

Certified Seafood International (CSI)



U.S. Gulf of Mexico shrimp Surveillance Report

Certification Body (CB):	Global Trust Certification
Assessment team:	Dr. Ivan Mateo, Lead Assessor Dr. Gerald P. Ennis, Assessor Mr. R. J. (Bob) Allain, Assessor Mr. Matthew Jew, Assessor
Fishery client:	American Shrimp Processors Association (ASPA)
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Global Trust Certification

Quayside Business Park,
Mill Street, Dundalk,
Co. Louth, Ireland.

T: +44 (0) 1993 885682

E: Fisheries@nsf.org

Foreword

The Certified Seafood International (CSI) Certification program is a third-party sustainable seafood certification program for wild capture fisheries owned by the Certified Seafood International (CSI) Inc led by a diverse board of seafood and sustainability industry experts.

The Certified Seafood International (CSI) represents the latest stage in the evolution of the Alaska Responsible Fisheries Management (RFM) Program, which began in 2010 as a credible, ISO-based third-party certification system for sustainable wild-capture fisheries. Developed by the Alaska Seafood Marketing Institute (ASMI), the RFM Program was grounded in the UN FAO Code of Conduct for Responsible Fisheries and Eco-labelling Guidelines and operated under two core standards to ensure responsible practices and traceability.

In 2020, ownership of the RFM Program transitioned to the Certified Seafood Collaborative (CSC), a nonprofit organization focused on expanding the program to include other North American fisheries outside the State of Alaska while improving efficiency and reducing costs. This marked a key step in broadening the program's reach and impact.

In 2025, the program advanced further by transferring its name and assets to Certified Seafood International (CSI), a U.S.-based organization structured as a nonprofit and currently applying for 501(c) status nonprofit. This transition supports the program's global expansion, offering a cost-effective, credible certification option for wild-capture fisheries worldwide and reinforcing its commitment to responsible seafood sourcing on an international scale.

The Certified Seafood International (CSI) Responsible Fisheries Management (RFM) Standard is composed of Conformance Criteria based on the 1995 FAO Code of Conduct for Responsible Fisheries and the FAO Guidelines for the Eco-labelling of Fish and Fishery Products from Marine Capture Fisheries adopted in 2005 and amended/extended in 2009. The CSI RFM Standard also includes full reference to the 2011 FAO Guidelines for the Eco-labelling of Fish and Fishery Products from Inland Fisheries which in turn are now supported by a suite of guidelines and support documents published by the UN FAO. Further information on the CSI program may be found at: <https://csicertified.org/>

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Glossary	

2. Glossary

Acronym	Full Name
ABC	Acceptable Biological Catch
ACL	Annual Catch Limit
ADCNR	Alabama Department of Conservation and Natural Resources
AL	Alabama
ALS	Accumulated Landing System
AM	Accountability Measures
ASPA	American Shrimp Processors Association
BiOp	Biological Opinion
BPL	Beam Plankton Trawls
BRD	Bycatch Reduction Device
cap	Corrective Action Plan
CPUE	Catch Per Unit Effort
CSC	Certified Seafood Collaborative
DPS	Distinct Population Segment
DWH	Deepwater Horizon MC 252
E.O.	Executive Order
EDM	Empirical Dynamic Model
EEZ	Exclusive Economic Zone
EFH	Essential Fish Habitat
EIS	Environmental Impact Statement
ELB	Electronic Logbook
EPA	Environmental Protection Agency
ESA	Endangered Species Act
ETP	Endangered, Threatened and Protected
F	Fishing Mortality
FAO	Food and Agriculture Organization
FFWC	Florida Fish and Wildlife Conservation (Commission)
FGBNMS	Flower Garden Banks National Marine Sanctuary
FIN	Fish Information Network
FIS	Fishery Impact Statement
FL	Florida
FMP	Fishery Management Plan
GMFC	Gulf of Mexico Fisheries Council
GMFMC	Gulf Marine Fisheries Management Council
GOM	Gulf of Mexico
GOMMAPPS	Gulf of Mexico Marine Assessment Program for Protected Species
GOMSMP	Gulf of Mexico Shrimp Management Plan
GRRS	Gulf Royal Red Shrimp
GSMFC	Gulf States Marine Fisheries Commission
GSS	Gulf Shrimp System

Acronym	Full Name
HAPC	Habitat Area of Particular Concern
JEA	Joint Enforcement Agreement
LA	Louisiana
LDWF	Louisiana Department of Wildlife and Fisheries
LWFC	Louisiana Wildlife and Fisheries Commission
MBTA	Migratory Bird Treaty Act
MCS	Monitoring, Control and Surveillance
MFMT	Maximum Fishing Mortality Threshold
MMPA	Marine Mammal Protection Act
MMRD	Mississippi Marine Resources Department
MRFSS	Marine Recreational Fisheries Scientific Survey
MRIP	Marine Recreational Information Program
MS	Mississippi
MSA	Magnuson-Stevens Act
MSC	Marine Stewardship Council
MSFCMA	Magnuson-Stevens Fishery Conservation and Management Act
MSST	Minimum Stock Size Threshold
MSY	Maximum Sustainable Yield
NEPA	National Environmental Policy Act
NMFS	National Marine Fisheries Service (NOAA)
NOAA	National Oceanographic and Atmospheric Administration
NPS	National Park Service
OLE	Office of Law Enforcement (NOAA)
OY	Optimum Yield
P1	Principle 1 (MSC)
P2	Principle 2 (MSC)
P3	Principle 3 (MSC)
PI	Principle Indicator (MSC)
RFM	Responsible Fishery Management
SEDAR	Southeast Data, Assessment and Review
SEFSC	Southeast Fisheries Science Center
SERO	Southeast Regional Office
SSB	Spawning Stock Biomass
SST	Sea Surface Temperature
SWF	South West Florida
TED	Turtle Excluder Device
TPWD	Texas Parks and Wildlife Department
TX	Texas
USACOE	U.S. Army Corps of Engineers
USCG	United States Coast Guard
USFWS	U.S. Fish and Wildlife Service

3. Executive Summary

3.1. Brief intro and description of surveillance process.

This surveillance report documents the 1st surveillance assessment of the U.S. Gulf of Mexico shrimp fishery which was certified on July 10th, 2024 and presents the recommendation of the Assessment Team for continued CSI Certification.

Unit of Certification

The U.S. Gulf of Mexico shrimp (Brown, White, and Pink shrimp) commercial fishery under federal (NMFS/GMFC) and state (Texas, Louisiana, Mississippi, Florida, and Alabama) management, fished with otter trawl, skimmer, and butterfly net (within US 200 nm EEZ)

This Surveillance Report documents the assessment results for the continued certification of the above fisheries to the CSI Certification Program. This is a voluntary program that has been supported by ASMI previously and now by Certified Seafood Collaborative foundation (CSC) who wish to provide an independent, third-party certification that can be used to verify that these fisheries are responsibly managed.

The assessment was conducted according to the Global Trust procedures for CSI Certification using the fundamental clauses of the CSI RFM Standard v2.2 in accordance with ISO 17065 accredited certification procedures.

The assessment is based on 4 major components of responsible management derived from the FAO Code of Conduct for Responsible Fisheries (1995) and Guidelines for the Eco-labelling of products from marine capture fisheries (2009); including:

Section A. The Fisheries Management System

Section B. Science and Stock Assessment Activities and The Precautionary Approach

Section C. Management Measures and Implementation, Monitoring and Control

Section D. Serious Impacts of the Fishery on the Ecosystem

These four major components are supported by 12 fundamental clauses (+ 1 in case of enhanced fisheries) that guide the CSI Certification Program surveillance assessment.

The surveillance process included a desktop review of relevant new documentary information including but not limited to: the most current fishery assessment and stock evaluation reports; Shrimp Plan Team reports and meeting minutes; Council publications; relevant scientific publications; ecosystem status reports; fishery management plans and amendments thereof; changes to state and federal regulations; fishery enforcement statistics; environmental impact statements; marine mammal stock assessments; and strategic plans (see Section 10 - References for a more complete listing of documents reviewed).

The surveillance process also included substantive meetings with representatives from each of the key fishery management agencies charged with management of the US GOM shrimp fisheries.

Assessment team meetings included: Texas Parks and Wildlife Department, Louisiana Department of Wildlife and Fisheries, Mississippi Department of Marine Resources, Alabama Department of Conservation and Natural Resources Fisheries department, Florida Fish and Wildlife Conservation Commission, Gulf Council, LGL Ecological Research Associates, NMFS SEFSC, NMFS SEFC Sustainable Fisheries Division. The assessment team also met with the ASPA – fishery client and certificate holder. All meetings were held remotely via videoconferencing.

As described more fully in the following report sections, the assessment team did not find changes to the fishery management system. Thus, there is evidence to support continued compliance of the fishery management system

for US GOM shrimp fishery with requirements of the CSI RFM Standard. v.2.2. Progress in addressing non-conformities, as judged against defined milestones in client action plans, was judged to be adequate and on target.

3.2. Summary of main findings.

The Audit team has determined that the US GOM Shrimp commercial fishery operated within the defined UoC remained in compliance with the CSI RFM Fishery Standard v2.2 Fundamental Clauses for the Fisheries Management System component (Clauses 1, 2, 3), Science and Stock Assessment Activities and The Precautionary Approach (Clauses 4, 5, 6, 7), Management Measures and Implementation Monitoring and Control component (Clauses 8, 9, 10, 11), and Ecosystem Impact (Clause 12).

Following this 1st Surveillance Assessment, the assessment team recommends that continued certification under the Certification Seafood International Certification Program is maintained for the management system of the applicant fisheries, The U.S. Gulf of Mexico shrimp (Brown, White, and Pink shrimp) commercial fishery under federal (NMFS/GMFC) and state (Texas, Louisiana, Mississippi, Florida, and Alabama) management, fished with otter trawl, skimmer, and butterfly net (within US 200 nm EEZ).

3.3. Assessment Team Details

The Assessment Team for this assessment was as follows; further details are provided in [Appendix 1](#)):

- Dr. Ivan Mateo – Lead Assessor, responsible for DDF, FC 9
- Dr. Gerald P. Ennis – Assessor 1, responsible for FC 4, 5, 6, 7, 8
- Mr. R. J. (Bob) Allain – Assessor 2, responsible for FCs 1, 3, 10, 11
- Mr. Matthew Jew – Assessor 3, responsible for FC 2, 12

3.4. Details of Applicable CSI Documents

This assessment was conducted according to the relevant program documents outlined in Table 1 below.

Table 1. Relevant CSI program documents including applicable versions.		
Document title	Version number, Issue Date	Usage
CSI Procedure 2: Application to Certification Procedures for the CSI Fishery Standard	Version 6.3 October, 2024	Process
Certified Seafood International RFM Fisheries Standard	Version 2.2 October, 2024	Standard
Certified Seafood International Certification Program Guidance to Performance Evaluation for the Certification of Wild Capture and Enhanced Fisheries	Version 2.2, October, 2024	Guidance to Standard

4. Client contact details

Table 2. Client details and key contact information.

Applicant Information		
Organization/Company Name:		American Shrimp Processors Association
Address:	Street:	PO Box 399
	City:	Port Arthur
	State:	TX
	Country:	USA
	Zip code	77642
Applicant Key Contact Information		
Name:		Trey Pearson
Position:		President
E-mail:		treypjbs@aol.com

5. Unit(s) of Certification

5.1. Unit(s) of Certification

The Units of Certification (i.e. what is covered by the certificate) are described in Table 3 below.

Table 3. Units of Certification

UoA 1-36		Common to all UoAs (species and stocks)
Species	Latin name:	<i>Farfantepenaeus aztecus</i>
	Common names:	Brown shrimp
	Latin name:	<i>Litopenaeus setiferus</i>
	Common names:	White shrimp
	Latin name:	<i>Farfantepenaeus duorarum</i>
	Common names:	Pink shrimp
Stocks		1. Gulf of Mexico brown shrimp 2. Gulf of Mexico white shrimp 3. Gulf of Mexico pink shrimp
UoA 1-6		Specific to these UoA
Geographical area		FAO Fishing Area 31, Atlantic Western-Central, U.S. EEZ, Federal waters
Fishing gear type(s) and, if relevant, vessel type(s)		• Otter trawl • Skimmer net
Specific UoAs (resulting from combining the three species and two gear types in federal waters)		UoA 1. Federal waters, otter trawl, brown shrimp UoA 2. Federal waters, otter trawl, white shrimp UoA 3 Federal waters, otter trawl pink shrimp UoA 4. Federal waters, skimmer net, brown shrimp UoA 5 Federal waters, skimmer net, white shrimp UoA 6. Federal waters, skimmer net, pink shrimp
Client group		American Shrimp Processors inc.
Other eligible fishers		None, all shrimp fishing vessels with a valid federal permit are already eligible fishers.
UoA 7-15		Specific to these UoA
Geographical area		FAO Fishing Area 31, Atlantic Western-Central, U.S. EEZ, Louisiana state waters
Fishing gear type(s) and, if relevant, vessel type(s)		• Otter trawl • Skimmer net • Butterfly wing net
Specific UoAs (resulting from combining the three species and three gear types in Louisiana state waters)		UoA 7. Louisiana, otter trawl, brown shrimp UoA 8. Louisiana, otter trawl, white shrimp

	UoA 9. Louisiana, otter trawl pink shrimp
	UoA 10. Louisiana, skimmer, brown shrimp
	UoA 11. Louisiana, skimmer, white shrimp
	UoA 12. Louisiana, skimmer, pink shrimp
	UoA 13. Louisiana, butterfly, brown shrimp
	UoA 14. Louisiana, butterfly, white shrimp
	UoA 15. Louisiana, butterfly, pink shrimp
Client group	American Shrimp Processors inc.
Other eligible fishers	None, all shrimp fishing vessels with a valid state permit are already eligible fishers.
UoA 16-18	Specific to these UoA
Geographical area	FAO Fishing Area 31, Atlantic Western-Central, U.S. EEZ, Texas state waters
Fishing gear type(s) and, if relevant, vessel type(s)	• Otter trawl
Specific UoAs (resulting from combining the three species and one gear type in Texas state waters)	UoA 16. Texas, otter trawl, brown shrimp UoA 17. Texas, otter trawl, white shrimp UoA 18. Texas, otter trawl pink shrimp
Client group	American Shrimp Processors inc.
Other eligible fishers	None, all shrimp fishing vessels with a valid state permit are already eligible fishers.
UoA 19-24	Specific to these UoA
Geographical area	FAO Fishing Area 31, Atlantic Western-Central, U.S. EEZ, Florida state waters
Fishing gear type(s) and, if relevant, vessel type(s)	• Otter trawl • Skimmer net
Specific UoAs (resulting from combining the three species and two gear types in Florida state waters)	UoA 19. Florida, otter trawl, brown shrimp UoA 20. Florida, otter trawl, white shrimp UoA 21. Florida, otter trawl pink shrimp UoA 22. Florida, skimmer, brown shrimp UoA 23. Florida, skimmer, white shrimp UoA 24. Florida, skimmer, pink shrimp
Client group	American Shrimp Processors inc.

Other eligible fishers	None, all shrimp fishing vessels with a valid state permit are already eligible fishers.
UoA 25-30	Specific to these UoA
Geographical area	FAO Fishing Area 31, Atlantic Western-Central, U.S. EEZ, Alabama state waters
Fishing gear type(s) and, if relevant, vessel type(s)	• Otter trawl • Skimmer net
Specific UoAs (resulting from combining the three species and two gear types in Alabama state waters)	UoA 25. Alabama, otter trawl, brown shrimp UoA 26. Alabama, otter trawl, white shrimp UoA 27. Alabama, otter trawl pink shrimp UoA 28. Alabama, skimmer, brown shrimp UoA 29. Alabama, skimmer, white shrimp UoA 30. Alabama, skimmer, pink shrimp
Client group	American Shrimp Processors inc.
Other eligible fishers	None, all shrimp fishing vessels with a valid state permit are already eligible fishers.
UoA 31-36	Specific to these UoA
Geographical area	FAO Fishing Area 31, Atlantic Western-Central, U.S. EEZ, Mississippi state waters
Fishing gear type(s) and, if relevant, vessel type(s)	• Otter trawl • Skimmer net
Specific UoAs (resulting from combining the three species and two gear types in Mississippi state waters)	UoA 31. Mississippi, otter trawl, brown shrimp UoA 32. Mississippi, otter trawl, white shrimp UoA 33. Mississippi, otter trawl pink shrimp UoA 34. Mississippi, skimmer, brown shrimp UoA 35. Mississippi, skimmer, white shrimp UoA 36. Mississippi, skimmer, pink shrimp
Client group	American Shrimp Processors inc.
Other eligible fishers	None, all shrimp fishing vessels with a valid state permit are already eligible fishers.

5.2. Changes to the Unit(s) of Certification (if any)

There have not been any changes to the units of certification.

6. Summary of site visits and/or consultation meetings

Desktop reviews are the preferred assessment vehicle within the CSI program. In general, on-site/off-site audits are required only if the Certification Body deems that a desktop review may be inadequate for determining whether the fishery is continuing to comply with the CSI RFM Fishery Standard, based on the performance of the fishery, status of non-conformances and related corrective actions.

Table 4. Summary of site visits and/or consultation meetings.

Meeting Date and Location	Personnel	Areas of discussion
Date: July/07/2025 Location: Remote Meeting	ASPA Client Opening Meeting Client Group representatives Trey Pearson Kristen Baumer Paul Piazza & Son, Inc. Reese Antley Wood's Fisheries Derek Nagle Big Easy Foods Charlie Price Cox's Wholesale Seafood, LLC Ernie Anderson Graham Shrimp Company Regina Pena Philly Seafood Megan Westmeyer Sustainable Fisheries Partnership Assessment Team Members: Dr. Ivan Mateo, Lead Assessor Dr. Jerry Ennis, Assessor Mr. Bob Allain, Assessor Mr. Matthew Jew, Assessor	Topics Discussed: - Transition from RFM to CSI certification - Progress on nonconformances - New stock status information - Ecosystem impact changes - Enforcement and violations updates - Perceived changes in fishing operations or stock abundance - Observations on white, brown, and pink shrimp populations - Regional differences in shrimp availability - Update on economic trends and pricing - Impact of import restrictions and tariffs - State-level legislation on truth-in-menu labeling (Texas, Florida, Alabama) - Discussion on the Executive Order on American Seafood Competitiveness - Concerns about regulatory burdens affecting American shrimpers
Date: July/07/2025 Location: Remote Meeting	NOAA Fisheries, Southeast Fisheries Science Dr. John Walter Center Dr. Dave Gloeckner Dr. Alan Lowther Scott Leach Jennifer Lee Megan Westmeyer Sustainable Fisheries Partnership Assessment Team Members: Dr. Ivan Mateo, Lead Assessor	Topics Discussed: - Discussion of the new stock assessment model (EDM approach). - Questions about changes in fishery-dependent and independent data collection. - Inquiry into new research publications, especially on recruitment dynamics and density dependence. - Effects of federal funding cuts on NOAA's research and monitoring capacity. - Red tide events and hypoxia in the Gulf of Mexico. - Small oil spills and their localized impacts. - Bycatch Monitoring and Observer Program

	Dr. Jerry Ennis, Assessor Mr. Bob Allain, Assessor Mr. Matthew Jew, Assessor	- Protected Species: Sawfish and Manta Ray - Updates on ESA Section 7 consultation and biological opinion. - New bycatch estimates and observed mortalities. - Effort Monitoring and VMS Transition - Management Framework and Regulatory Review - Observer Deployment Strategy - Sea Turtle and Marine Mammal Assessments
Date: July/07/2025 Location: Remote Meeting>	Dakus Geeslin Les Casterline Mark Fisher Megan Westmeyer Sustainable Fisheries Partnership Assessment Team Members: Dr. Ivan Mateo, Lead Assessor Dr. Jerry Ennis, Assessor Mr. Bob Allain, Assessor Mr. Matthew Jew, Assessor	Topics Discussed: - Regulatory & Management Updates - Personnel Changes - Licensing - Ecosystem & Data Monitoring - Funding & Budget Impacts
Date: July/11/2025 Location: Remote Meeting	NOAA Fisheries, Southeast Fisheries Science Dr. Katie Sigfried Megan Westmeyer Sustainable Fisheries Partnership Assessment Team Members: Dr. Ivan Mateo, Lead Assessor Dr. Jerry Ennis, Assessor Mr. Bob Allain, Assessor Mr. Matthew Jew, Assessor	Topics Discussed: - Changes in Data Collection and Processing - Stock Assessment Model Updates: ○ Use of Empirical Dynamic Modeling (EDM) for brown and white shrimp. ○ EDM does not explicitly model recruitment; relies on machine learning to capture system dynamics. ○ Pink shrimp assessed using VAST model (index-based); MSY not estimable. ○ Pink shrimp to be treated as a data-poor species for management purposes. - SSC (Scientific and Statistical Committee) to review results in October 2025. - MSE considered but not pursued due to lack of clear management feedback loop.
Date: July/28/2025 Location: Remote Meeting	Mississippi Department of Marine Resources (MDMR) Jason Saucier Tracy Floyd Assessment Team Members: Dr. Ivan Mateo, Lead Assessor Dr. Jerry Ennis, Assessor Mr. Bob Allain, Assessor Mr. Matthew Jew, Assessor	Topics Discussed: - Management and Regulatory Updates - Organizational and Personnel Changes - Enforcement and Violations - Funding and Capacity - Coastal Zone Management - Closures and Effort Trends - Monitoring and Research Activities
Date: July/28/2025 Location: Remote Meeting	Louisiana Department of Wildlife and Fisheries (LDWF) Peyton Cagle Assessment Team Members: Dr. Ivan Mateo, Lead Assessor Dr. Jerry Ennis, Assessor	- Management and Regulatory Updates - Organizational and Personnel Changes - Funding and Grants - Ecosystem and Coastal Management - Bycatch and Catch Composition - Enforcement and Legal Updates

	Mr. Bob Allain, Assessor Mr. Matthew Jew, Assessor	▪ No new enforcement measures reported. ▪ Monitoring and Research Activities
Date: July/30/2025 Location: Remote Meeting	LGL Ecological Research Associates Dr. Nathan Putman Taylor Beyea Assessment Team Members: Dr. Ivan Mateo, Lead Assessor Dr. Jerry Ennis, Assessor Mr. Bob Allain, Assessor Mr. Matthew Jew, Assessor	Topics Discussed: ▪ Ecosystem Impacts ▪ Changes in Catch Profiles for Skimmer and Otter Trawl UoAs ▪ Trends or shifts in species composition ▪ Continuity of LGL's full catch sampling and species-level identification ○ Updated Biomass-Based Stock Indices ○ Atlantic Croaker ○ Seatrout species ○ Hardhead and Gafftopsail Catfishes ○ Cownose Ray ○ Atlantic Stingray ▪ LGL Analyses on ESA-Listed Species ▪ Monitoring or mitigation measures ▪ LGL Work on BRDs (Bycatch Reduction Devices) and TEDs (Turtle Excluder Devices) ▪ Implementation updates ▪ Changes in Fishing Footprint Data Since Initial Assessment ▪ Shifts in target species distribution ▪ Legislative or regulatory changes affecting fishing areas ▪ Spatial effort redistribution
Date: July/31/2025 Location: Remote Meeting	Alabama Department of Conservation and Natural Resources, Marine Resources Division Kevin Anson John Mareska Jessica Marchant Jason Downey Edward "Bo" Willis Sustainable Fisheries Partnership Megan Westmeyer Assessment Team Members: Dr. Ivan Mateo, Lead Assessor Dr. Jerry Ennis, Assessor Mr. Bob Allain, Assessor Mr. Matthew Jew, Assessor	Topics Discussed: ▪ Management and Regulatory Updates ▪ Organizational and Personnel Changes ▪ Enforcement and Violations ▪ Funding and Capacity ▪ Monitoring and Research Activities ▪ Non-Conformances and Management Planning
Date: July/31/2025 Location: Remote Meeting	Gulf Council Dr. Matt Freeman Dr. Jim Nance Dr. Mike Allen Leanne Bosarge Sustainable Fisheries Partnership Megan Westmeyer Assessment Team Members:	Topics Discussed: ▪ Regulatory and Management Changes ▪ Personnel Changes ▪ Stock Assessment and Monitoring ▪ Essential Fish Habitat (EFH) ▪ Bycatch and Impacted Species ▪ Marine Protected Areas (MPAs) ▪ Ecosystem-Based Fisheries Management (EBFM)

	Dr. Ivan Mateo, Lead Assessor Dr. Jerry Ennis, Assessor Mr. Bob Allain, Assessor Mr. Matthew Jew, Assessor	▪ External Review and Peer Assessment ▪ Economic and Funding Considerations ▪ Harvest Control Rules and MSE ▪ Information Requests and Follow-Ups ▪ EFH amendment status. ○ EBFM report timeline. ○ Economic data updates. ○ Contacts for CMAP data access.
Date: August 1st 2025 Location: Remote Meeting	Derrick Nagle Big Easy Foods Regina Pena Philly Seafood Vnay Bedi Cox's Wholesale Seafood Reese Antley Wood's Fisheries Sustainable Fisheries Partnership Megan Westmeyer Assessment Team Members: Dr. Ivan Mateo, Lead Assessor Dr. Jerry Ennis, Assessor Mr. Bob Allain, Assessor Mr. Matthew Jew, Assessor	Topics Discussed: ▪ Key Findings by Assessment Team ▪ Stock Assessment & Management Measures ○ Minimal changes since initial assessment. ○ New stock assessment model developed by SEFSC for white, brown, and pink shrimp. ○ White and brown shrimp models are robust. ○ Pink shrimp model less conclusive; will be treated as data-deficient with proxy reference points. ○ No major changes in fishery monitoring or management measures across Gulf states. ○ At the time of the closing meeting, Florida did not respond to the team message for a potential meeting. The team asked Gulf Council about any updates for Florida, but the council members were unaware of changes in Florida's shrimp management. Later on, Florida ended up reuniting with the team after the closing meeting? ▪ Ecosystem Impacts & Bycatch ○ No major changes in catch composition or harvesting practices. ○ Bycatch species status remains consistent, no new biomass indicators. ○ No new MPAs or habitat closures reported. ○ Non-conformance on ESA species (sawfish, manta ray) is on track: ○ Independent electronic monitoring pilot led by SFP and LGL (not NOAA-affiliated). ○ Cameras will monitor off-deck interactions to respect harvester privacy. ○ NOAA is aware but not involved. ○ Continued uncertainty in extrapolated impact estimates for ESA species. ○ Emerging research may split giant manta into two species, potentially increasing relative impact concerns. ▪ Management System, Socioeconomics, Enforcement ○ No significant changes in regulations, policies, or enforcement structures. ○ Economic performance data for 2024–2025 is limited; industry efforts to restrict imports noted. ○ Compliance and enforcement data collected from NOAA, Coast Guard, and states.

