



The Honorable Howard Lutnick
Secretary of the U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

October 14, 2025

RE: E.O. 14276 Notice Response

Dear Secretary Lutnick,

My name is Yelena Nowak. I submit these comments on behalf of the Oregon Trawl Commission (OTC) in response to Executive Order 14276, “[Restoring American Seafood Competitiveness](#).” Established by the Oregon state legislature, OTC is a fishermen-funded state commodity commission, which represents all Oregon trawl fishermen who harvest groundfish, Pacific whiting, and Oregon pink shrimp, delivering their catch to the Oregon shore-based processors.

The Oregon trawl fishing industry generates roughly \$60 million annually at the boat level across three fisheries¹. The seafood produced by this industry is harvested responsibly off the West Coast, with the majority landed by Oregon fishermen to Oregon-based seafood plants. Oregon trawl-caught products are wild, high-quality, sustainable, and 100% American-caught and processed. However, the industry is struggling. The fishermen bear high regulatory costs as the West Coast Groundfish trawl fishery is one of the topmost heavily regulated fisheries in the United States. At the same time, the influx of cheap foreign seafood continues to suppress prices of Oregon trawl-caught seafood in the market. The cost-price squeeze has led to a significant decline of the industry. Ex-vessel prices for many trawl species have remained stagnated – some are lower than they were decades ago. For example, in 2025, the average price paid to fishermen for Widow rockfish is \$0.25/lb. compared to \$0.33 in 1995; Oregon pink shrimp on average fetch \$0.50/lb. in 2025, down from \$0.71/lb. in 1995.²

The OTC appreciates the Administration’s efforts to support the U.S. seafood industries. The majority of the following comments are specific to the federally managed West Coast Groundfish Limited Entry trawl fishery, operating under the rationalized Trawl Catch Share Program³. The fishery is overseen by the [Pacific Fishery Management Council](#) (Pacific Council) and the West Coast Region of the [National Marine Fisheries Service](#) (NMFS). Several other comments are broader and concern all domestic fisheries.

¹ West Coast non-whiting groundfish trawl, Pacific whiting, and Oregon pink shrimp.

² www.reports.psmfc.org/pacfin/f?p=501:2:14592073509309:INITIAL:::

³ www.fisheries.noaa.gov/west-coast/sustainable-fisheries/west-coast-groundfish-trawl-catch-share-program

A brief background on the West Coast groundfish trawl fishery

Over the last 15 years, the trawl sector of the groundfish fishery has undergone significant transformation, becoming a model of rigorous management and sustainability. Prior to the enactment of the Magnuson-Stevens Act in 1976, the fishery was heavily exploited by European foreign fleets just outside the three miles off the West Coast. Later, major federal investments in fleet expansion, limited scientific understanding of groundfish biology, and lax regulations led to excessive fishing pressure and eventual fishery collapse. From a federal disaster declaration in 2000, the fishery evolved into one of the most heavily regulated in the U.S.

Reflecting a precautionary approach, regulatory measures in the groundfish trawl sector include:

- 200% observer coverage (100% at-sea and 100% dockside)
- 100% individual catch accountability
- strict quotas
- gear restrictions to protect sensitive habitats, and
- extensive area closures

The industry has demonstrated a strong track record of compliance and collaboration with fishery managers and scientists, including active participation in the Pacific Council process and long-term cooperative science efforts like the [U.S. West Coast Groundfish Bottom Trawl Survey](#).

In recent years, the fishery has been hailed by NOAA Fisheries as environmental “comeback of a century.”⁴ Nine of the ten previously overfished groundfish stocks have been rebuilt – well ahead of schedule.⁵ However, high costs, loss of fishing and processing infrastructure, regulatory “red tape” in production (e.g. wastewater and stormwater permitting)⁶, and an inability to compete with cheap foreign seafood have contributed to economic decline in the fishery.

The industry urgently needs help if it is to survive. The comments below provide specific areas of federal fishery regulations or policies that, if appropriately modified, would significantly improve access and economic profitability for the West Coast groundfish industry.

