Your name (optional)	Your state/territory (optional)	General comments/feedback
Bob Gill	Florida	Although the implementation plan will be more specific, I suggest that your goals be stand alone SMART (Specific, Measurable, Achievable, Relevant, and Time-Bound). That way the strategy plan is upfront definitive about WHAT the goal is. The implementation plan will provide the HOW with the steps to achieve the goals. In the current form, the goals are amorphous, feel good objectives with no boundaries. They do not inspire one to achieve. Definitive goals that are SMART can inspire the team and stakeholders.
no response	SD	I think the plans you have will help and i believe we will start to see change when we start taking action
no response	South Dakota	I think it's really important to look at the money involved with this sort of thing. It won't be cheap. It's possible to start fundraisers and other small campaigns to help. A part of me feels it will continue to get better but not to the end goal we all want it to. In the end, to most people it is all about the money.
no response	SD	Hello my name is ___ and I'm stevens high school and my environmental science teacher was asking us to write feedback to you guys I'm wondering what steps is president Biden taking to address this issue of over fishing and what is congress doing to address the threat of over fishing.
no response	South Dakota	I think that the government should focus less on the economic benefits of the seafood industry and focus more on the environmental take away. There is clearly no way to satisfy both sectors of the issue entirely, but I think the U.S. should give the environment a little bit more thought seeing as how we've only focused on the economy in the past. When we talk about the vitality of the seafood industry it is only fair to also express the negative impacts that commercial fishing has on the oceans. The biodiversity crisis is a rising issue in environmental news. Although the population tends to take note of the lack of biodiversity on land I believe that it is also fair to recognize the biodiversity crisis taking place in the water. Although this issue may feel "out of sight, out of mind," because it takes place beyond the surface, I think it is just as concerning as above ground biodiversity. You may be wondering, "what does the lack of biodiversity really harm?" Taking away species of fish from the life cycle of oceans, can be speculated to cause the entire aquatic ecosystem to collapse. Taking out one piece of a puzzle causes the puzzle to be inconmplete, or taking out a brick from a building, can cause the building to collapse. It is important to restore the balance in ecosystems as we take away from them. Obviously, just complaining about the issue and noting that it is; in fact, an issue, is only the first step. What can we do to solve this? There are already some regulations in place limiting how people are allowed to fish, but do we have regulations in place affecting commercial fishing? No, we do not. I also believe that it would be beneficial to have fishing "seasons." Just like other forms of hunting. I believe the aquatic ecosystem would benefit heavily if people were restricted by how much and of what they were allowed to take from the ocean at any given time.
no response	South Dakota	I believe that the actions being taken in this article to help the fisheries is good and will help fish habitats and fish live longer and have a longer species life.
no response	South Dakota	I think the ideas are really good and that this is a huge problem that I think this plan is going to help fix.
no response	SD	I think what you guys are doing is great for the environment. But what does it mean in terms of cost? Also, how many sustainable hatcheries will there be across the U.S.? Other than that, I think you guys are making a good decision.
no response	no response	I think the NOAA's mission has potential. It's nice to finally see companies taking action to the serious and very relevant problems our oceans face. One of the huge problems that affect our oceans, is overfishing. I hope this new technique focuses on restoring the ocean ecosystems, and depleting species, as well as being able to meet consumer needs, and economic growth. And since the economy comes first to many businesses, I feel there is nothing people can do except to wait and see what will happen. Putting our oceans first is what matters most, and I hope this helps boost the lively spirt the ocean once had.
no response	South Dakota	From what I read it looks like you guys are implimenting some very good strategies after the pandemic to get the fish industry back and more sustainable. This is very important because of the amount of fish that are available for spawning and that allow the industry to continue. There was one thing I thought would be effective that either wasn't included or I missed it. I think that no fishing zones would be effective to put in place because studies have shown that they increase the population so much they begin to overflow into the fishing zones.
no response	South Dakota	If fish are the holy grail of proteins and essential vitamins why haven't we switched over to them yet? would the cost of fish runs, filtration, monitoring and harvesting outweigh things like chickens, quail or even insects that require a fraction of the space and cost? instead of focusing on producing fish on the main lands, we should focus on producing food items that will give the natural ways the ocean produces fish to produce what we need
Carolyn Raasch	Pennsylvania	You make a positive difference!

Your name (optional)	Your state/territory (optional)	General comments/feedback
Mary E Riley	Ohio	I love to eat fish. Especially tilapia. I think we should increase aquaculture and I have heard that tilapia is fairly easy to raise. I would prefer not to eat fish from China as I don't have faith in their quality and sanitation practices. Thanks for asking.
Laurie	no response	While of course I support sustainable seafood and a diverse, fairly treated and compensated workforce to support it, I don't support increasing seafood production, aqucaculture, workforce etc. In my opinion, despite US fisheries being the most well and sustainably managed fisheries generally, we take entirely too much and waste more. The collapse of the Alaskan crab fishery is a good example. When will the trawling of those waters be stopped? If NA right whales go extinct because of pigheaded lobster fishermen, what a goddamn stain that will be on us. And aquaculture, to me, is a gross alternative. The pressure on fish including sharks, especially sharks, continues to devastating effect. Overfishing and bycatch continues to be a problem. Recreational fishing of sharks is controversial and proven to negatively impact their populations but NOAA looks away under the guise of science. What a farce. Climate change is here and affecting us big time. The only thing everyone worries about is the economy and capitalism while the environment burns and resources are squandered. We should be transitioning fishermen to other jobs, not increasing the workforce. Fish should be left for indigenous people and communities who rely on it as their only source of cheap protein. It should not be for anyone else, especially the rich who exploit everything possible. So no, I don't support your National Seafood Strategy, sorry to say.
Amanda	New York	This is so important and a long time coming. The promotion of local fish in the regions/states where they are caught and building domestic markets for those fish should be your first priority in strengthening US wild-capture fisheries. There are too many local fish here in the Northeast that go severely under-utilized as foreign seafood, Alaskan pollock, tilapia (not seafood!) and farmed salmon dominate the markets. Many of our most plentiful species - spiny dogfish, monkfish, butterfish - rely too heavily on foreign markets, which has been the near-demise of the monkfish fishery in recent years. Why are New Englanders so unaware of all the great fish right off the beach? Between weakening markets, consumer unawareness, and regulations based on incomplete science, Northeast fisheries are in dire need of assistance. Especially here in New York, where major saltwater ports lack any infrastructure at all for value-added, processing, etc., competing is difficult. I implore NOAA invest in promotion and infrastructure here in the Northeast to rebuild the country's first major ports.
Chuck Erickson	Western United Staes	Combine Pacific Fisheries Manage Council & North Pacific Management Council into United States Pacific Fisheries Management Council. Stake holders want a voice so we can restore the body size of the salmon. Alaska dumping 1.4 billion smolts for cat food products. Stop the monopoly games being done by the hack fish managers.
Larry Buchanan	Oregon	Nothing the Biden Administration implements for this country is any good for it , so why do you think there policy is going to be any different for you ?
Nicole Adamson	California	Under goal 1, NOAA should also aim to support innovation of new seafood technology that reduces bycatch and other negative ecosystem impacts (such as entanglement). Under goal 2, NOAA should specify that "aquaculture" relates to seaweed, shellfish, and finfish. This provides more clarity, as many members of the public typically only think of finfish when imagining aquaculture. Seaweed and shellfish aquaculture have fewer environmental concerns than finfish aquaculture.
Nathan Everett (Still Kickin' Seafood)	VA	Please incorporate entry level Processing facilities as well as entry level Fishers into this decision making process. Blue Catfish, Spanish Mackerel, Blue Fish, Spiny Dog Sharks, Black Drum, Red Drum, Speckled Trout, Spot are all plentiful in VA area. We are building a seafood processing facility from the ground up that is located in White Stone VA. Please contact us (252)945-2757 (804)436-6650 stillkickinseafood42@gmail.com
Martin Gary	Maryland	Please provide a system which allows consumers to trace the origin of the seafood as specifically as possible so we can support domestic fisheries and know where our seafood is coming from.

Your name (optional)	Your state/territory (optional)	General comments/feedback
no response	no response	TAKING THE OCEAN INTO ACCOUNT IS CRITICAL FOR SUCCESSFULLY ADDRESSING CLIMATE CHANGE, AND ADDRESSING CLIMATE CHANGE IS CRITICAL FOR THE FUTURE OF ALL OF US. Fishing is a major source of ocean pollution and plastic contamination due to discarded and lost fishing material. Overfishing is a major problem. Fish populations are dwindling and the lack of biodiversity caused by overfishing, along with the contamination caused by aquafarms, could have disastrous results to human life. It's easier than ever to leave fish and other animals off our plate with all of the plant-based foods available. If we truly cared about a livable planet we'd encourage people to STOP eating sea life and we would leave the oceans alone. With bottom trawling, everything that happens to be in the way gets swept up in the net, leading to huge amounts of bycatch and also the damaging of the seafloor, which creates harmful algae blooms and oxygen-deficient dead zones. Long lines are indiscriminate and by-catch is a huge problem. Every year around 650,000 whales, dolphins, seals, sea lions and turtles are killed each year because of the fishing industry - which equals more than one every minute. It is estimated that 50 million sharks are unintentionally caught as bycatch each year, which is about half as many as are killed intentionally for their meat and fins.The number of overfished species has increased three-fold in the past 40 years alone, with the United Nations FAO stating that 87% of the world's fisheries are either overexploited or fully exploited, with nearly one third of edible fish and seafood species having declined by 90%, and a study from an international team of researchers published in the Journal Science, even predicted that we could actually have fishless oceans by the year 2048. It is reported that as much as 70% of macroplastics found floating on the surface of the ocean are fishing related. A recent study of the "great Pacific garbage patch", an area of plastic accumulation in the north Pacific, showed that 86% of the macroplastics in this area were fishing nets. Famed fish, which now provide around half of all the fish that are consumed globally, actually leads to even more fishing, because many of the fish raised on these farms are carnivores, meaning they need to eat smaller fish to live. Billions of wild fish are therefore caught in order to feed these farmed species. For example, it can take up to five pounds of ocean fish to produce just one pound of farmed salmon.
Robert A. Sparks	Alaska	You need to end trawling in the Bering Sea because its screwing up the marine environment and the bycatch waste is immoral and unsustainable.
Meryl Williams	no response	The statement on Workforce Development - "Foster a growing and diverse seafood workforce and attract young fishermen and seafood farmers to the sector." - was a shock because it suggests that the seafood industry is for men. Women play an incredibly important role in US fisheries and aquaculture but statements such as these seem to not consider encouraging them. In this case, what is meant by "diversity"? At the least, this Seafood Strategy should be harmonising with the draft NOAA strategy for Equity and Environmental Justice in US fisheries.

Your name (optional)	Your state/territory (optional)	General comments/feedback
John DePersenaire	New Jersey	The absence of any mention of the recreational fisheries in the National Seafood Strategy is a significant shortcoming of the policy. In no definition that I have seen is seafood assigned exclusively to the commercial fishing sector. Seafood is defined as any produced harvested from the ocean for use or consumption, meaning, fish harvested by recreational anglers is seafood. Recreational fishing is perhaps one of the most sustainable ways to harvest fish. All fish harvested by recreational anglers are consumed within our country, they are not exported as seen with commercially harvested fish. It should be further noted that by not included recreational fishing, the strategy dismissing a significant portion of the public who go recreational fishing as an affordable way of accessing our nation's marine resources. Many cannot afford to pay the market rate for many commercially landed products. Even in the fish market, many of these products are too expensive. However, for the price of a single seafood dinner in a restaurant, a family can purchase rod/reel, tackle and bait and have the opportunity land double or triple the amount of seafood for their own consumption. If you were to go to many urban, coastal areas, you would be pleasantly surprised to find a significant number of anglers and families taking advance for their access to the water. Many could not afford the seafood being sold in restaurants and stores in that city, but they have the means to catch their own. This aspect must be recognized in the national seafood strategy. Benefits provided to commercial fishermen should also be provided to the recreational angler for they too are providing seafood for themselves and their families. Furthermore, the economic output of recreational fishing must not be ignored. To provide a simple example, the largest single marine industry employer in the state of New Jersey is not a commercial fishing operation or processing plant, it's a boat manufacture that builds boats specifically for offshore recreational fishing. The recreational sector provides similar economic output and jobs in providing seafood to the nation as commercial fishing operations. It is imperative that NOAA acknowledges the definition of seafood and stops excluding recreational fishing from the discussions or the resources being put forward by NOAA to help the seafood industry. Recreational fishing produces seafood, it is part of the seafood industry. Please revise the seafood strategy so that it is fair, equitable and includes those members of the public who can't afford high priced seafood provided by commercial fishing operations and catch their own seafood. This is all about equity and the strategy, in its current form, excludes a significant portion of the American public.
Sean Den Adel	AK	I don't see mariculture mentioned at all in the draft national seafood strategy... There is a growing interest in the US seaweed and shellfish industry and we farmers are already working towards the objectives outlined in Goals 3 and 4 of the draft national seafood strategy. As part of the Blue Economy and Seafood Industry I feel it is appropriate to see mariculture goals included in the next version of this draft. Thank you ~ Sean
Valerie	Oregon	I am 100% for seaweed aquaculture, but farmed fish have too many problems-too crowded, dirty water, disease, and pollution and taking up space needed by wild fish species. Unless those issues can be fixed, we need to support wild caught fish and adjust the amount we eat vs overfishing. Have you had a farmed fish recently? Ugh
Hans Brons	Alaska	Please look at slowing down the by-catch especially by- catch And killing of salmon, halibut, crabs, dolphins, killer whales, sharks by trawlers in Alaskan waters. Pollock caught this way isn't worth the by-catch. Thank you
Cynthia	Washington	I feel an element missing from this strategy is the consumer. I would love to see part of the strategy address the value of consumer education and engagement. Creating increased demand for the seafood sector's products will be a critical factor for long-term successful outcomes. Also, making sure the retail settings where consumers buy seafood do a good job of sharing information about the seafood and ensuring its quality will go far to building consumer demand and repeat purchase. I've been writing about seafood for the home cook for many years, and am conducting a survey about seafood shopping to learn more about improving consumer experiences with seafood. Working toward greater supply of domestic, sustainable seafood is great. But I believe that to ensure the biggest impact for the industry, consumer engagement should be part of the plan. I could see it as an added bullet point with Goal 4 of the draft strategy. Cynthia Nims, cnims@comcast.net
Francisco Ramos Torres	Puerto Rico	in a need of funds to repaired all costal zones for fisherman's in the island
Lex Ludtke	Washington State	Vision for Resilience your showing # 2Increase sustainable U.S. aquaculture production- The question or guidance why is Washington states governor closing the aquaculture salmon nets on Washington coast line... can someone reach out to Inslee and share this with him so we can get on the same page.
no response	AZ	I hope that part of your sustainable strategy is to do some serious, ongoing, mass marketing/advertising for the least-threatened types of fish, to encourage people to eat more of those (sardine, herring?) as opposed to more popular and over-fished types of seafood. Thanks.

Your name (optional)	Your state/territory (optional)	General comments/feedback
Larry Franks	Washington	Two critical issues: first REDUCE US wild capture production. Data indicates we are over-harvesting in a wide range of fisheries. Second, limit 'aquaculture' to Recirculating Aquaculture Systems (RAS) with concomitant non-forage fish based feed development.
no response	Maine	Windmills are NOT the answer! Not on land and Especially not in our ocean! Not only are they not "green" but they're an navigational hazard! Also like to add...Look at how many whales that are washing up on the beaches and/or floating dead in the ocean do to "exploratory sites" for these windmills.
Jessica Joyce	Maine	Thank you for the opportunity to comment. First, I applaud NOAA in developing such a concise draft strategy. I work in fisheries policy and community engagement, and a lot of my time in the last 10-years has been providing technical assistance to the wild-harvest shellfish industry in Maine, which is co-managed between the municipalities and the state. I'd like to speak primarily to Goal 4, and the strategy around seafood infrastructure, although this also applies broadly to Goals 1 and 2. One of the big issues facing the shellfish harvesters is a loss of access to the fishery as informal agreements they had to access the mudflats through coastal landowners private properties is being lost due to gentrification and other changes along the coast of Maine. If access is lost through private property, the harvesters have to go elsewhere (public access points, town docks, and boat ramps), and this shift can result in user conflicts with other commercial fisheries or recreational users. Access to the coast, and working waterfront infrastructure is the gateway for America's seafood to get to domestic and international markets. My business, Tidal Bay Consulting, has recently started working with Maine Coast Fishermen's Association on working waterfront preservation and how towns can inventory and monitor their infrastructure. Since starting this work, I've noticed that there is very limited funding at the state level for municipal working waterfront planning and implementation grants, and I am not aware of any direct federal funding programs aside from grants through FWS (I believe) for marinas that cater to larger recreational vessels. (Of course, NOAA CZM funding provided to the Maine Coastal Program is one source.) If Goals 1, 2 are about supporting and/or growing wild harvest and aquaculture production (and balancing these with other ocean uses), it is important to understand that if the working waterfront infrastructure and/or coastal access is a limiting factor, that these industries will not be able to grow using the approaches currently in use from moorings and marinas and offloading to wharfs, etc. Having a federal funding program to support the Goal 4 strategy of seafood infrastructure will enable Goals 1 and 2 to be realized through providing much-needed resources to the towns and states planning for the future and investing in the infrastructure to support their local marine economy. Looking across existing NOAA funding programs and new funding programs and considering the 'right size'
Jocelyn Juliano	South Carolina	I want to emphasize the following needs: infrastructure improvement and assistance particularly through public avenues since privately owned docks and shoreside infrastructure are not secure long-term; workforce assistance and professionalizing the industry; fuel subsidies; increase domestic processing capacity to reduce export processing;
Monica Jain	no response	I support the focus of the seafood strategy on sustaining wild harvests, allowing aquaculture to grow more efficiently, fostering market access, and strengthening the sector. There is little mention of innovation in the strategy - and we know that the sector is far behind agriculture and other industries in terms of innovation adoption that could improve data collection and usage, reduce carbon emissions, improve seafood quality (supporting all facets of this strategy) and reducing environmental impacts of processing and packaging from the industry. I believe that support for innovation should be explicitly mentioned in the strategy as well as improving the overall quality of US seafood (which will likely result in waste reduction as well). Finally, support for extension of many of the USDA policies - which have supported US farmers over the past century effectively and protected them against unforeseen events or bad actors in the system - should be extended to the aquaculture and fisheries industries. These policies were put in place almost a century ago when US farmers were experiencing many of the issues that US fishers and fish-farmers are today. There is no reason why they should not be extended to the seafood industry. Thanks for your work on this and your attention to this feedback.

Your name (optional)	Your state/territory (optional)	General comments/feedback
Casey Emmett	New York	To whom is may concern, my company, The Crop Project Inc, is a next-generation ingredients company based in Brooklyn, NY. We contract with kelp farmers in the US -- primarily in the Northeast and Alaska -- and turn the resulting crop into useful ingredients for CPG companies in the food and beauty industries. We believe that much of the future of farming in the United States will be performed on the ocean, via mariculture: seaweeds, shellfish, and bait fish, such as sardines and mackerel. Kelp alone is potentially as impactful to the marketplace as soy has ever been, but far more beneficial to the environment and human health, not to mention jobs. In order for these highly beneficial mariculture crops to scale, however, we require the federal government's support. And it begins with the farmer, for without them, there will be no mariculture industry. There are existing USDA programs that support traditional commodity agriculture crops such as corn and soy that should be applied to the mariculture industry. For example, basic crop insurance and the ability for farmers to be reimbursed if qualified industry buyers, such as my company, are unable to pay. The majority of innovation and companies in the space right now are very small, and thus face natural market headwinds. What is naturally a risky business endeavor -- be it farming a "new" crop or selling that crop wholesale -- is made even more so by the void of financial backstop that the federal government provides to plenty of other crops that frankly are demonstrably worse for human health and the broader environment. Please help. Thank you very much.
Angela Wilson	Florida	I would like fisheries returned to local stewards. I don't approve of foreign ships fishing right on the edge of our boarders. Fish do not perceive the boundaries we draw. I would also like fishery preservation areas. These areas would be closed permanently to fishing to allow populations a space to recover from fishing pressure.
no response	no response	The Food and Agriculture Sector (FAS) accounts for 20% of the United States (US) economy and has been designated a Critical Infrastructure Sector by the Department of Homeland Security (DHS). This sector consists of an extensive, open, globally interconnected, diverse, and complex array of privately owned "just in time" networks; and encompasses a variety of goods and services including the production and manufacturing of crops, livestock, poultry, and seafood products and by-products. As such, the threats to food and agricultural resources will come from various sources including foreign and domestic events, naturally occurring and/or human-induced, and the interdependencies of FAS with other critical infrastructures. Given the broad scope of these possibilities, the 2021 Threats to Food and Agriculture Resources (TFAR) DHS teams focused on the myriad of threats that could disrupt or devastate supply chains within the vast FAS of the US; examine shortfalls in US capacity to prevent and mitigate the threats; and recommend best practices, policy, and research priorities that will foster preparedness and resilience of the FAS against all threats. The TFAR discussions centered on terrestrial and aquatic environments in the context of food and agricultural systems, climate change, food adulteration, disruptions in the transportation sector, water shortages, globalization of trade/travel, biosurveillance limitations, social culture, cyberthreats, agro/bioterrorism, and economic coercion. In-depth capability and vulnerability analyses of the FAS identified several key areas for utmost attention by the public and private sectors, with recommendations to prepare for and address the likelihood of emerging threats that could severely impact the food, agriculture, and aquaculture industries, including: Aquatic/seafood safety and biosecurity. Globalization will remain the determinant factor to the world's economic, technological, and societal progress; with caveats that geopolitical disputes amongst dominant world powers for access to natural resources, including agricultural and aquaculture/seafood products, may change the dynamics of the global food supply chain. This will significantly impact the FAS and its interdependencies with other critical infrastructures. This report can be leveraged to support and address a variety of research requirements embedded within existing US government policy and doctrine. In particular, six key recommendations were provided, one of which was: The US government needs to promote domestic aquaculture for food production. National Security Memorandum-16 (NSM-16) on Strengthening the Security and Resilience of United States Food and Agriculture (2022) assigns key roles to
no response	no response	It is important to emphasize (Re: NOAA National Sea Grant Aquaculture 5-Yesr Strategy) that meeting the current and future US seafood demand will require commercial fishing and aquaculture together--not one or the other. It should be important to state this to both US fishermen and US fish farmers (stakeholder groups) that they are both needed and that the strategy cannot be "us or them". It is domestic US seafood production versus foreign imports.