		○ Two non-conformances (1.7 and 3.1) related to Alabama’s management plan and objectives: ○ Drafts are in place and progressing well. ▪ Recommendations: ○ Include decision-making processes and consultation mechanisms. ○ Define performance metrics (quantitative or qualitative). ○ Ensure continuous review (suggested every 2 years)
Date: August 4th, 2025 Location: Remote Meeting	Florida Fish and Wildlife Conservation Commission (FWC) Daniel Ellinor Sustainable Fisheries Partnership Megan Westmeyer Assessment Team Members: Dr. Ivan Mateo, Lead Assessor Dr. Jerry Ennis, Assessor Mr. Bob Allain, Assessor Mr. Matthew Jew, Assessor	Topics Discussed: ▪ Regulatory & Management Updates ▪ Enforcement Data ▪ Economic & Legislative Developments ▪ Ecosystem & ESA Species ▪ Funding & Research Capacity ▪ Information Requests & Follow-Up

7. Summary findings

Surveillance audits are summary audits intended to evaluate continued compliance with the CSI RFM Fishery Standard v2.2. Each aspect of the fishery they are intended to focus on is addressed below.

7.1. Update on topics that trigger immediate failure

The following fisheries management issues cause a fishery to immediately fail RFM assessment:

- Dynamiting, poisoning, and other comparable destructive fishing practices.
- Significant illegal, unreported, and unregulated (IUU) fishing activities in the country jurisdiction.
- Shark finning.
- Slavery and slave labor on board fishing vessels.
- Any significant lack of compliance with the requirements of an international fisheries agreement to which the U.S. is signatory. A fishery will have to be formally cited by the International Governing body that has competence with the international Treaty in question, and that the US has been notified of that citation of non-compliance.

The Assessment Team has, as part of this surveillance, carried out a review of any new evidence with respect to these issues and found no evidence that any of the above issues are occurring

7.2. Changes in the management regime and processes

With respect to Fundamental clauses 1, 3, 10 and 11, there are no changes in the management regime and processes that affect the outcome of certification or that have the potential to change the effect of the fishery on resources.

7.3. Changes to the organizational responsibility of the main management agencies

Site visits organized by the Assessment Team in furtherance of the fishery's 1st surveillance audit have confirmed that Federal and State agencies with responsibilities for the fishery management systems of the Gulf shrimp fishery in federal and state waters respectively have not undergone significant organizational changes since the initial assessment of the fishery.

7.4. New information on the status of stocks

In the past, stock synthesis-based models had been used to estimate F and SSB as a basis for overfished and overfishing determinations in the GoM penaeid shrimp stocks. The last such assessments were in 2017-2018 and they concluded that the stocks were not overfished and overfishing was not occurring. The team conducting the initial assessment of the fishery on these stocks for certification under the RFM standard learned in 2023 that it had been determined that the SS models have issues such that past assessments were no longer supported by NOAA. Empirical dynamic models (EDMs) had been developed and were undergoing testing as a new candidate model for GoM penaeid shrimp stock assessments. Peer review of these models began in 2023 as part of the SEDAR research track. Ongoing review and development of potential models for assessment of GoM shrimp stocks continued through 2024 and into 2025 and resulted in Assessment Process Reports for each of the three species by June 2025¹.

¹ [SEDAR 87 Gulf White, Pink, and Brown Shrimp – SEDAR – SouthEast Data, Assessment, and Review](#)

For the brown shrimp assessment, EDM models performed very well and had high levels of prediction accuracy and were recommended for providing management advice. The assessment determined that in 2022 fishing mortality was $< 2\%$ of F_{MSY} and stock size was $> 4 \times B_{MSY}$, therefore, overfishing is not occurring nor is the stock overfished.

For the white shrimp assessment, biomass and removals were modeled and predicted well by EDM models which were recommended for providing management advice. The assessment determined that in 2022 fishing mortality was 15% of F_{MSY} and stock size was $2.5 \times B_{MSY}$, therefore, overfishing is not occurring nor is the stock overfished.

Neither EDM nor JABBA (Just Another Bayesian Biomass Assessment) models were recommended for providing pink shrimp stock status determination criteria. However, alternate strategies were identified and research recommendations indicated potential improvements to the EDM modeling framework by way of direct inclusion of covariates that would likely improve forecasting efficiency for trends of abundance.

Discussion at site visit with SEFSC staff involved in the shrimp stock assessments indicated they plan to provide new assessments updated to 2024 to SSC by October 2025 and, for the time being, it is planned to treat pink shrimp as a data-poor stock and develop a proxy for MSY from the data series.

7.5. Update on fishery catches

Brown shrimp landings (1960 to 2022) have been on a downward trend since the early 1990s (Figure 1). Landings peaked in 1990 at 105.91 million pounds of tails but have been declining since the mid-2000s due to economic conditions. In 2023, the last year for which data are available as of late August 2025, landings were 38.65 million pounds (17,530 t)²

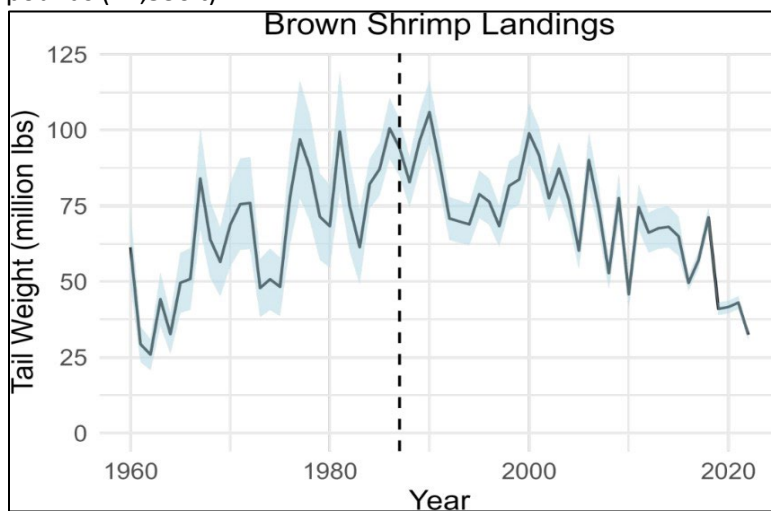


Figure 1. Final brown shrimp landings (blue line) and associated error (blue shading) input into JABBA. The dashed line indicates the start year of the index of relative abundance. Source: SEDAR 87 Stock Assessment Report Gulf of America Brown Shrimp August 2025. (Source: SEDAR 87)

² [Fisheries Information Network \(FIN\) - Data Management System | Gulf States Marine Fisheries Commission \(GSMFC\)](#)

White shrimp landings (1960 to 2022) peaked in 2006 at 85.12 million pounds of tails (Figure 2) and have since fluctuated at a relatively high level. In 2023, the last year for which data are available as of late August 2025, landings were 59.77 million pounds (27,111 t).

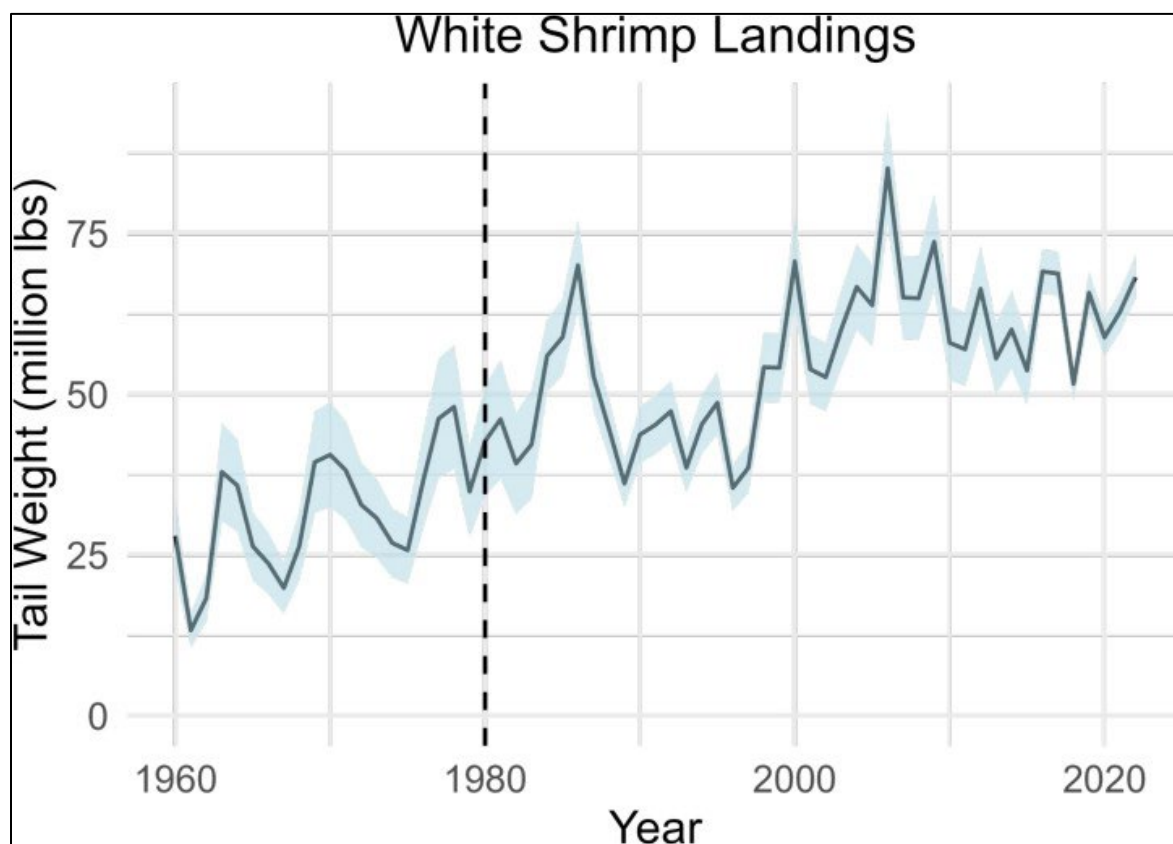


Figure 2. Final white shrimp landings (blue line) and associated error (blue shading) input into JABBA. The dashed line indicates the start year of the index of relative abundance. Source: SEDAR 87 Stock Assessment Report Gulf of America White Shrimp August 2025. (Source: SEDAR 87)

Pink shrimp landings (1960 to 2022) peaked in 1964 at 20.99 million pounds of tails. For the years where there is an index of relative abundance, landings peaked in 2018 at 12.99 million pounds (Figure 3). In 2023, the last year for which data are available as of late August 2025, landings were 7.80 million pounds (3,537 t).

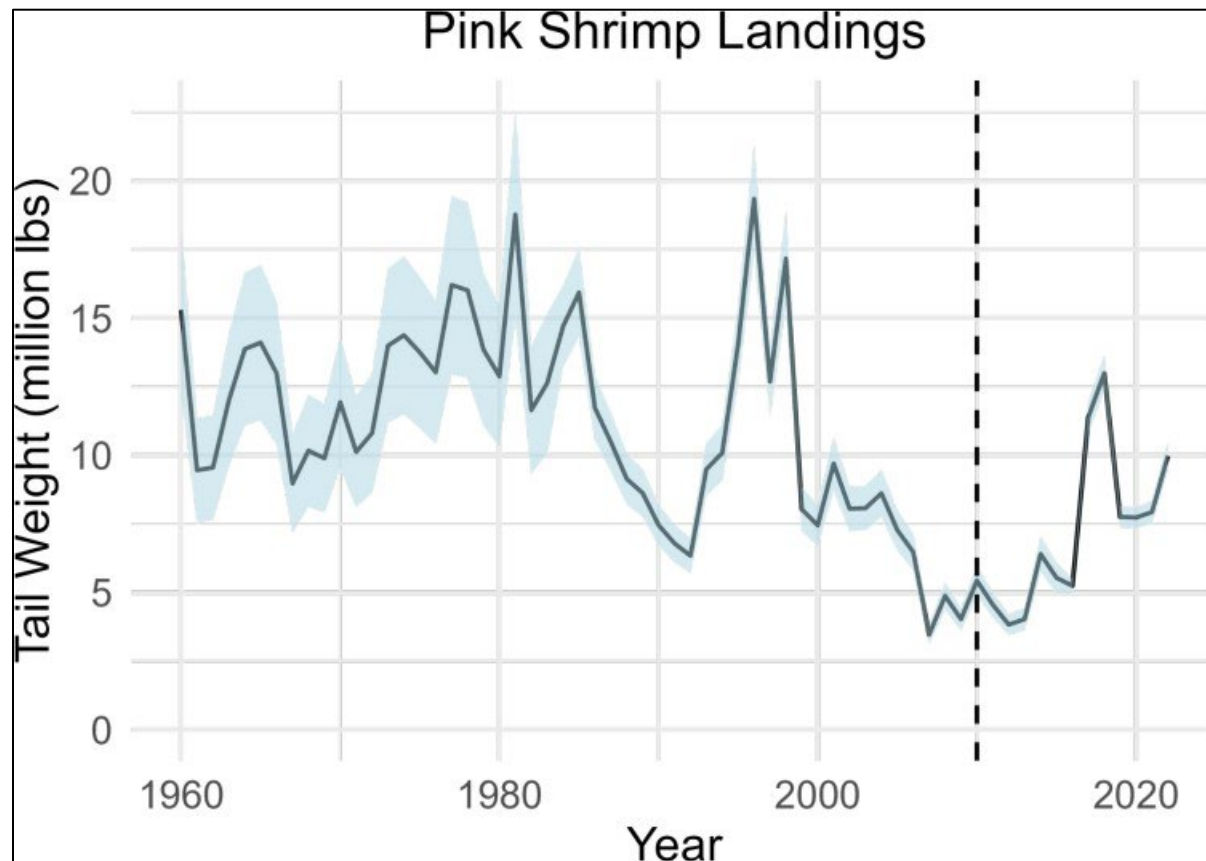


Figure 3. Final pink shrimp landings (blue line) and associated error (blue shading) input into JABBA. The dashed line indicates the start year of the index of relative abundance. Source: SEDAR 87 Stock Assessment Report Gulf of America Pink Shrimp August 2025. (Source: SEDAR 87)

7.6. Significant changes in the ecosystem effects of the fishery

There have not been any major changes in the ecosystem itself, nor has there been many changes to the fishery that could have significant effects on the ecosystem. The fishery has persisted with little expected changes in the catch profiles, the habitat impacts, and associated catch status. There were no major management changes that would affect the ecosystem in a manner that was not described during the initial assessment.

7.7. Violations and enforcement information

7.7.1. Gulf States

Texas Parks and Wildlife (TPWD)

TPWD law enforcement officers, also known as game wardens, are responsible for enforcing all provisions of the Texas Parks and Wildlife Code, the Texas Penal Code, and selected statutes. They have the same powers as other state peace officers and can enforce laws both on and off TPWD lands and waters.

In preparation for the fishery's audit, the Client Group formally requested TPWD enforcement program information for 2024 in relation to violations encountered during the state's commercial shrimp fishery. Table 5 summarizes the information by date of offense, statute violated and description of the violation. Warnings issued by law enforcement were excluded from the summary.

During the year, a total of 87 violations were logged by TPWD's Game wardens. Sixty-six percent of this total (57 violations) were related to the general category of fishing during closed times and closed areas. A further 22% (19 violations) were associated with turtle excluder devices (TEDs) and bycatch reduction devices (BRDs) that were improperly placed in the fishing gear or were absent.

Table 5. Texas Commercial Shrimp Violations in 2024 (Source: TPWD)

Date of offense	Statute	Description
January 28	31 Tex. Admin. Code 58.161	Shrimping in closed waters/gulf
	31 Tex. Admin. Code 58.160	TED escape greater than 2"
February 25	Tex. Parks & Wildlife Code 77.0351	No commercial shrimp boat captain's licence
	31 Tex. Admin. Code 58.160	BRD with any other violation
April 5	31 Tex. Admin. Code 58.160	Shrimping in other closed waters
April 11	31 Tex. Admin. Code 58.160	TED escape greater than 2"
April 20	31 Tex. Admin. Code 58.160	TED escape greater than 2" (2 violations)
	31 Tex. Admin. Code 58.160	BRD with incorrect dimensions
May 12	31 Tex. Admin. Code 58.162, 163, 164	Shrimping in closed waters/nursery area (2 violations)
May 31	31 Tex. Admin. Code 58.160	TED bar spacing greater than 3"
June 8	31 Tex. Admin. Code 58.163	Shrimping at night (bay)
June 23	Not cited	Any other shrimp violation
June 30	31 Tex. Admin. Code 58.160	TED bar spacing greater than 3"
July 14	31 Tex. Admin. Code 58.161	Shrimping in closed waters/gulf
July 19	Not cited	Any other shrimp violation
July 29	Not cited	Any other shrimp violation (2 violations)
July 30	31 Tex. Admin. Code 58.160	Failure to display shrimp boat plates
	Not cited	Any other shrimp violation
August 1	31 Tex. Admin. Code 58.160	TED with any other violation (9 violations)
August 9	31 Tex. Admin. Code 58.164	Illegal shrimp trawl (bait) (2 violations)
August 15	Not cited	Any other shrimp violation
August 17	31 Tex. Admin. Code 58.160	No BRD
August 25	31 Tex. Admin. Code 58.162, 163, 164	Shrimping in closed waters/nursery area (2 violations)
August 30	31 Tex. Admin. Code 58.160	BRD incorrectly installed
	31 Tex. Admin. Code 58.162, 163, 164	Shrimping in closed waters/nursery area
September 15	31 Tex. Admin. Code 58.162, 163, 164	Shrimping in closed waters/nursery area
September 21	31 Tex. Admin. Code 58.162, 163, 164	Shrimping in closed waters/nursery area (2 violations)

	31 Tex. Admin. Code 58.163	Shrimping at night (bay)
September 25	31 Tex. Admin. Code 58.160	Shrimping in other closed waters
September 27	31 Tex. Admin. Code 58.163	Shrimping at night (bay)
October 3	Tex. Parks & Wildlife Code 77.117	Flagrant offense: shrimping 30 minutes before or after legal hours (bay and bait licence only)
October 4	31 Tex. Admin. Code 58.162, 163, 164	Shrimping in closed waters/nursery area
	Not cited	Any other shrimp violation (6 violations)
October 5	31 Tex. Admin. Code 58.162, 163, 164	Shrimping in closed waters/nursery area
	31 Tex. Admin. Code 58.162, 163, 164	Shrimping in closed waters/nursery area (3 violations)
October 12	31 Tex. Admin. Code 58.163	Shrimping at night (bay)
October 13	31 Tex. Admin. Code 58.162, 163, 164	Shrimping in closed waters/nursery area (2 violations)
October 18	31 Tex. Admin. Code 58.162, 163, 164	Shrimping in closed waters/nursery area
October 19	31 Tex. Admin. Code 58.162, 163, 164	Shrimping in closed waters/nursery area (3 violations)
October 20	31 Tex. Admin. Code 58.162, 163, 164	Shrimping in closed waters/nursery area (7 violations)
October 24	31 Tex. Admin. Code 58.164	Shrimping at night (bay) (5 violations)
	Tex. Parks & Wildlife Code 77.117	Flagrant offense: shrimping 30 minutes before or after legal hours (bay and bait licence only)
October 27	31 Tex. Admin. Code 58.162, 163, 164	Shrimping in closed waters/nursery area
	31 Tex. Admin. Code 58.163	Shrimping at night (bay)
November 9	31 Tex. Admin. Code 58.162, 163, 164	Shrimping in closed waters/nursery area
November 10	31 Tex. Admin. Code 58.162, 163, 164	Shrimping in closed waters/nursery area
November 12	Tex. Parks & Wildlife Code 77.117	Flagrant offense: exceed shrimp net size by 5 feet
November 15	Tex. Parks & Wildlife Code 77.117	Flagrant offense: shrimping 30 minutes before or after legal hours (bay and bait licence only)
November 17	Not cited	Any other shrimp violation
November 18	Not cited	Any other shrimp violation
November 19	31 Tex. Admin. Code 58.163	Shrimping at night (bay) (2 violations)
December 4	31 Tex. Admin. Code 58.162, 163, 164	Shrimping in closed waters/nursery area
December 28	31 Tex. Admin. Code 58.162, 163, 164	Shrimping in closed waters/nursery area

Alabama Department of Conservation and Natural Resources (ADCNR)

The goal of the ADCNR is to promote statewide stewardship and enjoyment of natural resources and to ensure that future generations are able to enjoy these resources. The Department has four Divisions: Marine Resources, State Lands, State Parks, and Wildlife and Freshwater Fisheries. The Marine Resources Division manages state

marine resources through research and enforcement programs. In 2013, the former Marine Police were merged into the Alabama Law Enforcement Agency as the Alabama Marine Police.

In FY 2024-2025 (September – August), the Department reported at the April 2025 meeting of the GMMFC that it received \$423,089 in JEA funding, and that as of April, personnel had achieved the following results:

- Equipment purchases totaling \$170,577.
- Training and indirect costs totaling \$67,000.
- The remaining funds were directed at patrol activities including: (i) 745 hrs. on TEDs, (ii) 300 hrs. on recreational reef fisheries, (iii) 300 hrs. on Individual Fishing Quota fisheries, (iv) 25 hrs. on Illegal, Unreported and Unauthorized (IUU) fishing and Seafood fraud, (v) 235 hrs. on marine mammals/dolphins, (vi) 298 hrs. on Highly Migratory Species (HMS), and (vii) 300 hrs. on Outreach activities.
- The Department's enforcement statistics during the same period included: (i) 513 boat patrol hrs., (ii) 304 commercial fishers inspected, (iii) 632 recreational fishers inspected, (iv) 372 vessels inspected, and (v) 1,284 hrs. worked including outreach.

In furtherance of this surveillance audit, a representative of the Client group submitted a request pursuant to the *Alabama Open Records Act* seeking all commercial shrimp fishing violation codes, number of violations for 2023 and 2024 conducted by ADCNR. Also, a measure of enforcement effort (either in number of boardings, or number of patrol/surveillance hours) for each year of the same two years. A representative of the Department's Marine Resources Division providing the audit team with a record of the shrimp violations during the period January 1, 2023, to July 30, 2025. There were four reported shrimp violations during the period and warnings were issued in all cases. Two of the four violations involved the saltwater bait fishery and were excluded by the audit team. Of the other two, one involved a violation of Chapter 220-3-.01(3) of the *Administrative Code* which reads: *Individuals taking shrimp, for recreational purposes, in an area open to commercial shrimping by means of a cast net and without the use of a boat, are limited to no more than five (5) gallons of shrimp with heads on per person per day.* The other violation of the Code involved Chapter 220-3-.01(5) wherein: *It shall be unlawful to wash a trawl or net by pulling it or dragging it in any waters closed to shrimping.*

Louisiana Department of Wildlife and Fisheries (LDWF)

Law Enforcement Division (LED) of the LDWF is the state's fish and game regulatory agency. It has jurisdiction throughout the state including in territorial waters. The agency enforces both state and federal laws dealing with fishing (and hunting and boating safety). Most of the Department's Wildlife Agents also carry Federal law enforcement commissions issued from the U.S. Fish and Wildlife Service, and the U.S. National Marine Fisheries Service (NMFS). The federal commissions allow these state officers to enforce federal migratory waterfowl laws and federal marine fisheries laws in state and federal waters off the coast of Louisiana.

The responsibilities and powers of the Division's Enforcement Officers are described in Title 76 (Wildlife and Fisheries), Part 1, Chapter 1, Subchapter B of the *Louisiana Administrative Code*. The department is divided up into eight regions, with its headquarters in Baton Rouge.

In preparation for the fishery's audit, the ASPA formally requested LDWF enforcement program information for 2024 in relation to violations encountered during the state's commercial shrimp fishery. Table 6 summarizes the information by date of offense, statute violated and description of the violation. Any warnings that may have been issued by law enforcement were excluded from the summary. Of the 26 reported violation in 2024, thirty-eight

percent (10 violations) involved federal TED requirements while thirty-five percent (9 violations) involved improperly rigged fishing gear.³

Table 6. Louisiana Commercial Shrimp Violations in 2024 (Source: LDWF)

Date of violation	Louisiana Revised Statutes (RS) Title 56 or Consolidated Federal Regulations (CFR)	Description
January 31	RS §56:495.1B	No fishing with butterfly or skimmers nets in closed season (inside waters)
	CFR 50, Chapter 11C, Part 223.206(2)	Any shrimp trawler that is in the Atlantic Area or Gulf Area must have an approved TED installed in each net that is rigged for fishing.
February 1	CFR 50, Chapter 11C, Part 223.206(2)	Any shrimp trawler that is in the Atlantic Area or Gulf Area must have an approved TED installed in each net that is rigged for fishing.
April 25	CFR 50, Chapter 11C, Part 223.206(2)	Any shrimp trawler that is in the Atlantic Area or Gulf Area must have an approved TED installed in each net that is rigged for fishing.
May 8	RS § 56:495.1A	No trawling in closed season (inside waters)
	RS § 56:495.1A	No trawling in closed season (inside waters)
May 22	RS § 56:495.1B	No fishing with butterfly or skimmers nets in closed season (inside waters)
	RS § 56:497.1A	No person shall take, have in possession, sell, or offer for sale any saltwater shrimp taken from state waters except in open seasons.
	RS § 56:499.B	No person shall take saltwater shrimp with any trawl, skimmer net, or butterfly net with a mesh size less than five-eighths of an inch square or one and one-fourth of an inch stretched.
July 14	RS § 56:497.C	Requirement for annual special bait dealer's permit.
July 26	RS § 56:497.C	Requirement for annual special bait dealer's permit.
August 23	RS § 56:495.1A	No trawling shall be permitted in inside waters during the closed season with trawl rigging that exceed the legal dimensions.
September 19	RS § 56:322.C7	No nets or beam trawls used for taking fish or shrimp from the saltwater areas of the state shall be left unattended without a departmental tag (2 violations).
September 20	CFR 50, Chapter 11C, Part 223.206(2)	Any shrimp trawler that is in the Atlantic Area or Gulf Area must have an approved TED installed in each net that is rigged for fishing (5 violations).
October 11	RS § 56:322.C7	No nets or beam trawls used for taking fish or shrimp from the saltwater areas of the state shall be left unattended without a departmental tag.