High-Urgency Issues

Groundfish stock assessments

The West Coast groundfish fishery is currently experiencing a crisis with stock assessments. Scientific conclusions in more recent assessments about health of many stocks drastically contradict what fishermen observe on the water. New, more negative assumptions have been leading to pessimistic outcomes and substantial quota reductions. For example, the 2023 assessments of Shortspine thornyhead, Canary rockfish, and Petrale sole led to 2025 trawl quotas to be reduced by 63%, 60%, and 30%, respectively. Draft 2025 assessments of Widow and

⁴ www.fisheries.noaa.gov/feature-story/west-coast-fisheries-comeback-century

⁵ Council news: Rigorous management practices have led to successful rebuilding of several West Coast groundfish stocks (January 14, 2021) <https://shorturl.at/XHJJ6>

⁶ Seafood processing wastewater permitting www.oregon.gov/deq/wq/wqpermits/pages/seafood-processors.aspx. Stormwater permitting www.oregon.gov/deq/wq/wqpermits/Pages/Stormwater-Industrial.aspx.

Yellowtail rockfish are expected to lead to 59% and 25% trawl quota reduction.⁷ Drastic quota cuts are highly restrictive measures that indicate the stock has been overfished or is significantly declining. This contradicts the experience of fishermen who have not seen a decline in abundance with respect to the species that are subject to the quota cuts. Catches of these stocks have also stayed within the strict quotas.

We recommend the following:

1. **Review NMFS groundfish stock assessment process** to identify gaps, biases, and opportunities for improvement. The Pacific Council is conducting a similar initiative “*to evaluate transparency, trust, scientific rigor, and stakeholder engagement*”.⁸ Currently, NMFS scientists ‘reinvent the wheel’ each time they assess the same stock. This creates unpredictability and undermines trust.
2. **Include industry in the assessment process** by assigning an advisory seat to ensure that fishermen’s feedback is systematically considered. It is unclear how fishermen’s knowledge is utilized, if at all. Fishermen possess generational knowledge of local stocks, their behavior, and habitats which can greatly enhance assessment accuracy at no additional cost.
3. **Encourage NMFS scientists to develop a better understanding of the commercial fishery and its evolution.** Over the last 15 years, the industry’s environmental impact has been significantly reduced through fleet downsizing, regulatory changes (e.g. gear modifications and area restrictions), processing reduction/consolidation, and less overall fishing. We invite scientists to join fishing trips for firsthand insight into stock conditions and operational practices.
4. **For data-rich fisheries, prioritize fishery-dependent data** when reliable fishery-independent data (e.g. surveys) are lacking, or at least treat them equally. For example, the West Coast Groundfish Bottom Trawl Survey cannot effectively sample rocky habitats preferred by rockfish due to gear restrictions. Overreliance on such data can result in underestimating stock health and setting artificially low catch limits – a scenario that harms the industry without delivering conservation benefits.
5. **Invest in improved data collection and analysis**, including more innovative surveys, collaborative science, and logbook data integration. Poor data leads to poor decisions with both ecological and economic consequences. Stock assessment should not rely on unreliable data. For example, the survey data for rockfish mentioned above are referred to as the “Best Scientific Information Available” when they are simply unreliable in stock assessment, which has a significant impact on the livelihood of fishermen and the viability of the fishing industry.
6. **Complete NMFS studies on conservation benefits of trawl regulations** and incorporate those findings into the stock assessment framework. This ensures the full environmental benefits of industry compliance are recognized in assessing stock health.

⁷ <https://pam.pcouncil.org/wp-content/uploads/document-blocks/2025/08/01e9a975-2c6e-4f36-9c4a-e22cb3849887-OTC-comments-to-GF-SSC-SC-081125.pdf>

⁸ www.pcouncil.org/documents/2025/10/pfmc-response-to-co-14276.pdf/

7. **Undertake new groundfish studies**, such as examining behavior and migration patterns of Widow rockfish across life stages, starting with larvae. This would fill key knowledge gaps for the largest commercially important rockfish stock on the West Coast.

