



Massachusetts Lobstermen's Association

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December 9, 2025

Daniel McKiernan, Director
Massachusetts Division of Marine Fisheries
South Coast Field Station
836 S. Rodney French Blvd.
New Bedford, MA 02744

Sent via email: marine.fish@mass.gov

RE: Establish a framework to permit and regulate the removal, possession, and disposal of fishing gear debris.

Dear Director McKiernan,

On behalf of its approximately 1,800 members, the Massachusetts Lobstermen's Association (MLA) respectfully submits this letter in strong support of establishing a framework to permit and regulate the removal, possession, and disposal of fishing gear debris. The MLA has been engaged in this initiative since its inception and looks forward to continuing its work to remove fishing gear debris from our marine environment and shorelines.

Established in 1963, the MLA is a member-driven organization that recognizes the vital balance between species conservation and the collective economic interests of its members. Our membership spans from Maryland to Canada and represents a wide range of fishing practices, including both fixed and mobile gear.

The MLA works diligently within the management process alongside the Massachusetts Division of Marine Fisheries, the Atlantic States Marine Fisheries Commission, the Atlantic Large Whale Take Reduction Team, and the New England Fishery Management Council. Together, we strive to ensure the long-term sustainability, safety, and profitability of the marine resources on which our commercial fishermen depend.

The MLA Supports the Regulatory Proposal

1. Regulatory Framework (322 CMR 4.01).

a. Adopt relevant definitions, including "fishing gear", "fishing gear debris", "intact", "intact commercial trap/pot gear", and "intact recreational trap pot gear" to differentiate between fishing gear subject to private property rights and fishing gear debris that may be handled and disposed of through the proposed regulatory framework.

b. Authorize the Division of Marine Fisheries and the Massachusetts Environmental Police to — at any time — remove, possess, and dispose of any fishing gear debris.

c. Authorize any person or entity to — at any time — remove, possess, and dispose of fishing gear debris occurring above mean low-tide.

d. Allow any commercial fisher using mobile gear to possess and remove of fishing gear debris incidentally taken during lawful fishing operations while maintaining the existing prohibition on these fishers destroying, injuring, or otherwise molesting fishing gear.

e. Provide DMF discretionary authority to issue a Special Project Permit to a qualified person or entity to remove, possess, and dispose of fishing gear debris found below mean low-tide subject to an application that demonstrates the expertise of the applicant, the likelihood of the project's success, and the ability for the project to avoid gear conflicts and prevent interactions with fishing gear.

2. Special Project Permit (322 CMR 7.01). Update the regulatory language for the Special Project Permit to include the removal and disposal of fishing gear debris.

3. Aquaculture Gear Marking (322 CMR 15.08). Reinforce municipal requirements that all aquaculture gear be sufficiently tagged and marked with information that makes the aquaculture gear identifiable to a permit holder to enable municipal authorities to address the recovery of derelict aquaculture gear.

This positive change will give individuals the ability to remove, possess, and dispose of fishing gear debris.

Thank you for your continued efforts and support of the Massachusetts commercial lobster industry. If you have any further questions, please feel free to contact me to discuss this further.

Kind regards,

Beth Casoni

Executive Director