³ The Louisiana Shrimp Association launched a lawsuit in January 2024 against NOAA regarding the federal rule that requires shrimp skimmer vessels under 40 ft. to use TEDs.

October 22	CFR 50, Chapter 11C, Part 223.206(2)	Any shrimp trawler that is in the Atlantic Area or Gulf Area must have an approved TED installed in each net that is rigged for fishing.
October 23	RS § 56:322.C7	No nets or beam trawls used for taking fish or shrimp from the saltwater areas of the state shall be left unattended without a departmental tag (4 violations).
December 16	CFR 50, Chapter 11C, Part 223.206(2)	Any shrimp trawler that is in the Atlantic Area or Gulf Area must have an approved TED installed in each net that is rigged for fishing.

The LDWF's Enforcement Division regularly issues press releases of various categories of alleged violations of State statutes. The following summary information is specific to alleged violations of the State's commercial shrimp fishery regulations and rules between May 28, 2024, and June 26, 2026 (Table 7).

Table 7. Louisiana Commercial Shrimp Violations in 2024 and 2025 to present (Source: LDWF)

Date of Offence	Violation Particulars
August 2, 2023	Individual was charged with multiple violations including fishing shrimp with skimmers during a closed season, operating the vessel without navigation lights, and throwing incriminating evidence overboard; on May 28, 2024, the individual was ordered to pay a \$300 fine plus court fees for the skimmers issue and further ordered not to be onboard any shrimp vessel possessing shrimp or gear to take shrimp without having a VMS that is monitored by LDWF LED for a period of one year.
August 26, 2024	Individual observed trawling for shrimp inside waters with two oversized trawls; agents seized both trawls and 611 lbs. of shrimp; offence carries a \$400 to \$950 fine and up to 120 days in jail.
August 27, 2024	Individual observed setting a butterfly net in water and leaving it unattended and without a tag; net was seized and contents returned to the water; offence carries a \$350 to \$750 fine and up to 30 days in jail.
September 19, 2024	Individual observed on August 27th (see above) was observed repeating the same offence in the same area.
November 11, 2024	Three individuals observed leaving two butterfly nets unattended, failing to possess a commercial fishing licence, and failing to possess a commercial gear fishing licence; nets and 231 lbs of shrimp were seized; leaving nets unattended brings a fine of \$350 to \$750 and up to 30 days in jail; failing to possess a commercial fishing licence or a commercial gear licence carries a fine between \$250 and \$500 and up to 90 days in jail.
April 24, 2025	Individual observed using a skimmer trawl to harvest shrimp during a closed season; offence carries a fine of up to \$950 and 120 days in jail. 50 lbs of shrimp were seized.
May 13, 2025	Five individuals were cited separately to various shrimp violations involving failing to possess a commercial gear licence while operating butterfly nets, failing to possess a commercial vessel licence, and failing to tag unattended butterfly nets; 75 lbs of shrimp were seized; failing to possess the required licences carries a fine between \$250 and \$500 and up to 90 days in jail; leaving nets unattended carries a fine between \$500 and \$750 and 15 to 30 days in jail.

May 11 and June 11, 2025	Two individuals were cited for multiple violations of failing to report commercial fisheries data (12 counts) and failure to maintain commercial seafood records (15 counts), and selling or buying fish without a wholesale/retail dealer's licence (4 counts); failing to maintain records, failing to report commercial fishery data, selling or buying fish without a wholesale dealer's licence and buying fish from an unlicensed dealer brings a fine between \$250 and \$500 and up to 90 days in jail for each offence.
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During the January 30, 2025, meeting of the GMMFC, the LED reported that its FY 2023-24 enforcement outcomes for the commercial fisheries that were monitored under the existing Joint Enforcement Agreement with NOAA Fisheries included: (i) 1,152 dockside checks, (ii) 4,068 hours of at-sea surveillance, and (iii) 2,948 hours of patrol vessel presence. In addition, staff logged in 1,094 contacts with the public in relation to the commercial fisheries.

Florida Fish and Wildlife Conservation Commission (FWC)

The FWC's Division of Law Enforcement is responsible for protecting Florida's natural resources and people through proactive and responsive law enforcement services. FWC officers have full police powers and statewide jurisdiction pursuant to Florida Statute 379.3311.⁴ They patrol rural, wilderness and inshore and offshore areas and are often the sole law enforcement presence in many remote parts of the state. The Division has cooperative agreements with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service. Officers are also cross-deputized to enforce federal marine fisheries and wildlife laws, thus ensuring state and federal consistency in resource-protection efforts.

The Division includes over 1,000 members, including 890 sworn personnel, and operates in six regions throughout the state. FWC officers are responsible for uniformed patrol and investigative law enforcement services on more than 8,400 miles of coastline, 13,200 square miles of offshore waters, and more than 34 million acres of land encompassing a variety of habitats including private lands, wildlife management areas, state parks and forests.

In response to an official request from the Client Group, the FWC provided statewide data of the fisheries violations that were registered in 2023 and 2024. Table 8 represents the audit team's summary of the violations encountered in 2024 in relation to the state's commercial shrimp fishery in the Gulf of Mexico.

Table 8. Commercial shrimp fishery violations on Florida's West Coast in 2024 (Source: FWC)

Date of offence	County	FAC Statute	Description
April 2	Hernando	379.401 / 68B-38	Fishing closed time
June 2	Franklin	379.401 / 68B-31	Fishing closed area
August 28	Franklin	379.401 / 68B-31	Fishing closed area
	Franklin	379.401 / 68B-31	Fishing closed area
August 31	Franklin	379.401 / 68B-31	Fishing closed area
	Franklin	379.401 / 68B-31	Fishing closed area
November 3	Citrus	379.401 / 68B-38	Fishing closed time

⁴ Florida Statutes: http://www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=0300-0399/0379/Sections/0379.3311.html

At the November 2024 meeting of the GMMFC, the Division reported on its enforcement activities under the JEA with NOAA Fisheries for various federally-managed commercial fisheries. The combined federal-state outcomes included: (i) 2,629 hrs of surveillance, (ii) 1,974 hrs of reef fish and CEP patrols, (iii) 323 hrs of TED enforcement, (iv) 332 hrs of marine mammal enforcement, and (v) 498 enforcement actions of which 350 were combined warnings and 148 were combined citations. The data are not fishery-specific.

Mississippi Department of Marine Resources (MDMR)

The MDMR's Office of Marine Patrol provides marine enforcement of federal and state laws and the ordinances of the Commission on Marine Resources for the protection, preservation and conservation of Mississippi's seafood, aquatic life and associated coastal wetlands habitats. Marine Patrol also carries out the enforcement of state and federal laws pertaining to boating safety and provides emergency assistance concerning the state's marine environment.

The State regulates the commercial (and recreational) shrimp fishery in its waters pursuant to the Mississippi Code, Title 22, Part 2.⁵ Administrative Penalty Procedures are described in Part 20 of the same regulations. The Shrimp and Crab Bureau provides management of the state's commercial (and recreational) shrimp and crab fisheries through cooperation and coordination with adjoining state agencies, as well as regional and federal fishery management authorities.

The audit team reviewed the Department's Annual Report for FY 2024 (July 2023 - June 2024).⁶ The report's 'notable fisheries violations' during the period included: (i) exceeding limit of Red snapper – 3, (ii) possession of undersized Red snapper – 6; (iii) No tails N' scales – 21; (iv) undersized Spotted seatrout – 59, and (v) undersized Red drum – 38. There were no reported commercial shrimp fishery violations during the period. The report also listed 154 commercial fisheries violation involving either citations or warnings being issued.

The MDMR provided detailed documentation of various shrimp fishery violations in state waters for the period January 1, 2017 to August 12, 2025. The information was provided to the client group as a result of a Request for Disclosure of Public Records that was filed on August 5, 2025. A summary of the information is shown here. Note: Three non-commercial shrimp violations were excluded as not relevant to the reporting requirement.

- Shrimping during closed season contrary to 49-15-64: 1 citation on June 21, 2025.
- Shrimping in closed waters contrary to 49-15-64.1(3): 9 citations between June 7, 2019 and July 26, 2025.
- Shrimping during closed season/waters closed to shrimping contrary to 49-15-64.1: 11 citations between October 13, 2018 and June 10, 2021.
- Shrimping without a commercial shrimp licence contrary to 49-15-64.5: 5 citations between June 20, 2019 and July 2, 2025.
- Keeping certain fish caught in shrimp nets for personal consumption contrary to 49-15-96: 5 citations between June 20, 2019 and September 8, 2021.

⁵ Mississippi Code, Title 22, Part 2: <https://dmr.ms.gov/wp-content/uploads/2024/11/Title-22-Part-02-20220501-linked.pdf>

⁶ Mississippi Department of Marine Resources – Annual Report FY 2024: <https://dmr.ms.gov/wp-content/uploads/2024/12/Annual-Report-FY2024-WEB.pdf>

7.7.2. Federal Agencies

Assets and enforcement personnel with NOAA's Office of Law Enforcement and the United States Coast Guard, District 8 undertook routine surveillance patrols of the Gulf of Mexico in fulfillment of their mandates to ensure conservation and protection of the marine resources. Both agencies provide regular reports of their activities at meetings of the GMMFC using different reporting formats. Infractions observed by the Coast Guard and transferred to NOAA for review and resolution.

NOAA Office of Law Enforcement (NOAA – OLE)

The NOAA – OLE protects marine wildlife and habitat by enforcing domestic laws and supporting international treaty requirements designed to ensure global resources are available for future generations. OLE special agents, enforcement officers, as well as investigative and mission support staff provide stakeholders with compliance assistance and education about the nation's marine resource laws.

OLE conducts enforcement activities using a variety of methods such as (i) patrols both on and off the water, (ii) monitoring vessels electronically, (iii) criminal and civil investigations, (iv) partnerships with state, tribal, federal, and nongovernmental organizations, (v) outreach and compliance assistance, and (vi) the use of innovative technological tools.

NOAA's Cooperative Enforcement Program (CEP) aims to increase living marine resource conservation, endangered species protection, and critical habitat enforcement while strengthening state and territorial enforcement resources. The program uses two main tools to accomplish its goals:

- Cooperative Enforcement Agreements (CEAs) which authorize state and US territorial marine conservation law enforcement officers to enforce federal laws and regulations.
- Joint Enforcement Agreements (JEAs) which include a formal operations plan that transfers funds to state and US territorial law enforcement agencies to perform law enforcement services in support of federal regulations.

The following reported incidents were compiled from NOAA – OLE reports as provided at meetings of the Gulf of Mexico Fishery Management Council (GMFMC) for three periods: April to June 2024, July to September 2024, and January to March 2025. The incidents took place in federal waters and include violation of several federal statutes (Table 9). Summary settlements that were closed during the reporting periods are listed in Table 10.

Table 9. Number of Reported Incidents by Primary Law/Regulation/Program/Area – Gulf of Mexico (Source: NOAA-OLE reports)

Law/Regulation/Program	AL	FL KEYS	FL WEST	LA	MS	TX	Total
Magnuson-Stevens Act							
April – June 2024		5	62	8	1	21	97
July – September 2024	2	24	70	4	2	59	161
January – March 2025	1	7	95	12	1	45	161
Total	4	36	227	24	4	125	419
Endangered Species Act							
April – June 2024		10	3	8			21
July – September 2024	1		5	10		19	35
January – March 2025		4	9	3		5	21
Total	1	14	17	21		24	56
Highly Migratory Species							
April – June 2024			2	2		3	7
July – September 2024	1		1	1		4	7
January – March 2025		1	1	2			4
Total	1	1	4	5		7	18
Lacey Act							
April – June 2024	1					1	2
July – September 2024		1					1
January – March 2025		3		1	1	1	6
Total	1	4		1	1	2	9
Marine Mammal Protection Act							
April – June 2024			1				1
July – September 2024			1				1
January – March 2025							0
Total			2				2
National Marine Sanctuaries Act							
April – June 2024		22					22
July – September 2024		38					38
January – March 2025		17				1	18
Total		77				1	78
Other Federal Law							
April – June 2024							0
July – September 2024				1		1	2

January – March 2025			1				1
Total			1	1		1	3
Grand Totals							
April – June 2024	1	37	68	18	1	25	150
July – September 2024	4	63	77	16	2	83	245
January – March 2025	1	32	106	18	2	52	211
Grand Totals	6	132	251	52	5	160	606

Table 10. Summary Settlements closed by Primary Law/Regulation/Program/Area – Gulf of Mexico (Source: NOAA-OLE reports)

Law/Regulation/Program	AL	FL KEYS	FL WEST	LA	MS	TX	Total
Magnuson-Stevens Act							
April – June 2024	0	2	13	0	0	7	22
July – September 2024	0	2	6	1	0	10	19
January – March 2025	0	2	7	0	0	7	16
Total		6	26	1		24	57
Endangered Species Act							
April – June 2024	0	0	2	0	0	1	3
July – September 2024	0	0	1	0	0	0	1
January – March 2025	0	0	0	0	0	2	2
Total			3			6	6
Highly Migratory Species							
April – June 2024	0	0	0	0	0	0	0
July – September 2024	0	0	0	0	0	0	0
January – March 2025	0	0	0	0	0	1	1
Total						1	1
Lacey Act							
April – June 2024	0	0	0	0	0	0	0
July – September 2024	0	0	0	0	0	0	0
January – March 2025	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0
Marine Mammal Protection Act							
April – June 2024	0	0	2	0	0	1	3
July – September 2024	0	0	0	0	0	0	0
January – March 2025	0	0	0	0	0	0	0
Total			2			1	3
National Marine Sanctuaries Act							
April – June 2024	0	0	2	0	0	0	2
July – September 2024	0	14	0	0	0	0	14
January – March 2025	0	7	0	0	0	0	7
Total		21	2				23

Other Federal Law							
April – June 2024	0	0	0	0	0	0	0
July – September 2024	0	0	0	0	0	0	0
January – March 2025	0	0	1	0	0	0	1
Total			1				1
Grand Totals							
April – June 2024	0	2	19	0	0	9	30
July – September 2024	0	16	7	1	0	10	34
January – March 2025	0	9	8	0	1	10	28
Grand Totals	0	27	34	1	1	29	92

Note: An OLE officer or agent may issue a Summary Settlement offer whereby an alleged violator receives a document explaining the alleged violation and the alleged violator may resolve the matter expeditiously by paying a reduced penalty. Where an officer or agent determines that an alleged violation is significant, or where an alleged violator has one or more prior violations, or does not pay a proposed summary settlement amount, the officer or agent is required to refer the case to the NOAA General Counsel's Enforcement Section for further action. For more significant violations, the NOAA attorney may recommend charges under NOAA's civil administrative process (15 C.F.R. Part 904), through issuance of a Notice of Violation and Assessment of a penalty (NOVA), Notice of Permit Sanction (NOPS), Notice of Intent to Deny Permit (NIDP), or some combination thereof. Alternatively, the NOAA attorney may determine that there is a violation of a criminal provision that is sufficiently significant to warrant referral to a US Attorney's Office for criminal prosecution (Table 11).

Table 11. Summary of Cases referred for Prosecution – Gulf of Mexico (Source: NOAA-OLE Reports)

Law/Regulation/Program	AL	FL KEYS	FL WEST	LA	MS	TX	Total
Magnuson-Stevens Act							
April – June 2024	0	0	1	1	0	0	2
July – September 2024	0	2	6	1	0	10	19
January – March 2025	0	2	7	0	0	7	16
Total		4	14	2		17	37
Endangered Species Act							
April – June 2024	0	0	0	0	0	0	0
July – September 2024	0	0	1	0	0	0	1
January – March 2025	0	0	0	0	0	2	2
Total			1			2	3
Highly Migratory Species							
April – June 2024	0	0	0	0	0	0	0
July – September 2024	0	0	0	0	0	0	0
January – March 2025	0	0	0	0	0	1	1
Total						1	1
Lacey Act							
April – June 2024	0	1	0	0	0	0	1
July – September 2024	0	0	0	0	0	0	0
January – March 2025	0	0	0	0	0	0	0

Total		1					1
Marine Mammal Protection Act							
April – June 2024	0	0	0	0	0	0	0
July – September 2024	0	0	0	0	0	0	0
January – March 2025	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0
National Marine Sanctuaries Act							
April – June 2024	0	2	0	0	0	0	2
July – September 2024	0	14	0	0	0	0	14
January – March 2025	0	7	0	0	0	0	7
Total		23					23
Other Federal Law							
April – June 2024	0	0	0	0	0	0	0
July – September 2024	0	0	0	0	0	0	0
January – March 2025	0	0	1	0	0	0	1
Total			1				1
Grand Totals							
April – June 2024	0	3	1	1	0	0	5
July – September 2024	0	16	7	1	0	10	34
January – March 2025	0	9	8	0	1	10	28
Grand Totals	0	28	16	2	1	20	67

Cases Charged by NOAA – GCES during the reporting periods for the South-east Region (Source: <https://www.noaa.gov/general-counsel/gc-enforcement-section/enforcement-charging-information>)

1. SE2306432; Archimedes – Owner Knossos Ltd., Operating Company Euclidean Capital, LLC, and Operator Christopher Walsh, were charged jointly and severally under the **National Marine Sanctuaries Act** with operating a vessel greater than 50 meters in an Area To Be Avoided in the Florida Keys National Marine Sanctuary. A \$7,500 NOVA was issued.

2. SE2310377; F/V Mahi Tuna – Owner/Operator Adrian Enrique Martinez was charged under the **National Marine Sanctuary Act** with fishing in the Tortugas South Ecological Reserve in the Florida Keys National Marine Sanctuary. A \$23,232 NOVA was issued.

3. SE2202043; F/V Gypsea – Owner/Operator Eliu Gonzalez was charged under the **Magnuson-Stevens Act** with failing to have sufficient allocation in the IFQ vessel account or linked shareholder account equal to pounds estimated to be landed at the time of the advance notice of landing. \$7,485.55 in proceeds from the sale of **red snapper and red grouper** were voluntarily abandoned. A \$20,000 NOVA was issued.

4. SE2307849; M/V Freedom – Owners Freedom Unlimited and Aereon Marine Inc., and Operator David Passmore were charged jointly and severally under the **National Marine Sanctuaries Act** with operating a vessel greater than 50 meters inside the Area To Be Avoided in and around the Florida Keys National Marine Sanctuary. A \$7,500 NOVA was issued.

5. SE2400745; M/V Caribe Legend – Owner Caribe Shipping LTD and Operators Hyde Shipping Corporation and Manuel Morales were charged jointly and severally under the **National Marine Sanctuaries Act** with operating a vessel greater than 50 meters in an Area To Be Avoided in the Florida Keys National Marine Sanctuary. An \$11,000 NOVA was issued.
6. SE2303337; F/V FL2507SJ – Owner Christopher Shawn Harvey and Operator Christopher Shawn Harvey Jr. were charged jointly and severally under the **Magnuson-Stevens Act** with fishing for **shrimp** without the required permit. A \$9,500 NOVA was issued.
7. SE2303492; F/V FL6487MY – Owner/Operator Carlos Bastos and Owner Bottoms Up Fishing Excursions LLC were charged jointly and severally under the **Magnuson-Stevens Act** with fishing for **Gulf reef fish** in the Gulf EEZ aboard a charter vessel without a federal charter permit. A \$19,460 NOVA was issued, and the case settled for \$17,660.
8. SE2400743; M/V GOL Cowboy – Owner GOL, LLC and Operator Steven Brooks were charged jointly and severally under the **National Marine Sanctuaries Act** with operating a vessel greater than 50 meters inside the Area To Be Avoided in and around the Florida Keys National Marine Sanctuary. A \$7,500 NOVA was issued.
9. SE2206610; F/V Coastal Cowboy – Owner/Operator Louis James Krolczyk dba Coastal Cowboy Fishing Charters was charged under the **Magnuson-Stevens Act** with fishing for **Gulf reef fish** and **coastal migratory pelagic fish** in the EEZ aboard a charter vessel without a federal charter permit. A \$21,900 NOVA was issued.
10. SE2315139; F/V Liberty I – Owner Liberty I Inc. and Operator Chau Cao were charged jointly and severally under the **Endangered Species Act** with failing to have compliant **Turtle Excluder Devices** installed in **shrimp nets**. A \$4,000 NOVA was issued, and the case settled for \$3,600.
11. 1SE2306333; M/Y Viva – Owner Viva Holdings Ltd. and Operator Niels Ackermans were charged jointly and severally under the **National Marine Sanctuaries Act** with operating a vessel greater than 50 meters in the Area To Be Avoided in and around the Florida Keys National Marine Sanctuary. A \$7,500 NOVA was issued, and the case settled for \$6,750.
12. SE2309414; FL1876RW – Owner/Operator Russell Taylor and anglers Kelly Bond, Mark Bass, Daniel Emerson, and Mark Thomas were charged jointly and severally under the **National Marine Sanctuaries Act** with fishing and possessing fish in the Tortugas Ecological Reserve of the Florida Keys National Marine Sanctuary. A \$3,750 NOVA was issued.
13. 1SE2408156; M/Y Amaral – Owner Mullet II Ltd., and Operator Rodd Taylor were charged jointly and severally under the **National Marine Sanctuaries Act** with operating a vessel greater than 50 meters in registered length, inside an Area to be Avoided in and around the Florida Keys National Marine Sanctuary. A \$7,500 NOVA was issued, and the case settled for \$6,750.
14. SE2306293; M/Y Gene Chaser – Owner Gene Lab Ltd. and Operator Zack Green were charged jointly and severally under the **National Marine Sanctuaries Act** with operating a vessel greater than 50 meters in the Area To Be Avoided in and around the Florida Keys National Marine Sanctuary. A \$7,500 NOVA was issued, and the case settled for \$6,750.

15. SE2408257; M/Y Starship – Owner Brandywine Yacht LLC and Operator Steven Craig Feldman were charged jointly and severally under the *National Marine Sanctuaries Act* with operating a vessel greater than 50 meters in the Area To Be Avoided in and around the Florida Keys National Marine Sanctuary. A \$7,500 NOVA was issued, and the case settled for \$6,750.

United States Coast Guard

The 8th Coast Guard District, headquartered in New Orleans, covers all or part of 26 states throughout the Gulf Coast and Heartland of America. It stretches from the Appalachian Mountains and Chattahoochee River in the east, to the Rocky Mountains in the west, and from the Canadian border in North Dakota to the border between the US and Mexico, and the Gulf of Mexico.

The organization's MCS program is highly structured with multi-tasked aerial assets and various surface patrol vessels. Enforcement outcomes for FYs 2022 to 2025 are summarized in Table 12.

Table 12. USCG District 8 Enforcement Outcomes (Source: USCG report to GMMFC)

Table 22: 2025 District Enforcement Outcomes (continued) District Summary

Exclusive Economic Zone					
Fiscal Year	2022	2023	2024	2025	Highlights
Interdictions	87	53	57	31	Feb 6, 2025: 3 lanchas, 11 people and approximately 3,000 lbs of snapper seized. Mar 12, 2025: 4 lanchas, 16 people and approximately 2,500 lbs of snapper seized.
Red Snapper (lbs)	12,524	5,895	12, 376	11,181	
Domestic Fisheries (Gulf)					
Fiscal Year			2024	2025	Highlights
Boardings			621	184	Most common violations are TEDs, BRDs, and seasonal and area closures.
Significant Violations			9	0	
Marine Protected Resources (Gulf)					
Fiscal Year			2024	2025	Highlights
Assistance			4	1	
Interactions			4	1	

Notes:

- (i) FY 2025 extends from September 2024 to August 2025; data is current to April 2025.
- (ii) According to the official minutes of the GMMFC's April 2025 meeting, the USCG representative indicated that the U.S. Department of State intends to inform Mexico that the U.S. will begin to prosecute some of the lanchas fishermen under the *Lacey Act*. There is a level of recidivism in the fishery.

7.7.3. NOAA Gulf Shrimp Observer Program

NOAA's Southeast Fisheries Science Center (SEFSC) operates several observer programs to collect data on fishing activities and their impact on marine ecosystems and protected species. These programs monitor various fisheries, including shrimp, reef fish, and shark bottom longline, as well as pelagic longline and gillnet fisheries. The data collected by observers is crucial for stock assessments, informing management decisions, and ensuring compliance with fishing regulations.

The Gulf Shrimp Observer Program seeks to provide quantitative biological, vessel, and gear selectivity information for the southeastern shrimp fishery. The primary objectives are to: (i) provide general fishery bycatch characterization and catch rates for finfish species by area and target species, and (ii) provide catch rates that can be used to estimate protected species bycatch levels.

