



## Massachusetts Lobstermen's Association

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House Appropriations Committee Republicans  
Chairman Tom Cole  
H-307, The Capitol  
Washington, DC 20515

### **RE: Request to Suspend ALL Federal Funding for On-Demand Fishing Gear Research**

Honorable Chairman Cole,

On behalf of its 1,800 members, the Massachusetts Lobstermen's Association submits this letter in strong and unequivocal opposition to continued federal funding for on-demand (ropeless) fishing gear research by any federal agency or through any federally supported program.

The Massachusetts Lobstermen's Association does not support on-demand fishing gear and urges the House Appropriations Committee to immediately halt all public funding, testing, and expansion of this technology in fixed-gear fisheries. Continued federal investment in this program represents a poor use of taxpayer dollars, lacks economic justification, and fails to meet basic standards of accountability, feasibility, and fiscal responsibility.

Established in 1963, the Massachusetts Lobstermen's Association (MLA) is a member-driven organization and a steadfast defender of the Commonwealth's commercial lobster fleet. We advocate for fisheries management that protects marine resources while preserving fishermen's ability to operate viable businesses. Regulations that are disconnected from economic reality, operational feasibility, or sound science threaten not only individual fishermen, but the working waterfronts and coastal economies they sustain.

The MLA engages directly with the Massachusetts Division of Marine Fisheries, the Atlantic States Marine Fisheries Commission, and the New England Fishery Management Council to ensure that management decisions reflect real-world fishing practices and measurable conservation outcomes. We urge Congress to provide oversight and direction that prioritizes science-based, economically sustainable policy, protects access to the resource, and prevents unnecessary regulatory burdens that undermine the future of America's domestic seafood industry.

## Lack of Scientific, Operational, and Practical Justification

Despite years of federally funded research, pilot projects, and regulatory exemptions, on-demand fishing gear has failed to demonstrate real-world viability, scalability, safety, or enforceability in the dense, mixed-use fishing grounds of the Northeast.

This technology does not reflect actual commercial fishing conditions. It ignores vessel congestion, severe weather, gear density, interactions between mobile and fixed gear, enforcement limitations, and—critically—the economic realities faced by working fishermen. Continued federal spending on technology that has repeatedly failed to meet basic operational thresholds represents an unjustifiable use of limited public funds and should be discontinued.

## Unsustainable Federal Reliance

At a meeting held in Danvers, Massachusetts in late 2021, on-demand gear developers explicitly acknowledged that they could not manufacture the volume of units required to outfit the commercial fishing industry. That reality has not changed.

Current testing relies almost entirely on a limited, federally owned gear cache and is sustained solely through continued appropriations. There is no credible plan for commercial production, private-market adoption, or long-term sustainability without ongoing federal subsidy. This perpetual reliance on taxpayer funding—with no exit strategy—runs counter to principles of responsible governance and market-based innovation.

Public funds should not be used to prop up a technology that cannot stand on its own, cannot be produced on scale, has no viable path to commercial deployment and, most of the commercial lobster industry **DOES NOT SUPPORT**.

## Poor Economics and Fiscal Irresponsibility

From an economic standpoint, on-demand fishing gear is wholly unviable.

In 2023, the Commonwealth of Massachusetts commissioned the report *Estimating the Cost of Using On-Demand Gear in Massachusetts Lobster Fisheries*, which concluded that converting the Massachusetts fleet would cost well over **\$150 million in the first year alone**. This equates to approximately **\$200,000 per fisherman**, exclusive of ongoing maintenance, software fees, replacement costs, training, and an average annual gear loss of approximately 10 percent.

## Recent Federal Funding Examples

Federal funding for on-demand (ropeless) gear is often part of larger appropriations for North Atlantic right whale recovery. Under the **Consolidated Appropriations Act of 2023**, Congress allocated **\$25 million** to nine Atlantic Coast states (Maine to Maryland) Specifically for these efforts.

- **Nearly \$18.3 million in grants** was awarded in late **2023** through the National Fish and Wildlife Foundation and National Oceanic and Atmospheric Administration New England Gear Innovation Fund, specifically for projects focused on developing or trialing innovative, on-demand fishing gear to reduce entanglement risks for North Atlantic right whales.

- In **August 2024**, federal authorities committed nearly **\$10 million** to saving right whales, with nearly **\$7 million** of that specifically supporting the development of on-demand gear by providing funds to the fishing industry to assess and provide feedback on the technology.
- Through the U.S. Consolidated Appropriations Act of **2023**, Congress appropriated **\$25 million** to nine Atlantic Coast states to support right whale recovery, some of which was specifically allocated for on-demand gear research and purchase programs, such as the **\$1.1 million** for on-demand gear research and **\$472,000** for new gear in Massachusetts.
- Maine received over **\$5 million** from NFWF in **November 2023** to expand the research and testing of alternative, ropeless lobster fishing gear.

No credible cost-benefit analysis has demonstrated that these expenses can be absorbed by fishermen or justified by any measurable conservation gain. There has been no analysis of harvest-to-cost ratios, profitability impacts, or long-term financial sustainability. Continued federal funding absent such analysis is fiscally irresponsible and inconsistent with the House Appropriations Committee's obligation to safeguard taxpayer dollars.

At a time when Congress is appropriately scrutinizing federal spending, continued appropriations for unworkable and economically destructive technology should be viewed as wasteful and unjustified.

## **Inappropriate Timing and Increased Risk During Peak Right Whale Presence**

Proposed and ongoing trials raise serious concerns due to their timing during periods when North Atlantic right whales are known to be present in high densities within the closed areas.

It is both illogical and irresponsible for the federal government to promote experimental gear testing during the most sensitive months of the year—particularly when no commercial fixed-gear fishing is occurring due to existing closures. Conducting trials during February, March, and April introduces unnecessary risk with no corresponding conservation benefit.

## **Massachusetts' Proven Conservation Record**

Massachusetts' lobster industry has already achieved an estimated **92 percent risk reduction** through mandatory conservation measures including seasonal closures, weak-rope requirements, comprehensive gear marking, and extensive monitoring.

These proven, enforceable measures have allowed right whales to safely feed in Commonwealth waters while maintaining a viable commercial fishery. Diverting federal resources toward unproven technology undermines these successful efforts and threatens years of collaborative progress between fishermen and fisheries managers.

## **Gear Conflict and Mobile Fleet Risk**

Testing has failed to address the high risk of catastrophic gear conflicts between fixed-gear and mobile-gear fleets. These fisheries operate in overlapping areas, and available regional data clearly show significant multispecies and scallop effort in proposed testing locations.

The resulting risks to safety, equipment loss, and operational disruption further demonstrate that this technology is incompatible with real-world fisheries.

## Conclusion and Formal Request

The Massachusetts Lobstermen's Association respectfully but firmly urges the House Appropriations Committee to:

- **Immediately cease all federal funding for on-demand (ropeless) fishing gear research and expansion;** and
- **Redirect limited federal resources toward proven, enforceable conservation measures that deliver real results without destroying fishing businesses or wasting taxpayer dollars.**

The risks posed by on-demand fishing gear—to conservation progress, public safety, enforcement integrity, and the economic stability of the commercial lobster industry—far outweigh any unproven theoretical benefits. Continued federal funding of this technology represents poor economics and an irresponsible use of public funds.

The Massachusetts Lobstermen's Association appreciates the opportunity to submit these comments and urges the Committee to exercise strong fiscal oversight by ending funding for a program that has failed to demonstrate viability, affordability, or accountability.

Respectfully submitted,

*Beth Casoni*

Executive Director

cc. Office of Advocacy