



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

October 3, 2025

RE: Recommendations for Restoring American Seafood Competitiveness

Dear Ms. Denit:

The North American Marine Alliance (NAMA) supports independent fishermen to steer decisions about their livelihoods, coastal resource management, and the future of food security. We represent 500,000+ fishing families across North America through our program areas. We welcome the opportunity to address how the Administration can improve our fisheries, and allow family fishermen to once again be prosperous in providing healthy seafood to communities here in the U.S.

We focus these comments on **three key areas**:

- (1) catch share reform,
- (2) stopping Federal agencies from permitting harmful finfish aquaculture operations, and
- (3) clamping down on tainted seafood imports.

Recommendation 1: Reform catch share policy

Executive Order 14276 states that “Federal overregulation has restricted fishermen from productively harvesting American seafood.” NAMA agrees with this assessment, insofar as it relates to America’s fishing families. “Catch share” policy is in dire need of reform, as these **federal regulations have designed an unfair playing field, which is directly contributing to job losses and economic harm** in our nation’s fishing communities.

The privatization of fishing access has harmed family fishermen and transferred wealth away from working waterfronts and into the hands of private equity firms and global corporations. NAMA urges the Administration to examine and address the anti-competitive impacts of catch shares, as they prevent new fishermen from entering a fishery and ultimately consolidating wealth and power among existing “quota holders” — with little to no benefit to the American public.

How Did We Get Here? NOAA Fisheries “Gifted” Quota to Some, and Excluded Most

NOAA Fisheries’ advancement of catch shares – also known as individual fishing quotas (IFQs) or individual transferable quotas (ITQs) – over the course of several Administrations has been disastrous across America’s coasts ever since this policy was adopted in the early 1990s. A [piece by FoodPrint](#) helps lay out a brief background on how we got here. The theory was if the total allowable catch were divided into sellable “shares,” proponents reasoned fishermen would treat their share like a personal stake in the health of the fish stock.

But those shares became more like **investments**, becoming more valuable as assets to be bought and sold than they were as a way to encourage responsible fishing. Because the shares were **tradeable, in many cases any entity could buy them** — usually with no or minimal limits on share ownership, which naturally greased the wheels for consolidation. And because the initial shares (as doled out by NOAA) were **given** based on historical fish catches, larger operations started out with more of the catch, leaving smaller fishermen with few shares or not enough to sustain their business. Many fishermen allege that the intent of this system was for the Federal government to reduce fleets and evict as many fishermen as possible - despite its destruction to their livelihoods.

Interestingly, Congress passed a moratorium on new catch share programs in 1996. However, it was short-lived. Things worsened when the Magnuson-Stevens Fishery Conservation and Management Act (MSA) was reauthorized in 2007 to *lift the Congressional moratorium* on privatization schemes. As these programs expanded under the Obama administration, they led to rapid fleet reduction and job losses for family fishermen. Once-thriving fleets that numbered in the hundreds, have shrunk in some cases to just a few.

The surviving fishermen are seeing higher costs. **Today, fishing quota is often bought, sold, and leased by non-fishing shareholders (including overseas private equity firms), resulting in a wealthy few entities that dictate price and further squeeze out America’s fishing families.** Transferring wealth away from fishing communities and into the hands of so-called “sea lords” produces no benefit for the public, and has only resulted in **extreme consolidation, anti-competitive business practices, and bankruptcy for coastal fishermen across the country.** Access to our nation's publicly-owned fishery resources should instead be prioritized for *boots-on-deck* family fishermen.

The fishermen who didn’t have enough quota to make a profit found that they couldn’t afford to buy more shares, so they just sold their shares to wealthier fishing companies. Others chose to keep fishing by either leasing shares from the wealthy companies, or signing on as contractors for these companies (as was the case with fisherman Jerry Leeman, profiled further below).

In sum, share owners could buy up catch shares and shift the costs onto fishermen who didn’t have the capital or access to participate in the system themselves, then price-gouge those fishermen just to keep working. Catch shares emerged as a lucrative, low-risk investment game where the only winners are those with high capital — **artificially propped up by U.S. regulatory structures and barriers, courtesy of NOAA Fisheries.**

Case Study: Catch Shares in the Gulf (Red Snapper IFQs) Entrench Shareholders and Ward Off the Next Generation of Fishermen

The Gulf of Mexico Fishery Management Council's IFQ system for red snapper, introduced in 2007, was purportedly created to prevent overfishing and promote sustainability by controlling the total allowable catch (TAC) of red snapper in the Gulf. Yet despite a healthy stock, the number of boats actively fishing has drastically declined from over 800 in 2007 to just around 370 or fewer today. Of these, only 150 boats are still actively participating in the red snapper fishery.