The program has existed since 1987 and was originally developed to provide an economic evaluation of TEDs in shrimp trawls. Onboard observers monitor shrimp trawl, and reef fish trap and longline vessels. The deployment of observers and related coverage to vessels participating in the commercial shrimp fishery in federal waters is determined by the fishery's level of interactions that result in incidental mortality or serious injury of marine mammals pursuant to the *Marine Mammal Protection Act*. The Gulf shrimp fishery has been categorized as a Category II since 2011 based on interactions reported through observer reports, stranding data, and fisheries research data. NOAA Fisheries decide how many observer sea days are required by month, port, gear, and fisheries. Observer coverage of the entire southeastern federal shrimp otter trawl fishery is about 2.5 %.

Between April 1 and June 30, 2024, observers were deployed on 23 trips for 346 days. They reported a total of three incidents, namely one for harassment/intimidation/impediment, one for safety and one for gear. The incidents were reported to NOAA-OLE for investigation.

Between July 1 and September 30, 2024, observers were deployed on 20 trips for 215 days. They reported a total of four incidents to NOAA-OLE for follow-up investigation. The incidents included one for harassment/intimidation/impediment, two for safety, and one for gear.

During the period January 1 to March 31, 2025, observers were deployed on 8 trips for 92 days, and reported one incident for harassment/intimidation/impediment and one incident related to safety. The NOAA-OLE Division for the Southeast area also reported on 16 occasions for non-compliant for observer coverage.

Note: In November 2024, NOAA Fisheries issued a statement to remind vessel owners of their statutory obligations when selected to carry an observer in the Southeast Region (which includes the Gulf of Mexico).⁷

7.8. Other information that may affect the outcome of certification

There was no other information that may affect the outcome of certification including an update on any new fishery developments since certification not already covered in other sections.

⁷ NOAA Fisheries: <https://www.fisheries.noaa.gov/s3/2024-11/Additional-Information-SEFOP-1-508.pdf>

7.8.1. Section A: The Fisheries Management System

7.8.1.1. Fundamental Clause 1. Structured and legally mandated management system

1. There shall be a structured and legally mandated management system based upon and respecting international, State, and local fishery laws, for the responsible utilization of the stock under consideration and conservation of the marine environment.	
Summary of relevant changes:	The information described in the initial assessment report was reviewed to ascertain whether there were changes to the scope of this Fundamental Clause at the federal and Gulf states levels. Remote site visit discussions with representatives from all agencies confirmed the Assessment team's researched findings that no substantive changes had occurred in 2024 and to August 2025 with respect to new or amended statutes and rules of relevance to the legally mandated fishery management systems across all jurisdictions. All Supporting Clauses remain at the full conformance level with the exception of 1.7 (Alabama) where a minor non-conformance was raised and addressed by the client for the Year 1 deliverable. Clauses 1.1, 1.2, 1.2.1, 1.5, 1.6, 1.7 (except Alabama), 1.8 While no relevant changes were reported, Clause 1.7 (Alabama) includes an ongoing minor non-conformance finding for which a redress plan was developed and is currently in progress as reported in Section 8.1.2. Note: Clause 1.6 requires that Federal and State agencies "agree on the means by which the activities of such organizations and arrangements will be financed...." The Assessment team is monitoring the impacts to the federal management system of the announced reductions to the budgetary allocations to agencies like NOAA. The evaluation of any impacts is understood to be ongoing with possible staffing level reductions or deferrals, and adjustments to some program activities. The following Supporting clauses are not applicable. Clauses 1.3, 1.3.1, 1.4, 1.4.1, 1.6.1, 1.9
References:	1. Florida Statutes: http://www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=0300-0399/0379/Sections/0379.3311.html 2. Mississippi Code, Title 22, Part 2: https://dmr.ms.gov/wp-content/uploads/2024/11/Title-22-Part-02-20220501-linked.pdf 3. Mississippi Department of Marine Resources – Annual Report FY 2024: https://dmr.ms.gov/wp-content/uploads/2024/12/Annual-Report-FY2024-WEB.pdf 4. Documentation provided by the client representative(s). 5. Site visit notes compiled by Assessment team members.
Statement of consistency to the CSI RFM Fishery Standard	The fishery continues to meet the requirements of this Fundamental Clause of the CSI RFM Fisheries Standard.

7.8.1.2. Fundamental Clause 2. Coastal area management frameworks

2. Management organizations shall participate in coastal area management, decision-making processes and activities related to the fishery and its users, supporting sustainable and integrated resource use, and conflict avoidance.	
Summary of relevant changes:	Clause 2.1: <i>Within the fisheries management organization's jurisdiction, an appropriate policy, legal, and institutional framework shall be adopted in order to achieve sustainable and integrated use of living marine resources, (1) taking into account the fragility of coastal ecosystems and finite nature of their natural resources, (2) allowing for determination of the possible uses of coastal resources and</i>

2. Management organizations shall participate in coastal area management, decision-making processes and activities related to the fishery and its users, supporting sustainable and integrated resource use, and conflict avoidance.

governing access to them, and (3) recognizing the rights and needs of coastal communities and their customary practices to the extent compatible with sustainable development. In setting policies for the management of coastal areas, States shall take due account of the risks and uncertainties involved.

The federal Coastal Zone Management Act (CZMA) of 1972 authorized a voluntary partnership between the federal government and coastal states to address national coastal issues with a local focus. NOAA's Office for Coastal Management organizes participation from all states and territories with a coastal zone (including the great lakes).⁸ Each state has their own Coastal Management Program (CMP) and the Gulf States. During the site visit, each state (except for Florida) confirmed that there has been no change to this program, and it continues on as stated during the initial assessment report. Despite the lack of confirmation from Florida FWCC, it appears that the program is still implemented and ongoing.⁹

Below is a revised evidence basis that reflects the current state and sources:

Texas Coastal Management Program¹⁰

Louisiana Coastal Management Program¹¹

Mississippi Coastal Resources Management Program¹²

Alabama Coastal Area Management Program¹³

Florida Coastal Management ProgramError! Bookmark not defined.

Clause 2.1.2: *The fisheries management organization shall ensure that the authority or authorities representing the fisheries sector and fishing communities in the coastal management process have the appropriate technical capacities and financial resources.*

Given the current landscape of geopolitics in the United States, there is some concern regarding the allocation of resources to management the Gulf of Mexico shrimp fishery and its effects. The political landscape surrounding science funding in the United States is shaped by a complex interplay between federal priorities and state-level agendas. At the federal level, agencies like the National Science Foundation (NSF), and Department of Commerce/NOAA rely on annual appropriations from Congress, making their budgets vulnerable to shifting political ideologies, economic pressures, and partisan negotiations. Meanwhile, state governments play a critical role in supporting public universities, research institutions, and regional innovation hubs—often influenced by local economic development goals and legislative attitudes toward climate, health, and technology. As scientific challenges grow more urgent and interdisciplinary, the alignment between federal and state funding priorities has become a defining factor in the pace and direction of American research.

In 2025, the scientific community has faced unprecedented disruptions due to sweeping federal budget cuts and hiring freezes across major research institutions. The NSF and NOAA/NMFS, saw their budgets slashed dramatically following the establishment of the Department of Government

⁸ <https://coast.noaa.gov/>

⁹ <https://floridadep.gov/rcp/fcmp>

¹⁰ <https://www.glo.texas.gov/coast/grant-projects/cmp/index.html>

¹¹ <https://www.dnr.louisiana.gov/index.cfm?md=pagebuilder&tmp=home&pid=85&ngid=5>

¹² <https://dmr.ms.gov/coastal-resources-management-2/>

¹³ <https://adem.alabama.gov/coastal>

2. Management organizations shall participate in coastal area management, decision-making processes and activities related to the fishery and its users, supporting sustainable and integrated resource use, and conflict avoidance.

Efficiency (DOGE), which proposed cutting more than half of NSF's budget.¹⁴ These reductions triggered a cascade of consequences. Part of these cuts included the option for early retirement, which has reduced the level of staffing with the inability to replace those employees due to hiring freezes.

The federal agencies interviewed as part of this surveillance audit were divisions within the NOAA Southeast Fisheries Science Center (SEFSC) and the Gulf Council. SEFSC has reported a 30% loss in staffing and the ability to replenish lost staff has been impeded by a federal hiring freeze. These hiring freezes have also prevented SEFSC from hiring the vacant role of Shrimp Biologist. There are other aspects of SEFSC where funding has created gasps including surveys, observer program, and quality of information.

At the state level, all states reported that some portion of their funding to manage the fishery is allocated from federal funds. Texas reported that there have been no changes observed within scientific research, but there was a minor drop in funding as part of the joint enforcement agreement.

Management agencies from all states except or Florida have expressed that there are possible changes in funding that are coming but none have been realized at this point. There remains uncertainty with regard to how this federal administration will affect the ability to operate and manage the fishery.

Clause 2.5: *The economic, social, and cultural value of coastal resources shall be assessed by the appropriate fisheries management organization in order to assist decision making on their allocation and use.*

There have been no updates to the rationale as it all is still applicable to the fishery. The source for the Gulf Shrimp FMP has been revised.

Evidence:

Gulf Shrimp FMP¹⁵

Clause 2.6: *States shall cooperate to support and improve coastal area management, and in accordance with capacities, measures shall be taken to establish or promote (1) systems for research and monitoring of the coastal environment, and (2) multidisciplinary research of the coastal area using physical, chemical, biological, economic, social, legal, and institutional capabilities.*

See the update provided under Clause 2.1. The same is applicable here.

Clauses 2.1.1, 2.2, 2.3, 2.4, and 2.7

No relevant changes were reported.

References:

Refer to embedded footnotes

¹⁴ Anilocus Center for Research and Development. (2025). US research funding cuts: Impacts on nanomedicine, clean energy, and early-career grants. <https://anilocus.org/us-research-funding-cuts-2025/>

¹⁵ <https://gulfcouncil.org/fishery-management/implemented-amendments/shrimp/>

2. Management organizations shall participate in coastal area management, decision-making processes and activities related to the fishery and its users, supporting sustainable and integrated resource use, and conflict avoidance.

Statement of consistency to the CSI RFM Fishery Standard

The fishery continues to meet the requirements of this Fundamental Clause of the CSI Fishery RFM Standard.

7.8.1.3. Fundamental Clause 3. Management objectives and Plan

3. Management objectives shall be implemented through management rules and actions formulated in a plan or other framework.

Summary of relevant changes:

The information described in the initial assessment report was reviewed to ascertain whether there were changes to the scope of this Fundamental Clause at the federal and Gulf states levels. Remote site visit discussions with representatives from all agencies confirmed the Assessment team's researched findings that no substantive changes had occurred in 2024 and to August 2025 with respect to new or amended rules and actions of relevance to the management objectives of the management systems across all jurisdictions.

All Supporting Clauses remain at the full conformance level with the exception of 3.1 (Alabama) where a minor non-conformance was raised and addressed by the client for the Year 1 deliverable.

The following Supporting Clauses remain at the full conformance level.

Clauses 3.1 (except Alabama), 3.1.1, 3.1.2, 3.1.3, 3.2.1, 3.2.2, 3.2.3, 3.2.4.

The following Supporting clauses are not applicable.

Clause 3.2

References:

1. Documentation provided by the client representative(s).
2. Site visit notes compiled by Assessment team members.

Statement of consistency to the CSI RFM Fishery Standard

The fishery continues to meet the requirements of this Fundamental Clause of the CSI RFM Fisheries Standard.

7.8.2. Section B: Science & Stock Assessment Activities, and the Precautionary Approach

7.8.2.1. Fundamental Clause 4. Fishery data

4. There shall be effective fishery data (dependent and independent) collection and analysis systems for stock management purposes.

Summary of relevant changes:

Clause 4.1: *All significant fishery removals and mortality of the target species shall be considered by management. Specifically, reliable and accurate data required for assessing the status of fisheries and ecosystems—including data on retained catch, bycatch, discards, and waste—shall be collected. Data can include relevant traditional, fisher, or community knowledge, provided their validity can be objectively verified. These data shall be collected, at an appropriate time and level of aggregation, by relevant management organizations connected with the fishery, and provided to relevant States regional, and international fisheries organizations.*

All fishery removals and mortality of the target stocks of pink, brown and white shrimp in the US GOM fishery are considered by management. NOAA and each of the five States involved in the fishery undertake comprehensive, annual monitoring programs within their respective jurisdictions to collect data on retained catch, bycatch/discards in all directed shrimp fisheries as well as shrimp bycatch/discards in fisheries targeting other species. Within each jurisdiction there is also ongoing annual monitoring of ecosystem/environmental conditions that provides a basis for evaluation of impacts on recruitment to these stocks of factors other than fishing. These data are reviewed and

4. There shall be effective fishery data (dependent and independent) collection and analysis systems for stock management purposes.	analysed annually to determine trends and status of stocks. These assessments provide the basis for determining appropriate fisheries management measures and for assessing the effectiveness of those measures after they are enacted. The foregoing summary of data collection and analysis systems in place in the Gulf shrimp fisheries is from the initial RFM assessment report. Discussions during the July 2025 site visit meetings determined there had been no changes in the interim for any of the six jurisdictions involved in management of the fishery, except for those noted below with respect to collection of fishing effort data by way of cellular electronic logbooks. In 2025, the Gulf Council took final action on a Framework Action to modify the vessel position data collection program for the federal shrimp fishery in the Gulf of America. A program was selected that uses cellular electronic logbooks (cELBs) for the fishery that archives position data and automatically transmits it to National Marine Fisheries Service via cellular service to a non-law enforcement database. This new program replaces the cELB program which stopped transmitting vessel position data at the end of 2020, due to the expiration of 3G network support. In the interim, data were collected but required mailing of Secure Digital (SD) cards for processing resulting in less timely data and lower data return rates. This program is the source of shrimp effort estimates used for conducting shrimp stock assessments, estimating bycatch for finfish, monitoring bycatch of protected species, and monitoring the juvenile red snapper effort threshold. Clauses 4.1.1, 4.2, 4.2.1, 4.3, 4.5, 4.6 No relevant changes were reported. Clauses 4.1.2, 4.4, 4.7, 4.8, 4.9, 4.10, 4.11 Not applicable.
References:	Implemented Amendments – Gulf Council GMFMC 2025. Modification of the Vessel Position Data Collection Program for the Gulf of Mexico Shrimp Fishery. Tab D No. 5(b) 4/1/2025. Gulf Council Recommends New Shrimp Vessel Position Data Collection Program Gulf Council
Statement of consistency to the CSI RFM Fishery Standard	The fishery continues to meet the requirements of this Fundamental Clause of the CSI RFM Fishery Standard.

7.8.2.2. Fundamental Clause 5. Stock assessment

5. There shall be regular stock assessment activities appropriate for the fishery, its range, the species biology, and the ecosystem, undertaken in accordance with acknowledged scientific standards to support its optimum utilization.	Clause 5.1: <i>There is an established institutional framework for fishery management purposes that determines applied research needs and use.</i> A well-organized institutional framework is in place that conducts the research required for fishery management purposes. NOAA's Southeast Fisheries Science Center (SEFSC) has conducted shrimp
Summary of relevant changes:	

5. There shall be regular stock assessment activities appropriate for the fishery, its range, the species biology, and the ecosystem, undertaken in accordance with acknowledged scientific standards to support its optimum utilization.

research for decades. All aspects of the life cycle, movements, growth, survival and ecology of the various life-history stages of all three shrimp species are well known. NOAA conducts Shrimp/Groundfish Surveys in fall and summer annually. Objectives are to sample the northern Gulf of Mexico to determine abundance and distribution of demersal organisms from inshore waters to 60 fathoms; to obtain length-frequency measurements for major finfish and shrimp species to determine population size structures; and collect environmental data to investigate potential relationships between abundance and distribution of organisms and environmental parameters. Biological and environmental data from all SEAMAP Gulf of Mexico surveys are included in the SEAMAP Information System. The foregoing provides the basis for annual assessments of the status of each of the three GOM shrimp stocks under consideration over their broad distribution in the US EEZ. In addition, each of the five Gulf States undertakes annual surveys aimed at evaluating localized distribution and abundance of these resources within its waters.

The foregoing summary of stock assessment activities in place for the Gulf shrimp fisheries is from the initial RFM assessment report. Discussions during the July 2025 site visit meetings determined there had been no changes in the interim for any of the six jurisdictions involved in management of the fishery.

Clauses 5.1.2, 5.2, 5.5

No relevant changes were reported.

Clauses 5.1.1, 5.3, 5.4

Not applicable.

References:

Statement of consistency to the CSI RFM Fishery Standard

The fishery continues to meet the requirements of this Fundamental Clause of the CSI RFM Fishery Standard.

7.8.2.3. Fundamental Clause 6. Biological reference points and harvest control rule

6. The current state of the stock shall be defined in relation to reference points, relevant proxies, or verifiable substitutes that allow effective management objectives and targets to be set. Remedial actions shall be available and taken where reference points or other suitable proxies are approached or exceeded.

Summary of relevant changes:

Clause 6.2: *A scientifically based limit reference point or proxy has been officially established, and together with the measure to be taken, ensures the reference point(s) will not be exceeded. And*
Clause 6.3: *Data and assessment procedures (i.e., stock assessment process) are in place to measure the position of the fishery in relation to the target and limit reference points.*

Penaeid shrimp in the Gulf of Mexico are not required to have annual catch limits (ACLs) or accountability measures (AMs) because their annual lifecycles exempt them from the Magnuson-Stevens Act requirement for these management measures. Even though ACLs are not required for these stocks, Councils are still required to estimate other biological reference points such as SDC, MSY, OY, ABC and an ABC control rule. Status determination criteria (SDC) are in place for US GOM penaeid shrimp. Response to possible overfishing is set to trigger when overfishing (F in excess of Maximum Fishing Mortality Threshold, i.e., F_{MSY}) persists for two consecutive years. The two consecutive year requirement is in response to the biology of the shrimp stocks and the

6. The current state of the stock shall be defined in relation to reference points, relevant proxies, or verifiable substitutes that allow effective management objectives and targets to be set. Remedial actions shall be available and taken where reference points or other suitable proxies are approached or exceeded.

environmental influence on the stocks – penaeid shrimp rarely live longer than 18 months and stock size is driven by annual variability in environmental conditions. Similarly, response to possible overfished status is set to trigger when values of SSB are below MSST (Minimum Spawning Stock Threshold, i.e., B_{lim}) for two consecutive years. Management actions to be taken if recruitment overfishing occurs could include area and seasonal closures, trip limits or quotas. Although no target reference point as such (per supporting clause wording) has been established for these shrimp stocks, the approach to managing them is consistent with achieving MSY. Given that abundance is driven primarily by environmental conditions, fishing is unlikely to have a significant impact on these shrimp stocks in terms of long-term recruitment dynamics. Currently, the fishery is managed through monitoring fishing effort. Fishing effort is constrained through a moratorium permit, time/area closures, and market factors.

In the past, stock synthesis-based models had been used to estimate F and SSB as a basis for overfished and overfishing determinations in the GOM penaeid shrimp stocks. The last such assessments were in 2017-2018 and they concluded that the stocks were not overfished and overfishing was not occurring. The team conducting the initial assessment of the fishery on these stocks for certification under the RFM standard learned in 2023 that it had been determined that the SS models have issues such that past assessments were no longer supported by NOAA. Empirical dynamic models (EDMs) had been developed and were undergoing testing as a new candidate model for GOM penaeid shrimp stock assessments. Peer review of these models began in 2023 as part of the SEDAR research track. Therefore, in the initial assessment the DDF framework was used to evaluate US GOM shrimp stock status. The vulnerability scores determined for each of the three species were consistent with a low potential risk of overfishing.

Ongoing review and development of potential models for assessment of GOM shrimp stocks continued through 2024 and into 2025 and resulted in Assessment Process Reports for each of the three species by June 2025 and final stock assessment reports by August 2025.

For the brown shrimp assessment, EDM models performed very well and had high levels of prediction accuracy and were recommended for providing management advice. The assessment determined that in 2022 fishing mortality was $< 2\%$ of F_{MSY} and stock size was $> 4x B_{MSY}$, therefore, overfishing is not occurring nor is the stock overfished.

For the white shrimp assessment, biomass and removals were modeled and predicted well by EDM models which were recommended for providing management advice. The assessment determined that in 2022 fishing mortality was 15% of F_{MSY} and stock size was $2.5x B_{MSY}$, therefore, overfishing is not occurring nor is the stock overfished.

Neither EDM nor JABBA (Just Another Bayesian Biomass Assessment) models were recommended for providing pink shrimp stock status determination criteria. The JABBA models performed poorly across the board and were limited by the general constraints of surplus production models and poor performance was likely driven by the limited contrast present in the data. EDM models considered did not have sufficient predictive capability to estimate MSY. EDM was able to capture the cyclical nature of shrimp population abundance but was unable to predict outside of the data or project this information into the future. Lags of the population retain information on sometimes immeasurable drivers, including abundance of predators and important environmental influences. Direct inclusion

6.	The current state of the stock shall be defined in relation to reference points, relevant proxies, or verifiable substitutes that allow effective management objectives and targets to be set. Remedial actions shall be available and taken where reference points or other suitable proxies are approached or exceeded.
	of environmental and economic covariates improved model fits and allowed for better prediction for pink shrimp in some cases, however, they were not used to estimate MSY because additional assumptions would be required to forecast the state of the industry and environment into the future. For pink shrimp, while no models considered were recommended for providing status determination criteria or fishing mortality metrics, alternate strategies identified included using the third highest catch as a reference point and/or monitoring the trend of abundance using the VAST index. Vector Autoregressive Spatio-Temporal (VAST) is a modeling platform that can be used for standardizing indices of relative abundance. In addition, research recommendations indicated potential improvements to the EDM modeling framework by way of direct inclusion of covariates that would likely improve forecasting efficiency for trends of abundance. Discussion at site visit with SEFSC staff involved in the shrimp stock assessments indicated they plan to provide new assessments updated to 2024 to SSC by October 2025. Also, for the time being, it is planned to treat pink shrimp as a data-poor stock and develop a proxy for MSY from the data series. Clauses 6.1, 6.4, 6.5 No relevant changes were reported. No non-relevant clauses.
References:	SEDAR 87 Stock Assessment Report Gulf of America White Shrimp August 2025 sedarweb.org/documents/sedar-87-gulf-of-america-white-shrimp-final-stock-assessment-report/ SEDAR 87 Stock Assessment Report Gulf of America Brown Shrimp August 2025 sedarweb.org/documents/sedar-87-gulf-of-america-brown-shrimp-final-stock-assessment-report/ SEDAR 87 Stock Assessment Report Gulf of America Pink Shrimp August 2025 sedarweb.org/documents/sedar-87-gulf-of-america-pink-shrimp-final-stock-assessment-report/
Statement of consistency to the CSI RFM Fishery Standard	The fishery continues to meet the requirements of this Fundamental Clause of the CSI RFM Fishery Standard.

7.8.2.4. Fundamental Clause 7. Precautionary approach

7.	Management actions and measures for the conservation of stock and the ecosystem shall be based on the precautionary approach. Where information is deficient a suitable method using risk management shall be adopted to consider uncertainty.
Summary of relevant changes:	Clause 7.1: <i>There are management measures, regulations, and laws that command or direct the use of the precautionary approach (PA) for conservation, management, and exploitation of the aquatic resources under assessment. This could either take the form of an explicit commitment to the application of the PA, or be evidenced by an overarching approach applied throughout the management literature.</i>

7. Management actions and measures for the conservation of stock and the ecosystem shall be based on the precautionary approach. Where information is deficient a suitable method using risk management shall be adopted to consider uncertainty.

Application of the precautionary approach principle is a fundamental tenet of US law in regard to the management of fisheries in federally-managed waters. This includes using the best available information such as when providing science-based stock assessment advice and recommending new or amended management measures including for mitigating the impacts of fisheries on habitats and ecosystems. The application of the principle is prevalent in decisions taken by the Council as well as in recommendations advanced by the Commission. GOM states are represented on both entities; the proven record of collaboration and cooperation between member agencies suggests that the principle is well established and used across all jurisdictions involved in management of GOM penaeid shrimp fisheries.

The foregoing summary of the precautionary approach in place for the Gulf shrimp fisheries is from the initial RFM assessment report. Discussions during the July 2025 site visit meetings determined there had been no changes in the interim for any of the six jurisdictions involved in management of the fishery.

Clauses 7.1.1

No relevant changes were reported.

Clauses 7.1.2, 7.2

Not applicable.

References:

Statement of consistency to the CSI RFM Fishery Standard

The fishery continues to meet the requirements of this Fundamental Clause of the CSI RFM Fishery Standard.

7.8.3. Section C: Management Measures, Implementation, Monitoring, and Control

7.8.3.1. Fundamental Clause 8. Management measures

8. Management shall adopt and implement effective management measures designed to maintain stocks at levels capable of producing maximum sustainable yields, including harvest control rules and technical measures applicable to sustainable utilization of the fishery, and based upon verifiable evidence and advice from available objective scientific and traditional sources.

