

MAFAC Recommendations on Priorities for the Next Administration

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The Marine Fisheries Advisory Committee (MAFAC) is pleased to welcome the new Administration and to express our desire to work with the incoming leadership of the Department of Commerce and NOAA. We have prepared the following document to share our thoughts on some

MAFAC was established in 1970 to advise the Secretary of Commerce on all living marine resource matters under the purview of the Department of Commerce. MAFAC members evaluate and assess national programs, recommend priorities, and provide their views on future directions. MAFAC members have a wide range of expertise, including commercial and recreational fishing, aquaculture, seafood processing, seafood marketing and sales, consumer interests, coastal communities, and protected resources. MAFAC complies fully with the Federal Advisory Committee Act.

The ideas and recommendations included in this document are those identified by MAFAC members' as those that are particularly pressing and where we see unique opportunities for this Administration to contribute to healthy ocean ecosystems, sustainable fisheries, efficient and effective resource management, recreational opportunities for all Americans, and a thriving U.S. seafood industry. In 2007 NOAA asked the MAFAC to produce a stakeholders' consensus on the desired future state of domestic and international fisheries. That report was completed in 2007 and updated in 2012. This document, "[Vision 2020](#)" provides an overview of the current trends, strengths and challenges. The *Vision 2020* document also provides recommendations for future actions and needs to help guide NOAA senior management going forward. This document draws from and builds on Vision 2020 and we recommend it to your attention.

In the following sections, we present an overview of fisheries and aquaculture in the United States, a summary of some of the major challenges to healthy oceans and thriving industry, and a list of opportunities for the Administration to make important progress to address these challenges in the next four years. Where there are actions the Administration could undertake in the first 100 days to act on some of these opportunities, we have identified those as well.

We stand ready to work with you and welcome the opportunity to engage on any of these or other matters on which you require our assistance.

Overview

The United States is a global leader in fish production and management and U.S. fisheries are the best managed fisheries in the world. Under NMFS management and the Magnuson Stevens Fishery Conservation and Management Act (MSA), the U.S. has rebuilt 40 stocks since 2000 with more success stories every year. Commercial and recreational fisheries in the U.S. create 1.83 million jobs and approximately \$214 billion in economic activity.¹ Of the 313 federally managed stocks with known status, 91% are not experiencing overfishing, and each year managers generate data to reduce the numbers of stocks with unknown status.²

The United States is blessed with an abundant and productive ocean environment. It is home to ocean wildlife including whales and other marine mammals, sea turtles, birds; it supports diverse and prized commercial and recreational fisheries; helps to define the culture and character of our coastal communities, from Kodiak, Alaska to Guam and the U.S. Virgin Islands, to the Gulf of Maine.

¹ NOAA Fisheries. 2016. [Fisheries Economics of the United States, 2014](#).

² NOAA Fisheries. 2016. [Status of Stocks 2015 Annual Report to Congress on the Status of U.S. Fisheries](#).

Management of these resources is a collaborative effort between NMFS, states, and stakeholders who are closely interrelated and work together to preserve the balance between sustainable use and conservation of fish stocks, habitat, and protected resources. Successful fisheries depend upon an orderly and consistent fishery management process, in which stakeholders participate closely and which is largely implemented through regulations. Disruptions to this process have a significant impact on the businesses and individuals who rely on sustainable and reliable access to the oceans and fish.

The U.S. imports over 91% of the seafood we consume, with half of that cultured overseas. Seafood imports added 227,000 jobs and created \$91 billion in economic activity and added \$12 billion to our national trade imbalance.³ Much of this imported seafood is captured or cultured in nations with fewer conservation and management regulations and weaker enforcement than the U.S. U.S. seafood consumers demand high quality, safe, sustainably harvested seafood, and agencies in the Departments of Commerce, Homeland Security and Agriculture work collaboratively to ensure seafood imported into the U.S. meets those expectations.