Your name (optional)	Your state/territory (optional)	General comments/feedback
Kristin Uiterwyk	Massachusetts	NOAA's National Seafood Strategy appears to be a solid framework touching upon many important pieces of the seafood system. The only addition I would recommend for consideration is a goal to improve the sustainability of fishing activities. Under this goal, I would add bullets about (1) supporting efforts to modernize fleets in ways that reduce emissions, (2) addressing lost/derelict/abandoned gear that contributes to ghost fishing and pollution, and (3) developing technology to address conflicts between gear and other natural resources (e.g., lobster traps and North Atlantic right whales). Not only will these types of actions contribute to healthier oceans and therefore more vibrant fisheries, but they also advance the important message to consumers that the seafood industry is working to maintain a low environmental impact. Related to the Strategy Implementation plan, please reach out if you would be interested in learning about the National Working Waterfront Network. The Network may be able to help gather/distribute information and assist in other ways. I currently serve as Interim Chair and would be happy to speak with members of your team. (Though to be clear, the comments above are my own and I am not submitting them on behalf of the Network.)
Chris Schieble Louisiana Dept. of Wildlife & Fisheries	Louisiana	U.S. seafood continues to be produced sustainably •Offer grant assistance for fisheries that seek sustainability certifications. Offer incentives for fisheries already certified sustainability or rated A in a Fishery Improvement Plan. •Provide incentives for sustainable fisheries with grant programs for new equipment, facility development/expansion, and niche markets (dried shrimp, soft-shell crab, etc.). •Along the lines of sustainability, NOAA continues to manage (sometimes driven by acts of Congress) contrary to the idea of sustainable domestic seafood, and as a result forcing importation, by imposing more and more regulations on US fishermen that are the most sustainable in the world while ignoring the importation of unsustainable or illegal practices. One example of this is the ban on the possession of legally harvested shark fins in the US market. These fins are legally harvested and landed on an intact shark as part of a sustainable US shark fishery. ● The U.S. seafood sector contributes to the nation's climate-ready food production and to meeting critical domestic nutritional needs •Assist with the purchase of domestic products, especially from those that are certified sustainable. Promote the purchase of sustainable seafood over imported products. ● U.S. seafood production increases to support jobs, the economy, and the competitiveness of the U.S. seafood sector •Grants to assist people entering into a fishery. •US Fishery jobs will decrease if regulations continue to become more and more restrictive in the US while not taking steps to deal with the importation of seafood that is harvested in a manner inconsistent with US regulations and therefore puts US fishermen at a competitive disadvantage due to increased compliance costs. Funding to keep US harvesters competitive is essential if these contradictory management vs. importation practices are going to continue. ● Supply chains and infrastructure are modernized with more value-added activity in the United States •Tighten the country of origin labeling on value-added products. It is common that imported seafood products are brought into the U.S. and then go through some value-added process and are then labeled product of USA.

Your name (optional)	Your state/territory (optional)	General comments/feedback
The Town Dock	Rhode Island	United States fisheries are a sustainable and healthy choice in the diets of many Americans. In order to stay competitive and resilient, the fishing industry is going to need NOAA's support in the face of massive offshore wind development on and around prime fishing grounds, aquaculture expansion, and the effects of climate change. Goal 1: Sustain or increase sustainable U.S wild capture production. Investment is needed in replacing the surveys that the NMFS will be losing due to offshore wind development in the northeast. US fisheries can't afford to lose the valuable time series that informs our assessment and catch advice. Any uncertainty added to our management system due to this loss will be detrimental to our businesses and markets. With offshore wind starting development this year, developing a new survey system needs to be a priority. Fisheries on both sides of the coasts are extremely worried about the effects offshore wind will have on the ecosystem, oceanography, and access to fish in and around the area. These potential changes to the ecosystem and oceanography need to be tracked and measured as soon a steel goes into the water and well after the life of the project. Fisheries are going to need management flexibility as stocks shift and/or expand into new areas. Changes are going to need to be made in the way we manage fisheries and who manages specific fisheries. For that flexibility to take shape we are going to need NOAA to help facilitate those changes to make sure they are done fairly and based on sound science. Goal 3: Foster access to domestic and global markets for the U.S seafood industry. The sustainability of U.S caught seafood needs a massive domestic campaign educating our citizens about the benefits of choosing domestic caught and managed seafood. We have many underutilized species here that could benefit from a marketing campaign that would introduce them as a healthy sustainable option. This could greatly improve our markets for those species and take pressure off domestic species like cod and some US shrimp that aren't doing well but are still in high demand. That high demand or species like cod and shrimp draws fish from foreign, and sometimes unsustainable, markets into the country. If we could market and sell fish that aren't typically part of our normal fish choices it would increase jobs, improve markets, and hopefully help us rely less on foreign products. Support for these markets could come from the government purchasing US wild-caught fish
no response	no response	Within Goal 1, Fisheries Management, I would hope that the strategy includes discussion of a proposal to adopt improved nationwide standards for fishing gear. From gill nets to groundline traps, these kinds of equipment are certainly not sustainable for the ocean's largest creatures, particularly the North Atlantic right whale and its ongoing unusual mortality event (which is primarily due to entanglement). The Ropeless Consortium and its on-demand gear initiative can serve as potential inspiration.
Clarice Owens	California	We have applied to the SK grant program in multiple cycles. The comments from the reviewers are increasingly surprising and seem to betray a basic failure to understand the dynamics of seafood markets and especially the challenges being faced by the domestic fleets and processing sector. NOAA seems to also have a defensive posture that does very little to engender increased understanding. It would be very helpful to convene stakeholders throughout value chains, reduce the cronyism and protectionism and try to better understand the issues on the water and in our communities.

Your name (optional)	Your state/territory (optional)	General comments/feedback
Molly Lutcavage, Ph.D.	MA and HI	We have allowed our US fisheries, the best and most sustainably managed in the world, to fail to compete on US market place shelves alongside imported products. Many of these products are sourced from poorly managed fisheries, to say the very least. -The US needs to do more to support its coastal states fishermen and fishing communities in terms of recognition at the highest levels of government, so that it's on par with agriculture and other natural resource commodities. - NMFS must become more pro-active in debunking false claims made by eNGOs about US managed fisheries, and stated population status of some species that conflict with determinations made by NMFS and scientific bodies of RFMO's determination of status. NMFS remains the highest standard for reporting on the status of US fisheries. - NMFS should more vigorously promote the health and economic benefits of eating US-sourced ocean products. - In order for Atlantic commercial and recreational fishermen for tunas and other pelagic species cannot fully promulgate their economic returns from their businesses (harvest and harvest charters), and have transparency and predictability, NMFS must allow Congressional action to bring Atlantic HMS species oversight under the scientific and economic standards of national MSRA standards, i.e., a Council and SSC, or equivalent system. The highly outdated Atlantic Tunas Convention Act framework has failed miserably, and led to questionable practices of participation, funding, lack of accountability, non transparency, and a vastly underutilized opportunities for US fishermen and their businesses. Until this is remedied, Atlantic tuna and billfish fishermen struggle to overcome the lack of adequate oversight of these fisheries, with associated high losses of revenue, and impacts on consumers and retail markets. -NMFS must remove the current unsupportable, unscientific determination that sustainably caught, Pacific billfish species landed by US fishermen in highly monitored longline fisheries cannot be sold outside of the Main Hawaiian islands or shipped for commercial sale to the US mainland or elsewhere. This regulation damages economic returns to US commercial fishermen without justification, and appears to favor special interests. Given current genomic or other tracking technologies, the justification that Pacific sourced billfish can not be distinguished from Atlantic billfish is false. -NMFS should directly work with the USDA, and promote their calls for proposals for $$ economic development, value-added, and other food-related grants that are, in fact, open to ocean producers. This is not well represented in many of their RFP calls, and some
Loretta Roberson	MA	This is much needed to produce more sustainable food and feed, but the permitting process for new aquaculture operations in both nearshore and offshore areas is broken in the US and in some states almost impossible, and is also different state to state. Federal guidelines and cooperation could help make this process more efficient and timely.
Michael Rust	Washington	NOAA is to be congratulated on developing a seafood plan. I only have three areas of feedback. 1) In Goal # 1 NOAA includes "increasing" capture fisheries as an option. I am not sure this should be the top goal, given the unknowns over climate variability (see IPCC reports) and the cost of management as populations near maximal sustainable yield in an increasingly variable environment. Rather I would propose using any excess production as a buffer given the extremes in environmental conditions predicted by the IPCC in their latest assessment. Holding steady would be enough of a goal. 2) The "gradual" increase in aquaculture under goal 2 is unlikely to significantly increase US seafood for a long long time, especially if it is only going to be "gradual" - Goal 2 should be Goal 1 and some urgency added. 3) The plan ignores the vast majority of our seafood supply - imports. Our imports cannot be taken for granted, and largely come from countries that are not on good terms with the US or have increasing domestic demand (e.g.China). Given that climate impacts are largely predicted to impact small island development states and developing countries, might the US seek to use some of it's seafood development resources, to stand up sustainable aquaculture for import to the US, in countries friendly to the US, and in regions that will suffer under climate change? That may have the additional benefit of reducing the pressure for those populations to migrate because they will have sustainable economic activities at home. NOAA science has developed plenty of tools that would help such locations develop a sustainable industry that will likely develop faster than in the US. I understand that the US seafood industry will not support what they may perceive as the strategic development of overseas competitors, however the US consumer will benefit with increasing supplies of sustainable and affordable seafood. I also do not agree with that industry assessment, If handled well, the US industry could also benefit. When thinking about real seafood supply needs in the US, we should be working with friendly countries to develop a few aquaculture species that can be cultured in numerous countries and at scale. Otherwise, you are only producing seafood for happy hours at expensive bars catering to professionals. Where will the seafood come from for the average blue collar American? It is time to think about another world fish like farmed salmon. The US does not have the resources devoted to aquaculture to go it alone, so it either needs to step up the resources (unlikely) or partner with other countries to develop a few world fish.

Your name (optional)	Your state/territory (optional)	General comments/feedback
no response	California	All efforts to expand marine protection and reduce takes of wildlife should be made. Aquaculture feeds should not rely upon wild caught fish, krill or other wildlife. Shift to raising bivalves or herbivorous fishes instead. Fishing methods that result in any bycatch should be phased out - especially trawls, traps and long lines.
Brick Wenzel	New Jersey	Seafood Gleaning is an important part of any fisheries management plan and should be mentioned in NOAA's National Seafood Strategy moving forward.
Veronica G Stelly	Louisiana	Need help on wild seafood shrimp prices It's rediculous the low prices we r getting at the docks. How r we supposed to stay in business with very high fuel prices & pitiful low prices we get for our shrimp then to top that off the expenses to maintain our boats have all gone up since the covid disaster. Please find us solutions. This business is our lives it's what we know it's what we have always done. Thank u kindly.
Toby Stelly	Louisiana	Any help on us getting higher prices for our catch and lower fuel prices would be greatly appreciated. We can't keep operating like this. The money just s Isn't there since the covid disaster. It's terrible what's happening to commercial fishermen. Thanks
Brad	Fl	NOAA's National Seafood Strategy will be undermined as long as the Gulf of Mexico Fishery Management Council remains severely imbalanced and heavily-recreationally-favored. There is now only 1 commercial fishing representative on the 17-voting-member Gulf Council that has experience in the commercial fisheries the Gulf Council manages. The consequences of this imbalance are very real: conservation successes are being unraveled, commercial fishing and seafood businesses are being destabilized, illegal actions are being recommended, fishing quotas are being slashed, and the public's access to wild Gulf seafood is being severely restricted. This Administration is failing the working people in the Gulf's seafood industry - the men and women who support one of the most accountable fishery management systems in the world - and is instead favoring wealthy boat owners who are being rewarded for consistently exceeding their science-based annual catch limits. This is unacceptable to the Gulf's small seafood businesses and should be to our federal fisheries agency too. NOAA should do everything in its power to encourage and support the Secretary of Commerce rebalancing the Gulf of Mexico Fishery Management Council with commercial fishing representatives.
Zack Istre (Straight Hooks Inc)	FL Gulf	Because of continued fishery quota cuts, high quota prices and unavailable quota to majority of Gulf reef permit holders. High majority of fishery quota being moved over to recreational sector. A huge imbalance of recreational sided voters/ stake holders on Gulf council making rules cuts and laws. Tons of the smaller fishery businesses are getting forced out of work. Our profit margin has collapsed and the fish we are able to harvest are there. But without any quota or commercial portions of the fishery we are unable to fish them. We provide domestic fish to the 99 percent of the US that can not afford a boat or have the capability to fish. The quality and our fishery is light-years ahead of and better than international fish. We are being forced out of work ; doing what we love and being able to provide food and housing for our own families. I speak for a majority of friends, business partners, other fisherman and family in the above. Please make a change so we can start making a living again and provide U.S. fish to U.S. citizens.

Your name (optional)	Your state/territory (optional)	General comments/feedback
Bob Morris	Rhode Island	Toxic nitrogen from chlorinated sewage treatment is the culprit and major reasons to fisheries depletion The poisoning of the fisheries We should be seeking disaster relief from these injuries! We have chemical poisoning to the nitrogen base that is the foundation of the marine food web. The marine feeding system needs good healthy nitrogen, not a poisonous nitrogen, such as the millions of tons of chlorinated treated sewerage, which has toxic chlorinated by-products that are fed into marine food chain. In Narragansett Bay alone, DAILY! We add tons of hypochlorite (chlorine) into the sewage nitrogen base, then we add tons DAILY! of sodium bisulfate, at the very end of the sewerage outlet pipes that flow into the Bay. Why is sodium bisulfate added at the end? Because it neutralizes the remaining smelly, free chlorine from flowing into the Bay in order to make a claim that very little, in fact, just a few gallons of FREE CHLORINE went into the Bay. WHAT HAPPENES TO ALL THE TOXIC BY-PRODUCTS? When this chemical concoction is fed into the marine food web the poisoning of the entire fisheries begins. There are two excuses that allow governmental agencies to do this to our fisheries. One, is the Clean Water Act which states wastewater treatment must follow the E.P.A. testing standards. Do you think the Trillion-dollar Chlorine industry, may have an influence on the E.P.A. testing standards? Anyone with common sense will tell you the E.P.A. testing methods are a joke. The E.P.A. do not research the several hundred Chlorinated by-products that are toxic to marine life. The biggest fact of all is that Chlorine is a glutted hazardous waste product, with no place to go. In fact, China pays the U.S. chlorine industry a disposal fee to get their excess chlorine out of their country. The Russians got caught mixing their chlorine into the oil pipelines that they were being sent to western nations. Second, is leadership from the top. Some marine fisheries and water quality people may
Gary Jarvis	Gulf of Mexico Florida	NOAA's National Seafood Strategy will be undermined as long as the Gulf of Mexico Fishery Management Council remains severely imbalanced and heavily-recreationally-favored. There is now only 1 commercial fishing representative on the 17-voting-member Gulf Council that has experience in the commercial fisheries the Gulf Council manages. The consequences of this imbalance are very real and conservation successes are being unraveled, commercial fishing and seafood businesses are being threatened by unreasonable reallocation efforts and US citizens access to wild Gulf seafood is being severely restricted.. This Gulf council is failing the working people in the Gulf's seafood industry - the men and women who support one of the most accountable fishery management systems in the world - and is instead favoring wealthy boat owners who are being rewarded for consistently exceeding their science-based annual catch limits. This is unacceptable to the Gulf's small seafood businesses and should be to our federal fisheries agency too. NOAA should do everything in its power to encourage and support the Secretary of Commerce rebalancing the Gulf of Mexico Fishery Management Council with commercial fishing representatives.

Your name (optional)	Your state/territory (optional)	General comments/feedback
William Cochrane Sr.	Texas	You say - you are committed to supporting a thriving domestic U.S. seafood economy and enhancing the resilience of the seafood sector in the face of climate change and other stressors. I order to do this you should make the Gulf Council balanced with equal members of Commercial and Recreational. •NOAA's National Seafood Strategy will be undermined as long as the Gulf of Mexico Fishery Management Council remains severely imbalanced and heavily-recreationally-favored. There is now only 1 commercial fishing representative on the 17-voting-member Gulf Council that has experience in the commercial fisheries the Gulf Council manages. The consequences of this imbalance are very real: - conservation successes are being unraveled, - commercial fishing and seafood businesses are being destabilized, - illegal actions are being recommended, - fishing quotas are being slashed, and - the public's access to wild Gulf seafood is being severely restricted. - This Administration is failing the working people in the Gulf's seafood industry - the men and women who support one of the most accountable fishery management systems in the world - and is instead favoring wealthy boat owners who are being rewarded for consistently exceeding their science-based annual catch limits. - This is unacceptable to the Gulf's small seafood businesses and should be to our federal fisheries agency too. - NOAA should do everything in its power to encourage and support the Secretary of Commerce rebalancing the Gulf of Mexico Fishery Management Council with commercial fishing representatives.
Jonathan Fisk	Hawai'i	In relation to Fisheries Science in support of Goal 1, it's discrediting that "economic and social analyses" are littered as separate from science when social sciences is an entire domain of science. Likewise, there is no mention to cultural analyses despite this being a crucial factor of fisheries and socioecological systems at large. As a third note, ecosystem dynamics are indeed changing but so, too, are social dynamics. With this in mind, this point could instead be reworded to "Provide the ecological, economic, social, and cultural scientific analyses necessary for fisheries management under changing socioecological dynamics." Under Goal 2, the language here reflects attention being paid to aquaculture in its more modern form, with no mention being made to Indigenous aquaculture technologies and practices. Given the explicit mention of wanting to partner with Tribes to support subsistence fishing and traditional Tribal fishing rights, excluding Indigenous aquaculture from this section seems like a grave absence, particuyltural that Indigenous aquaculture technologies often work to enhance local ecosystems rather than causing detrimental impacts. For Goal 3, there is no mention of science and monitoring to ensure that goals are being met in regards meeting local demand with local supply, as well as for assessing changing market dynamics amidst changing ecological and social systems. This is particularly urgent for ensuring the accessibility of seafood across diverse populations, especially economically disadvantaged communities, for whom food security and food sovereignty is a grave concern. If we do not devote particular attention to such science and monitoring, we won't know if we're actually successful at accomplishing these goals. In regards to the point of Seafood Infrastructure in Goal 4, as with aquaculture before the focus here is on modernizing things, which certainly has its role, but it also is excluding Indigenous technologies surrounding seafood infrastructure, which often involve less in the way of imported materials, electricity, and other inputs that might be cut off or otherwise inaccessible after extreme climatic events or in the case of rising prices. Investing in a diverse array of seafood infrastructure technologies that match local needs and cultures would increase the diversity of potential solutions, therein bolstering resilience in a myriad of ways and allowing fishing communities to have greater agency over their seafood

Your name (optional)	Your state/territory (optional)	General comments/feedback
Brian lewis	Clearwater,Florida	NOAA's National Seafood Strategy will be undermined as long as the Gulf of Mexico Fishery Management Council remains severely imbalanced and heavily-recreationally-favored. There is now only 1 commercial fishing representative on the 17-voting-member Gulf Council that has experience in the commercial fisheries the Gulf Council manages. The consequences of this imbalance are very real: conservation successes are being unraveled, commercial fishing and seafood businesses are being destabilized, illegal actions are being recommended, fishing quotas are being slashed, and the public's access to wild Gulf seafood is being severely restricted. This Administration is failing the working people in the Gulf's seafood industry - the men and women who support one of the most accountable fishery management systems in the world - and is instead favoring wealthy boat owners who are being rewarded for consistently exceeding their science-based annual catch limits. This is unacceptable to the Gulf's small seafood businesses and should be to our federal fisheries agency too. NOAA should do everything in its power to encourage and support the Secretary of Commerce rebalancing the Gulf of Mexico Fishery Management Council with commercial fishing representatives. My boat fishes for Frenchys seafood and catches reef fish for Frenchys retail seafood house and 10 restaurants . Tourist come from all over to eat fresh wild caught seafood . I purchased 250,000 worth of grouper quota to try to keep our boat fishing economically and without having to lease quota . I have lost 60 percent of our quota due to overfishing practices by the recreational sector . This Gulf of Mexico council needs to be balanced for the commercial sectors and their communities. Noaa needs to urge the secretary of commerce needs to do a Better job on who they select to be on the council before we are gone for good .
no response	Florida	While I agree with the scope of this Strategy I would like to mention a very important aspect that is clearly missing? The Gulf of Mexico Fishery Management Council is severely imbalanced and heavily -recreationally FAVORED? We only have 1 commercial representative on the 17 voting member Council that has experience in the commercial fisheries the Gulf Council manages. The consequences of this imbalance are very real. 1 conservation successes are being unraveled 2. Commercial fishing and seafood businesses are being destabilized 3. Illegal actions are being recommended 4. Fishing quotas are being slashed 5. The American public access to wild caught Gulf seafood is being severely restricted. This Administration is failing the hard working people in the Gulf seafood industry? The men and women who support one of the most accountable fishery management systems in the World are being kicked to the curb in favor of wealthy purely recreational boat owners that are being consistently rewarded by overfishing their science based annual catch limits. The is unacceptable to the Gulf small seafood businesses like mine? Which I'm a 3'd generation fisherman. It should be unacceptable to our federal fisheries agency too. We believe NOAA should do everything in its power to encourage and support the secretary of commerce rebalancing the Gulf Council with commercial fishing representatives. Thank you
Elizabeth Cerny-Chipman	Washington, DC	Please see the attached letter from Ocean Conservancy, Natural Resources Defense Council, Mystic Aquarium, Seattle Aquarium, Oregon Coast Aquarium, and Point Defiance Zoo & Aquarium. Thank you for the opportunity to provide comment on the draft National Seafood Strategy.