Summary of relevant changes:

***Clause 8.1:** The process by which management measures are developed for the fishery utilizes the best scientific evidence available, including traditional sources where these are verifiable, and also considers the cost-effectiveness and social impact of potential new measures. The assessment team shall provide evidence for the main type of management measures present in the fishery. Some of the main examples may include (but are not limited to) legal gear specifications, permit requirements, observer requirements, reporting requirements, limited access, vessel license limitations, size limits, sex restrictions, total allowable catch, in season adjustments, fishing seasons, geographical registrations areas, bycatch reduction devices, gear modification, minimizing waste and ghost fishing, closed waters, catch limits for other fisheries, and bycatch management.*

The US GOM shrimp fishery involves several species whose stocks are shared and co-managed by Federal agencies and agencies of the five Gulf States. Jurisdictional fishery management systems have evolved over many years through collaborative arrangements that include extensive collaboration of industry groups, other stakeholders and the public at large. Being part of the US EEZ,

8.	Management shall adopt and implement effective management measures designed to maintain stocks at levels capable of producing maximum sustainable yields, including harvest control rules and technical measures applicable to sustainable utilization of the fishery, and based upon verifiable evidence and advice from available objective scientific and traditional sources.	
	management of the shrimp fisheries in Federal waters off the coasts of the 5 Gulf States is the responsibility of the Gulf of Mexico Fisheries Management Council (GMFMC), which is empowered via the US Magnuson-Stevens Fishery Conservation Act. The Council prepares fishery management plans consistent with National Standards for fishery conservation and management. In addition, the Gulf States Marine Fisheries Commission (GSMFC) provides a scientific advisory arm to the 5 US Gulf States and provides a forum for multi-State discussion on fishery conservation matters. Each state is represented equally as GSMFC Commissioners. GSMFC serves as a discussion centre for marine resource issues, allowing stakeholders to voice concerns and opinions regarding fishery resource management. There are several industry-led organizations representing shrimpers, processors, other segments of the US domestic wild-caught shrimp industry and the general public. These advocate for the shrimping industry by identifying industry issues, obtaining fisheries input, engaging federal and local officials in order to voice industry concerns and work to ensure the continued vitality and existence of the U.S shrimp industry. The foregoing summary of management measures in place for the Gulf shrimp fisheries is from the initial RFM assessment report. Discussions during the July 2025 site visit meetings determined there had been no changes in the interim for any of the six jurisdictions involved in management of the fishery. Clauses 8.1.1, 8.1.2, 8.2, 8.3, 8.4, 8.4.1, 8.5, 8.5.1, 8.7, 8.9, 8.11, 8.12 No relevant changes were reported. Clauses 8.6, 8.8, 8.10, 8.13 Not applicable.	
References:		
Statement of consistency to the CSI RFM Fishery Standard		The fishery continues to meet the requirements of this Fundamental Clause of the CSI RFM Fishery Standard.

7.8.4. Section C: Management Measures, Implementation, Monitoring, and Control

7.8.4.1. Fundamental Clause 8. Management measures

8.	Management shall adopt and implement effective management measures designed to maintain stocks at levels capable of producing maximum sustainable yields, including harvest control rules and technical measures applicable to sustainable utilization of the fishery, and based upon verifiable evidence and advice from available objective scientific and traditional sources.	
Summary of relevant changes:	Clause 8.1: <i>The process by which management measures are developed for the fishery utilizes the best scientific evidence available, including traditional sources where these are verifiable, and also considers the cost-effectiveness and social impact of potential new measures. The assessment team shall provide evidence for the main type of management measures present in the fishery. Some of the main examples may include (but are not limited to) legal gear specifications, permit requirements, observer requirements, reporting requirements, limited access, vessel license limitations, size limits,</i>	

8.	Management shall adopt and implement effective management measures designed to maintain stocks at levels capable of producing maximum sustainable yields, including harvest control rules and technical measures applicable to sustainable utilization of the fishery, and based upon verifiable evidence and advice from available objective scientific and traditional sources.	
	<i>sex restrictions, total allowable catch, in season adjustments, fishing seasons, geographical registrations areas, bycatch reduction devices, gear modification, minimizing waste and ghost fishing, closed waters, catch limits for other fisheries, and bycatch management.</i> The US GOM shrimp fishery involves several species whose stocks are shared and co-managed by Federal agencies and agencies of the five Gulf States. Jurisdictional fishery management systems have evolved over many years through collaborative arrangements that include extensive collaboration of industry groups, other stakeholders and the public at large. Being part of the US EEZ, management of the shrimp fisheries in Federal waters off the coasts of the 5 Gulf States is the responsibility of the Gulf of Mexico Fisheries Management Council (GMFMC), which is empowered via the US Magnuson-Stevens Fishery Conservation Act. The Council prepares fishery management plans consistent with National Standards for fishery conservation and management. In addition, the Gulf States Marine Fisheries Commission (GSMFC) provides a scientific advisory arm to the 5 US Gulf States and provides a forum for multi-State discussion on fishery conservation matters. Each state is represented equally as GSMFC Commissioners. GSMFC serves as a discussion centre for marine resource issues, allowing stakeholders to voice concerns and opinions regarding fishery resource management. There are several industry-led organizations representing shrimpers, processors, other segments of the US domestic wild-caught shrimp industry and the general public. These advocate for the shrimping industry by identifying industry issues, obtaining fisheries input, engaging federal and local officials in order to voice industry concerns and work to ensure the continued vitality and existence of the U.S shrimp industry. The foregoing summary of management measures in place for the Gulf shrimp fisheries is from the initial RFM assessment report. Discussions during the July 2025 site visit meetings determined there had been no changes in the interim for any of the six jurisdictions involved in management of the fishery. Clauses 8.1.1, 8.1.2, 8.2, 8.3, 8.4, 8.4.1, 8.5, 8.5.1, 8.7, 8.9, 8.11, 8.12 No relevant changes were reported. Clauses 8.6, 8.8, 8.10, 8.13 Not applicable.	
References:		
Statement of consistency to the CSI RFM Fishery Standard		The fishery continues to meet the requirements of this Fundamental Clause of the CSI RFM Fishery Standard.

7.8.4.2. Fundamental Clause 9. Appropriate standards of fishers' competence

9.	Fishing operations shall be carried out by fishers with appropriate standards of competence in accordance with international standards, guidelines and regulations.	
Summary of relevant changes:	SC 9.1: States shall advance, through education and training programs, the education and skills of fishers and, where appropriate, their professional qualifications. Such programs shall take into account agreed international standards and guidelines.	

9. Fishing operations shall be carried out by fishers with appropriate standards of competence in accordance with international standards, guidelines and regulations.

Technological and Programmatic Changes

- a) **Digital Training Expansion:** A marked transition toward technological integration is underway, with NOAA earmarking funds for pilot electronic training modules, as part of their 2025 aquaculture and shrimp fishery support packages¹⁶¹⁷. Early evaluations suggest heightened accessibility and engagement among fishers in pilot regions; however, systematic rollout across the Gulf remains incomplete, with broader implementation anticipated but not yet reported as full policy.
- b) **cELB and Modernization Initiatives:** In response to technological obsolescence (notably, the sunset of 3G cellular networks in 2020), training programs began to include protocols for operating and troubleshooting cellular electronic logbooks (cELBs), which became a management focus through 2025¹⁸¹⁹²⁰²¹. These advances required new technical competencies among fishers, prompting targeted workshops by Sea Grant and NOAA, though reports note that participation varied by jurisdiction.
- c) **NIOSH Safety Program Dismantling:** Federal support for the NIOSH Commercial Fishing Safety Program, crucial to Clause 9.1's effectiveness, was eliminated in mid-2025 due to budget decisions²². As a result, ongoing safety and first-aid training now rely more heavily on state programs, ad hoc industry events, and Sea Grant activities. This creates substantive concern regarding the long-term effectiveness and reach of safety- and compliance-oriented training.

Outreach, Funding, and Collaboration

- a) **Young Fishermen's Development Program Reauthorization:** New federal legislative efforts, including support for the Young Fishermen's Development Program via Sea Grant, have been introduced and partially funded, although continued reauthorization and appropriations will be required to fully restore former federal training capacity²³.
- b) **Funding Opportunities:** Several new federal funding streams emerged in 2025, including MARFIN and Saltonstall-Kennedy grants earmarked for shellfish and aquaculture workforce development, which could augment traditional training programs for shrimp fishers if fully leveraged²⁴²⁵.

Industry and Stakeholder Engagement

- a) **Industry Events and Safety Summits:** The discontinuation of the NIOSH program has prompted industry-organized, regionally-focused safety/first-aid training events (e.g., sessions in Ft. Bragg, CA, and at Sea Grant sites). While helpful, their reach is limited compared to centralized federal support²⁶.
- b) **Self-Directed and Community-Led Training:** Feedback from field-level research and peer workshops indicates informal mentoring and communication remain critical, particularly

¹⁶ <https://www.acquisition.gov/far/part-52?form=MG0AV3>

¹⁷ <https://seagrant.noaa.gov/noaa-sea-grant-to-invest-8-8-million-to-enhance-aquaculture-production-capacity-and-knowledge-sharing/?form=MG0AV3>

¹⁸ <https://reelsurprisecharters.com/blog/april-2025-news-from-the-gulf-council/?form=MG0AV3&form=MG0AV3>

¹⁹ <https://www.fisheries.noaa.gov/feature-story/seeking-shrimpers-help-modernize-data-collection?form=MG0AV3&form=MG0AV3>

²⁰ <https://www.fisheries.noaa.gov/southeast/commercial-fishing/electronic-logbook-gulf-shrimp-permit?form=MG0AV3&form=MG0AV3>

²¹ <https://www.savingseafood.org/news/management-regulation/gulf-council-approves-new-logbook-system-for-gulf-shrimpers/?form=MG0AV3&form=MG0AV3>

²² <https://oceanstrat.com/2025/07/23/summer-2025-national-fisheries-policy-report/?form=MG0AV3&form=MG0AV3>

²³ <https://oceanstrat.com/2025/07/23/summer-2025-national-fisheries-policy-report/?form=MG0AV3>

²⁴ <https://www.fisheries.noaa.gov/funding-opportunities/all-opportunities?form=MG0AV3>

²⁵ <https://www.fisheries.noaa.gov/national/aquaculture/aquaculture-funding-opportunities-and-grants?form=MG0AV3>

²⁶ <https://oceanstrat.com/2025/07/23/summer-2025-national-fisheries-policy-report/?form=MG0AV3>

9. Fishing operations shall be carried out by fishers with appropriate standards of competence in accordance with international standards, guidelines and regulations.

around new electronic devices required for data reporting (e.g., instruction on cELB device approval and operation)²⁷.

SC 9.2: States, with the assistance of relevant international organizations, shall endeavor to ensure, through education and training, that all those engaged in fishing operations be given information on the most important provisions of the FAO CCRF (1995), as well as provisions of relevant international conventions and applicable environmental and other standards that are essential to ensure responsible fishing operations.

Policy, Program, and Outreach Advances

- a) **No Major CCRF Policy Overhaul:** FAO has not made significant substantive updates to Article 9 of the CCRF in this period, but 2025 marks the CCRF's 30th anniversary, with expanded FAO programming and communication strategies launched to elevate the profile of responsible fisheries standards globally^{28 29 30}.
- b) **Federal and Regional Integration:** NOAA Fisheries and regional councils increased efforts to embed CCRF messaging in outreach, with digital modules, webinars, and direct integration into training sessions, particularly through Sea Grant extension work. In 2025, the Young Fishermen's Development Act (bipartisan) was reintroduced, with a strong CCRF-aligned workforce development emphasis. There is also a stronger orientation toward traditional and indigenous knowledge, in keeping with NOAA's strategic plans focusing on equity and environmental justice^{31 32}.
- c) **Mandates for CCRF in Training:** NOAA's Fisheries Outreach Division, starting in late 2024, began reviewing and updating educational content to guarantee explicit alignment with CCRF principles, using periodic content reviews and onboarding digital storytelling tools for consistency³³.
- d) **Coalition and Industry Engagement:** The launch of the National Future Fishermen Coalition and continued series of youth-targeted and industry training summits (such as the Alaska Young Fishermen's Summit, January 2025) fostered dialogue on next-generation CCRF communication and workforce development, providing additional, albeit sometimes regionally limited, channels for effective dissemination of principles³⁴.

Program Diversification and Accessibility

²⁷ <https://reelsurprisecharters.com/blog/april-2025-news-from-the-gulf-council/?form=MG0AV3>

²⁸ <https://weareaquaculture.com/news/sustainability/fao-launches-recognition-program-for-sustainable-fisheries-and-aquaculture-practices?form=MG0AV3>

²⁹ <https://www.fao.org/4/v9878e/v9878e00.htm?form=MG0AV3>

³⁰ <https://www.fisheries.noaa.gov/national/international-affairs/code-conduct-responsible-fisheries?form=MG0AV3>

³¹ <https://test-media.fisheries.noaa.gov/2022-12/NOAA-Fisheries-2022-25-StrategicPlan.pdf?form=MG0AV3>

³² <https://oceanstrat.com/2025/07/23/summer-2025-national-fisheries-policy-report/?form=MG0AV3>

³³ <https://www.acquisition.gov/far/part-52?form=MG0AV3>

³⁴ <https://oceanstrat.com/2025/07/23/summer-2025-national-fisheries-policy-report/?form=MG0AV3>

9. Fishing operations shall be carried out by fishers with appropriate standards of competence in accordance with international standards, guidelines and regulations.

- a) **Increased Digital Access:** In 2025, FAO expanded access to CCRF documents in 27 languages and enhanced online access to guidelines and knowledge sharing, thereby improving the reach and inclusivity of general training and CCRF-relevant material.
- b) **Sea Grant and Outreach Expansion:** Sea Grant's 2024–28 Investment Plan highlights formal workshops, professional development opportunities, and participatory learning as key outreach mechanisms. There is reference to a continuing absence of direct CCRF integration in some outreach, with communication sometimes remaining implicit rather than explicitly referencing the CCRF³⁵.
- c) **Focus on Equity and Underserved Communities:** NOAA's 2022–25 Strategic Plan and Equity/EJ initiatives further broaden CCRF training by targeting previously underserved populations and ensuring culturally responsive content delivery, which is a notable step toward universal effectiveness³⁶.

SC 9.3: The fishery management organization shall, as appropriate, maintain records of fishers which shall, whenever possible, contain information on their service and qualifications, including certificates of competency, in accordance with their State's laws.

Technological Modernization

- a) **Gulf Council Approval of New Digital Logbook:** On April 14, 2025, the Gulf of Mexico Fishery Management Council formally approved a new electronic logbook (ELB) system for Gulf shrimpers, superseding the prior system hampered by cellular network shutdowns³⁷³⁸³⁹⁴⁰. The new cellular-based ELBs (cELBs) allow for automated transfer of vessel positional and effort data directly to NMFS/NOAA databases, vastly reducing delays and manual error. These systems are expected to deliver substantial gains in record accuracy and reporting speed—a 35% improvement in accuracy was reported in early audits for 2025⁴¹.
- b) **Automation and Trip Matching:** Major peer-reviewed NOAA efforts in 2024–25 focused on improving data integrity and implementing features such as unique trip identifier (UTID) codes for records, enabling algorithmic data matching between observer logs, gear/revenue records, and effort data. These developments have begun to mitigate long-standing matching and error rate issues, though reportable match rates are still suboptimal (~62%)⁴²⁴³.
- c) **Training and Implementation:** Adoption of the cELB system requires targeted technical training for vessel operators, again highlighting training/competence issues under Clause 9.1. Observations indicate varying degrees of uptake and system performance, necessitating greater cross-jurisdictional standardization. The ongoing beta-testing phase and early adopter campaigns show strong indication of widespread future compliance and

³⁵ <https://seagrant.noaa.gov/noaa-sea-grant-to-invest-8-8-million-to-enhance-aquaculture-production-capacity-and-knowledge-sharing/?form=MG0AV3>

³⁶ <https://test-media.fisheries.noaa.gov/2022-12/NOAA-Fisheries-2022-25-StrategicPlan.pdf?form=MG0AV3>

³⁷ <https://www.savingseafood.org/news/management-regulation/gulf-council-approves-new-logbook-system-for-gulf-shrimpers/?form=MG0AV3>

³⁸ <https://www.fisheries.noaa.gov/feature-story/seeking-shrimpers-help-modernize-data-collection?form=MG0AV3>

³⁹ <https://reelsurprisecharters.com/blog/april-2025-news-from-the-gulf-council/?form=MG0AV3>

⁴⁰ <https://www.fisheries.noaa.gov/southeast/commercial-fishing/electronic-logbook-gulf-shrimp-permit?form=MG0AV3>

⁴¹ <https://www.acquisition.gov/far/part-52?form=MG0AV3>

⁴² https://www.st.nmfs.noaa.gov/Assets/Quality-Assurance/documents/peer-review-reports/2024/2024_04%20Tingley%20GOM%20Shrimp%20Bycatch%20Report.pdf?form=MG0AV3

⁴³ <https://www.fisheries.noaa.gov/southeast/commercial-fishing/electronic-logbook-gulf-shrimp-permit?form=MG0AV3>

9. Fishing operations shall be carried out by fishers with appropriate standards of competence in accordance with international standards, guidelines and regulations.

improvement in accuracy, though some fishers, especially those less tech-savvy, report initial hurdles⁴⁴⁴⁵.

Recordkeeping Policies and Compliance

- a) **Regulatory Framework Strengthening:** Updated Federal Acquisition Regulations (FAR 52.203-13, as amended June 2025) and NOAA internal controls now directly reinforce compliance standards, explicitly referencing internal controls, digital accuracy, and external audit requirements for contracts involving fisher training and records⁴⁶⁴⁷.
- b) **Peer-Reviewed Methodological Advances:** NOAA peer reviews in late 2024 and into 2025 recommended annual diagnostics, spatial/temporal bias review, and new procedures to better mitigate errors associated with incomplete records or mis-matched entries. They also called for integrating fishing site environmental and gear metadata to further enhance long-term data utility and cross-checking⁴⁸.
- c) **Observer Program and Stakeholder Input:** NOAA continues to maintain and fund observer programs, which serve as external checks for data accuracy across the shrimp fleet and inform ongoing refinements to trip ticket and logbook data protocols⁴⁹⁵⁰.

References:

Statement of consistency to the CSI RFM Fishery Standard

The fishery continues to meet the requirements of this Fundamental Clause of the CSI RFM Fishery Standard

7.8.4.3. Fundamental Clause 10. Effective legal and administrative framework

10. An effective legal and administrative framework shall be established, and compliance ensured, through effective mechanisms for monitoring, surveillance, control, and enforcement for all fishing activities within the jurisdiction.

Summary of relevant changes:

The descriptions of the legal and administrative frameworks for the fishery at the federal and state levels have remained as they were first reported during the initial assessment. The Assessment team's review of the monitoring, surveillance, control, and enforcement mechanisms across all jurisdictions was informed by its own research with assistance from the client representative(s) and from its notes taken during the site visit meetings.

Current agency enforcement activities are summarized by jurisdiction as follow:

- Texas (Table 5)
- Louisiana (Tables 6 and 7)
- Alabama (No table; narrative only)
- Florida (Table 8)
- Mississippi (No table; narrative only)

⁴⁴ <https://www.fisheries.noaa.gov/feature-story/seeking-shrimpers-help-modernize-data-collection?form=MG0AV3>

⁴⁵ <https://reelsurprisecharters.com/blog/april-2025-news-from-the-gulf-council/?form=MG0AV3>

⁴⁶ <https://www.acquisition.gov/far/part-52?form=MG0AV3>

⁴⁷ <https://www.law.cornell.edu/cfr/text/50/622.203?form=MG0AV3>

⁴⁸ https://www.st.nmfs.noaa.gov/Assets/Quality-Assurance/documents/peer-review-reports/2024/2024_04%20Tingley%20GOM%20Shrimp%20Bycatch%20Report.pdf?form=MG0AV3

⁴⁹ <https://www.fisheries.noaa.gov/southeast/fisheries-observers/gulf-america-reef-fish-and-shrimp-observer-program?form=MG0AV3>

⁵⁰

10. An effective legal and administrative framework shall be established, and compliance ensured, through effective mechanisms for monitoring, surveillance, control, and enforcement for all fishing activities within the jurisdiction.	
	▪ NOAA Fisheries (Tables 9-11) ▪ USCG (Table 12) All jurisdictions maintained active operations at sea and at dockside in 2024 and 2025, and all continued to participate in Joint Enforcement Agreements (JEAs) with NOAA. The number of reported violations in the Gulf commercial shrimp fishery was highest from the TDPW and from the combined Federal agencies. NOAA's Gulf Shrimp Observer Program continued to operate in accordance with prescribed methods and coverage levels. The following Supporting Clauses remain at the full conformance level. Clauses 10.1, 10.2 The following Supporting clauses are not applicable. Clauses 10.3, 10.3.1, 10.4, 10.4.1
References:	1. Documentation provided by the client representative(s). 2. Site visit notes compiled by Assessment team members.
Statement of consistency to the CSI RFM Fishery Standard	The fishery continues to meet the requirements of this Fundamental Clause of the CSI RFM Fisheries Standard.

7.8.4.4. Fundamental Clause 11. Framework for sanctions

11. There shall be a framework for sanctions for violations and illegal activities of adequate severity to support compliance and discourage violations.	
Summary of relevant changes:	The descriptions of the legal sanctions and penalty provisions at the federal and state levels, and their application, have remained as they were first reported during the initial assessment. The Assessment team's research and discussions with officials during the site visits indicate that the penalty provision listed below have not been amended. ▪ TX Penal Code – Title 3, Chapter 12 ▪ LA Revised Statutes – Title 56 ▪ AL Code – Title 13A, Chapter 5, Article 1 ▪ FL Statutes – Title XXVIII, Chapter 379, Part VIII ▪ MS Code – Title 22, Chapter 21 ▪ NOAA – Penalty Policy (June 2019) As a practical matter, sanctions are neither designed, sought nor applied to be of inadequate severity. The following Supporting Clauses remain at the full conformance level. Clauses 11.1, 11.2 The following Supporting clauses are not applicable. Clauses 11.3, 11.4
References:	1. Documentation provided by the client representative(s). 2. Site visit notes compiled by Assessment team members.
Statement of consistency to the CSI RFM Fishery Standard	The fishery continues to meet the requirements of this Fundamental Clause of the CSI RFM Fisheries Standard.

7.8.5. Section D: Serious Impacts of the Fishery on the Ecosystem

7.8.5.1. Fundamental Clause 12. Impacts of the fishery on the ecosystem

12. Considerations of fishery interactions and effects on the ecosystem shall be based on the best scientific evidence available, local knowledge where it can be objectively verified, and a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts of the fishery on the ecosystem shall be appropriately assessed and effectively addressed.	
Summary of relevant changes:	Clause 12.2 (non-scoring): <i>The most probable adverse impacts from human activities, including fishery effects on the ecosystem/environment, shall be assessed and, where appropriate, addressed and or/corrected, taking into account available scientific information and local knowledge. This may take the form of an immediate management response or a further analysis of the identified risk. In this context, full consideration should be given to the special circumstances and requirements in developing fisheries, including financial and technical assistance, technology transfer, training, and scientific cooperation. In the absence of specific information on the ecosystem impacts of fishing on the unit of certification, generic evidence based on similar fishery situations can be used for fisheries with low risk of severe adverse impact. However, the greater the risk, the more specific evidence shall be necessary to ascertain the adequacy of mitigation measures.</i> The assessment team has determined to not recategorize the catch at this surveillance audit. Louisiana Department of Fish and Wildlife (LDFW) and LGL Research associates did not perform the same bycatch analysis that was conducted and reported on during the initial assessment. The observer program bycatch database collects data on an annual basis and the assessment team utilized unpublished data from 2017-2022 during the initial assessment. These data remain unpublished as Dr. Scott-Denton has retired from her position and the role is has only been filled temporarily. There is an expectation that these data sets and publications will persist into the future, but it just has not done so at this time. Thus, there is no new data for the assessment team to consider. In interviews with all 5 states and representatives from NOAA, there is consensus that the catch composition presented at the initial assessment is likely more precautionary than the proportions of assessed species caught by the fishery. Associated Species Clause 12.2.1: <i>The fishery management organization shall consider the most probable adverse impacts of the unit of certification on main associated species (Appendix 1, Part 3 and 7), by assessing and, where appropriate, addressing and or/correcting them, taking into account the best scientific evidence available and local knowledge. Accordingly, these catches (including discards) shall be monitored and shall not threaten these non-target species with serious risk of extinction, recruitment overfishing, or other impacts that are likely to be irreversible or very slowly reversible. If such impacts arise, effective remedial action shall be taken.</i> For updates on penaeid species, please refer to Fundamental Clauses 5 and 6. There are no status updates, management changes, or other changes to report for Atlantic Croaker and Seatrout spp. Gulf menhaden Gulf menhaden in the Gulf of Mexico is considered a single stock. While other menhaden species are caught in the fishery, Gulf menhaden account for >99% of landings. For assessment purposes, the Gulf menhaden population is, therefore, considered to represent the total population of menhaden

12. Considerations of fishery interactions and effects on the ecosystem shall be based on the best scientific evidence available, local knowledge where it can be objectively verified, and a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts of the fishery on the ecosystem shall be appropriately assessed and effectively addressed.

in the Gulf of Mexico.⁵¹ The stock assessment of Gulf menhaden was last updated in 2024.⁵¹ This update added three more years of data to the input data time series but did not review the assessment procedure or methodology. It does, however, provide a much-needed update on the stock status.

The stock assessment now covers the period 1977-2023 and the data used include:

- Landings: commercial reduction (which include small amounts of commercial bait and recreational landings)
- Indices of abundance: juvenile coastwide abundance index based on seine surveys.
- Adult abundance index based on a gillnet survey.
- Age compositions of landings from the commercial reduction fishery.
- Length compositions of indices.
- Life history information:
 - Lorenzen M scaled to tagging data
 - Weights at age for population and fishery
 - Fecundity, maturity, and sex ratio.

The natural mortality is assumed constant over time, and this and other key model input is shown in Table 13.

Table 13: Model input data (From: SEDAR 2024). Weight at spawning is in g.

Age	Maturity	M	Fecundity	Weight at spawning
0	0.0	1.67	0	0.0
1	0.8	1.26	164,106	53.4
2	1.0	1.10	404,404	97.5
3	1.0	1.02	744,264	146.7
4+	1.0	0.98	1,149,697	196.4

The assessment model is the Beaufort Assessment Model (BAM) developed at the 2013 Gulf menhaden benchmark.⁵² The BAM applies a statistical catch-age formulation⁵³, implemented through the AD Model Builder software (ADMB Foundation 2011). The assessment includes sensitivity and uncertainty analyses.