The red snapper fishery is increasingly controlled by a few large shareholders, corporations, and absentee investors. These entities do not fish, but instead profit from *leasing quotas to active fishermen*, usually at shocking rates, which has earned them the nickname “armchair fishermen.” As documented by commercial fisherman David Maginnis, Vice President of Jensen Tuna, in the Gulf red snapper fishery, **these leasing costs can eat up as much as 53% of a fisherman's gross revenue**. The result is a system where the fishery is neither economically sustainable nor equitable. The fishermen who lease these quotas often pay exorbitant fees that leave them struggling to stay afloat. Many fishermen's dreams of one day owning their own fishing vessel are dashed, and they will be forced to fish for someone else for the rest of their lives or leave the industry entirely.

This current anti-competitive regulatory barrier also discourages new entrants to the fishery. There is no incentive for young men and women to follow in their families' footsteps due to the artificially high cost of quota. By committing to reforming this broken fisheries management system, this Administration can ensure that quotas are tied to active boat owners and captains who participate in the physical labor of harvesting, not absentee investors.

Case Study: Dominant Foreign Quota Holder Collapses and Leaves New England Working Waterfront Communities to Foot the Bill

In 2022, a [ProPublica and New Bedford Light investigation](#) exposed seafood company Blue Harvest and its parent company Bregal Partners, a Dutch private equity firm, for their practice of squeezing profits out of fishermen already struggling to stay afloat. The article also dug into Bregal's ownership by a “highly secretive” billionaire family in the Netherlands. In response, New England senators [called for greater federal scrutiny](#) of private equity's expanding dominance over fisheries, yet little has been done. In fact, the U.S. government *even aided this company through a USDA seafood purchasing deal for East Coast seafood producers* that resulted in a [\\$1.6 million payday](#) to Blue Harvest, as well as additional major USDA contracts [in 2020 and 2022](#).

The 2022 ProPublica / New Bedford Light report found that Blue Harvest was the single largest permit holder in the New England groundfish industry, a multispecies fishery that includes Atlantic cod, haddock, and pollock. Blue Harvest owned rights to catch 12 percent of groundfish, which amounts to 46 million pounds of fish. However, that number is an underestimate, as *Blue*

Harvest also leases fishing rights, or quota, from other permit owners. NOAA Fisheries sets no limits on quota leasing, letting individual companies dodge excessive share restrictions, nor does it disclose who controls fish quotas. In effect, corporations and private equity firms have an open pathway toward consolidation — and the public has no clear way of tracking the concentrated corporate control of federal fishery resources.

It concerns NAMA that fisheries regulators don't know who controls fishing access in our domestic fisheries. Meanwhile, [due to catch share programs](#), we continue to watch fellow fishermen lose access to the fish off their own coastlines, **not because the fish aren't there, but simply because they don't have the capital to compete with private equity firms and wealthy shareholders.**

The impact on New England fishermen has been severe. “Tell me how I can catch 50,000 pounds of fish yet I don't know what my kids are going to have for dinner,” Jerry Leeman, a local fisherman working for Blue Harvest, was quoted at the time of the 2022 investigation.

Tim Barrett, a member of NAMA's coalition who fishes out of Plymouth, MA, has said, “From the start, we knew catch shares would lead to corporate consolidation and vertical integration. We started losing people right from the jump.” In the five years after the catch share policy was introduced for New England groundfish, Barrett saw his fishing fleet, Northeast Fisheries Sector 10, shrink from 28 boats to about a dozen. “Now we're down to one — that's me. Last man standing. It's tragic.”

Similar dramatic decreases in groundfish participation are evident in Rhode Island, Connecticut, Maine, and New Hampshire. NAMA has heard from fishermen currently on the water that they estimate only 30 boats are actively fishing for groundfish throughout all of New England.