Your name (optional)	Your state/territory (optional)	General comments/feedback
Jimmy Hull	Florida	I am happy that you are developing a National Seafood Strategy. I own and operate 4 commercial boats a Seafood Market and a Seafoood Restaurant . I employ over 100 people. We provide the General Public Consumers access to our Fisheries resources. Currently many of our fisheries stocks are being underharvested and mis managed because of lack funding for stock sampling, monitoring, and timely stock assessments. A large increase in Fisheries science Funding is needed. Commercial Harvesters, Fisherman must comply and work with the most complex, restrictive, expensive regulations and rules to produce Domestic Seafood. We need regulations reduced and simplified to become more efficient. We should be able to retain what we catch, not dead discard our catch wasting the resource because of inaccurate stock status because of a lack of Science. Commercial Fisherman Seafood consumers and the entire Seafood Industry is underrepresented on the Regional management councils. Non boating Seafood consumers are losing access to Domestic Seafood thru reallocation of Seafood quota to Private Recreational sector. If the Federal Government really wants to increase and improve Seafood production, They will take their boot off Fishermans necks by reducing overbearing regulations. Also Fund year round data collection,monitoring and timely stock assessments. And require a equal balance of representation of Commercial members on Regional management councils. My business example and story is multiplied thousands of times in coastal communities across this Nation. Seafood Consumers are by far the largest stakeholder of our fisheries resources and they need protection to Domestic seafood access. Perhaps the National Marine Fisheries Service should be in the Department of Agricultural and Fisherman treated like Farmers. Thank you Captain James G. Hull Jr.
Robert Rheault	East Coast	I would like to commend NOAA on a brief and succinct policy statement that hits many of the critical elements. I would especially like to confirm a few key points that i feel are worthy of additional emphasis. NOAA can be a trusted voice that helps get the message out that aquaculture under US regulations is sustainable, and that domestic seafood (wild and cultured) has the highest quality and the lowest carbon footprint. That our seafood domestic supply is safe and well regulated. A national seafood marketing campaign would help get this message out. i would also confirm that we are challenged by several forces: 1) aquaculture science is underfunded, 2) public use conflicts are blocking development of aquaculture nationwide. 3) a lack of processing capacity hampers the use of underutilized species and cultured species like kelp 4) the disappearance of working waterfront access is blocking opportunities to grow the blue economy (including aquaculture, commercial and recreational fisheries) and in many cases is killing existing farms. NOAA needs to make substantial creative investments to address these challenges if we want the domestic seafood sector to grow. In the wake of Covid, rampant food inflation, and cuts to SNAP we are seeing consumers turn away from seafood to cheaper and less healthy food options. This will have negative impacts on our producers and our national health. Unless we see substantial investments in processing, messaging, research and waterfront access we can expect our domestic seafood sector to shrink in the years ahead.

Your name (optional)	Your state/territory (optional)	General comments/feedback
Andy Wink	no response	Below are my comments on various aspects for NOAA's Draft National Seafood Strategy Purpose NOAA can and should play a role in increasing consumption of seafood, by providing information about meal preparation and health benefits (or other means). None of the other parts matter very much if we don't have a customer base that wants seafood and knows how to prepare it. Ideally, it would be great if an emphasis could be placed on getting Americans to consume more domestic seafood. This is somewhat addressed within Goal 3, but feel like it probably should be stated as a purpose as well. I am not sure "value added" products should be a specific point of emphasis, perhaps to the detriment of "simpler" product forms. Value-added also means cost added. If more consumers could purchase fresh or (properly) frozen dressed fish, that would allow suppliers to hit a lower price point and broaden the market for seafood. Yes, they'd have to fillet their own fish, but that's great if they want to. Personally, I think filleting most fish is easier than breaking down a whole chicken. Seafood is seen as pricey, and it is, to a large degree. Also, fish is more susceptible to quality loss once filleted, than say beef/pork/chicken. so keeping it intact (for as long as possible prior to consumption) isn't a bad idea if consumers are willing to cut their own fish. This dressed fish approach also reduces packaging waste/cost. Goal 1 I am highly supportive of more adaptive management strategies. Many fisheries have quotas or similar approaches based on sampling the same areas (in the Bering Sea for instance). But climate change has driven some species to move around a lot more, so it's imperative that science/mgmt adapt to get a clear picture of stock abundance - not just stock abundance in the places they've historically inhabited. Goal 2 If funding is going to be directed towards aquaculture specifically, it only seems reasonable
Scott Hickman	Texas	Great plan but with our unbalanced heavy recreational led gulf council it won't be of any use in the Gulf of Mexico.
Tom Marvel	Florida	I whole heartily support this effort to recognize the important role the harvesters of sustainably harvested seafood fulfill. However, am I the only one who finds it ironic, at best, or hypocritical, at worst, for this measure to be on the table shortly after the Gulf Council shifted a significant amount of red grouper allocation from the public sector to the private recreational sector?
randy lauser	florida gulf of mexico	we are slowly being pushed out of business do to the unbalanced of the council how do get anything done with 1 commercail and 17 recreational it is not right at all they keep taking fish from us and giving it to the recs every meeting i go to they already have there mind made up its getting old we have no one fighting for the commercail side qouta is threw the roof and now with the gags its not right we told them what was going to happen with amendment 53 and they didnt care
Michael Miglini	no response	The proposed national seafood strategy is not going to be possible unless the Gulf of Mexico Fishery Management Council has balanced representation between commercial and recreational members. There is only one member with commercial fishing experience in the Gulf of Mexico. NOAA needs to tell the Secretary of Commerce to put more commercial reef fishing members and federally permitted 6-pack operators on the Guld Council. Many of the good changes to sustainable fishing are being undone by the imbalanced council and allocations are being taken away from seafood harvesters. The current administration is not being equitable to commercial harvesters who are the most accountable sector in the Gulf of Mexico.

SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL
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Carolyn N. Belcher, Ph.D., Chair | Trish Murphey, Vice Chair
John Carmichael, Executive Director

South Atlantic Fishery Management Council Comments
NOAA Fisheries Draft National Seafood Strategy
March 15, 2023

The South Atlantic Fishery Management Council (Council) appreciates the opportunity to comment on the NOAA Fisheries Draft National Seafood Strategy (Strategy). The Council has followed development of the Strategy through updates to the Council Coordination Committee and discussed the Strategy during its March 2023 meeting. The Council supports the vision statement and objectives and is committed to working with NOAA Fisheries to ensure a sustainable and viable US seafood sector.

Infrastructure emerged during Council discussion as a critical and necessary component to ensuring a thriving seafood economy. Without adequate infrastructure none of the strategy goals can be met. While the strategy addresses a vision to modernize infrastructure, within the South Atlantic there is an added need to preserve existing, and replace lost, infrastructure. The threats of climate change, increasing coastal populations, and waterfront development have combined in the South Atlantic to greatly reduce fishing related infrastructure. It is impossible to gain benefits to employment and communities or support thriving seafood markets and restaurants if there is no place in the community to land fish, berth, and service vessels. Access to fresh seafood is one reason so many South Atlantic locales make lists of top coastal tourist destinations, yet development to support increasing tourism often replaces the fishing industry infrastructure that is part of the appeal of these areas. Increasingly, this loss extends to the for-hire recreational industry as well as the seafood industry. In addition to working with federal agencies to modernize infrastructure as noted, the Council recommends that NOAA Fisheries use the Goals of the Strategy to promote partnerships with municipalities to support and expand infrastructure.

Many of the species managed by the Council are considered ‘data poor’ and are unassessed, and significant uncertainty buffers are applied to most assessed stocks due to gaps in data and shortcomings in our understanding of stock characteristics. Such buffers may help ensure stock sustainability in the face of uncertainty, but they pose a challenge to ensuring fishery sustainability as desired under Goal 1 and they impose a significant loss of revenue on the seafood economy in the South Atlantic. Additionally, chronic data deficiencies hinder our efforts to adapt to climate change. It is impossible to know how a stock is changing when there is inadequate baseline information on the stock historically. The Council considers increased fishery data, independent population monitoring, and stock assessment capabilities critical to improving management and maximizing opportunities and production as required to meet Goal 1.

The Council agrees that there is a significant labor shortage in the seafood industry. Barriers to new entrants are also an issue, and include more than just permit limitations. Regulations are complex, challenging, and subject to change with little warning relative to business planning timelines. Some common regulations, such as trip limits, can reduce the potential for profitability

from each trip. The lack of clear pathways to fully joining the industry in the future can deter young fishermen from entering the industry as the deckhands of today. Fishing businesses can have difficulty securing the kinds of financial support and assistance that are available to more conventional businesses. The Council recommends that NOAA Fisheries develop and support fishing industry vocational education programs directed at fishing industry participants in communities that still have a fishing influence. Additionally, the Council recommends that NOAA Fisheries develop financial infrastructure or build relationships with financial institutions to increase the financial support available to seafood businesses, including facilitating loans or grants for new fishery entrants where permit or share costs are prohibitive.

The Council strongly supports efforts in Goal 3 to increase public awareness of the value of US seafood. Markets are under constant threat from imports and consumer opinion is too easily swayed by incorrect and inappropriate information about which stocks are sustainable. The Magnuson-Stevens Act is built upon the ideals of conservation and precaution and has resulted in US fish stocks being arguably the best managed in the world. NOAA Fisheries monitors the sustainability of all managed stocks and should work to ensure that consumers have access to fair and unbiased information about stock conditions. The Council recommends developing marketing approaches that promote factual information to educate consumers about the value of fresh, wild seafood and the highly regulated industry that exists to provide seafood products. Working with existing trade groups, such as the National Restaurant Association, could greatly expand the impact of such efforts. The Council also recommends that NOAA Fisheries be proactive in addressing false and misleading information about fishing practices and stock sustainability put forth by advocacy groups.

The Council supports the Goals of the Strategy and commends NOAA Fisheries on identifying the many significant threats to the seafood economy. We appreciate the opportunity to provide these comments, and look forward to continued collaboration as actions, timelines and milestones are developed. Please feel free to contact John Carmichael, Executive Director (john.carmichael@safmc.net) if you require any additional information.

Sincerely,

Carolyn N. Belcher, PhD

Carolyn N. Belcher, Ph.D.
Council Chair

LN# 202305
cc: SAFMC members and staff

March 31, 2023

Ms. Janet Coit
Assistant Administrator
National Oceanic and Atmospheric Administration
NOAA Fisheries
1325 East-West Highway
Silver Spring, Maryland 20910

Re: Shareholders' Alliance comments on NOAA Fisheries' Draft National Seafood Strategy.

Dear Administrator Coit,

On behalf of the Gulf of Mexico Reef Fish Shareholders' Alliance (Shareholders' Alliance), please accept these comments on the NOAA Fisheries Draft National Seafood Strategy.

The Shareholders' Alliance is the largest organization of commercial grouper and snapper fishermen in the Gulf of Mexico. We work hard to ensure that our fisheries are sustainably managed so our fishing businesses can thrive and our fishing communities can exist for future generations. We are harvesters that provide the American public with a reliable source of domestically-caught wild Gulf seafood, and we do this through a philosophy that sustainable seafood and profitable fishing businesses depend on healthy fish populations.

To that end, please accept the following comments on the NOAA National Seafood Strategy.

GOAL 1: Sustain or increase sustainable U.S. wild capture production

The Shareholders' Alliance actively supports this goal. Science-based fisheries management is the keystone to sustainable wild capture production and we continue to fight to protect the Magnuson-Stevens Fishery Conservation and Management Act (MSA) and promote its core tennants of accountability, sustainability, and scientific integrity.

That being said, the biggest threat to sustaiable U.S. wild capture production in the Gulf of Mexico is the severely imbalanced Gulf of Mexico Fishery Management Council (Gulf Council). The Gulf Council has had its commercial representation steadily whittled away and replaced by provate recreational interests. The disregarding of commercial fishermen's voices continued in 2022 as the Biden Administration announced that the Mississippi seat on the Gulf Council – a seat held by Mississippi commercail fishing representatives for more than 20 years – was handed

over to a private recreational angler, further marginilizing ocmmercial fishing and conservation interests.

This has left the Gulf of Mexico's commercial fishermen with one single representative on this 17-member body who has experience in the commercial fisheries this Gulf Council manages.

One.

The Gulf of Mexico's seafood industry deserves better.

The consequences of this imbalance are very real: conservation successes are being unraveled, commercial fishing and seafood businesses are being destabilized, illegal actions are being recommended, fishing quotas are being slashed, and the public's access to wild Gulf seafood is being severely restricted. Red snapper, the remarkable stock that bounced back faster than anyone expected, are now in decline due to mismanagement of the private recreational sector and its chronic overfishing; yet the Gulf Council almost-unanimously recommended – and NOAA Fisheries is poised to implement – an increase in catch levels. Gag grouper and amberjack quotas now have to be cut by as much as 80% because their populations are so low, due in part to the high volume of recreational discards and high mortality. Red grouper were just reallocated from the commercial sector to the recreational sector despite NOAA Fisheries' own analysis concluding that this action will increase bycatch, increase management uncertainty, and increase risk of overfishing of the red grouper stock.

The United States Departent of Commerce and NOAA Fisheries should be better than this. The Biden Administration is failing the working families in the Gulf's seafood industry, who support one of the most accountable fishery management systems in the nation, and is instead favoring wealthy boat owbers who are being rewarded for consistently exceeding their science-based annual catch limits.

This is unacceptable to the Gulf's small seafood businesses and should be to NOAA Fisheries, too. NOAA should do everything in its power to encourage and support the Secretary of Commerce rebalancing the Gulf Council with commercial fishing representatives and allow this stakeholder body to start prioritizing the health of the Gulf's fish stocks once again. Otherwise, any attempts to sustain or increase sustainable U.S. wild capture production in the Gulf of Mexico will be udnermined and thwarted.

Thank you for considering our comments.

Sincerely,

Eric Brazer
Deputy Director

Gulf of Mexico Reef Fish Shareholders' Alliance
1902 Wharf Rd
Galveston, TX 77550
www.shareholdersalliance.org

North Pacific Fishery Management Council

Simon Kinneen, Chair | David Witherell, Executive Director
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Phone 907-271-2809 | www.npfmc.org

March 28, 2023

North Pacific Fishery Management Council Comments
NOAA Fisheries Draft National Seafood Strategy

To Whom It May Concern:

The North Pacific Fishery Management Council appreciates the opportunity to comment on the Draft National Seafood Strategy. We support the purpose of the National Seafood Strategy and the goals of sustainable seafood production, climate-ready fisheries and communities, market access and economic competitiveness, and a growing and diverse workforce. Our focus of these comments is on Goal #1, sustaining U.S. wild capture production.

The North Pacific Council has a successful record of science-based, sustainable fisheries management since the Magnuson-Stevens Fishery Conservation and Management Act was implemented in 1976. Each year for the past 40 years, the sustainable harvest of groundfish in the North Pacific totals 2,000,000 metric tons or greater. Harvest off Alaska currently accounts for over 60% of the total U.S. catch and is critical to ensuring food security for the nation due to both the size and the stability of the annual yield. These yields are a direct result of Council management for sustainable fisheries that provide benefits for harvesters, processors, recreational and subsistence users, and fishing communities, which (1) are maintained by healthy, productive, biodiverse, resilient marine ecosystems that support a range of services; (2) support robust populations of marine species at all trophic levels, including marine mammals and seabirds; and (3) are managed using a precautionary, transparent, and inclusive process that allows for analyses of tradeoffs, accounts for changing conditions, and mitigates threats. The North Pacific Council has a four-decade track record of demonstrating that sustainable fisheries production is possible when based on robust fisheries science and conservative fishery management policies.

Sustainable wild capture fisheries require sound science and monitoring programs, particularly in the face climate change. The North Pacific Council has invested significant time and resources, along with NOAA Fisheries, to initiate several efforts to better understand and respond to ecosystem effects in the marine environment driven by climate change. The Council reviews annual Ecosystem Status Reports that highlight trends and anomalies tailored toward supporting the Council's annual process to set groundfish harvest specifications. The Council has also initiated a multi-year effort to evaluate the vulnerability of key species and fisheries to climate change and to strengthen resilience in regional fisheries management. A recently published Climate Readiness Synthesis evaluates whether North Pacific Council management tools, stock assessments, and information onramps are able to accommodate and consider the unprecedented conditions and unique challenges presented by long-term climate change.

To maintain sustainable production in the North Pacific and improve our resilience in the face of increasing change in the ecosystem, NOAA must prioritize fisheries-independent and -dependent surveys. These surveys are the fundamental data source for groundfish stock assessments and ecosystem assessments, and are the most critical responsibility of the NOAA Alaska Fisheries Science Center to be able to meet its mission of monitoring the health and sustainability of living marine resources and their

habitat. The Council would also like to stress the importance of re-evaluating and potentially expanding survey designs as conditions and stock distributions change.

Adequate funding for fisheries management and science surveys is critical to meeting the goal of sustaining or increasing wild seafood production. Without significant increases to the base funding for NOAA Fisheries Science Centers, the scientific research possible will be insufficient for the Councils to sustain or increase fisheries production in the U.S. With reduced funding and staffing for research, the Alaska Fisheries Science Center has already had to drop critical surveys of the slope region and the Gulf of Alaska. With fish and crab moving deeper and northward due to ocean warming (e.g., pollock, Pacific cod, and snow crab), it is imperative to secure permanent funding necessary to provide comprehensive and consistent data for stock assessments and research projects, including in the northern Bering Sea, to understand and manage for the impacts of climate change. Inadequate scientific surveys result in an unnecessary reduction in sustainable yields of wild stocks. Under the Council's precautionary catch control rules, less scientific information increases the uncertainty buffers, resulting in lower annual catch limits and reduced yields. It is also critical to ensure that all necessary ecosystem scientist positions and stock assessment scientist positions at the Alaska Fisheries Science Center are filled and fully funded. Fewer assessment biologists necessitate longer intervals between assessments, which will potentially have adverse effects on the sustainability of marine resources and reduce the U.S. seafood supply.