The stock status in the most recent assessment was evaluated by comparing the geometric mean of the spawning stock biomass in 2021-2023 (measured as fecundity) and the geometric mean of the fishing mortality rate in 2021-2023 against the respective threshold benchmark reference points of $SSB_{25\%}$ at $F=0$ and $F=M$ and the target benchmark reference points of $F=0.75M$ and $SSB_{50\%}$ at $F=0$.

⁵¹ SEDAR. 2024. SEDAR 97/GDAR 04 – Gulf Menhaden Stock Assessment 2024 update assessment report.

SEDAR, North Charleston SC. 352 pp. available online at: https://www.gsmfc.org/ann_mtg/2024-10/S-FFMC/7%20-%20GDAR04-SEDAR97%20Gulf%20menhaden%20Assessment%20Report%20V5.0.pdf

⁵² SEDAR. 2013. SEDAR 32A - Gulf of Mexico menhaden Stock Assessment Report. SEDAR, North Charleston SC. 422 pp. available online at: http://www.sefsc.noaa.gov/sedar/Sedar_Workshops.jsp?WorkshopNum=32A

⁵³ Williams, EH, and KW Shertzer. 2015. Technical documentation of the Beaufort Assessment Model (BAM). U.S. Department of Commerce NOAA Technical Memorandum NMFSSEFSC-671. 43p.

- 12. Considerations of fishery interactions and effects on the ecosystem shall be based on the best scientific evidence available, local knowledge where it can be objectively verified, and a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts of the fishery on the ecosystem shall be appropriately assessed and effectively addressed.**

Overall, there is no change in the stock status compared to the previous stock assessment.⁵⁴ Hence, the spawning stock biomass is still at a high level (Figure 4) as it has been for over a decade. There was a large decline in 2023 compared to 2022, but as the 2022 value was a time series high that may represent model overestimation the next assessment update is needed to determine if this represents an actual stock change or merely variability. The fishing mortality has been on a downward trend over the past 25 years and is currently estimated to be at a time series low (Figure 5).

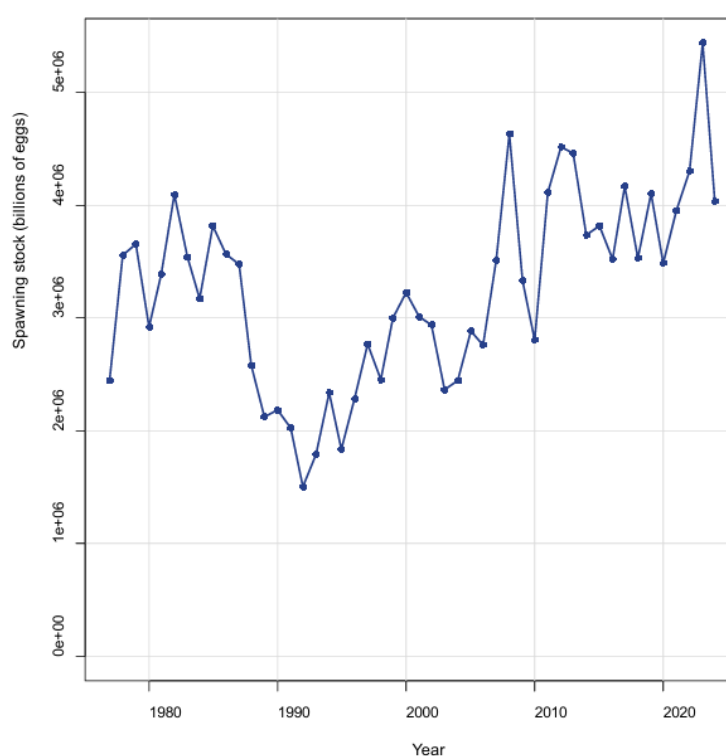


Figure 4: Estimated spawning stock biomass (fecundity in billions of eggs) at time of peak spawning for 1977-2023, with 2024 being a projection for the year after the terminal year of this update assessment. From SEDAR (2024)⁵¹.

⁵⁴ GDAR. 2021. GDAR 03 Gulf Menhaden Stock Assessment 2021 update. <https://www.gsmfc.org/publications/GSMFC%20Number%20308.pdf>

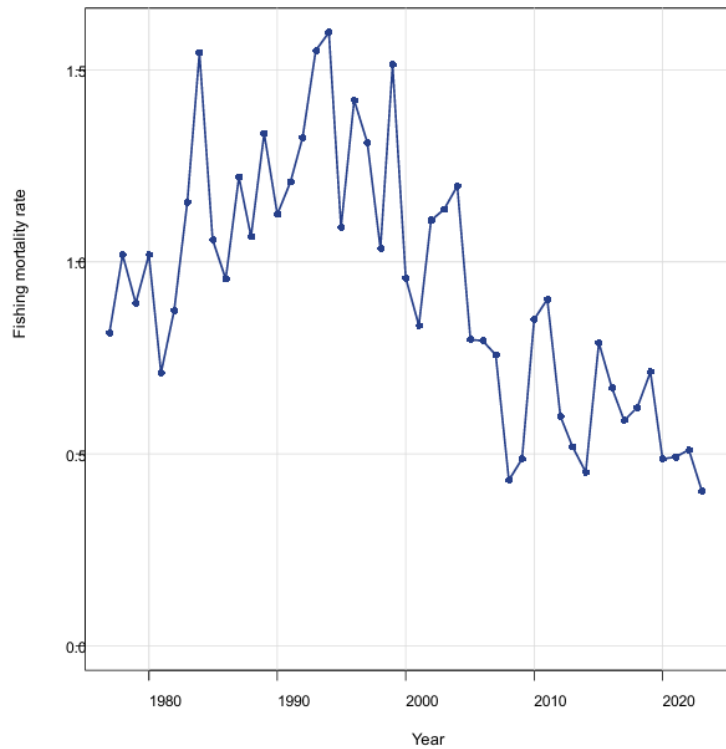


Figure 5: Estimated fully selected fishing mortality rate (per year) for the commercial reduction fishery. From SEDAR (2024)⁵¹.

At the benchmark in 2018 single-species reference points were defined.⁵⁵ For the fishing mortality the F-based biological reference points are based on $F=M$ for the threshold and $F=0.75M$ as the target level. For biomass, the reference points were 25% (threshold) and 50% (target) of the equilibrium value when $F=0$ with biomass being measured as fecundity. The current status in relation to these reference points are shown in Table 14. Hence, the fishing mortality is well below the target level (0.47) and the spawning biomass is above both the threshold (3.44) and the target level (1.72). Hence, the Gulf menhaden stock is neither overfished nor experiencing overfishing and is considered healthy.

⁵⁵ SEDAR. 2018. SEDAR 63 – Gulf Menhaden Stock Assessment Report. SEDAR, North Charleston SC. 352 pp. available online at: <http://sedarweb.org/sedar-63>.

Table 14: Estimated status indicators, benchmarks, and related quantities from the Beaufort catch-age model conditional on estimated current selectivity. Rate estimates (F) are in units of y^{-1} , and status indicators are dimensionless. Spawning stock biomass is measured in total fecundity in billions of eggs. From SEDAR (2024)⁵¹.

Quantities	Units	Estimates
$F_{F=M}$	y^{-1}	1.32
$F_{F=0.75M}$	y^{-1}	0.99
$SSB_{25\% \text{ at } F=0}$	Billions of eggs	1,315,586
$SSB_{50\% \text{ at } F=0}$	Billions of eggs	2,631,172
$F_{2021-2023}$	y^{-1}	0.47
$SSB_{2021-2023}$	Billions of eggs	4,525,923
$F_{2021-2023}/F_{F=M}$	-	0.35
$F_{2021-2023}/F_{F=0.75M}$	-	0.47
$SSB_{2021-2023}/SSB_{25\% \text{ at } F=0}$	-	3.44
$SSB_{2021-2023}/SSB_{50\% \text{ at } F=0}$	-	1.72

Hardhead and Gafftopsail catfishes

It remains that hardhead and Gafftopsail catfish do not have stock assessments or reference point-based management across the Gulf of Mexico, hence these species are assessed through the RFM Data Deficient Framework. Managers from NOAA, LDFW, and the Gulf Council confirmed that there is no biomass based indices or stock assessments for these species. There have been no noted changes to the attributes used in the DDF and therefore the scores for these species remain the same.

Clause 12.2.2: *The fishery management organization shall consider the most probable adverse impacts of the unit of certification on minor associated species (Appendix 1, Part 3 and 7), by assessing and, where appropriate, addressing and or/correcting them, taking into account the best scientific evidence available and local knowledge. Accordingly, these catches (including discards) shall be monitored and shall not threaten these non-target species with serious risk of extinction, recruitment overfishing, or other impacts that are likely to be irreversible or very slowly reversible. If such impacts arise, effective remedial action shall be taken.*

The following species continue to have low fishing vulnerability from Cheung *et al.* (2005).⁵⁶ The system and calculation take species' life history traits and ecological characteristics to assess their level of vulnerability to marine fishery exploitation. These low vulnerability levels combined with low overall catch levels by the UoAs indicate that these species are not at risk of being threatened by the most probable adverse impacts of the fishery. Thus, the following species continue to meet the requirements for this supporting clause:

- Longspine porgy
- Beltfish
- Spot croaker
- Box jellyfish
- Bigeye sea robin
- Gulf butterfish
- Pinfish
- Atlantic thread herring
- Highfin goby
- Spot croaker

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Cownose ray and Atlantic stingray

It remains that cownose ray and Atlantic stingray do not have stock assessments or reference point-based management across the Gulf of Mexico, hence these species are assessed through the RFM Data Deficient Framework. Managers from NOAA and the Gulf Council confirmed that there is no biomass based indices or stock assessments for these species. There have been no noted changes to the attributes used in the DDF and therefore the scores for these species remain the same.

Blue crab

According to the LDFW 2024 GSMFC Crab Subcommittee Report⁵⁷, there is no formal update to the 2022 blue crab assessment was conducted in 2024. The 2022 assessment indicated the stock is currently not overfished and not experiencing overfishing. An update is scheduled to take place in spring 2025. This assessment is the assessment that was included in the initial audit report.⁵⁸

In addition to the stock assessment status, the report highlights significant environmental stressors that impacted Louisiana's blue crab fishery between July 2023 and June 2024. An extended period of extreme heat — with 99 consecutive days exceeding 32.2°C and 32 days surpassing 37.8°C — combined with drought and saltwater intrusion into the Mississippi River, led to elevated coastal salinities and reduced freshwater flow. These conditions contributed to a decline in commercial blue crab landings, which fell below 40 million pounds during the reporting period. Despite lower landings, dockside prices per pound remained above the five-year average.

The Louisiana Wildlife and Fisheries Commission (LWFC) also advanced its Derelict Crab Trap Removal Program. In August 2023, the Commission adopted a Notice of Intent establishing six closure areas for the 2024 harvest season, prohibiting trap use for up to 14 days in each designated basin. With support from Coastal Mapping and Sciences LLC, a total of 2,142 derelict traps were removed from the Pontchartrain and Terrebonne areas. Since the program's inception in 2004, over 57,000 abandoned traps have been cleared from Louisiana waters.

No new regulatory changes affecting the blue crab fishery were enacted during the July 2023–June 2024 period.

ETP Species

Clauses 12.2.4 & 12.2.5

Turtles

Green Turtle

⁵⁶ Cheung, W.W., Pitcher, T.J. and Pauly, D., 2005. A fuzzy logic expert system to estimate intrinsic extinction vulnerabilities of marine fishes to fishing. *Biological conservation*, 124(1), pp.97-111. <https://www.sciencedirect.com/science/article/pii/S000632070500042X>

⁵⁷ Louisiana Department of Wildlife and Fisheries. (2024). 2024 GSMFC Crab Subcommittee Report: First Draft. Gulf States Marine Fisheries Commission. https://www.gsmfc.org/ann_mtgs/2024-10/TCC-Crab/07c%20%20LA%20CRAB%20SUBCOMMITTEE%20-2024%20-%20first%20draft.pdf

⁵⁸ West, J., Lang E., and P. Cagle. 2022. Update Assessment of Blue Crab *Callinectes sapidus* in Louisiana waters. Louisiana Department of Wildlife and Fisheries, Report. https://www.wlf.louisiana.gov/assets/Resources/Publications/Stock_Assesments/Blue_Crab/2022-Update-Assessment-of-Blue-Crab.pdf

12. Considerations of fishery interactions and effects on the ecosystem shall be based on the best scientific evidence available, local knowledge where it can be objectively verified, and a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts of the fishery on the ecosystem shall be appropriately assessed and effectively addressed.

There has not been a new assessment for the green turtle since the publication of the initial assessment.⁵⁹ There has been no change in scoring for the green turtle for the above clauses.

Hawksbill turtle

There has not been a new assessment for the hawksbill turtle since the publication of the initial assessment.⁶⁰ There has been no change in scoring for the hawksbill turtle for the above clauses.

Kemp's Ridley turtle

There has not been a new assessment for the Kemp's ridley turtle since the publication of the initial assessment.⁶¹ There has been no change in scoring for the Kemp's ridley turtle for the above clauses.

Leatherback turtle

There has not been a new assessment for the leatherback turtle since the publication of the initial assessment.⁶² There has been no change in scoring for the leatherback turtle for the above clauses.

Loggerhead turtle

There has not been a new assessment for the loggerhead turtle since the publication of the initial assessment.⁶³ There has been no change in scoring for the loggerhead turtle for the above clauses.

Bottlenose Dolphin

The most recent stock assessment for bottlenose dolphins was conducted in 2021.⁶⁴ The assessment team did not receive any new information on the interaction between the fishery and bottlenose dolphin at this site visit. So the status of these ETP species remains unchanged. There are no additional protections to provide on the management of these ETP species.

Gulf sturgeon

There is no new information to report on the population status of the gulf sturgeon. The assessment team did not receive any new information on the interaction between the fishery and gulf sturgeon at this site visit. As previously reported, there is very low observed interaction between the fishery and these species (especially since the requirement for TEDs in the skimmer and otter trawl fleets), therefore the assessment team remains confident that the status of this species has not changed. The protection of this species has also remained the same since the initial assessment.

Brown pelican

⁵⁹ Seminoff JA, Allen CD, Balazs GH, Dutton PH, Eguchi T, Haas H, Hargrove SA, Jensen M, Klemm DL, Lauritsen AM, MacPherson SL. Status review of the green turtle (*Chelonia mydas*) under the Endangered Species Act. <http://repository.library.noaa.gov/view/noaa/4922>

⁶⁰ National Marine Fisheries Service & U.S. Fish and Wildlife Service. (2015). Kemp's Ridley Sea Turtle (*Lepidochelys kempii*) 5-Year Review: Summary and Evaluation. U.S. Department of Commerce & U.S. Department of the Interior. https://repository.library.noaa.gov/view/noaa/17048/noaa_17048_DS1.pdf

⁶¹ National Marine Fisheries Service & U.S. Fish and Wildlife Service. (2015). Kemp's Ridley Sea Turtle (*Lepidochelys kempii*) 5-Year Review: Summary and Evaluation. U.S. Department of Commerce & U.S. Department of the Interior. https://repository.library.noaa.gov/view/noaa/17048/noaa_17048_DS1.pdf

⁶² National Marine Fisheries Service & U.S. Fish and Wildlife Service. (2020). *Endangered Species Act status review of the leatherback turtle (Dermochelys coriacea)*. U.S. Department of Commerce & U.S. Department of the Interior. <https://repository.library.noaa.gov/view/noaa/25629>

⁶³ National Marine Fisheries Service & U.S. Fish and Wildlife Service. (2020). *Endangered Species Act status review of the leatherback turtle (Dermochelys coriacea)*. U.S. Department of Commerce & U.S. Department of the Interior. <https://repository.library.noaa.gov/view/noaa/25629>

⁶⁴ Hayes, S.A., Kosephson, E., Maze-Foley, K., Rosel, P.E., Wallace, J. 2022. U.S. Atlantic and Gulf of Mexico Marine Mammal Stock Assessments 2021. <https://media.fisheries.noaa.gov/2022-08/U.S.%20Atlantic%20and%20Gulf%20of%20Mexico%202021%20Stock%20Assessment%20Report.pdf>

12. Considerations of fishery interactions and effects on the ecosystem shall be based on the best scientific evidence available, local knowledge where it can be objectively verified, and a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts of the fishery on the ecosystem shall be appropriately assessed and effectively addressed.

There are no new updates to provide for the brown pelican at this time.

Giant Manta

New analyses from NOAA's Southeast Fisheries Science Center (SEFSC) have expanded the available observer data through 2023, allowing for more refined estimates of giant manta ray bycatch in the GoM. Bayesian model-based estimates now suggest annual bycatch ranging from 385 individuals in 2021 to 863 individuals in 2023, with credible intervals reflecting substantial uncertainty.⁶⁵ These estimates are notably higher than the 2019 extrapolated take of 140.1 individuals reported by Carlson (2020)⁶⁶, which was previously considered an overestimate due to limited data and potential recaptures.

Table 15. Giant Manta bycatch estimates in the commercial shrimp fishery (Gulf and South Atlantic), from 2008 to 2023. With 95% credible intervals. (Source: Peterson et al., 2025⁶⁷)

⁶⁵ Babcock, E. A., Carlson, J. K., Horn, C., & Pate, J. H. (2025). Sawfish and Manta Ray Bycatch in the Gulf of Mexico Shrimp Trawl Fishery: A Technical Report. NOAA Fisheries, Office of Protected Resources. Version 4. 23 pp.

⁶⁶ Carlson, J.K. 2020. Estimated Incidental Take of Smalltooth Sawfish (*Pristis pectinata*) and Giant Manta Ray (*Manta birostris*) in the South Atlantic and Gulf of Mexico Shrimp Trawl Fishery. National Oceanic and Atmospheric Administration, National Marine Fisheries Service, Panama City, Florida. Panama City Laboratory Contribution Series 20-03.

⁶⁷ Peterson, C., Babcock, E.A., & Woods, D. (2025). New Bycatch Estimates and Other Analyses for Smalltooth Sawfish and Giant Manta Ray. Presentation to the Gulf of Mexico Fishery Management Council Standing and Shrimp SSC, May 2025. Gulf Council Office, Tampa, FL. https://gulf-council-media.s3.amazonaws.com/uploads/2025/04/08a-SSC-slides_Sawfish-manta-bycatch_CTP.pdf

12. Considerations of fishery interactions and effects on the ecosystem shall be based on the best scientific evidence available, local knowledge where it can be objectively verified, and a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts of the fishery on the ecosystem shall be appropriately assessed and effectively addressed.

	Giant Manta Ray		
Year	Gulf	SA	Total
2008			
2009			
2010			
2011			
2012			
2013			
2014			
2015			
2016			
2017			
2018			
2019	406 (163 – 844)	1245 (205 – 4611)	1651 (368 – 5455)
2020	443 (107 – 1034)	1195 (197 – 4407)	2438 (304 – 5441)
2021	385 (144 – 781)	1636 (89 – 2253)	2021 (233 – 3034)
2022	461 (202 – 807)	1244 (67 – 1707)	1705 (269 – 2514)
2023	863 (357 – 1643)		863 (357 – 1643)

Between 2019 and April 2023, NOAA documented 34 observed interactions with giant manta rays across the southeastern shrimp fishery, resulting in five confirmed mortalities.⁶⁸ While this includes both Atlantic and GoM data, the GoM-specific mortality rate remains low. The 2021 Biological Opinion had previously assumed zero mortality and set a maximum allowable annual encounter rate of 140 individuals for the GOM.⁶⁹ The updated mortality data suggest that post-interaction mortality (PIM) may be higher than previously assumed, though still not considered significant at the population level although the level of impact cannot be accurately quantified due to low observer coverage.⁶⁵

In 2025, NOAA Fisheries advanced the development of an ESA Section 4(d) rule for the giant manta ray, aiming to extend “take” prohibitions and better manage threats from recreational fishing and habitat disturbance.⁶⁸

⁶⁸ Lee, J. (2025). *Giant Manta Ray ESA Section 4(d) Rule Development Update and New Information*. Southeast Regional Office, Protected Resources Division. Presented at the Mackerel Cobia Committee Meeting, South Atlantic Fishery Management Council. Retrieved from https://safmc.net/documents/mcap_a3_mantarayupdate_202503-pdf/

⁶⁹ NMFS (2021). Endangered Species Act Biological Opinion on the Authorization of the Southeast U.S. Shrimp Fisheries and Implementation of Sea Turtle Conservation Regulations. NOAA National Marine Fisheries Service, Southeast Regional Office. April 2021.

12. Considerations of fishery interactions and effects on the ecosystem shall be based on the best scientific evidence available, local knowledge where it can be objectively verified, and a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts of the fishery on the ecosystem shall be appropriately assessed and effectively addressed.

The assessment team was provided with drafts of the Recovery Plan⁷⁰, Implementation Strategy⁷¹, and Recovery Status Review⁷² for the giant manta.

The giant manta ray (*Mobula birostris*) was listed as a threatened species under the Endangered Species Act (ESA) in 2018 due to its vulnerability to overutilization, low reproductive output, and inadequate regulatory protections (83 FR 2916). NOAA Fisheries has since developed a comprehensive recovery framework, including a Draft Recovery Plan, a Recovery Implementation Strategy (RIS), and a Recovery Status Review, to guide conservation efforts for the species.

The Draft Recovery Plan (2024) provides the foundational framework for species recovery. It outlines the biological and ecological needs of the giant manta ray and identifies site-specific management actions necessary to reduce threats and promote population stability. The plan emphasizes the species' vulnerability due to its extremely low reproductive rate (typically one pup every 2–5 years), slow growth, and fragmented populations. Key threats include bycatch in commercial and artisanal fisheries, targeted fishing for gill plates, habitat degradation, and climate-related stressors such as harmful algal blooms. The plan sets measurable recovery criteria and estimates the time and cost required to achieve recovery goals, including improved data collection, expanded protected areas, and enhanced enforcement of existing regulations.

The Recovery Implementation Strategy (RIS) operationalizes the recovery plan by breaking down its objectives into actionable steps. It prioritizes activities based on feasibility and conservation impact, and assigns responsibilities to federal agencies, regional partners, and stakeholders. The RIS places strong emphasis on international collaboration to reduce targeted fishing, particularly in regions where manta rays are harvested for their gill plates. It also calls for improved monitoring of manta ray interactions in fisheries, development of gear modifications to reduce bycatch, and public outreach to reduce consumer demand. The strategy is designed to be adaptive, allowing for updates as new data and threats emerge.

The Recovery Status Review offers a comprehensive update on the species' biology, distribution, and threats. It confirms that giant manta rays remain highly vulnerable due to their extremely low reproductive rates—typically one pup every 2–5 years—and small, fragmented subpopulations. The review notes that while U.S. fisheries pose relatively low risk, global threats from artisanal and industrial fisheries remain significant. It also underscores the lack of reliable abundance estimates across much of the species' range, reinforcing the need for continued monitoring and international conservation efforts. The review is intended to inform ESA Section 7 consultations, grant decisions, and other conservation planning efforts.

Together, these documents form the backbone of NOAA's recovery strategy for the giant manta ray. They provide a science-based foundation for management decisions, ESA consultations, and future

⁷⁰ National Marine Fisheries Service. (2024). Draft Recovery Plan for the Giant Manta Ray (*Mobula birostris*) (Version 1). NOAA Fisheries, Office of Protected Resources. Silver Spring, MD. 59 pp. https://www.fisheries.noaa.gov/s3/2024-10/Draft-Manta-Ray-Recovery-Plan_508-1-.pdf

⁷¹ National Marine Fisheries Service. (2024). Draft Recovery Implementation Strategy for the Giant Manta Ray (*Mobula birostris*). NOAA Fisheries, Office of Protected Resources. Silver Spring, MD. https://www.fisheries.noaa.gov/s3/2024-10/Draft-Manta-Ray-RIS_508.pdf

⁷² National Marine Fisheries Service. (2024). Endangered Species Act Recovery Status Review for the Giant Manta Ray (*Mobula birostris*). NOAA Fisheries, Office of Protected Resources. Silver Spring, MD. 147 pp. https://www.fisheries.noaa.gov/s3/2024-10/Recovery-Status-Review-for-Giant-Manta-Ray_508.pdf

12. Considerations of fishery interactions and effects on the ecosystem shall be based on the best scientific evidence available, local knowledge where it can be objectively verified, and a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts of the fishery on the ecosystem shall be appropriately assessed and effectively addressed.

updates to recovery criteria. While the species faces considerable challenges globally, the recovery framework offers a structured path forward to mitigate threats and support long-term conservation.

To note for future consideration. In 2025, there was the formal recognition of a third manta ray species, *Mobula yarae*.⁷³ This species, found in the Atlantic, adds complexity to conservation efforts and underscores the need for species-specific management strategies that currently exist for *Mobula birostris*. It is likely that the interactions observed between the commercial shrimp fishery and giant mantas are not confined to *M. birostris*. Once identification and research continues to differentiate these species, there will be a greater ability to determine the impact on the individual species, not the species complex, as it exists now. *M. yarae* is not yet listed by the US ESA, however the assessment team will continue to monitor the impacts on both species.

Smalltooth Osawfish

Recent efforts to quantify this threat have led to substantial improvements in bycatch estimation. Using observer data from 2015 to 2023 and Bayesian generalized linear models, Babcock et al. (2025)⁶⁵ estimated annual Gulf bycatch of smalltooth sawfish ranging from 17 to 123 individuals (Table 16). In 2020, the estimated bycatch was 122.9 individuals (95% CI: 47–258), while in 2023, it dropped to 48.4 (CI: 19–96), possibly reflecting reduced fishing effort post-Hurricane Ian (2022).

