



October 25, 2025

Mr. Robert E. Beal
Executive Director
Atlantic States Marine Fisheries Commission
1050 N. Highland St., Suite 200 A-N
Arlington, VA 22201

By: email rbeal@asmfc.org

Re: Atlantic Menhaden Management Board Meeting
Dear Mr. Beal (Bob):

I represent the members of the **Southeastern Fisheries Association (SFA)**, the oldest seafood industry association in Florida, established in 1952. Our members include American fishermen, wholesale and retail markets, boat owners, processors, bait providers, restaurant owners, packers, transportation companies, for-hire charter operators, and consumers from North Carolina through Texas. On behalf of our members, I am submitting the following comments regarding the menhaden fishery and the discussion scheduled for **Tuesday, October 28, 2025**.

I understand the Commission will be considering several important issues related to the menhaden fishery. I am confident that both your staff and every commissioner are aware of the many controversial claims surrounding this fishery and the abundance of misinformation circulated by various organizations and media outlets. I am equally confident that the Commission has reviewed the numerous scientific reports demonstrating that this fishery is healthy—**not overfished and not undergoing overfishing**—and that bycatch of other species is minimal and does not cause harm. The current harvest level maintains a sustainable biomass, and the approved fishing gear ensures proper management of this species throughout the Atlantic and Gulf of America.

The issues under consideration have the potential to **seriously impact this historic fishery**. One major topic will be the results of the menhaden and ecological reference points (ERP) stock assessment. Despite a rigorous reevaluation that resulted in a lower estimate of menhaden fecundity, the assessment again found that the stock is **not overfished and overfishing is not occurring**. The assessment team credited this to the fact that “management has consistently been more conservative than single-species reference points would have historically prescribed.”

The most immediate and consequential decision before the Board will be setting the **total allowable catch (TAC)** for menhaden for 2026, and potentially through 2028. It is my understanding that some are calling for a **55% reduction** in the current TAC, a move that would devastate the **150-year-old reduction fishery**. Such a drastic cut would also harm small-scale bait fishermen, lobstermen, and crabbers all along the Atlantic Coast who depend on menhaden for their livelihoods. Furthermore, many commercial and recreational fishermen in the Gulf of America also rely on this fishery for bait, meaning the negative impacts would extend far beyond the Atlantic.

Such a reduction is **wholly unjustified**. As noted by the scientists who prepared the ERP assessment, even if the current TAC is maintained, “the probability of exceeding the ERP FTHRESHOLD [i.e., overfishing to the detriment of menhaden predators] is low.” These scientists and numerous studies have also found that the fishery has little effect on predator species such as striped bass, since (1) these predators mostly rely on younger menhaden not targeted by the fishery, and (2) the main factor determining menhaden availability to predators is **recruitment success**, which is driven primarily by environmental conditions—not by the fishery.

It is also important to note that menhaden are among the nearshore and inshore species highly susceptible to naturally occurring low oxygen levels, which can cause mass die-offs. As anyone who lives along or visits the coastline knows, these natural fish kills—often due to overpopulation of the species—create severe odors and health hazards for nearby communities. Any effort to sharply reduce the TAC could lead to **overpopulation and an increase in such events**, creating unnecessary environmental and community problems.

SFA members strongly recommend that the TAC **not be reduced by more than a precautionary 10%** from the current level (i.e., no lower than 210,195 metric tons). This would ensure no chance of overfishing in 2026 and only about a 1% probability if maintained through 2027–2028. This represents a responsible and science-based approach that balances conservation with the needs of those who depend on this fishery.

Another major concern is the potential for **reallocating the TAC among states**. SFA members do not oppose a review of current allocations; however, any effort to shift quota as a way to offset drastic TAC reductions would unfairly burden one or two states and violate the **ISFMP Charter**, which requires that “management measures shall be designed to achieve equivalent management results throughout the range of a stock.” As the original and subsequent allocation systems recognized, any reallocation should reflect **current use and dependence** on menhaden. If reductions are made, the Board should also reevaluate TAC allocations to states with **no active menhaden fishery**.

Finally, the Board will address **Maryland’s proposal** to impose new and unnecessary limits on the Chesapeake Bay menhaden reduction fishery cap. On **October 23, 2025**, the **Science Center for Marine Fisheries (SCMFIS)** funded a new project to develop a detailed, scientifically defensible, and ecologically meaningful harvest cap for Atlantic menhaden in the Chesapeake Bay. Given that this study is underway and will soon provide updated scientific data, there is **no valid justification** for additional restrictions at this time. Any rush to impose new measures

before the results are available would be irresponsible and could cause significant social and economic harm to fishermen and coastal communities. The Board should await this **new and relevant science** before taking further action.

Atlantic menhaden support the **largest commercial fishery by weight on the U.S. East Coast** and play a vital role as forage for many predator species. The fishery also sustains a **unionized workforce with strong wages and benefits** in rural regions with few comparable opportunities. Any management decisions that dramatically reduce the TAC would be inconsistent with responsible management and contrary to the **Presidential Executive Order 14276, “Restoring American Seafood Competitiveness.”** Actions that destroy jobs and harm coastal communities clearly conflict with the Administration’s stated goals.

Thank you,

Capt. Bob Zales, II

Cc: file