Additional funding for the Regional Fishery Management Councils is necessary to support effective and efficient management. Costs for the Councils (including personnel, health care, meeting, and travel costs) are rising at much faster rates than the small incremental increases received for Council funding. Combined with the additional mandatory requirements the Councils must complete over time (including regular program reviews, allocation reviews, essential fish habitat reviews, etc.), the ability of the Councils to manage for optimum yields, provide effective management, and react to changes in ocean conditions is greatly reduced without sufficient funding.

Lastly, we suggest that the implementation plan for increasing seafood production under Goal #1 consider ways to reduce discards of wild fish, increase utilization, and reduce waste. This may include evaluating regulatory barriers that force discards of edible wild seafood (e.g., size limits, bag limits, retention limits), as well as development of management measures and marketing support that could encourage retention of fish that are discarded due to being a currently unmarketable species or of a size that is not profitable to retain or process. We suggest that, as part of the implementation plan, NOAA fisheries highlight these management challenges as priorities to be addressed, and work with the regional fishery management councils and the fishing industry to develop alternative management approaches and incentives to increase retention and utilization of wild seafood.

In conclusion, the North Pacific Fishery Management Council supports the Draft National Seafood Strategy and its goals. However, we suggest incorporating the changes mentioned above to ensure its success as you develop an implementation plan. Please continue to include the Councils as you finalize the strategy and develop a timeline for its implementation. We thank you for considering our comments.

Sincerely,

Simon Kinneen
Chair, NPFMC

SEAFOOD HARVESTERS
OF AMERICA

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March 16, 2023

Janet Coit
Assistant Administrator
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
1325 East-West Highway
Silver Spring, MD 20910

Re: Comments on NOAA Fisheries' Draft National Seafood Strategy

Dear Assistant Administrator Coit:

We appreciate the opportunity to comment on the National Marine Fisheries Service's ("NOAA Fisheries") *Draft National Seafood Strategy* ("Strategy"). This Strategy lays out the initial steps to ensuring the U.S. seafood industry remains resilient, sustainable, accessible, and profitable. Domestically produced seafood is among the lowest carbon footprint protein and incredibly nutritious, underscoring the importance of our industry in addressing climate change and securing our nation's food security. We applaud NOAA Fisheries for its work on this strategy and appreciate the opportunity to provide feedback.

Seafood Harvesters of America ("Harvesters") is a national commercial fishing organization with 21 member groups representing thousands of fishermen from Alaska to Hawaii to Florida to Maine. We are proud stewards and harvesters of America's seafood, our nation's strategic protein reserve and a critical component of our country's food security. We work closely with NOAA officials around the country to ensure our fisheries are accountable, sustainable, and profitable, and that domestic seafood products are accessible to American consumers.

We appreciate the high-level framework laid out in the Strategy, as well as the comments in the introduction highlighting the importance of wild capture seafood, its sustainability, and its role as a low-carbon, nutrient dense source of protein. Today, we will provide feedback and comments on parts of the strategy that we believe are particularly important. We also request additional opportunities to comment on the Strategy as NOAA Fisheries develops more detailed implementation plans.

Goal 1: Sustain or increase sustainable U.S. wild capture production
Fisheries Science: This briefly stated goal captures one of Harvesters' key priorities: support NOAA's work to expand data collection through both traditional and innovative methods. We

wholeheartedly support the importance of fisheries science to the sustainable management of our ocean. It is critical to both maintain existing longstanding federal fisheries surveys and other long-term data sets while also working to incorporate new data collection methodologies, including uncrewed systems, buoys, fishing gear sensors, etc. Additionally, in the face of increasing uses of federal waters (offshore wind energy development, offshore aquaculture, for example), NOAA should also aim to expand cooperative research efforts with fishing industry participants to maximize data collection. NOAA should prioritize core fisheries surveys and data collection efforts above all else; any expansion of data collection cannot occur at the cost of NOAA's core mission work.

Fisheries Management: We appreciate NOAA Fisheries' nod to the need to maximize fishing opportunities while ensuring the sustainability of our fisheries resources, particularly in the face of a changing climate. This will require significant work at the headquarters and Council level, including supporting more proactive and agile management informed by real-time data. We continue to hear from our membership that the time lag between data collection and surveys, and management decisions significantly hinders the industry's ability to capitalize on upswings of a fish population and hammering them on the downswing. The agency's ability to support adaptive management in the face of climate change will also require easier and more timely data sharing between regions. As marine animals react to changing ocean conditions, we not only need to be able to observe those reactions, but we also need for Fishery Science Centers around the country to be able to readily access that data regardless of their stated jursdiction. As we all know, fish don't care about arbitrary lines on a map. Improving data systems to support real-time data collection and analysis, as well as accessibility, will go a long way to achieve this goal.

Goal 2: Increase sustainable U.S. aquaculture production

We encourage NOAA Fisheries to work towards this goal in an informed and mindful way. The onshore infrastructure required to support increased aquaculture production will be significant. At a time where commercial fishing access to working waterfront infrastructure is already decreasing, we urge NOAA Fisheries to not further exacerbate this pain point for wild capture fishermen. We also encourage NOAA Fisheries, and other permitting agencies, to continue to be transparent in the siting process for any potential offshore aquaculture facilities. Again, as competition for offshore waters is increasing, we urge NOAA Fisheries to not harm the ability of the wild capture sector to harvest seafood for the American people.

Goal 3: Foster access to domestic and global markets for the U.S. seafood industry

Communication and Promotion: We appreciate NOAA Fisheries' recognition of the need to increase the public's awareness of the availability, sustainability, and nutritional value of all U.S. seafood, and we strongly support the agency's work in this specific area. There is room to increase and better use the funding available through the Saltonstall-Kennedy (SK) Grant program to support the needs of the seafood industry in marketing and promoting domestic seafood products. We also urge the agency to better promote Fishwatch.gov as an educational tool to help American consumers not just learn about different types of seafood, but to learn about the management context and the health of a particular fishery or fish stock. Because there are multiple competing eco-labels and standards that can confuse consumers, NOAA Fisheries should play an important role in serving as an unbiased, science-focused source of information for consumers.

U.S. Market Development: We have long encouraged the U.S. government to aid in keeping domestic seafood products here in the U.S. on the plates of our fellow Americans. Reducing our reliance on imported seafood not only reduces the carbon footprint of the wider seafood industry, but provides a valuable opportunity for U.S. consumers to support their local fishermen

and learn about local products. In addition to identifying and building domestic seafood markets, we encourage NOAA to examine how to reduce reliance on overseas processing capabilities. By increasing domestic processing capabilities, we will increase the seafood industry's resiliency, reduce the carbon footprint of our industry, and create job opportunities.

Goal 4: Strengthen the entire U.S. seafood sector

Seafood Infrastructure: The U.S. seafood infrastructure, including vessels, processing, working waterfronts, and others, is aging. In particular, our fishing vessels are decades old and we face significant barriers to building new vessels that are safer, more efficient, and reduce our carbon footprint. Investments to modernize our processing facilities would increase efficiency while creating opportunities for more value-add processing in the U.S. Additionally, investments to preserve working waterfront access for the seafood industry would provide stability for the industry around the country, especially as development threatens to squeeze access in many coastal communities. Prioritizing investments to upgrade and modernize our seafood industry will significantly strengthen the U.S. seafood sector against the backdrop of climate change and global dynamics.

Workforce Development: Harvesters have long supported workforce development and training for the commercial fishing industry, as well as our related support industries (welding, hydraulics, diesel mechanics, etc.). There is growing concern that fewer young people are opting to become commercial fishermen, which threatens our national food security. We encourage NOAA Fisheries to work with the National Sea Grant College to fully implement the Young Fishermen's Development Act to provide the necessary training and business planning support for those interested in the seafood industry. Additionally, rapidly changing fishery conditions have spawned an unprecedented number of fishery disasters across the country in recent years. This has highlighted the need for much faster disaster relief to fishermen and communities, as well as the need for other mitigation measures when necessary for fishing businesses and individual fishermen (e.g. SBA EIDL program or job retraining resources).

We appreciate the opportunity to provide our feedback on NOAA Fisheries' *Draft National Seafood Strategy*. We understand the agency will prepare an implementation plan that contains more specific actions, timelines, partnerships, and milestones, and we request the opportunity to review and comment on that plan when it becomes available.

We are available to answer any questions you may have or provide additional information should you require it. Thank you for your consideration of our comments and feedback.

Respectfully,

Chris Brown
President

Leigh Habegger
Executive Director

Responsible Offshore Development Alliance

March 31, 2023

NOAA Fisheries

Re: NOAA Fisheries Draft National Seafood Strategy

Submitted online via - NOAA Fisheries Draft National Seafood Strategy

The Responsible Offshore Development Alliance (RODA) and the undersigned fishing industry representatives appreciate the opportunity to submit the following comments on the NOAA Fisheries Draft National Seafood Strategy (Draft Strategy).[1] RODA is a national coalition of independent fishing businesses, associations, companies and community members committed to ensuring the compatibility of new offshore development with their businesses. RODA members operate in federal and state waters and shoreside throughout the New England, Mid-Atlantic, and Pacific coasts.

We very much applaud the intent behind the document - supporting a thriving domestic U.S. seafood economy and enhancing the resilience of the seafood sector in the face of climate change and other stressors. As noted in the Draft Strategy, the U.S seafood industry is an important contributor to our nation's economy and food security. Moreover, we provide millions of Americans access to the living marine resources of our coasts.

In February, NOAA Fisheries published the *Fisheries Economics of the United States Report, 2020* (FEUS 2020).[2] U.S. commercial fisheries supported 1.1 million jobs in 2020 and generated $154.7 Billion in sales and another $62.5 Billion in value added economic benefits.[3] These are down from 2019's 1.2 million jobs, $165 Billion in sales and $68 Billion in value-added.[4] When one considers the impacts of the COVID-19 pandemic on harvesters, processors, and other integral components of the supply chain, the slight reduction in jobs, sales and value-added speaks to the importance and resiliency of our domestic seafood industry. In short, our fishermen and women rose to the occasion and fed the nation when other food producing sectors were forced to shutter because of the pandemic.

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[1] Published on the NOAA Fisheries website on February 14, 2023. See - https://www.fisheries.noaa.gov/s3/2023-02/Natl-Seafood-Strategy-Final-Draft-Public-Comment.pdf

[2] See - https://www.fisheries.noaa.gov/resource/document/fisheries-economics-united-states-2020

[3] FEUS 2020 describes value-added as the contribution made to the gross domestic product in a region. See - FEUS 2020, page 9. Available at https://www.fisheries.noaa.gov/resource/document/fisheries-economics-united-states-2020

[4] See - https://www.fisheries.noaa.gov/resource/document/fisheries-economics-united-states-report-2019

Our domestic harvesters are also integral to the culture and fabric of many coastal communities and the foundation upon which many ports and harbors were built. The State of Rhode Island named calamari the state appetizer in 2014[5]. The author of The Rise and Fall of Commercial Fishing in Morro Bay says it best, "Not only is the fishing industry of Morro Bay a powerful link to the past, but it is also an integral part of the city's identity and provides a great sense of pride for its local residents."[6] We suggest this sentiment is felt in many ports and harbors across the U.S. The allure of the fishing heritage in ports and harbors across the U.S. continues to be a draw for tourists to those areas to watch local fishermen ply their trade and to sample their catch in restaurants on the waterfront.

In May of last year, the Administration set a goal of ending hunger and increasing healthy eating and physical activity in the U.S. by 2030.[7] It is beyond dispute that wild capture seafood is a healthy dietary component. The United States Food and Drug Administration (US FDA) has repeatedly touted the health benefits of including seafood in your diet(s). Positively Groundfish recently published a nutrition and health benefits fact sheet outlining species-specific nutrient information.[8] America's seafood consumers are rightly concerned about where their seafood comes from. When choosing to purchase domestically sourced wild capture seafood, those consumers can rest assured the product was harvested under strict management frameworks implemented in accordance with the Magnuson-Stevens Fishery Conservation and Management Act (MSA).[9] In addition to being sustainably sourced by gear types that minimize impacts to protected and bycatch species, our wild capture harvesters provide this protein source with less of an impact on climate than imported seafood and most domestic terrestrial-based protein sources. In 2018, Dr. Ray Hilborn co-authored a study entitled "The environmental cost of animal source foods."[10] This study found that a diet that included seafood, in particular wild-capture seafood, would result in less environmental costs compared to diets rich in other animal source foods. Similarly, a 2021 study quantified the climate forcing (potential impacts on climate drivers) per unit of fish protein associated with several U.S. tuna fishing fleets, among the most important capture fisheries by both volume and value. That study found that skipjack

[5] See - https://www.providencejournal.com/story/news/politics/county/2014/06/21/20140620-calamari-as-official-appetizer-gets-ri-assembly-approval-ece/35345757007/

[6] See - http://historicalmorrobay.org/wp-content/uploads/2019/06/Hidden-History-Final-Project-Copy-1.pdf. Last accessed March 14, 2023.

[7] See - https://www.whitehouse.gov/briefing-room/statements-releases/2022/05/04/white-house-announces-conference-on-hunger-nutrition-and-health-in-september/

[8] See - https://www.positivelygroundfish.org/nutrition

[9] 16 U.S.C. §§ 1801 et seq

[10] Hilborn, R., Banobi, J., Hall, S. J., Pucylowski, T., and Walsworth, T. E. (2018). The environmental cost of animal source foods. Front. Ecol. Environ. 16, 329–335. doi: 10.1002/fee.1822

tuna caught by purse seine, results in lower climate forcing than all other sources of proteins examined with the exception of plants.[11]

Above, we briefly mentioned our role in providing the vast majority of Americans access to the living marine resources off our coasts. While some of us have the ability to go out on the ocean to catch our own fish; most do not. Concerns about environmental and social justice are inexorably linked to food consumption. The U.S. has strong labeling requirements. "Women that are pregnant or trying to become pregnant need to monitor the kinds of fish they eat due to higher mercury concentrations in some species of fish. A mislabeled fish could unexpectedly raise mercury levels in the body and create problems for an unborn baby. Though uncommon, if a fish has a drastically different nutritional profile than its label would indicate, some people, particularly women, could be at risk as mercury in fish can cause birth defects. Pregnant women are advised to avoid certain species of high-mercury fish during pregnancy. If a high-mercury fish was passed off as a low-mercury fish, a mother and unborn child could be at risk."[12] Americans worried about the nutritional value of the seafood they consume, can rest assured that our labeling requirements address those concerns.

We provide the above to reiterate the importance of the seafood industry to the United States and highlight that it is one worth supporting, promoting, expanding and protecting. We are concerned that neither of those are likely given the unprecedented challenges facing industry, as outlined in the Draft Strategy.

- Climate change

  We agree that changing ocean conditions are impacting stock distribution(s) and accessibility for harvesters. As stocks shift, infrastructure will be needed to support fisheries in those new areas. For example, on the west coast, market squid (*loligo opalescens*) is available in new areas. In recent years, harvestable quantities have gathered off the Oregon coast. The local fishermen have been able to harvest the resource because suitable infrastructure exists in the local ports and harbors.

- Coronavirus pandemic

  As noted above, U.S. fishermen and women navigated the pandemic admirably.

[11] McKuin, B, Watson, JT, Stohs, S, Campbell, JE. 2021. Rethinking sustainability in seafood: Synergies and trade-offs between fisheries and climate change. Elementa: Science of the Anthropocene 9(1). DOI: https://online.ucpress.edu/elementa/article/9/1/00081/116726/Rethinking-sustainability-in-seafoodSynergies-and

[12] University of Washington Sustainable Fisheries blog post entitled, *Social & Environmental Justice in Seafood*. Available at https://sustainablefisheries-uw.org/seafood-101/social-environmental-justice-in-seafood/. See also Relationships between seafood consumption during pregnancy and childhood and neurocognitive development: Two systematic reviews Joseph R. Hibbeln, Philip Spiller, J. Thomas Brenna, J.J. Strain et al October 11,2019 DOI:https://doi.org/10.1016/j.plefa.2019.10.002

Developing new and creative ways to get seafood from the vessel to an eager public by off-the-boat sales, home delivery services, etc. The fishing industry is still feeling the impacts of the pandemic - especially by those fisheries which are dependent on shipping. Container availability and logistics remain problematic.

- New technologies

  As a member of the Pacific Fishery Management Council recently said, "Offshore wind is the biggest threat to the fishing industry that I have seen in my lifetime." The Draft Strategy is incorrect when it suggests that offshore wind will "potentially result in conflicts." Offshore wind, and other potential new ocean uses, **will result in conflicts for the U.S. fishing industry.** The process being utilized by the Bureau of Ocean Energy Management (BOEM) all but assures that. We acknowledge and appreciate the work being done by NOAA's National Centers for Coastal Ocean Science (NCCOS) in developing a spatial suitability modeling tool that can help in identifying areas on the outer continental shelf suitable for offshore renewable energy developments. In determining suitable sea space, those areas which are important to our commercial, recreational, tribal and subsistence fisheries should be deemed unsuitable.

  Not only will these technologies create conflicts, they will significantly impact our fisheries. While some of these impacts are identifiable (loss of fishing grounds, reduced harvest guidelines, etc) others are reasonably foreseeable; but the magnitude is unknown. For example, how will upwelling, nutrient transfer, larval transport and other ecosystem functions be impacted? Changing migratory patterns of whales and other protected species may have profound impacts on the west coast dungeness crab fishery and other fixed gear fisheries. NOAA Fisheries, as a science provider, is integral to our operations. It is disappointing that NOAA Fisheries is not pushing back on the rush to industrialize our oceans with unproven technology with unknown impacts.

- Labor shortages and infrastructure

  The Greying of the Fleet is a significant issue and the lack of the next generation of fishermen and women should be a concern to all Americans. One strategy to address this is messaging the importance of our profession to the public. Far too often, our fisheries and the men and women who operate in this profession, are vilified in public. Whether it be whale entanglements, overfished status of a stock, etc - those become newsworthy events that some groups highlight in their fundraising efforts. Particularly with regard to overfished stocks, fishing might have had no role in the stock status change. For example, Pacific sardine was declared overfished in June of 2019, nearly 4 years after the directed fishery closed.

  We touched on infrastructure needs above. In addition to ensuring ports and harbors are

equipped to support fisheries new to an area, the dilapidated condition of existing infrastructure is a concern.

Missing from the Draft Strategy is any mention of policy initiatives that have the potential to greatly curtail our ability to access living marine resources. Section 216 of Executive Order 14008[13] established a goal of conserving at least 30% of our lands and waters by 2030. In October of 2020, the Governor of California executed Executive Order N-82-20 which established "the goal of the State to conserve at least 30 percent of California's land and coastal waters by 2030."[14] Neither of these executive actions define "conserve". We expect similar actions to be proposed and/or initiated in other coastal states. Similarly, earlier this month the United Nations announced it had reached agreement on an international legally binding instrument[15] under the United Nations Convention on the Law of the Sea on the conservation and sustainable use of marine biological diversity of areas beyond national jurisdiction.[16] U.S. based fisheries which operate on the high seas are rightly concerned about implementation of the agreement. While we understand and appreciate the need to conserve biodiversity, it must be understood that U.S. fisheries are managed towards that goal. Any definition of conservation that fails to acknowledge the important social and economic contributions of our fisheries and fails to identify specific threats to biodiversity from our operations should be avoided.

Many RODA members will be submitting comments specific to their fisheries or concerns. We defer to their sector-specific expertise and individual experiences.

GOAL 1: Sustain or increase sustainable U.S. wild capture production

We very much support and applaud this goal. For the reasons highlighted above, the U.S. wild capture seafood industry is one worth protecting, supporting, and expanding. Unfortunately, the challenges identified in the Draft Strategy and addressed above represent significant barriers to the attainment of this goal.