The World Bank and the U.N. Food and Agriculture Organization project that population increases and growth of the middle class in developing countries will cause the global demand for seafood to exceed the global supply by approximately 50 million metric tons in 2030.⁴ Global landings of wild fish have remained stable at approximately 95 million metric tons. If these projections are accurate, Americans can expect significant increases in seafood prices and potential declines in per capita consumption with attendant negative health impacts. There is a need to ensure wild stocks are managed for long term sustainability to continue to meet demand and both the need and a latent capacity in the U.S. for expansion in U.S. aquaculture production to meet global seafood appetites. One example is oyster aquaculture where oyster production has doubled in the last five years.

Challenges

Management of fisheries, aquaculture, protected resources and ocean ecosystems is a challenging and complex endeavor. The challenges listed here are by no means exhaustive. However, the matters of environmental change, outdated data collection and management systems, regulatory barriers, and barriers to trade are significant, widespread, and are of shared concern to industry, government, and conservation interests.

For fisheries managers, changes in climate and ocean conditions presents a perplexing problem because of the different ways these changes can affect fisheries, habitat, and protected resources. More than two-thirds of respondents to a recent MAFAC survey reported being “very concerned” about the impacts of environmental change on fisheries, aquaculture and coastal communities. Changes to ocean temperatures and habitat are leading to observed changes in fish distribution and abundance that make the management of those species under the regional fisheries management councils increasingly difficult and uncertain. The future extent of these spatial shifts is currently unknown, as are the potential impacts on fishing communities. Ocean chemistry is changing, as waters become more acidic and may be affecting organisms with calcium carbonate exoskeletons - such as corals or shellfish - and associated ecosystems. Vulnerability analyses estimate that by 2050 a total loss of landings across global fisheries costing between \$17 to 41 billion, based on a global 2°C warming scenario.⁵

Data about fish stocks – known as “fishery independent” data collected by scientists - and about fisheries – or “fishery dependent” data and collected by managers from fishermen’s reports - are essential ingredients to the periodic stock assessments that are the foundation of healthy, sustainable fisheries. And

³ NOAA Fisheries. 2016. *Fisheries Economics of the United States, 2014*.

⁴ World Bank. 2013. *Fish TO 2030: Prospects for Fisheries and Aquaculture*.

⁵ Holmyard, N. "Climate change: implications for fisheries and aquaculture." *University of Cambridge and Sustainable Fisheries Partnership, UK* (2014).

yet, these data and assessments are often too infrequent, incomplete, or inadequate to properly guide management decisions for commercial and recreational fisheries. Moreover, as environmental conditions change – as has been observed the last few years – the types of information and analyses needed to understand the changes and their impacts on fisheries will need to evolve. Fisheries in some regions of the country have moved to dynamic in-season fishery management driven by real-time data; an approach that has been demonstrated to address these challenges and more. Other regions lack the resources, capacity, or willingness to make this necessary shift. Related to this, NOAA lacks a capital infrastructure budget to replace aging satellites, research vessels and land-based facilities. This causes the agency to careen from emergency to emergency to fund critical budget-busting infrastructure investments.

Too often, fisheries management rules and regulations are complex, inflexible, and expensive to implement. They can also make it difficult to respond quickly to new information, and fail to provide much incentive for the regulated community and their partners to find innovative ways to address resource challenges. Regulations can take years to implement resulting in lost income, wasted effort and frustration in the regulated community. It is challenging, particularly in recreational fisheries, to collect scientifically sound and trusted social, cultural, economic, and ecological information that can provide the basis for fisheries management. Aquaculture development is also constrained by an unworkable regulatory environment, the lack of a lead agency with the authority to grant permits in federal or state waters, and a lack of investment in fundamental science.

