012. While it was in place, the councils reflected a fair and diverse range of perspectives, resulting in more equitable decision-making.

Since its expiration, the councils—particularly the Gulf and South Atlantic—have become skewed toward recreational interests. Currently, the Gulf Council has only **one commercial representative among 11 appointed members**, a clear imbalance that undermines fair deliberation. The commercial sector's voice has been minimized, leaving it at a disadvantage when regulations are proposed.

Recommendation: Reinstate the requirement for balanced representation on fishery councils to ensure fair, science-based regulation and equity among all user groups.

2. Shark Fin Sales Elimination Act of 2023

The passage of this act in December 2022 banned the sale, possession, and transport of shark fins—even when those fins are harvested legally under highly regulated U.S. standards. This measure has devastated the domestic shark fishery and driven responsible operators out of business, while doing little to curb unethical international practices.

Domestic landings data reveal the impact:

- 2025 YTD (through April 11): landings range from **2% to 15%** of allowable quotas.
- 2022–2024: steadily declining landings across all shark categories.

This law inadvertently rewards **unregulated foreign fleets** while punishing **compliant American fishers**, leading to ecological imbalance (due to surging domestic shark populations), harm to other fisheries, and increased public safety concerns.

Recommendation: Conduct an immediate review of the Shark Fin Sales Elimination Act to assess domestic economic impacts and unintended consequences, and consider exemptions for legally harvested fins.

3. Inflexible Fishery Science Mandates (Magnuson-Stevens Act SSC Authority)

The 2007 Act transferred excessive authority to Science and Statistical Committees (SSCs), prohibiting councils from adopting policies more liberal than SSC recommendations—even when credible new data is available. This rigidity undermines adaptive, real-time management and often ignores the vast, practical knowledge of seasoned fishers.

For example:

- **Gag Grouper (Gulf):** A stakeholder-supported six-month closure to aid recovery was rejected by NMFS scientists. Now, the fishery faces record-low quotas and a **seven-day recreational season in 2025**.
- **South Atlantic Red Snapper:** Despite high observed abundance and state-collected data suggesting stock recovery, **commercial and recreational access is highly restricted**, with only two recreational weekends permitted and a single-fish bag limit.

Recommendation: Amend the SSC authority to allow councils greater flexibility and incorporate stakeholder expertise and cooperative research findings in decision-making.

4. Closed Areas and Low Quotas in HMS Fisheries

Highly Migratory Species (HMS) such as tuna and swordfish are managed with outdated closures and underutilized quotas. Modern fishing gear and electronic monitoring systems have drastically reduced bycatch, yet regulations have not adapted to these advancements.

Key issues include:

- Unused quotas due to restrictive regulations and unfair international allocations.
- Recreational quota overages due to lack of timely reporting, which penalize commercial sectors in subsequent seasons.
- **Swordfish harvests fell from 8,000 in 1996 to 1,800 in 2023**, the result of 14 overly burdensome regulations.

Recommendation: Reassess and reopen appropriate closed areas using modern data and technologies. Advocate for increased U.S. quota shares in international agreements (e.g., ICCAT) and improve recreational harvest tracking.

5. Impact of Imports on the Domestic Seafood Industry

More than **90% of seafood consumed in the U.S. is imported**, often from countries with:

- Poor labor practices
- Severe environmental violations
- Use of banned antibiotics
- Lack of regulatory requirements similar to U.S. requirements creating unfair playing fields
- Forced child labor practices

In many cases, U.S. funds have even supported the development of foreign aquaculture systems that now undercut American producers. Mislabeling is widespread, as restaurants and retailers sell imported shrimp as “fresh local” to unsuspecting consumers.

Recommendation: Enforce country-of-origin labeling, enhance inspection standards, and provide support for domestic seafood industries competing against foreign subsidies and unfair practices.

6. U.S. Fish and Wildlife National Wildlife Refuges and National Parks restrictions and elimination of commercial fishing operations.

In Florida, National Parks and Wildlife Refuges such as the Merritt Island National Wildlife Refuge, Biscayne National Park, and others where historic commercial fishing operations, charter operations, and sight seeing operations have seen recent efforts to eliminate commercial fishing operations while continuing to allow charter and sight seeing operations. The commercial fishing activity does not harm any of the

areas where traditional fishing has occurred but the park superintendents have taken upon themselves to not renew commercial fishing permits for the areas thus eliminating commercial fishing. These actions are clearly contrary to the intent of EO 14276 and must be addressed. While the commercial fishing activity is small, it is historic and traditional and provides harvest of important commercial species such as blue crabs, mangrove snappers, lobsters, and other important species.

7. Decreasing Commercial Seafood Industry Activity and Continued Issues with Lack of Recreational Data, which adversely affects all fishers by negatively impacting stock assessments.

The recent Council Coordinating Committee meeting provided comments by all 8 regional councils about the continued decline of American Seafood small family businesses. This was discussed among the committee members and reflects what we see in the industry. It is clear that a problem exists which is caused by excessive regulations, arbitrarily setting low quotas based on overly conservative management measures. This is a national issue that must be addressed in order to achieve the goals of the President's EO.

In addition, all 8 council representatives discussed the ongoing issue of the lack of reliable recreational data programs. The recreational sector remains unaccountable for any reliable data collection program which results in best guesses of recreational harvest and discards with resulting discard mortality. The excessive discard mortality assumed to be from the recreational sector adversely impacts stock assessments which results in lower quotas to be harvested by every fishing sector, commercial, for hire charter, and recreational. A simple design for easy reporting is available for use on any cell phone where pictures can be taken of catch and submitted to managers that, with AI technology, can identify species harvested, estimate length, and weight of the species. This type of reporting can provide close to real time monitoring of recreational harvest, but must be required. The NOAA/NMFS with actions by the councils can implement such plans.

Broader Impacts

The cumulative effect of these regulatory and economic pressures is the **steady erosion of America's working waterfronts**:

- Small, family-owned fishing businesses are disappearing.
 - Coastal communities suffer job losses and economic stagnation.
 - Consumers face rising seafood prices and declining access to fresh, local products.
 - Supporting industries—processors, marine suppliers, fuel providers, and restaurants—are all negatively affected.
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Requested Federal Actions

1. **Review and assess the economic impact** of the Shark Fin Sales Elimination Act.
 2. **Amend the Magnuson-Stevens Act** to provide councils with flexibility to consider real-time data and stakeholder input.
 3. **Pursue increased U.S. quotas** and modernized management approaches in HMS fisheries.
 4. **Strengthen inter-agency collaboration** and require stakeholder engagement during rulemakings.
 5. **Provide clear guidance from U.S. Fish and Wildlife Department Managers to** instruct Park Superintendents to allow continued commercial fishing unless the fishing activity is proven to be harmful to the environment.
 6. **Identify excessive regulations and overly conservative management measures** that restrict commercial fisheries and remove such regulations and measures to allow more harvest of species.
 7. **Establish and implement simple recreational data programs** that can be easily operated using cell phone and AI technology. Such programs will enhance recreational data collection and provide a means for more effective data collection and improved stock assessments.
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Conclusion

Overregulation rooted in inflexible or outdated frameworks is not merely inefficient—it is actively destructive. It jeopardizes American livelihoods, undermines sustainable fisheries, and increases our reliance on foreign seafood sources that do not share our values for transparency, labor protections, and environmental stewardship.

SFA urges the Administration to prioritize reform in these areas and to support balanced, science-based, and stakeholder-driven management going forward. Restoring fairness and functionality to our fishery governance systems is essential to the survival of the American commercial seafood industry.

Respectfully,
Southeastern Fisheries Association
Established 1952