In May 2023, Blue Harvest [laid off 64 workers](#) at its fish processing plant in New Bedford, MA. In June, Bregal Partners [announced its divestment](#) from Blue Harvest and several other of its seafood holdings. In November, only three years after assuming control and becoming the dominant player in the New England groundfish fishery, [Blue Harvest suspended its operations and filed for Chapter 7 bankruptcy](#), leaving many fishermen unemployed once again. It was estimated that **Blue Harvest left as much as \$100 million in outstanding debts** — many of them to local vendors in New Bedford who performed maintenance and upgrades on its fleet. [A follow-up investigation by the New Bedford Light](#) found that the bankruptcy was **likely an avenue for Bregal to avoid paying those debts** and maximize the cash it could extract.

Also **among the unpaid creditors were fishermen themselves**, who were never fairly compensated even when Blue Harvest was still solvent. Indeed, fishermen were expected to shoulder most of its operating costs as independent contractors, with Blue Harvest charging them for the fuel, maintenance, gear and even permits. For crew members, this meant earning [as little as 7 cents per pound of fish](#).

The Administration Should Act to Repeal or Reform Federal Catch Share Policy

While catch share programs vary by region, they share a few core commonalities. First, the original “beneficiaries” of this giveaway from the Federal government — that is, those who were freely given the initial ample quota by NOAA Fisheries — tend to most vociferously defend the program. Second, the large quota holders rely on NOAA Fisheries to keep the unfair system in place, which lets them continue to charge exorbitant leasing rates to smaller-scale fishermen – the same rates that prevent new, would-be entrants from ever entering the fishery as owner-operators. Third, while a few exceptions exist in the North Pacific, these systems place little to no restrictions on who can own the quota, require minimal transparency so the public does not know who owns it, and have few to no restrictions on transferability.

NAMA asks that the Administration investigate and remove the anti-competitive regulatory barriers presented by unfair catch share policies. In particular, NMFS should work with other agencies to investigate the **lack of transparency around quota ownership and leasing, bar the transferability of quota among private hands, block monopolistic control through stricter caps on quota ownership, and return fishing access back to the hands of independent family fishermen** who earn their living on the water.

Recommendation 2: Support Family Fishermen and Save Money by Cutting Off Federal Funds that Prop Up Harmful Finfish Farms in the Ocean

NAMA agrees with EO 14276’s assertion that aquaculture can play a role in our overall seafood production, but with a significant caveat - **the type of aquaculture matters**. Bivalve and seaweed farming, regulated by the states, is a welcome addition and supplement alongside our wild-capture fisheries. However, massive, polluting finfish farms in our oceans are an entirely different beast and should never have a place in our nation’s waters.

America’s commercial fishermen and coastal communities **resoundingly reject the development of massive finfish farms off of our nation’s coasts**. These operations directly **discharge pollution and contaminants** into the surrounding waters, including fish waste, over-enriched excess fish feed, **diseases, antibiotics, and pesticides**. **Wild fish stocks are harmed** by being in close proximity to these factory fish farms, and so are the commercial fishermen who rely on healthy ecosystems to earn a living. The Federal government must not sacrifice these communities or our shared marine resources for a controversial industry that has proven that it will recklessly harm *existing* coastal waterfront businesses in its own quest for profit.

Despite fish farming’s massive unpopularity and poor global track record (even in developed nations like Norway), NOAA Fisheries has spent roughly two decades seeking to develop and promote this deeply problematic industry. NOAA Fisheries has wasted millions of dollars of taxpayer money on controversial grants to subsidize the nascent aquaculture industry, rerouting funds granted through programs such as Sea Grant, the Saltonstall-Kennedy Grant program, and SBIR grants. Between 2017-2024, agencies spent nearly \$45 million promoting fish farms through these three grant programs alone.

In 2025, NOAA Fisheries announced a \$300 million funding opportunity to create a Cooperative Institute Fostering Aquaculture Research and Marketing (CIFARM). Despite a clear lack of buy-in from the American public, and no meaningful effort to address the adverse economic impacts of industrial aquaculture on independent fishermen, NOAA Fisheries invested an amount equivalent to roughly 25% of its enacted FY24 funding level into the establishment of a promotional entity for the aquaculture industry.

Both the U.S. Congress and the Federal Courts have had no interest in overruling the will of the people. The U.S. Congress has never authorized NOAA Fisheries to begin zoning the oceans for fish farms, yet the agency has been working with industry trade groups and large NGOs to do exactly that.

In ***Gulf Fishermen's Association v. NMFS***, the Fifth Circuit Court of Appeals [held](#) that the Manguson-Stevens Fishery Conservation and Management Act (MSA), the law of the land for fisheries management, **does not authorize** NOAA or its Regional Fishery Management Councils to regulate aquaculture in federal waters.