International trade barriers on fisheries products inhibit U.S. seafood producers from participating in foreign markets (e.g., barriers to shellfish exports to the European Union). Addressing these barriers would open the door to maximize value for American fisheries products and improve the trade balance. A number of factors including cheap labor, less restrictive foreign regulations, favorable business climates, and high U.S. demand for cheap proteins coupled with virtually no U.S. tariffs, give foreign companies producing seafood a distinct trade advantage over U.S. producers. This advantage is often so pronounced that many U.S. producers export large quantities of raw seafood to Asia for secondary and value added processing so that it may be imported *back* into the US. Many of these Asian, and EU countries charge tariff fees on U.S. producers that can exceed 20%. Related to this, is that the U.S. demand for imported seafood has grown to a point where 91% of our U.S. seafood is imported creating a dependency for a huge segment of business and a supply chain that, if suddenly disrupted, would have severe economic impact on seafood companies that sell *both* domestic and imported seafood.

Opportunities and Recommendations

While many of the points raised above present significant challenges, many are areas where current conditions offer extraordinary opportunities. Focused investments of time and resources to address these challenges have the potential to unleash dramatic increases in production, improvements in management efficiency, and reductions in costs for commercial fisheries. For example, the projected global shortfall in seafood supply ensures that future markets for domestic products may improve dramatically if nations the U.S. exports to grant the same access those nations have when they export their products into the U.S. Improvements in fisheries management and aquaculture permitting will unleash innovation by entrepreneurs and encourage more efficient and higher value use of limited resources.

NMFS and their academic partners have oceanic monitoring capabilities that we have never had before. There are tremendous opportunities to accelerate the flow of recreational and commercial data from the docks to the databases, integrate the current multitude of agency databases that cannot currently communicate with each other, and modernize fishery data collection management systems. Improved stock assessment science would increase commercial and recreational fishing opportunities while reducing uncertainty and regulatory delay. By improving monitoring, data integration and data management capabilities we can speed the integration and incorporation of data from the docks to the managers, improving the responsiveness of the management regime to real-time changes in stocks and landings, and achieve efficiencies in agency operations.

- *NMFS should accelerate regional adoption of data improvements through cross-regional knowledge exchanges that share tools and best practices across NMFS and Council staff and the fishing community and update key policies related to data collection and management (data retention, confidentiality, data storage, etc.) to provide clear and consistent guidance to regional managers, fishing interests, and service providers.*

As scientists and managers embrace Ecosystem Based Fisheries Management (EBFM) the fishing community could begin to take better advantage of opportunities to increase landings of underutilized and under-fished species without triggering overfishing. Increases in understanding of ocean ecosystems, improvements in technology for ocean observations, and interest and engagement by stakeholders, scientists and others in EBFM may also present managers with important opportunities and the wherewithal to anticipate, predict, and respond to large scale changes in ocean ecosystems.

- *NOAA should ensure continued investment and support for EBFM, including science and planning and encouraging the incorporation of EBFM principles into traditional fishery management plans.*

Framework actions in Fishery Management Plans have been successful in providing a framework for nimble and flexible adaptive management adjustments. However these are underutilized in some regions. The advantages of framework approaches include predictable outcomes based upon agreed upon goals and objectives; a more predictable business model; and, the ability to adjust to climatological variations, population dynamics, technological advances, and consumer demand. Since critical decisions are based upon goals and priorities established within a framework management plan over a protracted period of time, the overall administrative burdens are usually reduced substantially.

- *Promote greater use of framework actions in fishery management plans with resource material and workshops for regional fishery management council staff and council members.*

The projected global seafood deficit will create greater demand for both U.S. and foreign products. Improvements in the regulatory and business environment for domestic aquaculture and wild stocks will create jobs and economic activities in rural coastal communities. Elimination of trade barriers and embargos would greatly improve our ability to participate in global markets and maximize the value of American aquaculture and wild caught fishery products. Although there is a strong desire among U.S. harvesters and processors to achieve reciprocal fair trade, the necessary changes must be carefully thought out, and implemented in a premeditated manner that accounts for this dependency and existing supply chains. Care should be taken to ensure this is done in a manner that does not inadvertently drive down U.S. per capita consumption, result in retributory tariffs by other nations, or destroy essential infrastructure and supply chains that are vital for the harvest, production and distribution of U.S. produced seafood.

