



Louisiana Shrimp Association
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**Public Comment on Regulatory Burdens Affecting
the U.S. Commercial Fishing Industry: Executive Order 14276**

As members, supporters, and representatives of the U.S. commercial fishing industry, we write to express deep concern regarding the growing regulatory burdens placed on fishermen, processors, and small seafood businesses. While we recognize the importance of sustainable fisheries management, the current patchwork of federal mandates has become increasingly difficult to navigate, particularly for small- and medium-sized operations that form the backbone of our coastal communities.

We respectfully submit the following regulations to be visited and revised:

1. Cumulative Regulatory Strain: Fishermen are contending with overlapping regulations ranging from observer mandates and electronic reporting systems to gear requirements and species-specific restrictions—all of which are costly, complex, and often inconsistent across regions.
2. Restricted Access to Fisheries: Limited entry programs and capped permit systems prevent new and younger fishermen from participating, threatening the future viability and diversity of the industry.
3. One-Size-Fits-All Conservation Tools: Regulations such as mandatory Turtle Excluder Device (TED) use and universal observer coverage fail to account for regional variability, vessel size, or actual conservation risk, creating inefficiencies without delivering proportionate ecological benefit.
4. Excessive Compliance Costs: From CVMS installation to USDA catfish inspection fees and CITES permit requirements, many fishers and buyers are incurring costs that make legal participation economically unfeasible.
5. Key Concerns in U.S. Shark Fishery Regulations: Expanded commercial access would strengthen coastal economies, improve supply chains, and support generational renewal in the industry.

Allowing more shark harvest could reduce gear damage and lost catch from shark interactions.

The Shark Conservation Act's requirement that fins remain naturally attached complicates processing, raises refrigeration costs, and limits access to distinct markets for meat and fins. Allowing fins to be separated *after landing*, with rigorous documentation, could balance traceability with economic viability. The 2023 addition of requiem sharks to CITES Appendix II has increased paperwork, delayed trade, and imposed high compliance costs on buyers of legally harvested U.S. shark.

6. Data Mandates Without Support: Increased reporting expectations and monitoring obligations have not been matched with adequate funding, training, or technical assistance—leaving businesses stretched thin and at risk of non-compliance.

To restore economic resilience and safeguard the future of U.S. fisheries, we recommend:

*Simplifying and streamlining regulatory frameworks, especially for smaller operators and wild-caught producers.

*Incorporating risk-based, regional flexibility into conservation mandates such as TEDs, observer coverage, and reporting systems.

*Reopening access pathways by expanding federal shrimp permits.

*Adapting shark harvest regulations to reflect current stock health and industry conditions. Streamlining CITES permitting processes for legally caught domestic shark species to avoid unnecessary trade delays.

*Returning oversight of wild-caught catfish to state wildlife and fisheries agencies, reducing federal inspection costs that have crippled small processors.

*U.S. Code § 4503(a) imposes strict certification requirements on certain commercial fishing vessels. While intended to enhance safety, the regulation places disproportionate burden on small and mid-sized operators in the commercial fishing industry. Compliance costs—such as design approvals, stability tests, and frequent surveys—are financially and logistically challenging for many vessel owners. These hardships threaten the viability of family-owned and independent fishing operations, especially in coastal communities.

We respectfully urge your office to review and reconsider the mounting federal regulations that are placing an unsustainable burden on our nation's commercial fishermen. These rules, often crafted without adequate input from those directly impacted, are not only threatening our livelihoods, but they are also undermining the long-term viability of our coastal communities and domestic seafood supply.

It is time to restore fairness, transparency, and access to all commercial fisheries. We ask that you support policies that allow American fishermen to legally harvest all commercial species without unnecessary barriers like limited entry and exclusionary permitting systems.

Our communities depend on this industry. Please stand with us in ensuring that future generations of commercial fishermen are not regulated out of existence.

Thank you for the opportunity to provide comment.

Sincerely,

Acy Cooper Jr

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President, Louisiana Shrimp Association