High regulatory costs

The West Coast groundfish trawl fishery faces disproportionately high regulatory costs with 10-20% of revenue going to regulatory compliance, including monitoring, cost recovery, and vessel buyback loan repayment. The high regulatory costs have significantly impacted the fishery's ability to compete in the marketplace, which is flooded with cheap, often unregulated or underregulated, imported seafood. We urgently request the following measures to enhance the competitiveness of this industry:

1. **Reduce 100% observer coverage requirement** (both at-sea and dockside).⁹ Observer costs for fishermen exceed \$700 per day, which is especially burdensome for small operators. Dockside observer costs add further strain also costing processors upwards of \$700 per day.
2. **Simplify the Electronic Monitoring (EM) program and reduce its costs.** High video review rates and burdensome requirements (e.g. deck sorting in bottom trawl) create cost and compliance barriers. Minor issues – like water droplets on camera lenses – can lead to infractions.
3. **Eliminate or reduce the 3% cost recovery fee.** NMFS charges the West Coast groundfish trawl sector the maximum amount allowed.¹⁰ The agency has not provided a detailed accounting of how these funds are used.
4. **Forgive the remaining \$7 million vessel buyback loan balance.** In 2003, Congress authorized \$46 million for vessel buyback; the trawl sector was responsible for \$28 million of that and has paid back over \$50 million to date.

Other Important, Less Urgent Issues (in no priority order)

1. **Eliminate Trawl Gear Exempted Fishing Permit (EFP)¹¹ and remove the outdated associated regulations.**¹² This EFP allows for year-round targeting of midwater rockfish with midwater trawl gear before the start of the Pacific whiting season, while reporting data on salmon bycatch. Since its implementation in 2017, this EFP has not triggered any bycatch thresholds, demonstrating no conservation risk. Refer to the comments from the West Coast Seafood Processors Association for additional details.

⁹ www.psmfc.org/program/west-coast-groundfish-observer-program-wcgop/

¹⁰ www.pcouncil.org/documents/2024/02/agenda-item-f-4-a-nmfs-report-1-pacific-coast-groundfish-trawl-rationalization-program-2024-cost-recovery-annual-report.pdf/

¹¹ www.pcouncil.org/documents/2023/10/e-6-supplemental-attachment-4-year-round-trawl-gear-midwater-rockfish-cfp-monitoring-and-minimizing-salmon-bycatch-when-targeting-rockfish-in-the-shorebased-ifq-fishery-2025-2026-west-coas.pdf/

¹² [50 CFR 660.130\(c\)\(2\)\(i\)](#) and [50 CFR 660.130\(c\)\(2\)\(ii\)](#); [50 CFR 660.130\(c\)\(3\)\(ii\)](#) and [50 CFR 660.130\(c\)\(4\)\(ii\)\(B\)](#); [50 CFR 660.112\(b\)\(1\)\(x\)](#) and [50 CFR 660.130\(c\)\(3\)\(i\)](#)

2. **Minimize Economic Data Collection (EDC) requirements.**¹³ Annual reporting is burdensome and can be reduced without impacting management. A five-year cycle in the EDC requirements would align with the Trawl Catch Share program review, which also happens every five years.
3. **Reduce frequency of Individual Fishing Quota (IFQ)-related administrative requirements** (vessel account, quota share account, and permit renewal) from annually to every five years to reduce administrative workload.
4. **Increase funding for Saltonstall-Kennedy (SK) grant.** In 2022, U.S. commercial fisheries supported \$182 billion in sales and 1.6 million jobs.¹⁴ Yet SK grant only receives \$6-\$12 million/year, despite the fund drawing from \$377 million in duties collected on imported seafood (2024).¹⁵
5. **Establish a long-term domestic seafood marketing program** to promote U.S. seafood based on health benefits, quality, and sustainability. This program should not be housed within NOAA Fisheries, as the agency's core focus is on fisheries science and the management of resources before harvest. Instead, the U.S. Department of Agriculture (USDA) would be a more suitable lead, given its mission to foster economic opportunity in rural communities and promote sustainable, productive agriculture.
6. **Create a seafood liaison office at the USDA** to ensure wild domestic seafood has access to USDA grants, research, and other nonregulatory programs, similar to land-based agriculture. Wild U.S. seafood is an important component of the national food system. It should have access to USDA marketing and economic development opportunities.
7. **Adequately enforce the Marine Mammal Protection Act import provisions** to ensure foreign fisheries comply with the same level of regulatory requirements as US seafood, leveling the playing field.¹⁶
8. **Expand the Seafood Import Monitoring Program (SIMP) to include all foreign seafood, including aquaculture products**, to screen out Illegal, Unreported, and Unregulated (IUU), child or forced labor derived foreign seafood products which undercut responsible U.S. seafood producers. U.S. fisheries are bound by strict laws and regulations to ensure responsible fishing and worker protection. Many foreign producers are not. A strong and comprehensive SIMP would help level the playing field for the U.S. seafood industry.
9. **Increase testing of imported farmed-raised seafood for banned antibiotics by the Food and Drug Administration (FDA)** to protect consumer health and level the playing field for domestic seafood.¹⁷ The misuse of antibiotics in aquaculture production constitutes an