- *Seizing the opportunity now to streamline aquaculture regulations and establish regulations for leasing in the exclusive economic zone will enhance the U.S. domestic aquaculture industry's ability to compete internationally and to increase production of sustainable domestic seafood to meet growing demand.*
- *Further research into aquaculture species biology and physiology will improve competitiveness, create jobs and economic benefits from sustainable domestic aquaculture development.*

Increasing use of cooperative approaches to both research and management can reduce uncertainty, improve communication, and create a culture of innovation. This includes improving use of co-management with States and tribes, expand cooperative research and cooperative management opportunities with industry and recreational stakeholders.⁶ By increasing cooperation and eliminating overlapping regulatory jurisdictions we can achieve greater regulatory efficiency among the many federal programs that regulate ocean management and fisheries production in the Departments of Commerce and

⁶ For more information on increasing use of cooperative research and management, please see NOAA Fisheries 2015 report [Cooperative Research and Cooperative Management: A Review with Recommendations](#).

the Interior. And, we can encourage fishing groups to find ways to meet conservation and management needs that work for their community's unique needs, thereby reducing uncertainty and offering new economic opportunities. These cooperative efforts generate a good rate of return on investments in them, as they identify efficiencies, enable members to take advantage of new market opportunities, and provide greater certainty and stability.

- *Implementing the recommendations in NMFS' 2015 report on cooperative research and management and continuing to address the many barriers to cooperative science and management partnerships will pave the way to more streamlined and effective management with strong stakeholder engagement and compliance.*
- *Support initiatives by commercial and recreational fishing groups and coastal communities to develop innovative cooperative management partnerships by creating a new Fishing Communities Investment Fund that will provide targeted grants and other assistance to these groups.*

In recreational fisheries there are ample opportunities to empower anglers as resource stewards, and to support recreational access to quality fishing using new information and tools. Alternative management strategies for saltwater recreational fisheries are being discussed. New guidance on allocation decisions will ensure that allocations among sectors are periodically reviewed. Moreover, several fishery management councils are developing plans that protect ecosystem health, including forage fish - those that are prey for many recreationally and commercially important species.

- *Moving this work forward will help ensure healthy fish stocks and future harvest opportunity for millions of fishermen.*

A National Recovery Program Review⁷ requested by NMFS in 2016 identified several opportunities for improving the likelihood of recovery for the protected resources managed by NMFS. Recovery actions should link closely to recovery criteria, and objectives and delisting factors should be clarified. Stable, well-functioning recovery teams are better able to move recovery forward. Adaptive management approaches and partnerships will also increase the success of recovery efforts.

- *Revising the outdated 2004 Interim Guidance for Recovery of Protected Resources to implement the recommendations made in the program review would be a significant step toward protecting the iconic ocean wildlife Americans treasure.*

Finally, in addition to the opportunities and recommendations above, there are a number of things the Administration could do in the first 100 days that would jumpstart action on critical challenges. MAFAC urges the Administration to:

- Convene a task group of industry leaders to identify and propose solutions to major trade barriers with seafood products.
- Direct NMFS to issue an updated policy directive on improving fisheries data systems, including the use of electronic technologies, which sets out guidelines for data storage, sharing and aggregation and document retention.
- Issue a presidential decree that NOAA is the lead agency with the authority to grant aquaculture permits and leases in the EEZ (with input from other federal agencies with relevant regulatory authority and state review for coastal consistency) would open up a lot of projects that sit on the sidelines awaiting secure rights of tenure such as off shore mussel farming.

Thank you for your consideration of our views. We look forward to working with you.

⁷ Consensus Building Institute. 2016. [National Marine Fisheries Service National Recovery Program Review](#).