We are at the precipice of industrializing the ocean with technologies whose impacts on the marine environment, ecosystem, and marine species remain largely unknown. To RODA and our

[13] 86 Fed. Reg. 7627 (February 1, 2021)

[14] See - https://www.gov.ca.gov/wp-content/uploads/2020/10/10.07.2020-EO-N-82-20-.pdf

[15] See - https://www.un.org/bbnj/sites/www.un.org.bbnj/files/draft_agreement_advanced_unedited_for_posting_v1.pdf

[16] See - https://www.un.org/sg/en/content/sg/statement/2023-03-04/statement-attributable-the-spokesperson-for-the-secretary-general-intl-legally-binding-instrument-under-the-un-convention-the-law-of-the-sea?_gl=1*8sc79t*_ga*NDIyMjY0MTcyLjE2NzYxNzAyODE.*_ga_TK9BQL5X7Z*MTY3ODA3MjkyMS43LjAuMTY3ODA3MjkyMS4wLjAuMA..

members, this is unacceptable. More science is coming out highlighting the need for a precautionary approach to offshore developments.[17] In May of last year, a NOAA Scientist submitted a letter to BOEM raising concerns about potential "population-level effects on an already endangered and stressed species."[18] If a fishery participant was to propose a new method of harvest, not only does the proponent have to show it will operate as intended; but also will not have unacceptable impacts on protected species, bycatch species, habitats, and the marine ecosystem. We must hold other new ocean uses to the same standards. On the west coast, we rushed to build dams in support of hydroelectric power to answer energy goals. Now we are seeing the impacts of dams on our iconic salmon runs and the peoples dependent on salmon for their livelihoods, recreational opportunities, cultures, and ceremonial purposes. It is almost certain that California and Oregon commercial and recreational salmon fisheries will be greatly curtailed, if not fully closed, this year due to declining Klamath and Sacramento River runs. It is beyond dispute that failed water policies have exacerbated the drought and its impacts on those salmon runs. Later this year, we are likely to see the beginning of dam removal on the Klamath River. There is increasing talk of additional dam removals to assist in the recovery of anadromous fish stocks and restoration or important habitats.

Fisheries science is key to our operations and a necessity to support Goal 1. New ocean uses have to be sited and designed to avoid impacts to NOAA's marine surveys. These surveys, and resulting long-running datasets, are integral to our understanding of the marine environment (including impacts of climate change) and the foundation for stock assessments which are the cornerstones of our fisheries management processes. Disruptions to those surveys, or long-running datasets, result in less certainty for stock assessments and other tools utilized in setting harvest guidelines for our fisheries. The MSA establishes a management framework for U.S. fisheries based on the precautionary principle. As uncertainty in stock assessments increases, harvest guidelines are reduced to account for that uncertainty.

GOAL 2: Increase sustainable U.S. aquaculture production

We look forward to public facing efforts intended to develop and identify gaps in aquaculture science so it can be implemented and deployed in a manner that considers and avoids impacts on marine life, protected resources, essential fish habitat, and marine ecosystems and mitigates for those impacts which are unavoidable.

GOAL 3: Foster access to domestic and global markets for the U.S. seafood industry

Our reliance on imported seafood comes with a climate cost. We are fully supportive of any and

[17] A recent example is a study released in late 2022 which caution that offshore wind farms change marine ecosystems. https://phys.org/news/2022-11-offshore-farms-marine-ecosystems.html

[18] See May 13, 2022 letter from NOAAs' Chief of Protected Species to BOEM's Lead Biologist - https://newbedfordlight.org/wp-content/uploads/2022/11/UR1-2023-000009_10_17_2022.pdf

all efforts which level the playing field for the U.S. seafood industry, including the recent agreement reached at the United Nations addressing areas beyond national jurisdiction. There is a very real fear that vessels flagged under certain nations will disregard any Marine Protected Areas established on the high seas, which in turn will impact U.S. fisheries.

GOAL 4: Strengthen the entire U.S. seafood sector

While the pandemic surely highlighted systemic challenges to industry; as noted above, it also highlighted its resiliency, creativity, and ingenuity. The Draft Strategy specifically mentions seafood infrastructure. There are significant concerns about that infrastructure in the face of new ocean uses that will need space in our ports and harbors. A holistic approach to planning for these new uses, both at sea and on land, needs to be prioritized.

Concluding remarks

RODA's members provide an invaluable service to residents of the U.S. and the world. A thriving and expanding domestic seafood economy, resilient to climate change and other stressors, should be a top priority for this administration and all that follow. We must reduce our reliance on seafood products harvested by nations with lower conservation and management standards for their fisheries and a higher climate cost to get that seafood to the plates of America's seafood consumers. As they Draft Strategy highlights:

- Seafood is good for people;
- Seafood is good for the economy; and
- Seafood is good for the planet

Actions which could negatively impact the ability of U.S. fishermen and women to provide seafood for our people, the economy, and for the planet, should be closely scrutinized. We very much appreciate the opportunity to comment on this important document. RODA and its members are looking forward to working with NOAA Fisheries as it implements its National Seafood Strategy.

Thank you for your consideration of these comments.

Sincerely,

Mike Conroy, West Coast Director

Lane Johnston, Programs Manager
Responsible Offshore Development Alliance

See below for additional signatories.

Alan Alward
Co-Chair
Alliance of Communities for Sustainable Fisheries
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Angela Sanfilippo
Executive Director
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ASSOCIATION of FISH & WILDLIFE AGENCIES

The voice of fish and wildlife agencies

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March 16, 2023

Ms. Janet Coit
Assistant Administrator
National Marine Fisheries Service (NOAA Fisheries)
National Oceanic & Atmospheric Administration
1315 East West Highway
Silver Spring, MD 20910

Re: National Saltwater Recreational Fisheries Policy

Dear Administrator Coit,

The Association of Fish and Wildlife Agencies ("Association") is the professional organization that represents the collective voice of the state fish and wildlife agencies, including the U.S. Virgin Islands and the District of Columbia ("state agencies"). These agencies exercise primary statutory authority for management of fish and wildlife as public trust resources within their borders and engage substantially in the conservation of marine wildlife and habitats in partnership with the National Oceanic & Atmospheric Administration ("NOAA"). We appreciate the opportunity to provide NOAA with the following comments on NOAA's National Seafood Strategy Draft.

Though the Association represents the collective voice of the 50 state fish and wildlife agencies and includes Canadian provincial and territorial agencies in its membership, NOAA may receive comment letters from individual member states. These are vital and important sources of input for NOAA to consider as it proceeds with development of this strategy. This letter does not supersede or alter the views or input of any state and should not be viewed as representing the perspective of any individual state, province, or territory.

We thank you for the opportunity to share our perspectives on the draft National Seafood Strategy ("Strategy") as it relates to the conservation of coastal and marine resources and connected ecosystems. If you have any questions about these comments, please contact Kurt Thiede at kthiede@fishwildlife.org or (202) 838-3468.

Sincerely,

Curtis E Melcher

Curt Melcher
President

Association Comments on NOAA National Seafood Strategy

Consultation with State Fish and Wildlife Agencies

The Association supports a National Seafood Strategy that promotes collaboration between state and federal agencies and industry, and that recognizes the distinct jurisdictions and authorities of the agencies. As states exercise primary authority to manage coastal resources and are responsible for the biosecurity of fish and wildlife species that rely on interconnected ecosystems, it is vital that state agencies are meaningfully consulted during the earliest possible stage of any action related to implementation of the Strategy. It is likewise important that the Strategy remain appropriately broad to give regional administrators and Fisheries Management Councils maximum flexibility in working with states and Marine Fisheries Commissions to implement the Strategy according to geographic-specific needs and considerations.

The Association strongly recommends that explicit direction to consult with state agencies be included in the Strategy. We appreciate NOAA's commitment to partnering with "…state and other federal agencies… Tribes, non-government organizations…and other stakeholders" to implement the Strategy. However, it is necessary to recognize that the rights, roles, and authorities of states and tribes call for a higher degree of collaboration than the weight and consideration given to the perspectives of non-managing partners. We encourage NOAA to apply a high standard for government-to-government consultation that occurs prior to, and separate from, solicitation for comment from general stakeholders.

Involving the states early and often is necessary for ensuring the agencies' public trust responsibilities are fulfilled and to facilitate the best available science to inform aquaculture efforts. Science support and data are vital to improving management of coastal resources, and the Association supports a Strategy that accounts for the effects of a changing climate and facilitates increased focus on climate adaptation. Developing resilient, climate-smart policies requires coordination and collaboration across all regions and partnerships and should therefore be supported in the national Strategy. It is crucial to provide resource managers with the necessary data to respond to shifting habitats and the effects of increasingly frequent storms and dynamic weather events across ecosystems.

Support monitoring and enforcement of state managed fisheries

State managed fisheries are a significant source of seafood for the nation, but tend to be under-resourced from a monitoring and enforcement standpoint. Both monitoring and enforcement become increasingly complex as climate change impacts the ranges of species targeted, as well as those non-targeted species managers may be attempting to exclude in fisheries harvests. Continued funding for cooperative agreements such as those for Dungeness crab and pink shrimp is essential. Additionally, there is a lot of great work being done in federal fisheries to plan for climate change and adopt an ecosystem-based management approach. We suggest that the

Strategy should support training and workforce development that enhances states' capacity and expertise to make state fisheries more climate resilient.

Invest in the future of the fishery by supporting young commercial fishermen

Commercial fisheries are a valuable part of the U.S. Blue Economy. Our fishing industry helps ensure food security, provides jobs, and supports the well-being of coastal communities. But today many U.S. commercial fishermen are on the cusp of retirement. This "graying of the fleet" poses concerns for industry resilience and national food security if there are not enough young fishermen willing and able to take their place.[1] Reduced opportunity and increasing costs associated with boats, equipment, and fishing infrastructure have made it hard for new fishermen to get into the industry. We encourage a strategy that supports apprenticeship programs for new fishermen and grant programs to help them purchase equipment, whether they are starting up, shifting practices to adjust to new management regimes, or investing in equipment with a lower carbon footprint.

Elevate voices of historically under-represented communities

As the seafood sector modernizes, we encourage state and federal partners to consider ways to highlight historically under-represented communities. As fleets become increasingly diverse, it is even more important that advisory committees, industry forums, and other groups reflect that diversity. We encourage NOAA to consider ways to highlight and increase the diversity in the seafood sector as it develops the Strategy.

Sustainability

One element of the vision for the National Seafood Strategy is that "US seafood continues to be produced sustainably." It is important to note that sustainability is dependent on adequate funding for stock assessments. In addition to funding, additional consideration should be given to the development of offshore wind and the disruption of long running systematic surveys if/when offshore floating wind platforms conflict with those survey areas. The Association recommends that the Strategy highlight the need for the increased funding and scientific expertise needed to adapt policies and management with additional ocean uses.

Support local seafood supply chain by marketing sustainable seafood

We also encourage NOAA to develop a strategy that can support state certification of sustainability standards, as some states have begun exploring certification as a tool to boost marketing efforts and establish a framework for best management practices where there may be gaps in regulation. While price is an important factor for consumers when purchasing seafood, local consumers are willing to pay a premium for local seafood because of the high quality and sustainability of the product. We recommend supporting location-based branding for regional

[1] Building the Next Generation of U.S. Commercial Fishermen | NOAA Fisheries

seafood to help increase visibility in local markets, strengthen local supply chains, and promote sustainable fisheries.

Infrastructure to support direct sales and small businesses

We encourage NOAA to support infrastructure to support small-scale processing, direct sales, and dockside sales in coastal communities to help reduce overhead to small businesses and increase accessibility to fresh local seafood. Such infrastructure may include filet stations in marinas, commercial kitchens, or processing space to support growth of direct sales.

In closing, the Association appreciates the opportunity to comment on NOAA's Draft National Seafood Strategy and thanks NOAA for its consideration. We stand ready to assist the development of a national Strategy that fully respects the distinct roles and authorities of state and federal agencies, empowers actions based on the best available science, enables resource managers to better serve the public and ensure resilient habitats for healthy, abundant populations, and supports America's seafood industry.

Alaska Longline
FISHERMEN'S ASSOCIATION
Post Office Box 1229 / Sitka, Alaska 99835 /907.747.3400 / alfastaff@gmail.com

March 29, 2023

To: Ms. Janet Coit
Assistant Administrator, National Marine Fisheries Service
1314 East-West Highway
Silver Spring, MD 20910

Submitted electronically

Comments on NOAA's National Seafood Strategy

Dear Assistant Administrator Coit,

I am submitting these comments on NOAA's National Seafood Strategy. Thank you for taking a strategic look at the country's seafood industry and inviting comment from tribes, stakeholders, and the broader public. We deeply appreciate the work you and your agency are doing to maintain sustainable fisheries in the face of increasing challenges.

The Alaska Longline Fishermen's Association (ALFA) is an organization of independent small-scale fishermen who promote sustainable fisheries and thriving fishing communities through research, policy, and education. We are deeply committed to ocean health and the sustained access of community-based fishermen to local fisheries. Our work is guided by a firm commitment to triple bottom line solutions that maintain or restore social, ecological, and economic health.

Climate Action

Our oceans are under siege from climate change, marine plastics, industrial pollution, and ocean acidification. Likewise, our fishing communities are struggling to withstand the impacts of shifting stocks, rising operational costs, and the impacts of industrial fisheries. NOAA must play an active role in navigating the seafood industry through these troubled waters while also working at every level to address the challenges. NOAA cannot be passive as fisheries collapse, nor can the agency be solely reactive to *de facto* dislocations or reallocations associated with climate change or bycatch. As the highest priority in the seafood strategy, NOAA should commit to aggressive climate action through national policy initiatives, decarbonization investments, and nature-based climate solutions that maintain or enhance fish habitat while also building resilience into local fisheries and fishery dependent communities. NOAA can and should play a lead role in advocating for meaningful climate action while also championing fishermen friendly climate solutions. Climate action that also promotes healthy fisheries is a win for the nation's food security, workforce, and economy.

Fishing Community Partnerships

In general, ALFA supports the broad strokes of this seafood strategy. NOAA's stated purpose is well-aligned with our own mission. Clearly NOAA plays a critical role in assessing fish stocks,

monitoring fisheries, and enforcing fishing regulations, all of which will only become more important with climate change and ocean warming. Without reducing that importance, ALFA sees room for improvement and growth within NOAA through deepened commitment to the Nation's fisheries and fishermen—in particular, to the small-scale fishermen who are the backbone of the industry and the socioeconomic cornerstone of regional economies. As NOAA moves forward with creating a seafood strategy for the times, we urge you to center small-scale fisheries and fishing communities in that process. NOAA's seafood strategy should include genuine partnerships with the fishing organizations that are working hard every day to sustain ocean health, maintain productive fisheries and provide high quality protein to our nation. Working with community partners across the country will allow NOAA to co-design strategies that are keyed to different fisheries, scaled to meet local needs, and appropriate to each region. We are eager to work with NOAA to design these strategies.

Fishery Access

The rising cost of fishery access means small scale fishermen are struggling to remain viable participants in local fisheries. Fishery trusts and community permit banks have worked to anchor access in fishery dependent communities while also preventing overfishing. Providing capital and low interest loans to fishery trusts and permit banks will support access for young fishermen, fishermen of color, and others who are currently struggling to access permit and quota systems.

Enhanced attention and investment are also needed in our nation's working waterfront infrastructure and human resources. Coastal development that does not support the harvest of seafood reduces our country's food security. Many seaports have aging infrastructure and rising competition for waterfront property. Concerted investment is needed to reclaim waterfront access and build forward facing services that propel the industry toward decarbonization, value added seafood processing, and efficient/affordable services. ALFA members are eager to reduce our fleet's carbon footprint, but we need resources that support energy transition, including demonstration projects, alternative fuel delivery systems, and local businesses with the skills and capacity to perform the work. Prioritizing this investment as part of the seafood strategy will ensure our industry contributes to climate solutions, our domestic fisheries are at the forefront, and our coastal economies survive and thrive.

Finally, NOAA needs to change course on industrial fisheries and bycatch management. Federal systems currently prioritize bycatch over historic directed harvesters, allowing a *de facto* reallocation of valuable fish stocks to high bycatch users. This prioritization is destroying the cultural, social, and economic health of fishery dependent communities around the Nation and will, ultimately, bankrupt fisheries. Changing course will require substantially improved socioeconomic data collection, a rebalancing of National Standards, and a deeper commitment to social equity, environmental justice, and regional food security. We urge NOAA to incorporate these changes into the evolving seafood strategy.

Aquaculture

ALFA has a long-standing mistrust of finfish aquaculture born of extensive data documenting the impacts on wild capture fish and fisheries. ALFA opposes federal investment in aquaculture that competes or disadvantages an existing wild capture fishery. Any national aquaculture policy must allow individual states to opt out of aquaculture, and prior to require an assessment of potential impacts to adjoining states from aquaculture development prior to permitting. We recognize the potential benefits of mariculture and strongly recommend finfish aquaculture and mariculture be differentiated in national policy development.

In closing, ALFA appreciates the NOAA's decision to evaluate the nation's seafood strategy and to solicit comment from tribes, stakeholders, and the public. We urge NOAA to center fishing communities and small-scale fishermen in an ongoing process to develop that strategy, and to foster meaningful partnerships to inform forward facing policy development. Climate change demands an active response from NOAA, and a response that builds resilience into our fisheries and fishing communities. We urge NOAA to maintain its active role in the science of fisheries management while building a stronger presence in advocating for healthy fisheries and thriving fishing communities, fishermen friendly climate action, and meaningful investment in fisheries access and working waterfronts. Finally, we oppose federal investment in finfish aquaculture that competes with or negatively impacts wild capture fisheries and urge national policy that avoids these downstream effects.

We look forward to working with NOAA to advance a seafood strategy that meets the challenges of our times.

Sincerely,

Linda Behnken

Linda Behnken
(Executive Director, ALFA)

March 31, 2023

Re: AWTA Comments on *NOAA's National Seafood Strategy*

Dear Assistant Administrator Coit:

Thank you for recognizing the vital importance of a strong seafood industry to the United States and our coastal fishing communities. As commercial fishermen, and residents of Kodiak, Alaska we appreciate this opportunity to comment on *NOAA's National Seafood Strategy* (Strategy). Members of Alaska Whitefish Trawlers Association live and work in Kodiak and have a vested interest in maintaining and growing our industry, as well as Kodiak's working waterfront. Kodiak is a major commercial fishing port at a national level, ranking 3rd in Nation for pounds landed, but is also a small and remote Alaskan coastal community with limited population and resources. We appreciate this opportunity to provide input into a national strategy that will support our industry, and serve as a framework to further strategic partnerships between federal agencies to better provide what we need to be successful. The framework outlined in the Strategy provides a helpful structure to think about what is necessary to maintain and grow our seafood industry.

Alaska Whitefish Trawlers Association (AWTA) is a Kodiak-based trade association representing about half of the independently-owned trawlers operating in the Gulf of Alaska. Most AWTA vessels are on the small ender of trawlers, averaging 76 feet, and most of our owners, skippers and crew living in Kodiak year-round. Trawl is a high-volume fishery, and the groundfish landed by AWTA members is generally minimally processed in Kodiak, and then sent overseas for additional value-added processing. The finished products are then often imported back into the U.S. and sold to U.S. consumers.

First, we appreciate NOAA's emphasis on the importance of supporting a thriving domestic U.S. seafood economy, and on enhancing resilience in both the seafood sector and in our coastal fishing communities. AWTA recognizes that bringing value-added processing back to the U.S. will increase our food security, and allow that value to stay in the U.S. rather than being reaped by operations in other countries. Keeping seafood harvesting and production local reduces the need for complex shipping, and could allow our harvesting and processing operations to respond more quickly to unexpected circumstances (e.g., COVID, or the conflict in Ukraine). Finally, fisheries in the North Pacific have long been recognized as some of the most sustainable fisheries in the world. At that same time our location on the globe has put us at the leading edge for climate change impacts, which includes impacts on our fisheries stocks (hurting some and helping others).

Impacts from climate change are felt throughout Alaska and in our fisheries, however, this does not negate our strong and sustainable fisheries management system. We believe that the effectiveness of our science and management system served to mitigate even worse negative impacts resulting from changes in our fisheries. We greatly appreciate the introductory comments in the Strategy document highlighting that wild seafood in the U.S. is responsibly harvested, and

one of the best sources of essential nutrients. The Alaska Seafood Marketing Institute has worked hard on Alaska's wild and sustainable seafood brand, and their market research shows how that characteristic distinguishes us from many foreign competitors. AWTA encourages NOAA to highlight to the American public that U.S. seafood is healthy and sustainable, and that we should all support our domestic seafood industry by choosing U.S. seafood over competitors.

The following comments are organized by goal as listed in the Strategy.

Goal 1: Sustain or increase sustainable U.S. wild capture production

Fisheries Science. Our Alaskan fisheries rely on good science, particularly the core fishery surveys that underpin stock assessments and our science-based management system. Ideally these surveys should be conducted at least annually because survey gap years can mask pivotal changes in fish stock conditions. For example, in the Gulf of Alaska Pacific cod surveys generally occur every other year, and the lack of survey in the off-year led to shocking results in 2018 when the cod Total Allowable Catch (TAC) was reduced by 80%. Granted, an annual survey would probably not have averted the cod crash, but it would have provided more notice to managers, industry and communities and allowed them to better prepare for the ensuing losses. AWTA encourages NOAA to consider what is considered "core" and whether core surveys need to be increased, including Northern Bering Sea and Gulf of Alaska surveys. AWTA also support expanding fisheries science and research to better understand impacts of rapidly changing ecosystem dynamics, however, we strongly believe expansion of other fisheries science cannot come at the cost of core fisheries surveys.