¹³ www.fisheries.noaa.gov/west-coast/science-data/economic-data-collection-west-coast-groundfish-trawl-fishery#:~:text=All%20participants%20of%20the%20West,been%20a%20requirement%20since%202009

¹⁴ [www.fisheries.noaa.gov/resource/document/fisheries-economics-united-states-reports#:~:text=Current%20Economic%20Impact%20Trends,%2C%20\\$74.9%20billion%20in%20recreational](https://www.fisheries.noaa.gov/resource/document/fisheries-economics-united-states-reports#:~:text=Current%20Economic%20Impact%20Trends,%2C%20$74.9%20billion%20in%20recreational)

¹⁵ www.fisheries.noaa.gov/s3/2024-05/ORF-Transfer-Slides-MAFAC-May-2024.pdf

¹⁶ www.fisheries.noaa.gov/foreign/marine-mammal-protection/marine-mammal-protection-act-import-provisions#:~:text=The%20MMPA%20at%2016%20U.S.C.,in%20excess%20of%20U.S.%20standards

¹⁷ Some of the common banned antibiotics used in foreign aquaculture include: **Nitrofurans & Chloramphenicol** (antibiotics used in feed) banned due to potential carcinogenic effects and antimicrobial resistance; **Triphenylmethane Dyes**

unfair trade practice, enabling artificially low production costs. According to the most recent public data, the FDA only tests 0.1% (one tenth of one percent) of imported seafood for drug residues.¹⁸ Of the seafood tested, 12% of shrimp, 11% of tilapia, and 9% of catfish contained drug residues (2017 GAO report).

10. **Conduct a Programmatic Environmental Impact Statement (PEIS)** under the NEPA to **assess offshore finfish aquaculture risks**, especially in relation to wild fisheries and marine environment off the West Coast. Economic sustainability of the existing fisheries should be prioritized over introduction of potentially harmful farmed stocks.
11. **Review the protected species list** for potential delisting where warranted by improved stock status. Continued listing without conservation need yields no benefit.

Regarding NMFS

Many talented individuals work at NMFS, and we recognize their challenges. As NMFS undergoes workforce “re-balancing” to address personnel and budget cuts, the West Coast Region should engage directly with the fishing industry to better understand its priorities. This will help shape a stronger, more responsive plan aligned with the President’s directives. Internal performance incentives should also reflect the goals of the Executive Order to encourage cooperation and accountability.

We respectfully urge the administration to take these recommendations into serious consideration, as it works to restore American seafood competitiveness. The Oregon Trawl Commission and the industry we represent are committed to being active partners in building a strong, resilient, and sustainable domestic seafood sector. Our organization stands ready to assist in any way necessary to ensure the long-term success of our fisheries and to uphold the values of responsible stewardship, economic opportunity, and food security.

Thank you for your leadership and for the opportunity to provide these comments.

Sincerely yours,



Yelena Nowak
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(antifungal/antiparasitic dyes used in ponds) linked to cancer and organ toxicity; **Avermectins** (antiparasitic agent found in farmed salmon to prevent sea lice) residues can harm consumers at high levels; **Fluoroquinolones** (synthetic antibiotics used in feed) concern about antimicrobial resistance, **Isoeugenol** (fish sedative) possible carcinogenic effects.

¹⁸ www.gao.gov/assets/gao-17-443.pdf