



Massachusetts Lobstermen's Association

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May 13, 2026

The Honorable Howard Lutnick
Secretary U.S. Department of Commerce

The Honorable Brooke Rollins
Secretary U.S. Department of Agriculture

The Honorable Jamieson Greer
U.S. Trade Representative

Dear Secretaries Lutnick and Rollins and Ambassador Greer:

We write on behalf of the 1800 members of the Massachusetts Lobstermen's Association (MLA) we urge your immediate engagement with the European Union (EU) to secure additional time and practical solutions under the EU's new digital CATCH certification system (EU CATCH).

Established in 1963, the MLA is a member-driven organization that recognizes the interdependence of species conservation and the collective economic interests of its members. The MLA continues to work conscientiously through the management process with the Massachusetts Division of Marine Fisheries, the Atlantic States Marine Fisheries Commission, and the National Marine Fisheries Service to ensure long-term sustainability and profitability of the resources on which lobstermen depend. Yet today, the seafood industry faces threats that extend far beyond the ongoing North Atlantic right whale litigation. Every day, lobstermen and women contend with deep market uncertainty driven by burdensome tariffs on U.S. exports, an influx of tariff-free imported lobster that undercuts domestic prices, and a patchwork of outdated and often conflicting regulations. Together, these overlapping challenges are jeopardizing livelihoods, straining an already vulnerable industry, and putting our coastal heritage and fishing communities at risk.

The EU CATCH system is intended to combat Illegal, Unreported, and Unregulated (IUU) fishing—a goal we strongly support. However, as currently implemented, the system imposes data and reporting requirements that are operationally infeasible for Massachusetts' seafood sector. The core challenge with the EU CATCH system is its requirement that each imported shipment provide precise, weight-based traceability linking every product to individual harvest vessels, including vessel identifiers, landing dates, and captain attestations. While U.S. fisheries maintain comprehensive digital catch accounting and oversight at the vessel level, the operational structure of our fisheries makes this form of product-level traceability infeasible. Moreover, the U.S. information technology system designed to communicate with EU CATCH does not appropriately capture and communicate all the necessary information for compliance by American seafood companies. Full enforcement is scheduled to begin July 10, 2026, following delayed implementation of the original January 10, 2026, deadline.

We respectfully request that the United States engage with the European Commission to:

- Secure an extension of the current implementation and enforcement grace period beyond July 10, 2026, to February 10, 2027, at a minimum; and
- Develop alternative compliance pathways for U.S. fisheries which have extremely low-IUU-risk, including options such as allowing NOAA to sign off as the competent authority, or allowing aggregation at the primary processing facility level as an acceptable traceability unit.

Massachusetts fisheries depend on longstanding, efficient practices that aggregate and redistribute catch to maintain quality, reduce waste, and ensure economic viability:

- In many fisheries, catches from multiple vessels are consolidated before delivery to shore-based processors. Products may also be transferred among dealers and processors to maintain quality and reduce transportation costs.
- At processing facilities, further commingling occurs as seafood is processed into a wide range of products, including fillets, shellfish products, frozen products, bait, fish oil, and other ancillary products. Tracing each of these products back to individual vessels is operationally impractical.
- Products are frequently sold to secondary processors in the United States and abroad before final markets are known, requiring compliance with EU standards throughout the supply chain to preserve market access.

A single representative shipment to the EU analyzed by industry would require thousands of individual product records tied to specific vessel landings. Even when aggregated at the dealer or processor level, hundreds of records would still be required, each necessitating separate certification and manual data entry. This transforms a single shipment into what is effectively a full supply chain audit, creating administrative costs that can exceed the commercial value of the product.

These requirements go well beyond those applied in other regulated sectors. For example, agricultural traceability systems recognize a farm or production unit as the appropriate level of aggregation. The EU CATCH system, by contrast, effectively requires tracing production to the individual harvester—an approach that is neither practical nor necessary for well-managed, low-risk fisheries.

Massachusetts fisheries are globally recognized for strong science-based management, extensive federal oversight, and robust monitoring systems that effectively eliminate IUU risk. The additional traceability requirements imposed by the EU CATCH system provide no meaningful conservation or enforcement benefit, while imposing substantial operational burdens.

The fishing and seafood companies we represent sustainably harvest and process seafood from federal and state waters off Massachusetts and throughout the Northeast and U.S. East Coast. Commercial fishing remains a foundational component of Massachusetts' maritime economy. Massachusetts consistently ranks among the top commercial fishing states in the nation by landed value, with iconic ports such as New Bedford and Gloucester supporting thousands of jobs in harvesting, processing, distribution, shipbuilding, cold storage, and waterfront services. New Bedford alone has ranked for years as the highest-value commercial fishing port in the United States, driven primarily by the scallop fishery. The seafood industry contributes hundreds of millions of dollars annually to the Massachusetts economy and remains vital to the economic stability and cultural identity of coastal communities across the Commonwealth.

The economic stakes are significant. The EU remains an important export market for U.S. seafood products. If implemented as currently structured, the EU CATCH system is expected to disrupt or halt a substantial share of this trade.

Key Massachusetts and Northeast seafood products—including scallops, lobster, groundfish, squid, monkfish, clams, and other high-value species—could face significant barriers to EU market access depending on handling and processing practices. Smaller businesses throughout the supply chain would be disproportionately affected.

These impacts will extend beyond the United States, affecting European importers, processors, retailers, and consumers who rely on consistent access to high-quality American seafood.

We recognize and appreciate ongoing efforts by NOAA Fisheries and other agencies to engage with EU counterparts and support industry compliance. However, as implementation approaches, it is increasingly clear that without additional time and structural adjustments, a substantial portion of U.S.-EU seafood trade will be disrupted.

President Trump's Executive Order (EO) 14276, "Restoring American Seafood Competitiveness," which highlights unfair trade practices that have put seafood markets at a competitive disadvantage, directs federal agencies to develop and implement an America First Seafood Strategy, in part, to expand market access and address unfair trade barriers facing U.S. seafood producers. The challenges posed by the EU CATCH system are directly in opposition to these priorities and warrant immediate, high-level engagement.

We stand ready to work with the Administration, EU officials, and international partners to develop practical, risk-based solutions that uphold the shared goal of combating IUU fishing while preserving fair and functional trade in sustainably harvested seafood.

Thank you for your leadership and attention to this urgent matter.

Best regards,

Beth Casoni

Executive Director