Fisheries Management. AWTA strongly supports maximizing fishing opportunities while ensuring the sustainability of fisheries through efficient and effective management, and supporting the commercial fishing industry and fishing communities to adapt and thrive in the face of a changing ocean economy. As noted above we live on Kodiak Island, which means we rely on marine transportation and marine shipping every day, and we rely on commercial fishing businesses to support our families. The last several years have driven home the importance of being able to quickly adapt and pivot in the face of extreme and rapid changes, over which we had no control, including supply chains, domestic and international markets, and ocean conditions. We need effective fisheries management that can respond quickly to changes, allowing maximum sustainable harvest today while continuing to ensure fisheries for tomorrow, in order to allow our fishing businesses and coastal fishing communities to thrive.

Goal 3: Foster access to domestic and global markets for the U.S. seafood industry

Communication and Promotion. As noted above we believe there is tremendous opportunity to sing the praises of U.S. seafood, both domestically and internationally. Unfortunately, there are still too many instances of negative comments about U.S. fisheries and fisheries management in the media and social media. As a neutral party without a vested interest in any particularly gear-type or fishing business NOAA is in a unique position to keep telling the story of sustainable and nutritious U.S. seafood. The truth is that if domestic seafood consumers don't buy U.S. seafood, then they are going to buy products from somewhere else that are probably much less sustainable.

U.S. Market Development. U.S. consumers eat far less seafood than is recommended by the USDA, this means there is a huge market opportunity for domestic consumption. There is also a huge opportunity to grow consumer awareness about U.S. seafood. For example, many people are familiar with the following national campaigns: "Got Milk?," "The Incredible Edible Egg," "Beef-It's What's For Dinner," but would be hard-pressed to come up with similar catchy slogans related to U.S. seafood. Fortunately, we have a mechanism to help marketing and promotions through the Saltonstall-Kennedy (SK) grant program, which was created for marketing and promotion of U.S. seafood. The SK program currently uses a small fraction (3% in the current fiscal year) of funds available for seafood marketing grants, and we hope the program can receive higher allocations in the future to help fund national awareness and promotion campaigns.

Fair Trade. Most of groundfish harvested by AWTA members enters international trade, and competes in global markets, and we appreciate the recognition and attention to seafood fair trade issues in the Strategy. We recommend that NOAA find a way to partner with the U.S. Trade Office (USTR), which does not have staff dedicated to seafood (which it does for textiles and agricultural products). I was part of the United Fishermen of Alaska group that met with U.S. Trade Ambassador Tai in June 2022, and was impressed with her genuine interest in Alaska seafood, and believe her office would benefit greatly from subject matter experts from NOAA who could help support trade issues related to U.S. seafood.

At a high level the U.S. seafood industry often lacks policy recognition and support that is often afforded to agriculture and facilitated by the USDA. This is felt in trade where tariff barriers in key export markets continue to grow, including China and Japan where Phase One agreements should have increased purchases and opened markets, and while the U.S. continues to allow duty-free import of Russian-harvested pollock and crab (often processed in China). We encourage partnerships between NOAA and the USTR as appropriate to address these disconnects.

Goal 4: Strengthen the entire U.S. seafood sector

Seafood Infrastructure. We greatly appreciate the focus on modernizing the seafood industry infrastructure, including fleets and processing plants. Most AWTA vessels are over 30 years old, and U.S. Coast Guard regulations often make it cost-prohibitive to replace these vessels. Other countries support vessel modernization, for example through government subsidies or grants thereby increasing safety and efficiency of the fleet. Over time the cost to build a new commercial fishing vessel has increased substantially due to new U.S. Coast Guard regulations, placing new vessels out of reach for many fishing operations. We urge NOAA to explore ways to support upgrading the fishing fleet, either through new builds or renovation, as part of the Strategy.

Kodiak's shore-based processing plants are also old, including the external building structure, the dock structures, and the processing equipment inside. Modernizing our processing facilities would increase efficiency, and create opportunities to bring value-added processing back to the U.S. Investing in our own seafood industry would greatly benefit our coastal communities and working waterfronts. Improving our capacity to process seafood in the U.S. would increase local and

national food security and eliminate our reliance on international supply chains. Increasing processing in Kodiak would leverage its unique position as probably the only location to run processing operations on 99% renewable energy, thanks to Kodiak Electric Association's investments in hydroelectric and wind power.

Workforce Development. AWTA members are experiencing more challenges with finding crew members, both because less young people want to become commercial fishermen and because many potential crew members lack the necessary skills and training to safely work on a fishing boat. Other countries have fisheries schools that could provide a model for workforce development in our industry, including BIM National Fisheries College in Greencastle, Ireland. We support workforce development and training for future fishmen, as well as for the shore-based trades necessary to keep our fleets operational, including refrigeration, welding, hydraulics, etc.

We understand that NOAA Fisheries will prepare a more detailed implementation plan with specific actions, timelines, partnerships, and milestones, and we would like an opportunity to review and comment on that plan when it becomes available.

Sincerely,

Rebecca Skinner, Executive Director
Alaska Whitefish Trawlers Association

Enclosure
December 2, 2022 Comments on Senator Murkowski's Working Waterfronts Plan

December 2, 2022

Senator Murkowski
522 Hart Senate Office Building
Washington, DC 20510
Fax: (202)-224-5301

Via: Working_Waterfronts@Murkowski.Senate.Gov

Re: Comments on Working Waterfronts Framework

Dear Senator Murkowski:

Thank you for recognizing the vital importance of healthy working waterfronts, particularly in coastal communities such as Kodiak, and we appreciate this opportunity to comment on your Working Waterfronts Framework. Members of Alaska Whitefish Trawlers Association live and work in Kodiak and have a vested interest in maintaining and growing working waterfronts in our community. While Kodiak is a major commercial fishing port at a national level, it is still a small and remote coastal community with limited population and resources to self-fund major waterfront infrastructure and improvements. Your framework provides a helpful structure to think about what projects are necessary to maintain a healthy working waterfront, and the results you receive will clarify where federal funding, and your support, can help.

Alaska Whitefish Trawlers Association (AWTA) is a Kodiak-based trade association comprising trawl catcher-vessels that operate primarily in the Gulf of Alaska (GOA), with some additional participation in Bering Sea (BS) and West Coast groundfish fisheries. Most AWTA vessels are smaller trawl vessels averaging 76 feet, with owners, skippers, and crew who live in Kodiak. The following comments reflect that perspective of commercial fishermen who live in a small Alaskan coastal community and who depend on a viable working waterfront.

Domestic Seafood Production and Marketing. A high priority for the U.S., and Alaska, should be increasing domestic production of value-add seafood products. Currently, most groundfish landed in Kodiak is minimally processed at shore-based plants before being shipped overseas for additional processing, then imported back into the U.S. As a result, other countries are reaping the benefits of processing our seafood into more valuable end-consumer products, and selling it back to us. The last few years have taught us that we should be manufacturing food in the U.S. to increase food security, and ensure that sustainably harvested U.S. seafood is what ends up on the plate of American households (rather than Russian-caught seafood, for example). Kodiak has the 3rd highest commercial fishery landings by volume in the country, runs on 99% renewable energy, and should be home to value-add processing plants for seafood. Federal assistance to modernize or build value-add seafood processing plants could lead to higher ex-vessel price for fishermen, increase U.S. food security, and create American made seafood products that could go into USDA purchases and thereby increase domestic consumption of domestic seafood.

In addition to increasing domestic seafood production we could benefit from major U.S. campaigns to promote seafood consumption by American households. Most of us are familiar with national ad campaigns for beef ("beef, it's what's for dinner"), pork ("the other white meat"), milk ("got milk?"), eggs, ("the incredible edible egg"), and of course chicken (think Chick-fil-A/KFC and the competitive chicken sandwich market). Can you think of one catchy slogan from a national ad campaign for fish or seafood? U.S. consumers do eat some seafood, but most of it is imported from other countries. The seafood industry could use help raising awareness and educating consumers about the healthy and sustainable protein available through Alaskan harvest, and encouraging domestic seafood consumption in general. We hope the recently created American Fisheries Advisory Committee will help with this, and appreciate any support you can give during the appropriations process to ensure funding for key areas in support of marketing.

Fishing Vessel Modernization Program. Alaskan fishing fleets would benefit from federal subsidies supporting modernization, including revamping existing vessels as well as building new ones. In addition, retrofitting fish holds and installing RSW could bring significant quality improvements. This is a multifaceted issue which touches on vessel loadline, classification, USCG regulations, and Jones Act requirements, and federal assistance would greatly improve the safety, efficiency, quality and global competitiveness of our domestic fishing fleets.

Workforce Development. While many high-level issues confront the commercial fishing industry (barriers to entry, increasing costs, global factors like climate change, pollution and geopolitical turmoil), there are more basic challenges that need to be addressed. Vessel owners lament that young crew often do not have critical skills necessary to safely and effectively work on deck, and that we lack adequate training opportunities to prepare them. Historically, young people often learned commercial fishing from their relatives as they grew up; that is much less common today[1]. Fewer young people from fishing families choose the same path as their parents, and those without fishing relatives lack an obvious training pathway. We need programs that teach concrete skills[2], and focused training on the basics would significantly benefit both young people seeking to enter the industry, as well as existing commercial fishing operations that are hurting for capable crew members. We appreciate your continued advocacy for federal support and funding to provide young or inexperienced people with the skills necessary for commercial fishing operation, including gear-work, navigation, communications, electronics, and basic mechanics.

In addition to training future commercial fishermen we are seeing a need for more skilled tradesman who support the fishing industry, including electricians, welders, specialists in hydraulics, electronics and refrigeration, and even individuals certified to repack life rafts. This last example is a real challenge in Kodiak today as the company certified to repack Viking life rafts closed due to retirements, necessitating shipping life rafts off-island. Unfortunately, we are seeing more and more support businesses closing, losing key staff, or operating under reduced hours, which negatively impacts our working waterfront. While it is not clear whether federal support would fix this problem it is having an impact and we appreciate your continued attention.

[1] At the current Alaska Board of Fish meeting residents of Bristol Bay testified that young people (under 16) cannot get fishing experience if they do not relatives who own a permit or boat.

[2] Perhaps a fisheries training school similar to what they have in Ireland, see the BIM Nation**a**l Fisheries College, Greencastle, Ireland

Harbor Infrastructure. As noted in your framework Kodiak's harbor and waterfront infrastructure needs do not align well with priorities identified in existing major federal funding streams. We are too small to qualify for big projects, too big to qualify for small projects; and while Kodiak is the top 3 port for volume of fish landed (and shipped out) we do not cleanly fit the transportation hub paradigm either. The commercial fishing industry needs functional and well-maintained harbors, docks and shipyards, as well as adequate space to avoid conflicting uses during certain times of the year (usually summer). Please see the attached AWTA suggestions for Kodiak City's Long Range Transportation Plan. We appreciate your continued efforts to identify and procure federal funding for these vital (but sometimes small) infrastructure needs.

Implement Program similar to Crop-Insurance for Fisheries. Alaskan commercial fishermen have experienced a number of federal fishery disasters in the last 7 years and the federal fishery disaster program takes too long to provide financial relief. We would like to see a process that is faster and more responsive, and pre-funded. To augment the federal fisheries disaster program we also support exploration of a program similar to crop insurance to help mitigate risk for commercial fishing businesses, or whichever policy-holders have paid into it.

If you have any questions, or want to discuss any of these items further, please do not hesitate to reach out.

Thank you,

Rebecca Skinner

Rebecca Skinner, Executive Director
Alaska Whitefish Trawlers Association

Enclosure
AWTA Comments on Kodiak City Long Range Transportation Plan

April 13, 2022

Jackie Wander
Bristol Engineering

Sent via e-mail: jwander@bristol-companies.com

Mike Tvenge
Kodiak City Manager
710 Mill Bay Road, Room 114
Kodiak, Alaska 99615

Sent via e-mail: mtvenge@city.kodiak.ak.us

Re: Comments on City of Kodiak Long Range Transportation Plan

Dear Jackie:

I am submitting these comments to the City of Kodiak's Long Range Transportation Plan (LRTP) on behalf of Alaska Whitefish Trawlers Association. I chose to submit comments in letter format because our priorities focus on marine infrastructure and do not fit well into the structure and content of the online survey. I also attended the public outreach session on March 9, 2022, and appreciated the presentation and opportunity for discussion during that session.

Alaska Whitefish Trawlers Association (AWTA) is a Kodiak-based commercial fishing trade association comprising trawl and halibut longline catcher-vessels. Our membership comprises predominately family-owned vessels that fish primarily in the Gulf of Alaska and around the Kodiak Archipelago. Our trawl vessels are on the smaller end of Alaskan trawl vessels, with an average length of 85 feet. Even at a smaller size the Kodiak trawl fleet contributes 60-75% of all fish across Kodiak's docks each year, and consistently keeps Kodiak ranked within the top five ports in the nation by volume of fish landed[1]. Trawl fisheries are open 12 months a year, and trawl deliveries keep the processing plants open and running nearly year-round, providing consistent employment for plant employees, and ensuring markets are available for other commercial fishing gear types throughout the year.

As you know Kodiak is a remote Alaskan coastal community located on a rugged island in the Gulf of Alaska, and we rely on marine transportation to bring to the island groceries, consumer goods, and automobiles, as well as to ship out commercial fisheries harvest. Our marine infrastructure is vital to the ongoing success of the commercial fishing industry, as well as providing access to supply chains.

I have already highlighted many of the following priorities at Port and Harbor Advisory Board (PHAB) meetings over the last six years. I am aware of the Waterfront Master Planning process currently underway, and plan to participate in that process as well. I am concurrently submitting comments to the LRTP process to ensure these marine infrastructure priorities are documented and reflected in any final City plans.

[1] [1] *Fisheries of United States 2019 Report*, NOAA Fisheries, May 2021;
https://www.fisheries.noaa.gov/resource/document/fisheries-united-states-2019-report

In reviewing the LRTP I note that it encompasses marine infrastructure, but the plan itself identifies few specific projects related to ports and harbors. I have therefore included large and small projects, some of which may fall into a short-term category, in the interest of taking a comprehensive approach. My rationale is that including these items on a priority list, regardless of relative project size and anticipated completion timeline, could best help the City identify and acquire funding for project implementation.

1. Address Electrolysis in Harbors. Trawl vessels primarily use St. Paul Harbor on Near Island, and vessel owners report damage and corrosion of steel hulls from electrolysis in the harbor. This type of damage to the hull occurs below the waterline, and can result in holes that can only be repaired by divers or if the vessel is hauled out. In addition to the safety issue caused by compromising the integrity of the hull this damage costs tens of thousands of dollars to repair, and can also result in lost fishing time for vessels. I understand that St. Herman Harbor also has electrolysis issues. I have raised this issue on behalf of AWTA at PHAB meetings and to the City Manager directly.

2. Ensure All Harbors Are Repaired or Replaced as Necessary. Parts of Kodiak's harbors are falling apart and are unusable, and need to be replaced. As a major commercial fishing port that consistently ranking within the top five ports in the nation by volume of fish landed Kodiak needs to have fully functional and usable harbor infrastructure. There is already a shortage of stalls for larger vessels, with some vessels still on the waiting list for a permanent berth. Unusable parts of the harbor include fingers in St. Paul Harbor (on the small boat end closest to the harbor building) that are twisted and partially sinking, rendering them unusable. The "newer" M and N floats on the large boat end do not visually appear to be as damaged, however M and N floats are in constant use by the trawl fleet and should be prioritized for replacement before they deteriorate and also become unusable. In general, it should be a priority to ensure an electrical distribution system that does not produce electrolysis, working sources of fresh water on each finger, and a program for regular float maintenance.

3. Ensure Pier II (City Dock) Is In Good Repair. Pier II is heavily used by multiple user groups, including commercial fishermen to repair gear, dockage for cruise ships, Alaska Marine Highway ferry, and NOAA research vessels, as well as a shipping terminal for APL. If pilings are corroded or compromised they should be prioritized for repair, and a maintenance plan implemented to extend the life of replacement pilings as much as possible. As a centrally located, high-use dock area, we need it to be in good and usable condition.

4. Construct Additional Dockspace at Shipyard. Adding a dock at the Shipyard would provide working space for vessels that need repairs and shore power, but do not need to be hauled out. Currently, if a boat is not hauled out then all repair tools and materials have to be carted down the ramp and out to the vessel's stall. A new dock in the Shipyard would facilitate access to the vessel, and be in a protected area away from swells and boat wakes from boats. Creating a more protected area at Pier II and Pier III would require constructing a new breakwater. If a new dock is constructed in the Shipyard consideration could also be given to adding a crane to facilitate moving equipment between shore and vessel.

5. Ensure Adequate Dock for New AMHS Ferry. Based on AMHS design specs the new ferry will be longer than the Tustumena and may not be able to fit at the current ferry dock without impeding either the adjacent fuel dock or the Trident dock (fish processor). All of these services, the ferry, fish processing and marine fuel, are important to Kodiak's economy and any conflicts with space should be clearly identified and resolved sooner rather than later. The longer design of the new ferry provides better seaworthiness, and it may be a better long-term solution to relocate the dock rather than advocate for a shorter ferry.

6. Ensure Adequate Parking Near Harbors. Commercial fishermen and support services need places to park near vessel stalls, both long-term (while out on fishing trips) and short-term (stocking or providing services to the boat). Currently there is a shortage of parking at the second ramp in St. Paul Harbor, which is used almost exclusively by fishermen and harbor users. In addition, the road to the Shipyard is rutted and full of potholes, despite constant grading, and should be paved. Fishermen have also complained about a shortage of parking around St. Herman Harbor, which tends to share parking space with other businesses in the downtown area.

7. Ensure Adequate Space For Gear Work. Commercial fishermen need dockspace to repair and work on their gear, and Pier II is heavily used by multiple gear types for this purpose. In recent years competing uses for Pier II have made the dock unavailable at times for commercial fishing gear work; those competing uses include APL shipping, cruise ships, and ferry docking (Kennicott). There are two potential solutions to reduce the conflicts at Pier II: (1) create a long narrow paved area along the water in the Shipyard where nets can be stretched out and worked on, and (2) repair or replace Oscar's Dock (condemned area) so that it can once again be used to repair salmon seine nets. Oscar's Dock frequently used by salmon seiners in the past, before the middle area was fenced off. It is conveniently located in St. Herman Harbor, and now has a crane to facilitate transferring gear from vessel to shore.

If you have any questions about any of the items listed above please to not hesitate to contact me.

Thank you,

Rebecca Skinner, Executive Director
Alaska Whitefish Trawlers Association

March 9, 2023

NOAA Fisheries

Submitted via google form:
https://docs.google.com/forms/d/e/1FAIpQLSeLVWJT1CwGLtoZ93Xw9c-tM-sgNfzxuhK1JnOELaYegjpQnA/viewform
Re: NOAA Fisheries Draft National Seafood Strategy

To whom it may concern:

Cape Cod Commercial Fishermen's Alliance submits the following comments in response to the February 14, 2023 Notice by NOAA Fisheries inviting the public to provide information and recommendations concerning NOAA Fisheries Draft National Seafood Strategy.

Cape Cod Commercial Fishermen's Alliance is a member-based nonprofit organization that works to build lasting solutions to protect our ecosystem and the future of our fisheries. Fishermen's Alliance represents 150 fishing businesses and more than 300 fishing families, making our organization the leading voice for commercial fishermen of Cape Cod. We represent a diverse group of commercial fishermen, seafood processors, and shoreside support businesses who depend on access to healthy fish stocks and the marine environment. While the species we target, the gear we use, and vessel sizes may differ, we all firmly believe in robust federal investments to ensure we continue to be both a global leader in ocean sustainability and provide consumers with sustainable local seafood.

We support a National Strategy that focuses on supporting the entire U.S. seafood sector, increasing U.S. wild capture production, supporting sustainable aquaculture production, and fostering access to domestic and global markets for the U.S. seafood industry. While we support the four goals of the Draft National Seafood Strategy, we would like to provide recommendations on specific actions, and partnerships that will ensure a thriving domestic U.S seafood economy, and resilience of the seafood sector in response to a changing climate and other stressors. Below are comments regarding each goal:

1. **Goal 1: Sustain or increase sustainable U.S. wild capture production.**

We support building and maintaining strong partnerships with fishermen, regional councils, and research partners to ensure that wild-caught seafood is sustainable and managed appropriately. We recommend that funding be available to support fisheries science, and collaborative fisheries research projects. Adaptive fisheries management is important in the face of climate change and to protect and restore habitats important to our nation's fisheries to ensure resilient and sustainable coastal communities. Efforts should also be made to increase oceanographic sampling along our coast using fishing vessels as a platform for research. Existing data coverage often lacks spatial and temporal resolution to characterize key oceanographic processes in our region. By working

closely with the fishing industry, we can collect improved spatial and temporal coverage, and provide data products that directly benefit fishing operations, marine resource management, coastal research, climate change mitigation and the Blue Economy.

