



Massachusetts Lobstermen's Association, Inc.

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October 23, 2025

Chair: John Clark (DE)
Atlantic Menhaden Committee,
Atlantic States Marine Fisheries Commission
1050 N. Highland Street, Suite 200 A-N
Arlington, VA 22201

Sent via: comments@asmfc.org

Subject: Comments Opposing Cuts to the 2026–2028 Atlantic Menhaden Total Allowable Catch (TAC)

Dear Chair and Members of the Atlantic Menhaden Management Board,

The Massachusetts Lobstermen's Association (MLA) respectfully submits the following comments on behalf of our 1,800 members in strong opposition to any proposed cuts to the 2026–2028 Total Allowable Catch (TAC) for the Atlantic Menhaden fishery.

Established in 1963, the MLA is a member-driven organization that recognizes and supports the balance between species conservation and the economic well-being of our fishing communities. The MLA continues to work collaboratively through the management process with the Massachusetts Division of Marine Fisheries, the Atlantic States Marine Fisheries Commission (ASMFC), and the New England Fishery Management Council to ensure the sustainability and profitability of the marine resources upon which our fishermen depend.

The MLA **does not support** any reduction to the overall TAC for Atlantic Menhaden. The best available science confirms that the Atlantic Menhaden stock is **not overfished** and that **overfishing is not occurring**. Thousands of individuals employed in the Massachusetts commercial lobster and crab industries rely heavily on a consistent and affordable supply of Atlantic Menhaden for bait. Any further reduction to the TAC would cause significant negative economic impacts to an already challenged and marginalized industry.

Table 2. Allocation of the coastwide Atlantic menhaden TAC by state, as set by Addendum I to Amendment 3.

State	Allocation (%)
ME	4.80%
NH	1.19%
MA	2.12%
RI	0.81%
CT	0.33%
NY	0.84%
NJ	11.00%
PA	0.01%
DE	0.27%
MD	1.17%
PRFC	1.09%
VA	75.21%
NC	0.37%
SC	0.25%
GA	0.25%
FL	0.29%

Furthermore, the current TAC allocation system is deeply inequitable. There is a vast disparity between states—ranging from as little as **0.01% for Pennsylvania** to as much as **75.21% for Virginia**. Such an imbalance highlights the need for a comprehensive review and restructuring of the allocation system to ensure fair and equitable access among all states and fisheries that depend on this critical resource.

We urge the Commission to maintain the current TAC levels for the 2026–2028 period and to initiate a fair and transparent review of the allocation formula. Protecting both the sustainability of the Atlantic Menhaden population and the economic stability of dependent fisheries must remain central to the ASMFC’s management decisions.

Thank you for your consideration of these comments and for your continued commitment to science-based, equitable fisheries management.

Sincerely,

Beth Casoni

MLA, Executive Director