⁷³ <https://marinemegafauna.org/news/third-manta-ray-species-mobula-yarae-discovered-in-atlantic-ocean>

- 12. Considerations of fishery interactions and effects on the ecosystem shall be based on the best scientific evidence available, local knowledge where it can be objectively verified, and a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts of the fishery on the ecosystem shall be appropriately assessed and effectively addressed.**

Table 16. Smalltooth sawfish bycatch estimates in the commercial shrimp fishery (Gulf and South Atlantic), from 2008 to 2023. With 95% credible intervals. (Source: Peterson et al., 2025⁶⁷)

Year	Smalltooth Sawfish		
	Gulf	SA	Total
2008	82 (28 – 185)		82 (28 – 185)
2009	91 (33 – 185)	40 (7 – 113)	131 (40 – 298)
2010	47 (18 – 95)	48 (9 – 129)	96 (27 – 224)
2011	21 (19 – 101)	53 (10 – 151)	74 (29 – 252)
2012	37 (19 – 157)	33 (3 – 119)	70 (22 – 276)
2013	17 (6 – 74)	22 (1 – 77)	39 (7 – 151)
2014	94 (29 – 202)	26 (1 – 90)	120 (30 – 292)
2015	85 (25 – 181)	22 (1 – 81)	107 (26 – 262)
2016	76 (23 – 154)	58 (8 – 190)	134 (31 – 344)
2017	93 (32 – 196)	51 (7 – 164)	144 (39 – 360)
2018	100 (31 – 215)	43 (6 – 133)	143 (37 – 348)
2019	93 (28 – 191)	51 (7 – 166)	144 (35 – 357)
2020	123 (47 – 258)	65 (7 – 209)	188 (54 – 467)
2021	109 (44 – 208)	54 (6 – 182)	163 (50 – 390)
2022	85 (33 – 165)	39 (4 – 125)	124 (37 – 290)
2023	48 (19 – 96)		48 (19 – 96)

However, these estimates are constrained by low observer coverage—only about 1.4% of fishing hours in Gulf statistical zones 1–4 were observed during this period. This limitation introduces substantial uncertainty, particularly in years with few or no observed captures. Figure 6 illustrates the variability in pooled and unpooled ratio estimates, highlighting the smoothing effect of four-year pooling but also the wide confidence intervals that persist even with model-based approaches. This high variability is a result of low observer coverage which created high levels of uncertainty.

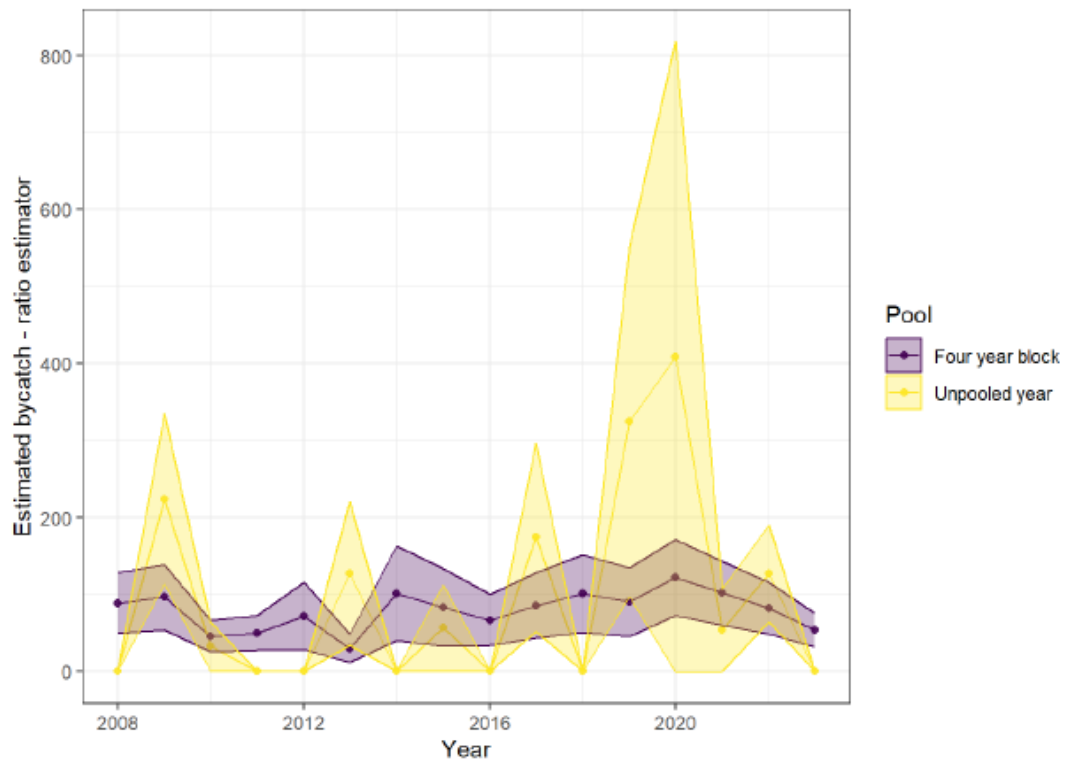


Figure 6. Pooled and unpooled ratio estimates for sawfish plus and minus one standard error for smalltooth sawfish bycatch in the GoM from 2008 to 2023. (Source: Babcock et al. 2025⁶⁵)

To assess the biological consequences of this bycatch, Carlson (2023)⁷⁴ and Carlson & Farmer (2025)⁷⁵ developed and updated a population viability analysis (PVA) using an age-structured Leslie matrix model. The model incorporated updated life history parameter alongside survivorship estimates and bycatch mortality inputs. Shrimp trawl mortality was applied to age classes 6–30, consistent with observer data indicating that most captured individuals exceed 360 cm STL.

The PVA explored multiple scenarios combining different initial population sizes and bycatch levels. In Carlson (2023)⁷⁴, scenarios with low initial population sizes (e.g., 1255 females) and high post-release mortality (e.g., 100%) led to extinction or quasi-extinction within 12–15 years. Figure 7 shows simulated population trajectories under various scenarios, with some lines dropping precipitously toward zero. Quasi-extinction thresholds were defined as fewer than 24 adult females (~175 total females), and the median time to quasi-extinction ranged from 6.9 to 22.8 years depending on the scenario.

⁷⁴ Carlson, J. K. (2023). Trouble in the trawls: Is bycatch in trawl fisheries preventing the recovery of sawfish? A case study using the US population of smalltooth sawfish, *Pristis pectinata*. *Global Ecology and Conservation*, 48, e02745. <https://doi.org/10.1016/j.gecco.2023.e02745>

⁷⁵ Carlson, J. K., & Farmer, N. (2025). An Updated Population Viability Model for the U.S. DPS of Smalltooth Sawfish Incorporating Improved Estimates of Bycatch for the Southeast Shrimp Trawl Fishery and a Large-scale Mortality Event Associated with a Toxic Algal Bloom. NOAA Fisheries, Southeast Fisheries Science Center.

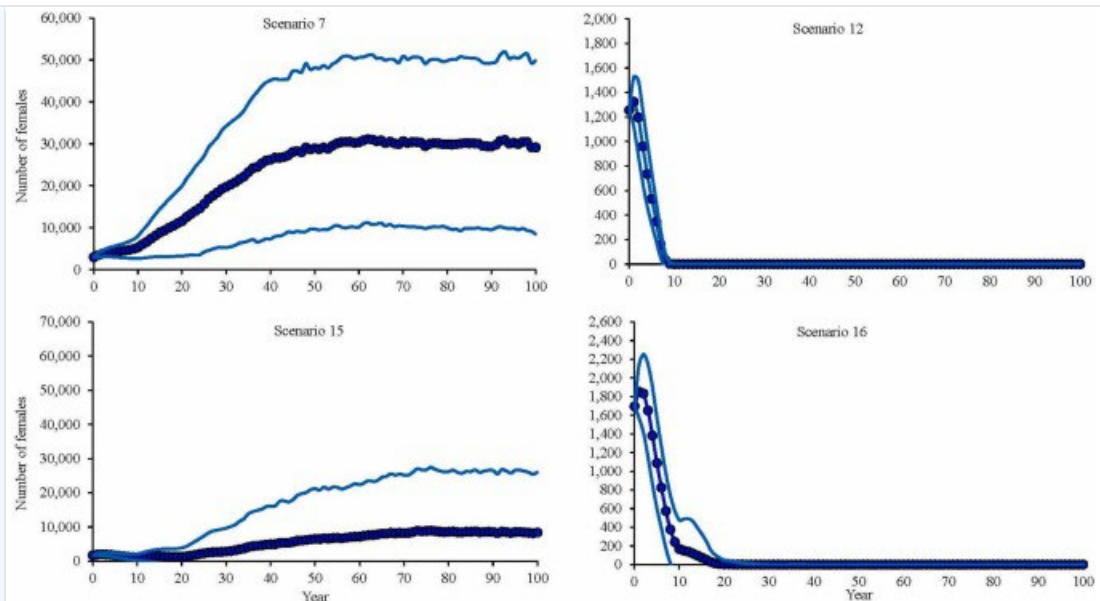


Figure 7. Simulated population projections of the smalltooth sawfish for scenarios 7, 12, 15 and 16. Blue circles=the mean abundance at time t. Solid lines represent the ± 1 standard deviation of the population at time t. (Source: Carlson, 2023⁷⁴)

Beginning at the initial site visit, the assessment team was aware of a potential Unusual Mortality Event (UME). The UME is classified as a large-scale mortality event in 2024 linked to a benthic harmful algal bloom. This event resulted in 230 reports of abnormal behavior (“spinning”) and 56 confirmed mortalities, primarily among large juveniles and adults. Carlson & Farmer (2025)⁷⁵ incorporated these mortalities into their analysis and the results became more bleak for the species (noting that the 2025 PVA uses a smaller range of bycatch mortality than the previous iteration of the PVA). When this episodic mortality was added to the PVA, all scenarios showed at least a 25% probability of extinction, and several showed >75% likelihood. Carlson & Farmer (2025) summarizes these outcomes, however they project the eight scenarios are based on the various permutations of shrimp trawl removals (60 or 72), UME mortalities (38 or 182), and initial population size (1255 pr 1695).

While the impact of the UME cannot be directly linked to the shrimp fishery, there is now a greater relative effect felt from this fishery on the smalltooth sawfish given the diminished population size. Thus, the shrimp trawl fishery poses a clear and quantifiable threat to the recovery of smalltooth sawfish in the Gulf of Mexico. While some scenarios suggest recovery is possible under low bycatch conditions, the species remains highly sensitive to even moderate increases in mortality. The 2024 mortality event underscores the vulnerability of the population to stochastic environmental stressors, and the potential for future events—such as the emerging 2025 “spinning fish” reports—adds further urgency. The model outcomes produced by Carlson (2023) and Carlson & Farmer (2025) suggests that the US-based DPS for smalltooth sawfish is at a metaphorical tipping point. Carlson & Farmer (2025) state that the next few years will be critical to the viability of the species. Additionally, if future mortality events are minimal in scope and scale, and if shrimp bycatch remains at or below the reduced 2023 level, there is cause for optimism that the population has the capacity to recover.

Finally, it should be noted that management responses are underway. The Southeast Regional Office (SERO) has reinitiated ESA Section 7 consultation to address new data and observed lethal takes.⁷⁶ Updated recovery plans for both smalltooth sawfish and giant manta ray are in development, and

12. Considerations of fishery interactions and effects on the ecosystem shall be based on the best scientific evidence available, local knowledge where it can be objectively verified, and a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts of the fishery on the ecosystem shall be appropriately assessed and effectively addressed.

NOAA is exploring improvements in observer coverage, electronic monitoring, and industry collaboration to refine bycatch estimates and reduce uncertainty.⁷⁷

Habitats

Clauses 12.2.6, 12.2.7, 12.2.8

In discussions with all five state management agencies, the Gulf Council, NOAA, it was confirmed that there are no new closed areas and that the distribution of fishing effort across the gulf has remained the same as what was reported during the initial assessment. During the interview with LGL Ecological Research Associates, Inc., it was stated that there has been a push to change how data on effort are collected. Currently, harvesters mail in SD cards, so the data collected are not in real time.

There are no changes to the fishery that would result in scoring changes to the habitat clauses.

Clause 12.6: *Research shall be promoted on the environmental and social impacts of fishing gear especially on the impact of such gear on biodiversity and coastal fishing communities.*

Research into gear utilized in the fishery has been an ongoing for decades and continues in the present. NOAA is currently invested in the *Better Bycatch Reduction Device for the Gulf Shrimp Fleet Project*.⁷⁸ The project involves the testing of new bycatch reduction device (BRD) designs in the commercial shrimp trawl fishery in federal waters of the Gulf of Mexico. The Better BRDs for the Gulf Commercial Shrimp Trawl Fishery project is a collaborative effort amongst NOAA Restoration Center, NOAA Southeast Fisheries Science Center, Louisiana Sea Grant, and Texas Sea Grant to restore finfish populations injured by the Deepwater Horizon oil spill through development and testing of new BRDs for the commercial shrimp industry in the Gulf of Mexico. The exempted fishing permit (EFP) would be valid through December 31, 2028, commencing on the date the EFP is issued.

There is currently testing ongoing for the Chauvin and Drury TED as a BRD as part of the *Better Bycatch Reduction Device Project*.⁷⁹ These are both top-shooting TEDs with PVC pieces ahead of the bars. The bar design "knocks shrimp down" as they pass through the TED extension and the large openings allow fish to escape. The Chauvin TED is already certified as a TED design but has shown excellent bycatch reduction potential. The Drury TED design modifies the Chauvin with a different diameter bar that is not included in a sack and shares the potential for bycatch reduction. The Drury TED design is in line for TED certification.

The following may also be applicable to information collection on ETP species, namely smalltooth sawfish. LGL currently has a project to test the effectiveness of electronic monitoring systems (cameras) on the decks of vessels to identify smalltooth sawfish caught in the gear. The hope is to allow these cameras to be mounted to the side of the vessels where catch is being hauled (not on the deck) to train AI to identify sawfish. The goal is to determine if side-aimed cameras can adequately monitor sawfish bycatch and facilitate an increase in the monitoring rates compared to

⁷⁶ U.S. Federal Register. (2024). Endangered and Threatened Species; Notice of Initiation of a 5-Year Review for the Non-U.S. Distinct Population Segment of Smalltooth Sawfish (*Pristis pectinata*). 89 FR 38873–38874, May 8, 2024. [Docket NOAA–NMFS–2024–0062].

⁷⁷ SERO (Southeast Regional Office, NOAA Fisheries). (2025). Updates on Giant Manta Ray and Smalltooth Sawfish Data and the Reinitiation of ESA Section 7 Consultation on the Authorization of the Southeast U.S. Shrimp Fisheries. Presentation to Shrimp AP, March 4, 2025.

⁷⁸ <https://www.fisheries.noaa.gov/southeast/commercial-fishing/better-bycatch-reduction-device-gulf-shrimp-fleet-project>

⁷⁹ <https://www.fisheries.noaa.gov/s3/2024-11/Better-BRD-Project-2024-EFP-Application.pdf>

12.	Considerations of fishery interactions and effects on the ecosystem shall be based on the best scientific evidence available, local knowledge where it can be objectively verified, and a risk assessment-based management approach for determining most probable adverse impacts. Adverse impacts of the fishery on the ecosystem shall be appropriately assessed and effectively addressed.
	traditional in person observers. This will allow for a greater scope of information collection by the EM to estimate the degree of interaction between the fishery and smalltooth sawfish. A second LGL project is to obtain diversity in samples to see train an algorithm to use AI to identify and quantify fish bycatch from net mounted cameras. The assessment team was told at site visit that it might have the ability to also identify large megafauna caught in the nets (such as sawfish and manta), but this is not the primary objective of the study. Clauses 12.1, 12.2.3, 12.2.9, 12.2.10, 12.2.11, 12.3, 12.5. 12.7 No relevant changes were reported. Clauses 12.4 Not applicable.
References:	Refer to embedded footnotes
Statement of consistency to the CSI RFM Fishery Standard	The fishery continues to meet the requirements of this Fundamental Clause of the CSI Fishery Standard.

8. Update on compliance and progress with non-conformances and agreed action plans

This section details compliance and progress with non-conformances and agreed action plans including:

- A review of the performance of the Client specific to agreed corrective action plans to address non-conformances raised in the most recent assessment or re-assessment or at subsequent surveillance audits including a summary of progress toward resolution.
- A list of pre-existing non-conformances that remain unresolved, new nonconformances raised during this surveillance, and non-conformances that have been closed during this surveillance.
- Details of any new or revised corrective action plans including the Client's signed acceptance of those plans.
- An update of proposed future surveillance activities.

8.1.1. Progress against open non-conformances

Non-conformance 1 (of 3)	
Clause:	1.7 (Alabama)
Non-conformance level:	Minor
Non-conformance:	
Rationale:	Documentary evidence is lacking to demonstrate how the components of the State's fishery management system for the commercial shrimp fishery, and their performance, is continuously reviewed. The required evidence is closely aligned to the existence of short and long-term objectives and associated performance metrics. The objectives are those that address the management system's components related to the sustainable exploitation of the target stock; the mitigation of negative impacts on non-target species through bycatch, discarding, and indirect effects; the protection of Endangered, Threatened, Protected (ETP) species; and the physical environment. In other words, evidence that the agency's current conservation and management measures are supported by long and short-term objectives that are also measurable.
Corrective Action Plan (CAP):	At the first surveillance (2025), the client in collaboration with State officials shall initiate discussions aimed at developing proposed short and long-term objectives and associated metrics for the components of the commercial shrimp fishery's management system in state waters. Evidence of such would typically consist of meeting minutes or exchanges of correspondence. Condition remains open. At the second surveillance (2026), the client in collaboration with State officials and interested stakeholders shall table for discussion with the appropriate state management body(ies) the proposed long and short-term objectives and associated metrics. Evidence of such would typically consist of meeting minutes or exchanges of correspondence. Condition remains open. At the third surveillance (2027), the client in collaboration with State officials and interested stakeholders shall demonstrate acceptance of the short and long-term objectives and associated metrics by the appropriate state management body(ies), including the approach for undertaking a continuous review process of the components of the fishery management system. Evidence of such would typically consist of meeting minutes or exchanges of correspondence. Condition remains open. At the fourth surveillance (2028), the client shall provide evidence that a (continuous) review of the components of the State's commercial shrimp fishery has been concluded. The review

Non-conformance 1 (of 3)	
	will demonstrate how the approved short and long-term objectives and metrics were considered in the review. The client will also demonstrate that the objectives have been formally (explicitly) adopted as a component of the state's fishery management system (either under a plan, statutes or other document). Condition is closed.
Progress against the CAP:	Year 1 Milestone (2025): <i>Has the client initiated discussions with ADCNR staff on developing short and long-term objectives for the shrimp fishery?</i> Evidence: The client submitted a progress report on July 30, 2025, that included the following information: - Marine Resources Division staff with the assistance of members of the client group have met and prepared a draft outline of tentative goals that would inform a five-year Strategic Plan across four major topics: marine natural resources, habitat, public safety, and outreach. - It is envisioned that the document will evolve based on public involvement, other state resource agency commitments, and internal ADCNR discussions. Assessment team's comments: - The Year 1 deliverable is tracking positively against the requirement. We welcome the decision to produce a multi-year Strategic Plan that could serve to define and evaluate the performance of the long-term objectives for the management and conservation of the State's marine resources. - Objectives, both short and long term, are typically defined so as to be measurable on a continuous basis, either quantitatively or qualitatively. - We welcome the addition of other long-term objectives that would serve to inform the Department's (i) consultation and engagement processes, (ii) decision-making processes, (iii) compliance and enforcement imperatives, and (iv) personnel training.
Non-conformance status:	Condition remains open with no scoring change.

Non-conformance 2 (of 3)	
Clause:	3.1 (Alabama)
Non-conformance level:	Minor
Non-conformance:	
Rationale:	The state's long-term objectives for the management of the commercial fisheries in the state's waters currently are annotated in statutes like the Alabama Code 2022, Title 9 (Conservation and Natural Resources), Chapter 12 (Seafoods), Divisions 2 and 3. The regulations include provisions in respect of the licensing requirements, landing and reporting requirements, and fishing restrictions. Management measures include spatial and temporal closures to protect juvenile shrimp and various ETP species as well as a state-wide coastal zone management program. However, in the Assessment team's opinion, these measures are more commonly associated with an "outcome" as opposed to a "purpose". In order to better meet the requirement of the clause, the state should (i) undertake to clearly define its long-term objectives, (ii) establish that they are based on the best available scientific evidence, (iii) are measurable, and (iv) are translated into a management plan, or regulations, or another document.
Corrective Action Plan (CAP):	At the first surveillance (2025), the client will, in collaboration with State officials, initiate discussions aimed at developing long-term objectives and associated metrics for the commercial shrimp fishery management system in state waters. Evidence of such would

Non-conformance 2 (of 3)	typically consist of meeting minutes or exchanges of correspondence. Condition remains open. At the second surveillance (2026), the client will, in collaboration with State officials and interested stakeholders, table for discussion and review the long-term objectives and associated metrics as developed. Evidence of such would typically consist of meeting minutes or exchanges of correspondence. Condition remains open. At the third surveillance (2027), the client will, in collaboration with State officials and interested stakeholders, present and recommend acceptance of the long-term objectives and associated metrics to the appropriate state management body(ies), including a recommendation on the most appropriate mechanism for adjoining the objectives and metrics to the fishery management system. Evidence of such would typically consist of meeting minutes or exchanges of correspondence. Condition remains open. At the fourth surveillance (2028), the client will provide evidence that the long-term objectives and metrics have been formally (explicitly) adopted as a component of the state's fishery management system (either under a plan, statutes or other document). Condition is closed.
Progress against the CAP:	<i>Year 1 Milestone (2025): Has the client, in collaboration with State officials, initiated discussions aimed at developing long-term objectives and associated metrics for the commercial shrimp fishery management system in state waters?</i> Evidence: The client submitted a progress report on July 30, 2025, that included the following information: ▪ Marine Resources Division staff has begun development of a Fishery Management Plan to address the non-conformance clause. ▪ Draft objectives were developed that will be refined after future public meetings, engagement with State agencies, internal ADCNR leadership discussions, and recommendations from the Audit Team. ▪ Draft objectives included: (i) Promote the value of local caught shrimp, (ii) Promote effective and efficient harvesting practices for a sustainable harvest, (iii) Minimize the incidental catch of finfish, crustaceans, and protected species while maintaining a profitable fishery, (iv) Conserve and protect habitat and environmental quality necessary for sustaining the shrimp resource, and (v) Maintain sustainable exploitation of target stocks. ▪ Each objective included sub-objectives that are not reported here. Assessment team's comments: ▪ The Year 1 deliverable is tracking positively against the requirement. We welcome the decision to produce a Shrimp Fishery Management Plan with long-term objectives i.e., an "evergreen" plan. ▪ Objectives, both short and long term, are typically defined so as to be measurable on a continuous basis, either quantitatively or qualitatively. ▪ We welcome the addition of other long-term fishery-specific objectives that would serve to describe and evaluate how the Department intends to (i) consult and engage the industry, stakeholders, and interested public, (ii) render decisions, (iii) ensure compliance with the fishery's statutory provisions and other rules, and (iv) address ongoing industry and public information needs.
Non-conformance status:	Condition remains open with no scoring change.

Non-conformance 3 (of 3)	
Clause:	12.2.5
Non-conformance level:	Minor
Non-conformance:	Guidance for the evidence basis evaluation parameter states that “the availability, quality, and/or adequacy of the evidence is sufficient to substantiate that there are effective outcome indicators seeking to ensure that the ETP species are protected from adverse impacts” from the UoAs. That means that the level of interaction/impact between the fishery with the smalltooth sawfish and the giant manta ray should be documented to a level in which being able to determine the level of detrimental impacts can be assessed. There is not sufficient evidence (available, quality, nor adequacy) to assess the these impacts. Therefore, a minor NC is raised against the pink shrimp UoAs in Florida and Federal waters with regard to the smalltooth sawfish. And, a minor NC is raised against all otter trawl UoAs (all species and all jurisdictions) with regard to the giant manta ray.
Rationale:	The overall lack of information for both species is evident by the very few publications on that documents the interaction between the fishery and sawfish and mantas. There is sporadic information regarding the interactions with sawfish presented in Scott-Denton <i>et al.</i> (2012; 2020). These publications present the number of captures and the animal’s release condition, but does not provide information on location (Gulf or Atlantic), year or any other type of information to indicate the impact of the fishery one the smalltooth sawfish. Carlson (2020) provides a bit more information regarding the interaction of both species with the southeastern shrimp fishery. Yet, due to the high variability within the dataset (and low statistical power), the confidence intervals describing the estimated take and the hypothesized mortality rate are wide ranging (Note: the 2021 Biological Opinion uses the same data presented in Carlson 2020). Additionally, the data presented in Carlson (2020) for giant mantas are from only one year of data in 2019 and those data have low confidence due to the likelihood of recaptures on the same vessel trip (Note: the 2021 Biological Opinion uses the same data presented in Carlson 2020). Data from 2019, coupled with low documented interactions between the fishery and giant mantas in 1992-1994 from Beyea <i>et al.</i> (2022), provide little insight to the overall impact of the fishery on the species. Corrective action may constitute a place of activities that the applicant confirms will be implemented within a specified timeframe in order for the non-conformities to be closed out. The non-conformances must be closed within the lifetime of the certificate. The corrective action should address the following milestones for the smalltooth sawfish and giant manta ray.

Non-conformance 3 (of 3)

Corrective Action Plan (CAP):

Corrective Action Plan #3

Client will initiate dialogue with NOAA's shrimp observer program coordinator to determine what protected species data from the observer program are available and ensure all data are provided to the assessment team such that it may be published in assessment related reports.

