

October 14, 2025

National Marine Fisheries Service
Office of Sustainable Fisheries
1315 East-West Highway
13th Floor
Silver Spring, MD 20910

RE: Recommendations for Restoring American Seafood Competitiveness, RTID 0648-XE889

Dear National Marine Fisheries Service, Office of Sustainable Fisheries,

American Bird Conservancy is a nonprofit organization dedicated to conserving wild birds and their habitats throughout the Americas. With an emphasis on achieving results and working in partnership, we take on the greatest problems facing birds today, including fisheries bycatch of birds. We appreciate the opportunity to comment on the implementation of Executive Order (EO) 14276, Restoring America's Seafood Competitiveness. We are commenting to provide specific input on how seabird bycatch management should be built into implementation of EO 14276.

Bycatch occurs when fisheries accidentally catch nontarget wildlife, such as birds. Seabirds interact with fisheries when they are feeding. Many seabirds dive to retrieve their food and become hooked by lines, entangled in nets, or fatally injured after collisions with equipment or the fishing vessel's mast. Estimates show that around 400,000 seabirds die in gillnets annually¹. Longlines kill between 160,000–320,000 seabirds annually². These figures are likely low because of lack of data.

Given this lack of data, we believe fisheries management can be improved by collecting more seabird bycatch data through fisher or observer efforts. Collecting this data could help inform gear changes and conservation efforts that reduce bird-vessel conflict, improving commercial fishing experiences for vessel operators.

Likewise, reliable technologies are available that could reduce these interactions and we urge you to help U.S. businesses implement these technologies. For example, in 2024 the National Marine Fisheries Service (NMFS) allowed Hawai'i deep-set longline (DSL) vessels to use tori lines in place of the previously required thawed, blue-dyed bait. Tori lines are a more effective alternative that distract birds away from baited hooks. This method is a cleaner, simple change that when installed correctly helps fishers and conserves birds. We urge you to find more opportunities to introduce gear changes that reduce seabird bycatch and simplify the job for fishers.

American seafood competitiveness and seabird conservation can complement one another. Boosting data collection, by recording seabird-vessel interactions, and implementing commonsense, practicable gear changes can mitigate seabird bycatch while reducing burden on

¹ Ramūnas Žydelis, et al. "The incidental catch of seabirds in gillnet fisheries: A global review," *Biological Conservation*, Volume 162 (2013): 76-88, <https://doi.org/10.1016/j.biocon.2013.04.002>.

² Anderson, Orea, et al. "Global Seabird Bycatch in Longline Fisheries," *Endangered Species Research*, 14 (2011): 91-106, <http://dx.doi.org/10.3354/esr00347>

Contact

abcbirds.org
info@abcbirds.org
tel. **540.253.5780**
fax **540.253.5782**

Address

regular, registered, or certified mail:
P.O. Box 249, The Plains, VA 20198
physical address for deliveries:
**8255 E. Main Street, Suites D & E,
Marshall, VA 20115**

fishers. We urge you to consider seabirds as you implement EO 14276. Thank you for considering our comments.

Sincerely,

American Bird Conservancy

Contact: Annie Chester, achester@abcbirds.org, 202-888-7471