2. Goal 2: Increase sustainable U.S. aquaculture production.

Expansion of aquaculture should only be done in a way that reflects the values of the local communities. We agree that aquaculture growth should be regionally appropriate and would recommend that growth be locally appropriate. We would recommend the following guidelines for how aquaculture is permitted:

1) Require communication among fishermen, local communities, and aquaculture startup companies, so they can openly discuss options, identify shared values for the ocean and working waterfronts, and create respectful relationships.
2) Aquaculture should collaborate with local fishermen to select mutually agreeable species and locations for their farms. Farms should be a location that does not take away important fishing grounds (or other culturally important areas). The species grown should complement and not compete with wild harvest. Commercial and recreational fishermen should be allowed to fish around the net pens, benefiting from the wild fish aggregations. There are other forms of assistance to be considered as well: co-marketing for domestic seafood, shared shoreside infrastructure, economies of scale for processing and distribution.
3) Mandate technology and farm designs that ensure aquaculture creates low to no environmental impact. This could be copper mesh that does not need chemicals to stay clean, controlled feeding to minimize food waste, using feed that is primarily waste from fish processing and plant oils, subsurface nets to avoid storm damage and escaped fish, wild broodstock or sterile babies so escaped fish won't impact the wild population, plenty of space and water circulation to keep fish healthy without antibiotics, and farm designs that prevent protected species interactions.
4) Model, Monitor and Management: Complete pre-permit modeling and pilot studies on farm design to ensure the proposed farm site can absorb effluent and function as designed. It is crucial to measure success or failure and shut it down if it is not functioning successfully. In addition, it is important to continue to monitor for environmental impacts, even after transitioning from pilot to a full-scale farm. Finally, practice responsible management with a commitment to values and a respect for the local community.

3. Goal 3: Foster access to domestic and global markets for the U.S. Seafood industry

Efforts need to be made on a federal level to identify and develop U.S seafood markets that provide more local, and abundant seafood onto plates at universities, school systems, hospitals, and food banks. Education to consumers should focus on an approach that shrinks the geographical distance from port to plate and encourages individuals to choose a wide variety of seafood from their local ecosystems, thereby supporting a reduced carbon footprint. When consumers eat a diversity of local seafood, they increase market demand for other non-traditional species fishermen harvest, thereby supporting local fishermen and their communities. In addition, climate change is altering our ecosystems, and as waters warm, fishermen encounter new species that are traditionally found elsewhere. Therefore, we should encourage federal and state management and seafood markets to adapt to a changing ecosystem. Finally, it is important to form a relationship with the fishermen in your area, and know where your seafood comes from, and where it was caught. When you buy local, you support the entire seafood supply chain that includes fishermen on the water, seafood processors and dealers, and those in support businesses. Domestic seafood has a lower carbon footprint than imported seafood, and there should be efforts to support a market-based system that would create incentives for the seafood sector to reduce their emissions.

4. Goal 4: Strengthen the entire U.S. seafood sector.

In 2020, our nation and commercial fishermen faced unprecedented challenges in the face of the COVID-19 pandemic such as closures of local businesses, government stay-at-home orders, and international market disruptions. Retail sales of fresh and frozen seafood spiked as individuals cooked more at home. In addition, many consumers if they were able to, and lived near the coast, were able to go to the fishing docks and buy species such as lobsters and crabs off the boats. Seafood is a vital part of the Blue Economy, and purchasing local seafood is the best way to ensure that the seafood on our plates is both fresh, ecologically sustainable, and a socially responsible choice. Recently, there have been efforts in place to support a program for low and zero emissions technology in the commercial fishing industry through the Energy Efficient Fisheries (EEF) program in Massachusetts. This program, can allow commercial fishermen to save on their fuel bill, reduce emissions, and develop ways to lower their carbon footprint.

Another way to strengthen the seafood sector is to make sure local communities protect and support infrastructure like fishing docks and waterfront access, so coastal communities can adapt to new species that may migrate into our waters and invest in increasing seafood wastewater processing capacity. Federal money needs to be allocated to invest in new emerging fisheries that allow fishermen to diversify their harvester portfolio and decrease fishing pressure on species in rebuilding or low stock status. Finally, we need to address the "graying of the fleet" and attract young fishermen and seafood farmers to the sector by fully funding and expanding the Young Fishermen's Development program. Currently, farmers and ranchers are eligible to participate in hundreds of workforce development programs compared to the seafood industry. The Young Fishermen's Development Act (YFDA) allows funds to provide training, education, outreach, and technical assistance to the U.S. seafood sector. Priorities of the Young Fishermen's Development Act are seamanship, navigation, vessel and engine care, innovative conservation, and fishing gear engineering, sustainable fishing practices, good business practices, direct marketing, and financial/risk management including vessel, permit and quota purchasing. At the Fishermen's Alliance we place emphasis on recruitment, training, and retention through a program that is comprehensive of a diversity of local fisheries participants could work in, as well as rigorous safety training. Our program's mission is to ensure that those individuals who attend the program stay local and find a future for themselves in the industry.

In conclusion, the fishing sector faces unique challenges that include complex fisheries management, gear restrictions and area closures, uncertain markets, changing ocean conditions, rising expenses, availability of permits and allocations, and a lack of understanding by the public. Despite these challenges, there are many opportunities to improve and grow this vital sector of our nation's economy. Demand for local seafood is high and there is an important realization from COVID-19, that depending more on locally produced and harvested seafood is an important aspect of food security and a vital part of ensuring a sustainable Blue Economy. Cape Cod Commercial Fishermen's Alliance greatly appreciates the opportunity to provide these comments to NOAA. We respectfully request that you take these comments into full consideration.

Sincerely,

Aubrey Church

Aubrey Ellertson Church
Policy Manager
Cape Cod Commercial Fishermen's Alliance

March 15, 2023

To: NOAA/NMFS

From: Southern Offshore Fishing Association, National Association of Charterboat Operators, Greg Abrams Seafood, Tarpon Dock Seafood, Hunts Oyster Bar, and Capt Bob Zales Charters, llc.

Email:

Re: Draft National Seafood Strategy

On behalf of the group of diverse Associations and Seafood and Restaurant businesses, I appreciate the opportunity to comment on your draft National Seafood Strategy. As your narrative indicates, Fresh American Seafood is paramount to a healthy citizenry and the multitude of small family seafood catchers, producers, and processors who provide substantial social and economic impacts to the many coastal fishing communities and the working waterfronts of the United States.

We have several suggestions to be seriously considered for the National Seafood Strategy. First, and foremost, is to ensure that the 8 Regional Fishery Management Councils are populated with equal members of commercial, charter for hire, and private recreational members who have real world on the water experience. While the coastal state marine resource agencies all have a seat on each regional council, careful consideration must be given to their representation of environmental, commercial and recreational directions. As all know, most state resource agencies depend on the economic impact of recreational fisheries which routinely outweigh the commercial fishery impact. This has and will continue to skew the management decisions by these state agencies resulting in limiting the commercial fisheries.

Balance of council members is not just an equal number of commercial, charter for hire, and private recreational membership. Balance must consider a reasonable number of academic/environmental members that are also balanced with the state marine resource agencies. A clear example of a regional council out of balance is the Gulf of Mexico Fishery Management Council. Currently, out of 17 members there are 2 members listed as commercial but in reality on 1 is a true commercial representative as the other is a corporate land manager selling access to recreational anglers. While each member takes an oath to manage fisheries for the best benefit of the nation, the Gulf Council representation clearly sides with the recreational sector disregarding the needs and impacts to the commercial fisheries and fishing communities of the Gulf Coast. BALANCE is ESSENTIAL to proper fishery management for the benefit of all users and consumers.

The Strategy should provide for maintaining and increasing the working waterfronts of our country. This country was founded on working waterfronts and they should be embraced, enhanced, and available to all. All fishers, commercial, charter for hire, private recreational, must have access to our marine resources. Commercial fishers, producers, and processors must have a place to offload their catch, process it, and be able to produce their products for consumers to be able to buy quality fresh American Seafood. Consumers must have access to retail markets for their own use and also to be able to enjoy a fresh seafood lunch or dinner in one of the many seafood restaurants across the country. As the working waterfronts are steered away from our historical seafood processors, we lose the ability to provide sustainable seafood to all.

For hire charter and private recreational fishers must have a stable and secure working waterfront in order to have access to our marine resources for their enjoyment and personal use. Our marine resources are

enjoyed and used by multiple thousands of fishers and others which contribute greatly to the social and economic well being of local fishing communities and the country.

U.S. Seafood production provide good clean, environmentally safe, and productive workers who contribute to the overall economy. Proper fishery management must include, along with solid science, local fisher on the water knowledge. The combination of fisher input of their historical real world experience with the solid science will help to sustainably manage our resources and help stakeholders better understand management. The inclusion of real world on the water knowledge helps to confirm or not the virtual science of the stock status of fisheries so they can have confidence in the proposed management.

Consumers and markets depend on a sustainable market. Managers must include the economics of market supply when considering management actions. When a fishery faces drastic reduction of product, the market can be lost. Once the fresh seafood market is gone foreign, and questionable health, markets move in, and the fresh market is lost. Sustainable fisheries are must for steady markets to provide fresh, safe seafood to all.

A critical issue for the Strategy is how NOAA/NMFS handles fishery disasters. As all know the U.S. Department of Agriculture handles crop and animal disasters extremely well. In their budget they provide for upfront funds to be available when a disaster occurs. Typically farmers receive funds and equipment very quickly, generally less than a couple months, after a disaster which helps them to expedite their recovery and to be able to again produce goods for consumers. This helps to provide social and economic help to their communities and the nation. In contrast, the Department of Commerce does not include funds in their budget meaning that when a fishery disaster occurs, a disaster declaration must be made and the Secretary of Commerce must approve it, then Congress must make an emergency appropriations request for funding, then the DOC determines where the funds will be used.

Historically and continued today, when a fishery disaster, such as Hurricane Ian, occurs it can take up to 4 years before any disaster funds reach the fishermen. This causes some to leave their fishery never to return and creates a void in American seafood production. In addition, consumers lose the ability to enjoy fresh seafood and the trickle down impact causes seafood dealers, processors, restaurants, and other supporting businesses to suffer negatively affecting their community. The DOC must modify their fishery disaster process to better provide to those affected by the loss of their vessels, waterfront access, and other issues negatively affecting them.

The strategy should also include clear direction of on and offshore aquaculture operations. Due to naturally occurring storms and other natural issues, many offshore locations for aquaculture are not appropriate. While some profess to be able to drop offshore cages to the bottom or provide other safeguards to operations in the face of serious storms such as hurricanes, the reality is there is no safe place. All you have to do is look at the recent hurricane Ian and the complete and total destruction it caused to southwest Florida. The storm surge I not limited to high water on land, but also creates mush damage to the seafloor as you can see from the multiple yards of bottom sand washed up on the city lands. Storms powerful enough to topple offshore drilling platforms and destroy underwater pipelines will certainly destroy any cage holding genetically altered fish. The locations of aquaculture operations must be carefully considered before operations can begin.

This concludes our comments. Again, we appreciate this opportunity to comment and hope our suggestions are seriously considered.

Thank you,

Capt Bob Zales, II

March 31, 2023

Dr. Michael Rubino
Senior Advisor for Seafood Strategy
NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

Re: Request for Public Input on the NOAA Fisheries Draft National Seafood Strategy

Dear Dr. Rubino:

We, the undersigned organizations, are writing to provide comments on the draft National Seafood Strategy ('the Strategy') released by NOAA Fisheries in early 2023. We are supportive of the effort to create strategies around key challenges, including climate change, market disruption, and new ocean uses, that NOAA Fisheries must address to fulfill its stewardship mission. Sustainably managed fisheries provide valuable benefits to the nation, including an important source of seafood, livelihood, economic support for coastal communities, and the opportunity for recreational and cultural practice.

We offer some recommendations for the agency as it finalizes the Strategy and begins developing an implementation plan. We recommend that NOAA Fisheries add greater consideration of climate change in the Strategy and its goals, strengthen the commitment to sustainability, ensure that equity is being considered both in the Strategy and the process of its development, and draw links to other strategies and policies that are completed or in development.

1. Improve the consideration of climate change in the Strategy and its goals and include NOAA Fisheries' role in transitioning to climate-ready fishery management.

Climate change is one of the most serious threats to fish and fisheries, and it is already affecting the productivity and distribution of fish stocks and altering fishing. Climate change will affect every part of the management process—from data collection and assessment to setting of management measures. It will also have wide-ranging impacts on the seafood sector. Climate-driven changes to fish stocks and marine ecosystems will require NOAA Fisheries adopt climate-ready management approaches that improve resilience of fish stocks and fisheries, help fishermen adapt, and address the impacts of sea level rise and storms on coastal infrastructure important to the seafood industry.

Under that Goal 1, the stated role of NOAA Fisheries with respect to climate is to "Support the commercial fishing industry and fishing communities in their efforts to adapt to climate change and thrive in a changing ocean economy." Supporting community adaptation efforts is valuable, and we are supportive of the agency engaging more with communities to help them prepare and plan for climate impacts. However, the language does not reflect the much broader responsibility of NOAA Fisheries and its Council partners to maintain the health of trust resources in the context of climate change. This stewardship responsibility will require that the agency improve and adapt its management to prepare the system for climate change. Climate-ready management prioritizes sustainability, resilience, and equity to support healthy marine ecosystems and preserves the ocean's long-term ability to provide food and support businesses, recreation, and culture. Without substantive changes to the management system, fishing community adaptations are likely to be insufficient to address the climate challenge in fisheries. NOAA Fisheries can advance its climate-ready management by making climate a priority for

policy development and action and by giving the Councils greater guidance and technical assistance as they integrate climate considerations into fishery management plans and other processes.

We appreciate that the impact of climate has been substantially expanded in the introductory sections of the Strategy relative to the previous draft released in January 2022, but we think there are ways to further carry it through the goals and ultimately the actions of the Strategy. For example, climate should be reflected in all the goals, not just Goal 1, which focuses on wild capture fisheries. Climate change has clear impacts on aquaculture planning, siting, and operations, and we note that both fisheries and aquaculture were included in EO 14008.[1] For Goal 4, resilience to climate change should be part of the considerations around the blue economy and seafood infrastructure.

2. Recommit to sustainability as a core management goal, especially in recognition of recent concerning trends in stock status.

The U.S. has among the largest fisheries in the world and has been a leader in sustainability. However, the percentage of stocks that are overfished has risen each year since 2017, and progress on overfishing has stalled. From coast to coast, there are concerning examples where stock health has declined and where actions taken by managers run counter to those that would promote sustainable fishing. Sustainable management under the Magnuson-Stevens Act remains a key component for the long-term health of fish stocks, marine ecosystems, and the delivery of the benefits they offer. NOAA Fisheries must recognize the existing sustainability challenges that fisheries are currently experiencing and address them in the Strategy. Fundamentally, the best way to provide stability and growth opportunities to the wild capture seafood sector is through rebuilding and maintaining healthy, resilient fish populations. But the Strategy is entirely silent on the lost fishing opportunities due to long-term failures to rebuild stocks. Combined with the challenges facing fish stocks due to climate change, the Strategy comprehensively fails to commit to robust, enhanced actions to restore and then keep stocks healthy.

In this context, it is notable that the goals around wild capture fisheries and aquaculture are framed in terms of maintaining or increasing sustainable production. This is far different from the goal to "optimize sustainable production" that was included in the January 2022 draft of the Strategy and which recognizes that fulfilling the agency's statutory responsibilities may not always result in increased or even sustained production. To achieve the vision in the Strategy, it is imperative that NOAA Fisheries fully commits to sustainable management and uses sustainability as a benchmark with which to assess its priorities and actions. Increases in production should not come at the cost of sustainability or jeopardize stock and ecosystem health, and it may not be possible to increase production in many cases given the multitude of challenges fisheries face, including climate change. In addition, the objective to "maximize fishing opportunities" in Goal 1 may not always be aligned with sustainable management. In the implementation plan, the agency should consider tradeoffs and interactions among the various goals and objectives of the Strategy.

3. Ensure that the agency engages underserved communities in the development of the plan and their needs and vision are reflected in the final Strategy and implementation plan.

Many communities, including underserved communities, are part of and engage with the seafood sector in various ways, and the Strategy should reflect their diverse needs and visions for fisheries and seafood.

[1] NOAA Fisheries, *Recommendations for More Resilient Fisheries and Protected Resources Due to Climate Change*, 86 Fed. Reg. 12410 (March 3, 2021).

Implementation of Strategy, and initiatives taken as a result, should prioritize active engagement with affected communities. This should include a concerted effort to engage with underserved communities to build equity in the delivery of the benefits of a resilient seafood sector. The agency must also work collaboratively and engage in meaningful consultation with Tribes.

In addition, the Strategy does not explicitly address equity and how it is a part of the goals and bulleted objectives. For example, the draft mentions food sovereignty, subsistence fishing, and traditional Tribal fishing rights, but there are no additional details provided for how the Strategy will address these topics, which are often in conflict with "maximizing" fishing opportunity, or how they fit under the goals. As another example, the Strategy uses the term "seafood communities," but it does not define this term. To achieve the vision for a thriving and resilient seafood sector, NOAA Fisheries must ensure that its actions reflect equity and environmental justice principles and that underserved communities have meaningful engagement throughout decision-making processes.

As NOAA Fisheries implements the Strategy, its actions should be inclusive and ensure that benefits that result from implementation are equitably distributed. To do to this, the agency could consider adding specific objectives related to equity and establishing metrics with which to assess performance. For instance, Goal 1 is silent on the need to consider tradeoffs between direct catch and bycatch across fisheries; simply "maximizing" fishing opportunity could result in exacerbating equity issues between Tribes, subsistence users, local communities, and large industrial fleets. At a minimum, the Strategy and implementation plan should consider the equity implications of the different goals, such as how to ensure aquaculture production does not disproportionately impact underserved communities, whether the development of U.S. seafood markets may benefit some groups more than others, how to support the sustained participation of dependent communities, how to help ensure equitable access to seafood, and how to increase representation in fishery management and make the process more inclusive.

4. Establish the link between the Strategy and other key NOAA Fisheries policy documents and ensure these efforts are not implemented in isolation.

During the listening sessions, it was mentioned that the Seafood Strategy is part of a broader set of strategies being developed, including on climate change, equity and environmental justice, international affairs (including IUU fishing), and protected resources and habitat. These separate strategies (for example, the Seafood Strategy and the Equity and Environmental Justice Strategy) should be aligned and work together. Fisheries are social-ecological systems, and management must be done in a way that acknowledges the links between different parts of the system. For example, healthy habitats and ecosystems and equitable and climate-ready management practices are important components for a thriving seafood sector. It should also be clear how the Strategy interfaces with other important NOAA Fisheries policies and strategies, such as the NOAA Fisheries Strategic Plan, the Climate Science Strategy and the Ecosystem-Based Fishery Management (EBFM) Policy and Road Map.

Thank you for the opportunity to provide comments on the draft National Seafood Strategy and for consideration of our recommendations.

Sincerely,

Meredith Moore
Director, Fish Conservation Program
Ocean Conservancy

Molly Masterton
Director, U.S. Fisheries
Natural Resources Defense Council

Katie Cubina
Senior Vice President for Mission Programs
Mystic Aquarium

Carrie Lewis
President and CEO
Oregon Coast Aquarium

Nora Nickum
Senior Ocean Policy Manager
Seattle Aquarium

Alan Varsik
Director
Point Defiance Zoo & Aquarium

The following comment is submitted on behalf of the Aquatic Life Institute, a leading international not-for-profit organization, dedicated to improving the lives of aquatic animals exploited in the global food system. For the past 3 years, we have been supporting global and country-level governments (including the FAO, UK and Canada) as they introduced welfare considerations for farmed and wild aquatic animals.

We appreciate the many efforts of NOAA to fulfill its mission to spur sustainable seafood production and are grateful for the opportunity to share with you some recommendations on aquatic animal welfare that we hope your administration may find relevant. We believe that improved aquatic animal welfare, which encompasses appropriate stocking density, responsible feeding practices, and good fish health, can have auxiliary benefits of making the seafood sector more resilient to the urgent threat of climate change.