Milestone	Action	Roles & Responsibilities	Outputs
Year 1 (early 2025)	–Client will initiate dialogue with NOAA on protected species data availability and create a plan with defined timelines for obtaining the appropriate protected species observer data on an ongoing basis.	Client Group/NOAA	–Client will share with the CAB any notes/reports from meetings/communications with NOAA on protected species data availability, and a copy of the aforementioned plan.
Year 2 (early 2026)	–Client will verify that protected species data are being collected and are publicly available.	Client Group/NOAA	–Client will share with the CAB evidence that the protected species data are being collected and are publicly available.
Year 3 (early 2027)	– Client will verify that protected species data are being collected and are publicly available.	Client Group/NOAA	–Client will share with the CAB evidence that the protected species data are being collected and are publicly available.
Year 4 (early 2028)	–Client will provide CAB with publicly-available, multi-year observer data on shrimp fishery interactions with smalltooth sawfish and giant manta ray.	Client Group/NOAA	–Client will provide CAB with publicly-available, multi-year observer data on shrimp fishery interactions with smalltooth sawfish and giant manta ray.

Progress against the CAP:

Year 1 Milestone (2025): client will initiate dialogue with NOAA on protected species data availability and create a plan with defined timelines for obtaining the appropriate protected species observer data or an ongoing basis.

Both Section 7 ESA consultations have been re-initiated for the smalltooth sawfish and giant manta. Despite observer coverage remaining low, there are an extensive amount of data being collected on these two species. The client provided evidence of publications and presentations pertaining to the ESA Section 7 process. These documents demonstrate that conversations are taking place, especially those pertaining to low observer coverage and the ability to effectively manage these species in the absence of more robust observer data.

During the site visit, the assessment team also learned that there is an ongoing funded project to use electronic monitoring (cameras) to identify sawfish caught in the nets. This has the potential to increase the amount of observed shrimping effort specifically for sawfish. This has been a noted deficiency in the PVA models (included in Section 7.8.4.1).

Assessment team's comments:

- The Year 1 deliverable is tracking positively against the requirement

Non-conformance status:

Condition remains open with no scoring change.

8.1.2.New non-conformances

There were no new non-conformances

8.1.3.New or revised corrective action plans

There were no new or revised corrective action plans

8.1.4.Proposed surveillance activities

The next assessment will be the 2nd surveillance assessment which will commence for the anniversary of the re-certification in July 2024. This 2nd surveillance will examine progress made in fulfilling the milestones of the corrective action plans.

9. Recommendations for continued certification

9.1. Certification Recommendation

Following this surveillance audit, the Assessment Team recommends that the fishery be awarded continuing certified under the Certification Seafood International (CSI) Program.

10. References

10.1. Fundamental Clauses 1, 3, 10, 11

Florida

Statutes:

http://www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=0300-0399/0379/Sections/0379.3311.html

Mississippi Code, Title 22, Part 2: <https://dmr.ms.gov/wp-content/uploads/2024/11/Title-22-Part-02-20220501-linked.pdf>

Mississippi Department of Marine Resources – Annual Report FY 2024: <https://dmr.ms.gov/wp-content/uploads/2024/12/Annual-Report-FY2024-WEB.pdf>

Documentation provided by the client representative(s).

Site visit notes compiled by Assessment team members

10.2. Fundamental Clauses 4, 5,6, 7,8

GMFMC 2025. Modification of the Vessel Position Data Collection Program for the Gulf of Mexico Shrimp Fishery. Tab D No. 5(b) 4/1/2025.

[Gulf Council Recommends New Shrimp Vessel Position Data Collection Program | Gulf Council](#)

SEDAR 87 Stock Assessment Report Gulf of America White Shrimp August 2025

sedarweb.org/documents/sedar-87-gulf-of-america-white-shrimp-final-stock-assessment-report/

SEDAR 87 Stock Assessment Report Gulf of America Brown Shrimp August 2025

sedarweb.org/documents/sedar-87-gulf-of-america-brown-shrimp-final-stock-assessment-report/

SEDAR 87 Stock Assessment Report Gulf of America Pink Shrimp August 2025

sedarweb.org/documents/sedar-87-gulf-of-america-pink-shrimp-final-stock-assessment-report/

10.3. Fundamental Clause 12

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11. Appendices

11.1. Appendix 1 – Assessment Team Bios

Based on the technical expertise required to carry out this assessment, an Assessment Team was selected as follows.

Team Leader: Dr. Ivan Mateo, Primary Responsibility for Data Deficient Framework (DDF)

Dr. Ivan Mateo has over 20 years' experience working with natural resources population dynamic modeling. His specialization is in fish and crustacean population dynamics, stock assessment, evaluation of management strategies for exploited populations, bioenergetics, ecosystem-based assessment, and ecological statistical analysis. Dr. Mateo received a Ph.D. in Environmental Sciences with Fisheries specialization from the University of Rhode Island. He has studied population dynamics of economically important species as well as candidate species for endangered species listing from many different regions of the world such as the Caribbean, the Northeast US Coast, Gulf of California, and Alaska. He has done research with NMFS Northeast Fisheries Science Center Ecosystem Based Fishery Management on bio-energetic modeling for Atlantic cod. He also has been working as environmental consultant in the Caribbean doing field work and looking at the effects of industrialization on essential fish habitats and for the Environmental Defense Fund developing population dynamics models for data poor stocks in the Gulf of California. Dr. Mateo also worked as National Research Council postdoc research associate at the NOAA National Marine Fisheries Services Ted Stevens Marine Research Institute on population dynamic modeling of Alaska sablefish and as a research associate investigating recruitment/early life history of Pacific Ocean perch.

Dr. Mateo does not have any conflicts of interest in relation to the fishery under assessment.

Team Member: Dr. Jerry Ennis, Primary Responsibility for stock assessment

Following undergraduate and graduate degrees at Memorial University of Newfoundland in the 1960s, Dr. Ennis completed a Ph.D. in marine biology at University of Liverpool in the early 1970s. He retired in 2005 following a 37-year research career with the Science Branch of the Department of Fisheries and Oceans. Dr. Ennis extensively published work has focused primarily on lobster fishery and population biology and on various aspects of larval, juvenile and adult lobster behavior and ecology in Newfoundland waters. Throughout his career, Dr. Ennis was heavily involved in the review and formulation of scientific advice for management of shellfish in Atlantic Canada as well as the advisory/consultative part of managing the Newfoundland lobster fishery. Jerry does not have any conflicts of interest in relation to the fishery under assessment.

Team Member: Mr. Robert J. Allain, Primary Responsibility for fisheries management.

Mr. Allain is a graduate of Saint Mary's University in Halifax, Nova Scotia with undergraduate degrees in Commerce (Business Administration) and Science (Chemistry). In 1977, he joined the former Federal Department of Fisheries and Environment as a Fishery Officer (International Surveillance) and carried out inspections of foreign and domestic fishing vessels within and beyond Canada's EEZ. During his 32-year career with the now Department of Fisheries, Oceans and the Canadian Coast Guard, Mr. Allain served in a variety of fisheries management, strategic planning and policy positions in Nova Scotia, New Brunswick, Prince Edward Island, Newfoundland and Labrador, and at Departmental Headquarters in Ottawa. He served in senior executive positions from 1991 to 2008.

Currently, he is the president of the consulting firm OceanIQ Management Services in Dieppe, New Brunswick. He is a Marine Stewardship Council-certified P3 assessor who has participated in approximately 45 assessments and surveillance audits in Canada and the U.S. in respect of demersal, pelagic, invertebrate and crustacean fisheries. He is also fully conversant with the Certified Seafood International (CSI) Standard through his participation as a technical expert to the Alaska Fisheries Standard Committee that developed the certification scheme, and as a participant in U.S. fisheries assessments in the Pacific and Gulf of Mexico. A full CV is available upon request.

Team Member: Mr. Matthew Jew, Primary Responsibility for fisheries impacts to the ecosystem

Mr. Matthew Jew has over 10 years' experience in the field of marine research and over 6 years in the field of fisheries science. Mr. Jew earned his M.S. in Marine Science from Moss Landing Marine Laboratories (California State University, Monterey Bay). He has worked at Moss Landing Marine Laboratories as Principle Investigator on numerous projects studying the trophic ecology of a wide range of species, species differentiation based on taxonomic classification and morphological characteristics, and statistical modelling. The primary focus of his work has been on ecosystem structure as it relates to the effects commercial fisheries. Mr. Jew has done research with NOAA Northwest Fisheries Science Center's West Coast Groundfish Bottom Trawl Survey studying life history and population dynamics of economically important fishes. He has done work monitoring broad-scale ecosystem productivity from an ecosystem-based management approach. He does not have any conflicts of interest in relation to the fishery under assessment.

11.2. Appendix 2 – Recent Commercial and Trade Developments

The globalization of the shrimp market with a focus on cheap aquaculture has resulted in dire economic operating conditions for the domestic fleet (Griffith et al. 2023).⁸⁰ Increasing fuel costs and plummeting ex-vessel prices have created a situation in which most vessels struggle to remain profitable. Further, many vessels have exited the fleet, and those that remain may oscillate between narrowing profit margins and losses (SEDAR87 data workshop report 2023 pp. 84–94). With fewer vessels operating, the shrimping effort and associated landings have decreased overall, and the shrimp population size has increased.

Separately, in an August 2024 presentation during a meeting of the GMMFC and titled *Southeast Shrimp Strategy and Planning Meeting Summary Report*, the Texas Sea Grant Interim Director summarized the economic pressures on the Gulf's shrimp fisheries as follows:

- Economic challenges for the Southeast Shrimp Fishery reached a new height in 2023 causing most shrimp vessels to remain tied up for part, or all, of the season due to extremely low shrimp price (2023 ex-vessel prices falling to 50-60% of 2021 dockside prices and continues to drop) and increasing operation costs-particularly fuel expenses, which has put the future of this industry in jeopardy.
- The flood of imported shrimp, exceeding US shrimp consumption, combined with previous season's domestic shrimp, and coupled with infrastructure losses (hurricanes, buyouts) has led to a backlog of product at frozen storage facilities, causing a stall out in the market.
- Gulf and South Atlantic shrimp fleets in multiple states requested disaster declarations and have approached multiple agencies and legislators seeking assistance but there has not been a clear path for relief or coordinated strategy to address the current challenges.

Federal Oversight Actions of Shrimp Imported into the U.S.

The Assessment team has been particularly interested in following the actions taken by various U.S. Federal and State Agencies in regard to the practices of various shrimp exporters who sell into the U.S. domestic market. During the team's initial assessment of the Gulf of Mexico commercial shrimp fishery, we heard from harvesters and processors regarding the significant challenges they faced from high volumes of shrimp that were being allowed to enter the U.S. market from offshore exporters. As a result, prices paid to U.S. fishers were significantly impacted (~ \$1. per lb) forcing harvesters to reduce the number of fishing trips and making the retention of crews especially challenging. Processors were equally impacted by shrinking profit margins, reductions in outputs of processed product due to lower supplies of raw material, and reduced hours of work for workers.

Like the American Shrimp Processors Association (ASPA), the Southern Shrimp Alliance (SSA), an organization of shrimp fishermen, shrimp processors, and other members of the domestic industry in the eight warmwater shrimp producing states of Alabama, Florida, Georgia, Louisiana, Mississippi, North Carolina, South Carolina, and Texas, has been focussed on bringing the industry's plight to the attention of federal and state agencies, and in advocating for a more orderly and fairer access approach to the U.S. market by foreign exporters. A snapshot of the Association's most recent efforts and those of some Federal agencies as of July 2025 are highlighted here.

American Food Industries Join Forces to Fight Unfair Competition (June 2025)

The SSA announced that it was partnering strategically with other domestic food producers facing similar trade challenges to advocate together as a coalition to seek stronger enforcement against unfair foreign competition devastating the U.S. honey, catfish, crawfish, and shrimp industries. According to the SSA, "the pattern is consistent across industries: dramatic increases in the volume of foreign goods over two decades have

⁸⁰ Griffith, D., C. Liese, M. Travis, M. Freeman, and D. Records. 2023. Social dimensions of Gulf of Mexico shrimping. Page 12pp. SEDAR, SEDAR87-DW-15, North Charleston, SC.

devastated American businesses that operate under completely different rules and have resulted in steep declines in U.S. production.”

Source: <https://shrimpalliance.com/strength-in-numbers-american-food-industries-join-forces-to-fight-unfair-competition/>

FDA Refuses Eleven Shrimp Entry Lines for Banned Antibiotics in May and Adds One BAP-Certified Exporter to All Three Major Import Alerts on Harmful Veterinary Drugs in Aquaculture (June 2025)

The US Food and Drug Administration (FDA) released detailed data regarding eighty-two (82) seafood entry line refusals in May, of which eleven (13.4%) were for shrimp for reasons related to banned antibiotics. Through the first five months of 2025, the FDA reported refusing a total of thirty-three (33) entry lines of shrimp for reasons related to veterinary drug residues. The eleven entry lines of shrimp refused for veterinary drug residues in May were attributed to shipments from five different exporters in Bangladesh, Hong Kong, India, Malaysia, and Vietnam. Of note, two of the five exporters are Best Aquaculture Practices (BAP)-certified shrimp processors.

Source: <https://shrimpalliance.com/fda-refuses-eleven-shrimp-entry-lines-for-banned-antibiotics-in-may-and-adds-one-bap-certified-exporter-to-all-three-major-import-alerts-on-harmful-veterinary-drugs-in-aquaculture/>

FDA Refuses Ten Shrimp Entry Lines for Banned Antibiotics from Five BAP-Certified Shrimp Processors (June 2025)

The FDA released detailed data regarding one hundred and forty-four (144) seafood entry line refusals in June, of which ten (6.9%) were for shrimp for reasons related to banned antibiotics. Through the first half of 2025, the FDA has reported refusing a total of forty-three (43) entry lines of shrimp for reasons related to veterinary drug residues and is on track to refuse the largest number of entry lines during a calendar year since 2016.

The ten entry lines of shrimp refused in June were attributed to shipments from seven different exporters in China, India, Indonesia, and Vietnam. Five of the seven exporters are Best Aquaculture Practices (BAP)-certified shrimp processors.

Source: <https://shrimpalliance.com/fda-refused-ten-shrimp-entry-lines-for-banned-antibiotics-from-five-bap-certified-shrimp-processors-in-june/>

Commerce Announces Preliminary Results with Large Increases in Dumping Margins (June 2025)

The U.S. Department of Commerce released the preliminary results of the agency’s latest administrative reviews of the antidumping duty orders on certain frozen warmwater shrimp from India, Thailand, and Vietnam. The Department reported significantly higher antidumping duties for several foreign shrimp exporters in Thailand and Vietnam. Shrimp that is determined to have been unfairly dumped in the U.S. is sold at prices massively below fair value, forcing prices for American wild-caught shrimp down. If maintained in the final results, U.S. companies that import shrimp from the targeted foreign companies will receive bills for substantial additional antidumping duty amounts.

Source: <https://shrimpalliance.com/commerce-announces-preliminary-results-with-large-increases-in-dumping-margins/>

U.S. State Department suspends Peru’s Section 609 Certification for wild-caught Shrimp (June 2025)

A published study, authored in part by NOAA, found that small scale commercial fisheries in Peru were likely capturing “tens of thousands” of sea turtles each year. It was further determined that Peru’s annual reports prepared pursuant to the *Inter-American Sea Turtle Convention* failed to identify any mitigation strategies adopted in the country. Consequently, the State Department initiated action to suspend the 609 certification of Peruvian wild-caught shrimp effective with dates of export on or after June 1, 2025 because its turtle protection program was no longer comparable to that of the U.S.

Source: <https://www.federalregister.gov/documents/2025/05/12/2025-08237/annual-determination-and-certification-of-shrimp-harvesting-nation>

U.S. International Trade Commission (USITC)

In November 2024, the Commission found that the American Shrimp Industry has been injured due to imported shrimp by reason of imports of frozen warmwater shrimp from Indonesia that the U.S. Department of Commerce has determined are sold in the U.S. at less than fair value and that imports of frozen warmwater shrimp from Ecuador, India, and Vietnam are subsidized by their national governments. Accordingly, the Department of Commerce issued countervailing duties on shrimp from Ecuador, India, and Vietnam. They also will issued an anti-dumping duty order on Indonesia.

Source: https://www.usitc.gov/press_room/news_release/2024/er1119_66150.htm

According to the Commission, foreign shrimp comprises 93% of all shrimp consumed in America, with four countries dominating imports in 2024.

- India: 656.4 million pounds (38.4% of total shrimp imports)
- Ecuador: 433.8 million pounds (25.4%)
- Indonesia: 297.1 million pounds (17.4%)
- Vietnam: 152.1 million pounds (8.9%)

Shrimp imports have surged 11.4% over the first five months of 2025 which represents an additional 75 million pounds compared to the same period in 2024.

The ASPA also issued a public statement on the Commission's ruling noting that the Commission voted in the affirmative on antidumping and countervailing duty petitions filed by the Association against imports of frozen warmwater shrimp from Ecuador, India, Indonesia, and Vietnam. As a result of the Commission's vote, duties ranging from 2.84 to 221.82 percent will be imposed on imports of shrimp from the four countries.

Source: <https://americanshrimp.com/>

In July 2025, the SSA and other seafood producers formally requested that the Commission initiate a Section 301 investigation to address the alleged unfair trade practice of using banned veterinary drugs in aquaculture in China, India, Indonesia, and Vietnam for seafood exports to the U.S. Currently, these countries account for nearly one-third of the total value of U.S. seafood imports. India and China, alone, comprise about 48% of the total volume of U.S. shrimp imports.

Source: <https://shrimppalliance.com/domestic-seafood-producers-petition-ustr-to-address-unfair-trade-practice-of-use-of-banned-veterinary-drugs-in-foreign-aquaculture/>

State Oversight Actions of Shrimp Imported into the U.S.**Texas Legislature passes Legislation requiring truthful Shrimp labeling in restaurants (May 2025)**

The House of Representatives passed SB 823 requiring all food service suppliers, wholesalers, distributors and wholesale distributors selling shrimp in Texas to include a label with "clear and conspicuous notice stating whether the shrimp is imported." The bill takes effect on September 1, 2025.

Source: <https://capitol.texas.gov/tlodocs/89R/billtext/pdf/SB00823H.pdf>

In addition, the Texas Senate voted to approve HCR 76, a resolution that was initially passed by the House of 4Representatives regarding the future of the industry that was affected by a glut of low-priced, unfairly-traded imports in the U.S. market. On June 20, 2025, the State's Governor signed a bill that urged the federal government to curb the mass importation of foreign shrimp into the U.S. to protect the Gulf Coast shrimping industry from unfair competition and to protect consumers from substandard shrimp that does not meet U.S. health standards..."

Source: <https://open.pluralpolicy.com/tx/bills/89R/HCR76/>

Louisiana Issues Seafood Warning as UGA Study Reveals Antibiotic Resistance in Shrimp Imports (June 2025)

An important study from a University of Georgia research team has identified imported shrimp and scallops as a vector spreading bacteria resistant to the potent antibiotic colistin. Resistant bacteria pose a threat to the medical community's ability to treat life-threatening infections. The researchers' findings build upon a rapidly growing body of academic literature ringing alarm bells regarding the [spread of colistin resistance](#). Recent studies have confirmed [high levels of antimicrobial resistance in bacteria found in Chinese shrimp farms where colistin resistance may be transferable](#) and have described how [foreign aquaculture constitutes a potential reservoir of colistin and carbapenem resistance](#). The Louisiana Department of Health issued a statement "encouraging residents of and visitors to the state to eat Louisiana seafood whenever it is available; imported seafood carries the risk of possible contamination by physical, chemical, and/or microbiological hazards."

Source: <https://web.archive.org/web/20250430020256/https://www.ldh.la.gov/bureau-of-sanitarian-services/commercial-seafood>.

Note: The FDA has not approved the use of any [antibiotics in shrimp](#) aquaculture, meaning that no shrimp containing antibiotics may be sold in the U.S. market. However, the FDA tests 0.1% of all imported seafood for the presence of banned antibiotics, making detection of even the most frequently abused antibiotics unlikely.

Mississippi Legislature passes Seafood Labeling Law (June 2025)

House Bill 602 was enacted to enhance seafood transparency and empower consumers across Mississippi to make informed choices about the seafood they purchase. By requiring clear labeling of seafood and crawfish as either "Domestic" or "Imported," the law aims to build consumer trust and support the U.S. seafood industry. Starting July 1, 2025, all grocery stores, markets, restaurants, and food trucks, must comply with all labeling standards. The Mississippi Department of Marine Resources (MDMR) and the Mississippi Department of Agriculture and Commerce (MDAC) will oversee enforcement, ensuring accountability throughout the supply chain.

Source: <https://billstatus.ls.state.ms.us/documents/2025/html/HB/0600-0699/HB0602IN.htm>

Alabama Legislature passes Seafood Labeling Law (October 2024)

A new Seafood Labeling Law enacted in May 2024 became effective on October 1, 2024. It mandates that "restaurants and retailers disclose the country of origin and whether seafood is wild-caught or farm-raised." The Department of Public Health is responsible for enforcing the provisions of the regulations. Under the new law, the public can request that an investigation of alleged false labeling can be conducted if they formally register their complaint using the accepted format.

Source: <https://www.seafoodsource.com/news/foodservice-retail/alabama-governor-signs-seafood-labeling-bill-into-law#:~:text=4%20Min,Executive%20Director%20William%20Strickland%20said>.

Louisiana Legislature passes Seafood Labeling Law

[Louisiana was an early leader in the push for labeling, with a law requiring restaurants to specify the country of origin for seafood since 2019](#), now updated it in 2024. The strengthened law designates an additional enforcement agency and took effect on January 1, 2025. It specifically prohibits claiming that imported shrimp originated in the U.S.

Source: <https://www.legis.la.gov/Legis/ViewDocument.aspx?d=1379419>

Florida considering Seafood Labeling Bill

A proposed bill (FL H1147) was introduced in February 2025 that establishes new requirements for the labeling and certification of wild and farm-raised fish in the State, aimed at providing consumers with more transparent information about the origin of seafood products. The legislation creates the Florida Wild Fish and Seafood Certification Program, which will be administered by the Commissioner of Agriculture and Consumer Services,

establishing standards for harvest, compliance, packaging, and certification of fish caught or raised in Florida. Under the new law, food establishments and public food service establishments selling wild or farm-raised fish originating outside the United States must clearly display the country of origin and specify whether the fish is wild or farm-raised through labels, menu notations, or conspicuous signs. However, in May 2025, the proposed bill was indefinitely postponed and withdrawn from further consideration. It is expected that a revised version of the original Bill will be submitted to the Legislature in late 2025. Source: <https://www.flsenate.gov/Session/Bill/2025/1147>

11.3. Appendix 3 – Continuous Review

Fishery Management Plans and regulations are reviewed regularly and can be updated based on new information, changing conditions, and public input to accommodate changing conditions and needs of the fishery and stakeholders.

Once a Federal Council recommends a fishery management measure, the Secretary of Commerce is responsible for approving and implementing regulations which are enforced by the U.S. Coast Guard, NOAA Fisheries Agents, and state partners.

Plan Amendments

The most recent Plan amendment of relevance to the Gulf's commercial shrimp fishery was adopted in March 2020 as Amendment 18. We understand that Generic Amendment 5 (January 2022) is under early consideration that may cause changes to the Gulf fishery based on essential fish habitat parameter impacts. The amendment is currently at the draft/scoping stage.

Stock Assessments

SEDAR 87 is a Benchmark assessment that addresses the stock assessments for Gulf White, Pink, and Brown Shrimp. The Data Workshop was held in September 2023, the assessment process from September 2024 – February 2025, and the Review Workshop in June 2025. Currently the assessment is in the final stages and is expected to be completed in August before being peer reviewed by external experts.

This assessment exemplifies the groundwork that is undertaken by the Council's subordinate teams in reviewing all aspects of the management system. For example, the Terms of Reference for the Data Workshop⁸¹ phase requires that information be collected and analyzed in relation to:

- Review, discuss, and tabulate available **life history information** for each stock being assessed.
- Create a conceptual model based on feedback from a variety of industry representatives in the Data Workshop to **capture** their **institutional knowledge**.
- Provide measures of **population abundance** that are appropriate for stock assessment.
- Provide **commercial catch statistics** for each stock where possible. Document species-specific issues.
- Describe any **known evidence regarding ecosystem, climate, species interactions, habitat considerations, species range modifications and/or episodic events** that would reasonably be expected to affect shrimp population dynamics, and the effectiveness of reference points.
- **Integrate economists** into the stock assessment model development process in order to explore models that can address questions such as benefits of seasonal/spatial closures, impacts of fuel prices on total effort, and ex-vessel prices of different market categories, if possible.
- Provide **recommendations** for future research in areas such as sampling, fishery monitoring, and stock assessment.

Regulatory Review

In May 2025, the Gulf Council issued a Request for Proposals for a qualified contractor to conduct an in-depth review of the regulatory processes that other U.S. regional fishery management councils are using to improve the timeliness of incorporating new scientific information into the development and implementation of federal fishing regulations consistent with the *Magnuson-Stevens Fishery Conservation and Management Act* (*Magnuson-Stevens Act*) and other applicable laws.

<https://gulfcouncil.org/gulf-council-solicits-proposals-for-conducting-a-review-of-fishery-management-councils-regulatory-process/>

Other components

⁸¹ SEDAR 87 Gulf of Mexico White, Pink, and Brown Shrimp Research Track - Terms of Reference (April 2023): <https://sedarweb.org/documents/sedar-87-gulf-of-mexico-white-pink-and-brown-shrimp-terms-of-reference/>

The following components of the federal FMP for Gulf shrimp have been reviewed recently by independent peer reviewers:

Jon Helge Vølstad (April 2024). Shrimp bycatch estimation methodology:

https://www.st.nmfs.noaa.gov/Assets/Quality-Assurance/documents/peer-review-reports/2024/2024_04%20V%C3%B8lstad%20GOM%20Shrimp%20Bycatch%20Report.pdf

Dr. Geoff Tingley (April 2024). Gulf of Mexico shrimp bycatch review:

https://www.st.nmfs.noaa.gov/Assets/Quality-Assurance/documents/peer-review-reports/2024/2024_04%20Tingley%20GOM%20Shrimp%20Bycatch%20Report.pdf