Right now, the drive for fish farms – *and the resulting demand for countless tons of wild fish to feed those farmed fish* – is spurring **Canadian companies to exploit state and federal waters, leaving America's fishermen and coastal residents out to dry**. The irony here is that Canada is also placing restrictions on open net pens in their own waters because of detrimental impacts. Canadian company Cooke Aquaculture is farming salmon in Maine waters, and is currently being sued for allegedly violating effluent discharge permits. The salmon [sometimes escape](#) these facilities, as 50,000 of them did from Maine's Machias Bay in 2023, and the toxic chemicals that the company uses to treat sea lice are particularly harmful to crustaceans, thereby a direct threat to the state's lobster industry.

Cooke Aquaculture, through its subsidiary Omega Protein, is also plundering waters further south, from Virginia to Texas, in its quest for wild forage fish (menhaden), which it makes into fish meal and fish oil, key ingredients in the salmon feed at its aquaculture operations. This decimates critically-needed fish from the marine food web, that would otherwise support the larger fish that commercial and recreational fishermen catch. Fishermen have documented these harms in a [video](#) reposted by the President himself, urging the Administration to keep Cooke Aquaculture out of our country's waters

Bipartisan legislation in Congress now, called the [Keep Finfish Free Act of 2025](#), would bring agency overreach to heel, and keep big aquaculture interests from capturing agencies and driving America's fishermen out of business. This bill would ensure that coastal fishing economies are not destroyed to pave the way for offshore fish farming. The people who have been catching our seafood for generations want community-operated fishing and aquaculture, not factory-scale, outside-owned fish farming behemoths that extract public resources, damage the ecosystem, harm tourism, and tank local fishing economies.

NAMA encourages the Administration to likewise curb excess agency overreach and to make sure that the fairytales told by fish farm companies (like co-opted catch phrases of “sustainable seafood”) are seen for what they are — false promises that will plunder wild forage fish, decimate small-scale fishing businesses, and hollow out working waterfronts.

Recommendation 3: Increase FDA Inspections and Urge Congress to Pass Legislation That Would Allow for Destruction of Tainted Seafood Imports

Seafood imports continue to devastate our domestic seafood markets and expose U.S. consumers to unhealthy, tainted products. It is well-established that the foreign shrimp industry, for example, is rife with labor abuses, environmental violations, and rampant use of toxic chemicals that transfer into the flesh of shrimp that are meant for human consumption.

The Administration should bolster portside inspectors and seafood imports should undergo more rigorous inspections. When tainted seafood arrives at our ports, port authorities ***should*** have the authority to destroy that product, instead of simply refusing entry. Refusal at the port often means that the product will be “shopped” at a different port of entry, often with greater success the second time. A bipartisan bill offered by Congressman Clay Higgins and Congressman Troy Carter, both of Louisiana, would address this concern. The [Destruction of Hazardous Imports Act](#) seeks to treat seafood the same way we treat imported medical devices, in that the bill grants the FDA additional authority to destroy food products that don’t pass initial inspection, which prevents importers from port-shopping their products.

Congressman Troy Nehls of Texas reintroduced the bipartisan [Save Our Shrimpers Act](#), aimed at protecting domestic shrimpers from foreign competition. If passed, the bill would prohibit International Financial Institutions from using federal funds to finance foreign activities related to shrimp farming, shrimp processing, or the export of shrimp to the United States. NAMA supports this legislation; it makes absolutely no sense for America’s taxpayers to be subsidizing an industry that directly competes with our own shrimping industry, especially when imported shrimp enters the U.S. market with an unfair advantage.

We are confident that these two pieces of legislation reflect the will of Gulf Coast fishing communities and working waterfronts, and that the Administration should consider how to protect small businesses, instead of falling for the false promises offered by distant and foreign venture capital firms with a poor track record.

This Executive Order provides NOAA Fisheries with clear direction to rectify several longstanding wrongs in the American seafood industry, and place our seafood harvesters and working waterfront families at the center of policymaking. We must reform the corrupt catch share system that shuts out family fishermen, stop harmful finfish farms from destroying our waters and livelihoods, and dramatically step up enforcement and inspection to combat the deluge of cheap, tainted seafood imports. We encourage NOAA Fisheries leadership to reach out with additional questions, and we stand ready to support the agency’s work on these critical issues. Thank you for considering our comments.

Sincerely,

James Mitchell, Esq.
Legislative Director
North American Marine Alliance