The following are recommendations for Goals 1 - 4.

GOAL 1: Sustain or increase sustainable U.S. wild capture production

We'd like to point out that while fisheries management systems have improved, 90% of global fisheries are still fully exploited, overexploited or depleted (FAO 2022). For mostly economic reasons, current fishing practices are centered around maximizing the efficiency ('catch per unit effort'; CPUE) of commercial fishing operations and minimizing the time spent at sea required to fulfill the fishing vessel's catch quota. This has to change for several reasons.

First, the process of capture in such CPUE-based operations inflicts significant stress, suffering and mortality upon both target and non-target aquatic animals. This means that more aquatic animals die as a result of the capture process than is necessary, which impacts marine ecosystems and removes carbon storage actors from the sea.

Marine animals play a crucial role in carbon sequestration in the ocean, with UNEP introducing the term "fish carbon" to recognize their potential in mitigating climate change and preserving biodiversity. From whales providing necessary nutrients to phytoplankton, which absorb carbon, to fish and other marine animals depositing stored carbon in fecal pellets on the ocean floor, animals play a significant role in maintaining the ocean's capacity as a carbon sink.

The type of welfare issues experienced in capture fisheries includes exhaustion from trying to evade capture, injury through overcrowding in nets and exposure to rapid changes in body temperature and atmospheric pressure which in turn lead to thermal shock and barometric trauma. Upon landing, they are further exposed to sunlight and air, and are then handled and 'processed' in a cost-efficient manner that pays little heed to the animals' welfare. Further, wild-caught individuals typically suffer a fate of death by asphyxiation (suffocation in air) or are frozen to death in ice water (so-called 'ice slurry'). To put the scale of this suffering into perspective, an estimated two to three trillion aquatic animals are caught at sea on an annual basis, 35 times more than the number of land animals killed for food.

Such inhumane practices would be unimaginable in almost all other food production sectors and particularly, in terrestrial animal farming. Given the attention that these other sectors already place on the health and welfare of the animals they raise — including in the aquaculture sector — it is time for the same standard to be applied to their wild-caught counterparts.

We recommend NOAA to adopt an animal welfare-based approach (WBA) to capture fisheries. The animal welfare-based approach (WBA) to fisheries management we propose is centered around the following principles:

1. Refining the methods used to capture and retrieve aquatic animals;
2. Improving the ways in which captured animals are handled on-board;
3. Implementing effective stunning and slaughter of captured animals; and,
4. Eliminating the indirect adverse welfare impacts on non-target species.

A WBA gives equal weighting to both the welfare of target animals and the welfare of other animals indirectly affected by fishing activities, such as those caught incidentally (so-called ‘bycatch’) and those ensnared in abandoned fishing gear (so-called ‘ghost fishing'). Under standard fisheries management regimes, such issues are typically disregarded or grouped under ‘conservation categories’ that are rarely resolved. However, under an animal welfare approach, the key ‘parameter’ is welfare. There is ample scientific consensus that aquatic animals have the capacity to suffer in the same way as terrestrial animals. Given that this recognition is enshrined in law5 throughout the world, we have both a legal and moral obligation to apply the same standards of welfare to wild-caught aquatic animals.

One example of humane capture fisheries best practices in the US comes from Bristol Bay Native Corporation, which owns F/V Blue North, a longline vessel operating in the Northwest Pacific for cod. This vessel was retrofitted with animal welfare in mind, including:

- Fish are individually hooked and retrieved within an hour.
- Uses a 'Moon Pool' to set lines and haul catch one by one inside the vessel.
- Onboard electrical stunning and once frozen fillet.

According to the company, the benefits associated with humane capture are the following:

- Shorter fishing time reduces stress and injury to target species.
- Reduced likelihood of catching non-target species.
- ‘Moon Pool’ improves crew safety by minimizing exposure to the elements.
- Stunning + once frozen fillet commands a higher price per pound than traditional non-humane harvest, once frozen or twice frozen fillet.

Second, the issue of abandoned, lost and otherwise discarded fishing gear (so-called ‘ghost gear’) can lead to significant suffering of aquatic animals. Moreover, ghost gear often results in the accumulation of marine debris on the sea bed and has been reported as the “deadliest form of plastic debris to marine life.” This is costly to the industry as well since an estimated 90 percent of species caught in ghost gear are of commercial value. We urge NOAA to prioritize

the commercial adoption by industry of durable gear components that incorporate biodegradable elements.

Third, commercial fishing is directly related to climate change through emissions from fishing vessels, direct disturbance to ocean sediments, and loss of carbon sequestration capacity due to the removal of aquatic animals. Bottom trawling, a significant contributor to overfishing, is a particularly harmful method that releases significant amounts of carbon that would otherwise be stored in the seabed. It also causes ocean acidification and reduces the ocean's ability to store CO2. At the ecosystem level, it can displace entire benthic communities through habitat destruction.

Already in other parts of the world, certain fishing vessels are being built as hybrid vessels. For example, shipbuilding company Ulstein designed a factory trawler, ECOFIVE, which won the 2022 Innovation Award at Nor-Fishing. This vessel was created to leave a far lower environmental footprint, produce higher fish quality and provide a safer working environment. The vessel has a hybrid fuel-efficient propulsion system with two propellers, combining batteries with diesel-electric and diesel-mechanical propulsion. The vessel also built in an in-water electrical pump stunner (by Ace Aquatec) so that fish are pumped into the vessel while being stunned along the way for humane slaughter. The fishing vessel is expected to be delivered at the beginning of 2024. Similarly, NOAA should encourage research and the development of more efficient fishing vessels.

GOAL 2: Increase sustainable U.S. aquaculture production

In order to support gradual, diverse, and regionally-appropriate growth of the domestic aquaculture industry that depends on an efficient, strategic, and science-based regulatory approach to consider and mitigate impacts on protected resources, essential fish habitat, and marine ecosystems, we must first come to the realization that improved animal welfare practices result in positive outcomes for all areas of interest being discussed in this strategy development.

Excess or insufficient feed in aquaculture leads to compromised water quality, aquatic pollution, and attracts wildlife. Combined with inappropriately high stocking densities, this creates toxic wastewater in and around fish farms. Left untreated, it can deplete surrounding waters of oxygen, causing algal blooms / dead zones, and public health issues. Additionally, instances of escape made possible by infrastructure failures during extreme weather-related events potentially caused by the severe effects of climate change for example, only further ecosystem destruction by instigating increased competition for resources between farmed organisms and wild populations. This disruption would displace native species, leading to deleterious consequences related to regional biodiversity.

The majority of aquaculture is still heavily reliant on marine ingredients (fishmeal and fish oil) as a primary component of aquafeed. Reducing the amount of wild fish required for aquaculture feed is directly linked to climate change. One capture method often utilized by the "reduction fisheries" industry is bottom trawling, which produces a significant amount of carbon emissions,

as mentioned above. Aquaculture will be increasingly affected by climate change in many ways, through increasing ocean acidity, dissolved oxygen, and temperature, as well as more intense and unpredictable weather events. Decreased use of “reduction fisheries” for aquafeed would also alleviate pressure on wild stocks, promote ecosystem health, and balance the multifaceted marine trophic system. These “reduction fish” could also be redirected to direct human consumption for coastal communities in the United States and abroad that will face direct issues of food security as the global population continues to grow.

Poor welfare practices result in disease outbreaks, as evidenced in many areas of global aquaculture as well as terrestrial agriculture, are caused by compromised immune systems due to poor health, nutrition, and rearing conditions. Weakened immune systems increase the possibility of disease outbreaks which is problematic as pathogens and parasites can spread outside of the farm, damaging local fish populations and ecosystems. Antibiotics are frequently used to prevent or treat bacterial infections, however, unregulated usage has caused major concern for antimicrobial resistance. Poor welfare increases the need for antimicrobials to treat viruses, parasites and pathogens. Antibiotic overuse, and ultimately antibiotic resistance, in aquaculture remains a significant concern in terms of animal welfare, environmental impacts, and public health. However, it is one that can be addressed through the dissemination of information amongst farmers, local policymakers, and international regulatory bodies regarding the link between increased animal welfare and industry improvements. When aquatic animal welfare is placed at the forefront of production practices, we encounter healthier animals. Healthy animals display a decreased reliance on prophylactic antibiotics, and an increased tolerance to farming stressors which enables an elevated resilience to disease. Adopting positive animal welfare protocols such as ensuring optimal water quality, refraining from excessive stocking densities, and implementing humane stunning and slaughter methods can help curb the misuse of antibiotics in aquaculture.

The Aquatic Life Institute has been highly involved with the Food and Agriculture Organization of the United Nations by contributing to their revision of the Guidelines for Sustainable Aquaculture as well as the Shanghai Declaration (2021), a high-level global policy paper and road map to optimize the role that aquaculture can play in achieving the 2030 Agenda for Sustainable Development. We highlighted the importance of animal welfare in aquaculture at the Global Conference on Aquaculture Millennium + 20 (GCA +20). The GCA +20 is organized every 10 years by the FAO, a major conference to establish a consensus among policy-makers around the world on aquaculture development priorities. This year, a key output was the creation of the Shanghai Declaration. Whereas the early draft included only one reference to aquatic animal welfare as it relates to biosecurity and disease prevention:

> *“Promoting aquatic biosecurity protocols and management agreements, including prevention of disease and integrated disease and pest management, and encourage measures to improve fish health and welfare.”*

The final draft added an entirely new clause on aquatic animal welfare based on our feedback:

> *Final version: "Recognizing* that developing aquaculture sustainably and equitably requires a holistic approach that values both human and animal health and welfare and further recognizing that aquaculture activities should be conducted in a manner that assures the health and welfare of farmed aquatic animals, by optimizing health through minimizing stress, reducing aquatic animal disease risks and maintaining a healthy culture environment at all phases of the production cycle."

In the final draft, the Shanghai Declaration made it clear that aquaculture needs to be developed in a manner that is not detrimental to planetary, human and animal health:

> *"At the same time, to feed an ever-growing human population, expected to reach almost 10 billion people by 2050, aquaculture development needs to continue its expansion while becoming more sustainable.* ***Recognizing that the capacity of aquaculture for further growth, and also the need to avoid that such growth comes at the cost of deteriorating ecosystem health, animal welfare standards, biodiversity loss, or social inequalities, the aquaculture sector demands new, sustainable, and equitable development strategies.*** *The private sector will remain the main actor in aquaculture production, and substantial public sector support and strong leadership will also be necessary with input and guidance from government and civil society playing essential roles in regulating aquaculture, and in supporting and promoting citizens' views, participation and Benefits."*

In order for NOAA to ensure that " the U.S. seafood continues to be produced sustainably", a similar approach prioritizing animal welfare must be explicitly considered in all strategies moving forward.

GOAL 3: Foster access to domestic and global markets for the U.S. seafood industry
We urge NOAA to communicate about the importance of the following to the seafood industry and become a global leader:

1. The need for aquatic animal welfare indicators & adequate training: Training in careful capture, handling and slaughter techniques should be mandatory for all personnel involved in fishing activities. Such training should cover how to consider the welfare of the animal when selecting fishing gear, how to carefully remove hooks and how to limit suffocation in air before slaughter. Training should also cover the consideration of welfare for indirectly affected species (e.g.,turtle resuscitation). It should be demonstrated how careful handling is also in the benefit of crew safety.
2. Monitoring, control and surveillance (MCS) to incorporate the treatment of animals: One of the biggest challenges to sustainable and humane capture fisheries is monitoring and enforcing fishing activities out at sea, including accurate record-keeping of catch data. There must be an urgent and concerted effort for improved fisheries management, such as mandating technology or other methods on board for continuous monitoring and enforcement. Such measures can help address concerns around animal and human

rights abuses on board as well as overfishing. This would also help combat illegal, unregulated and unreported (IUU) fishing and limit bycatch. Recommendations to strengthen MCS and improve animal welfare include:
    - ○ Electronically monitoring and recording injuries in captured animals in addition to catch, gear and bycatch data at the time of processing (phase out the use of manual logbooks);
    - ○ Installing on-board cameras capable of live streaming (in addition to human observers);
    - ○ Enacting policies to mandate MCS in commercial fisheries to protect both animals and fishers; and,
    - ○ All governments and regional fisheries management organizations (RFMOs) should cooperate closely in harmonizing data collection and sharing.
3. Transparency and traceability: The seafood supply chain is one of the most complex in the world, rife with widespread cases of fraud and mislabelling. In order for fisheries to be truly sustainable and to support efforts at improving animal welfare, we recommend the following:
    - ○ Markets and consumers should demand transparency and traceability of all aquatic animal products, including data on humane capture and stunning. This will allow them to make informed decisions in rejecting products derived through inhumane practices.
    - ○ Retailers should amend their sourcing policies to require, for example, supplier data on animal welfare training for fishers, catch data, and robust electronic monitoring onboard.
    - ○ Independent audits should be carried out across the value chain to ensure compliance with corporate responsible sourcing policies.

GOAL 4: Strengthen the entire U.S. seafood sector

We strongly recommend integrating aquatic animal welfare parameters into NOAA's fisheries and aquaculture development strategies. While aquatic animal welfare is not protected legally under US law, as sentient beings they should be treated with respect similar to land-based animals cultivated for food. This includes adopting animal welfare strategies in both aquaculture and fisheries. For detailed welfare recommendations, please see here for aquaculture and here for capture fisheries.

We would like to thank NOAA for the opportunity to comment. We hope our comment provides insightful feedback and we look forward to showing how data-driven and science-based animal welfare policy can facilitate the seafood sector's resilience in response to short- and long-term climate-driven threats. Please contact giulia@ali.fish for more information.

Comments on NOAA Fisheries National Seafood Strategy, March 31, 2023

Shark Advocates International, a project of The Ocean Foundation, appreciates the opportunity to comment on the National Oceanic and Atmospheric Administration (NOAA) National Seafood Strategy. We support the objectives associated with science-based sustainability and modernized supply chains. We are, however, concerned that the document:

- lacks mention of the importance of applying a precautionary approach in fisheries management;
- paints an overly positive picture of the current U.S. marine fisheries situation with respect to responsible fishing practices; and
- fails to recognize significant existing inadequacies (with respect to habitat protection, rebuilding plans, data collection, and illegal trade) that threaten not only species and ecosystems but U.S. fisheries over the long-term.

The statement *"Harvested responsibly, as it is in the United States, seafood is also an environmentally friendly way to produce a nutritious food"* ignores significant problems in U.S. fisheries. For example:

- Shrimp trawl fisheries off Southwest Florida represent the most lethal threat to *Endangered* **smalltooth sawfish** and yet are subject to extremely low observer coverage (1-2%);
- Biomass of New England **thorny skates** is at only 3.6% of the 2028 target and yet managers have repeatedly rejected proposals to close areas (to protect the species from fisheries impacts); and
- The **common thresher** shark is valued by both commercial and recreational fisheries along the U.S. Atlantic coast but has never been subject to a population assessment.

Accordingly, under **Goal 1,** with respect to sustaining or increasing sustainable U.S. wild capture production, we support the agency's intention to ensure the:

- development of the *scientific* analyses necessary for fisheries management, *as a priority;*
- sustainability of fisheries through effective and efficient management; and
- protection and restoration of key fisheries habitats.

Under **Goal 3**, regarding market communications and promotion, we urge NOAA to:

- provide the public with a more well-rounded picture of seafood sustainability by revising the *FishWatch* website to cover risks and concerns about conservation status, rebuilding timeframes, and plan implementation for seriously overfished species (e.g., Atlantic shortfin mako sharks); and
- enhance efforts to combat IUU fishing and related harmful fishing practices around the world by expanding the identification of countries under the High Seas Driftnet Moratorium Protection Act.

Under **Goal 4,** regarding strengthening the U.S. seafood sector, we support work across federal agencies to modernize U.S. seafood infrastructure, but we recommend that associated priorities include expanding the requirements and capacity needed to improve species-specific fisheries data collection and increase observer coverage.

Amendments along these lines will help balance the strategy. We appreciate the consideration of our views.

c/o The Ocean Foundation · 1320 19th Street, NW, Fifth Floor · Washington, DC 20036

NATIONAL FISHERIES INSTITUTE

March 31, 2023

Ms. Janet Coit
Assistant Administrator
National Marine Fisheries Service
National Oceanographic and Atmospheric Administration
United States Department of Commerce
1315 East-West Highway
Silver Spring, MD 20910

Submitted Via Webform and Electronic Mail Submission:
nmfs.seafoodstrategy@noaa.gov

Dear Assistant Administrator Coit:

The National Fisheries Institute ("NFI") welcomes the opportunity to submit comments on NOAA's draft National Seafood Strategy ("Strategy") and its future Implementation Plan ("Plan").

NFI is the principal trade association for the nation's commercial seafood supply chain, and as such represents harvesters, processors, exporters, importers, aquaculture, distributors, cold storage providers, retailers, and seafood restaurants. Collectively, these companies supply American families and consumers around the world with tens of millions of premium, sustainable seafood meals every year. According to NOAA, these companies, as part of the nation's commercial seafood industry, directly support 1.2 million American workers, and annually contribute $67.6 billion in value-added impacts nationwide.[1]

NFI appreciates the Strategy's emphasis on the importance of a thriving domestic U.S. seafood sector. Seafood is indeed "good for people," "good for the economy," and "good for the planet."

Before addressing each of the Strategy's goals, it is important to remember that seafood is one of the most under-consumed foods in American diets. Nearly all Americans across all ages – 90 percent on average – have seafood intakes below recommended amounts.

[1] NOAA Fisheries, *Fisheries Economics of the United States 2019*," Silver Spring, Maryland: NOAA Fisheries, 2022 https://media.fisheries.noaa.gov/2022-07/FEUS-2019-final-v3_0.pdf.

The 2020 Dietary Guidelines for Americans ("DGAs"), recommend that children and adults eat seafood 2-3 times weekly for a range of benefits, including heart and brain health, strong bones, and improved muscle mass. Any Administration strategy involving seafood must take account of the indispensable nutritional benefits that seafood – and sometimes only seafood – offers.

Goal 1: Sustain or increase sustainable U.S. wild capture production via fisheries science, and fisheries management.

Overall NMFS management of U.S. fisheries, and the Magnuson-Stevens Fishery Conservation and Management Act ("MSA") framework that undergirds that work, is excellent. The MSA system applies fundamental national standards to specific fisheries, in light of science and with due consideration of the views of essential stakeholders. The MSA framework relies for its success on regional fishery management councils, sound science, adaptive management, *and* public participation. The system works because it balances regional autonomy with science, and emphasizes transparency and fairness for all stakeholders. The undeniable result? The vast majority of American fisheries are sustainably fished.

Unfortunately, recent attempts to go around MSA to implement extraneous policy measures threaten the successful path NMFS has carved out. For instance, rather than recognizing that seafood sustainability under this framework augments ocean conservation efforts, some seek to wall off large swaths of the U.S. EEZ from commercial fishing. These proposals, especially when carried out without public input, undercut confidence in U.S. fishery management, weakening NOAA's position as a global fishery management leader and sowing uncertainty in industry as to the reliability of access to domestic fisheries. With due respect, NFI submits that these proposals would have less currency if the agency more effectively communicated the success of U.S. fishery management to key U.S. and overseas industry, NGO, and government players. NFI appreciates NOAA leadership in fishery management – and urges the agency to do more to advertise the manifest fruits of that leadership.

Goal 2: Increase sustainable U.S. Aquaculture production via regulatory efficiency and aquaculture science.

NFI has long supported increased domestic aquaculture production, and NOAA is right to emphasize practical steps to incentivize such production. More than half of the seafood Americans eat each year is farmed. Given that aquaculture continues to be fastest growing form of food production in the world, that percentage is poised to increase. Farmed and wild-capture products are both essential if seafood is to play a role in feeding a growing global population. Yet the U.S. lags behind, ranking 16th globally in aquaculture production. Although multiple factors contribute to this performance, the nation's complex and burdensome regulatory framework is a primary culprit.

NFI therefore applauds NOAA's stated goal to advance an efficient, predictable, timely, and science-based aquaculture regulatory framework that reduces red tape and increases transparency and predictability. Such a framework is essential in order to increase investor confidence and drive customer interest in the development of a mature U.S. farmed seafood sector. In its Plan, NOAA should clearly establish how the agency will work with other regulators, industry, and additional stakeholders to meet this objective.

Goal 3: Foster access to domestic and global markets for the U.S. seafood industry via communication, promotion, market development, and fair trade.

Seafood is the most globally traded protein. This fact creates opportunities, but it also makes seafood vulnerable to trade policy challenges and trade facilitation disruptions. The entire seafood value chain relies on global trade—this is just a fact. American consumers and workers benefit from the diversity of seafood sources and supply chains in order to meet growing customer demand for year-round supply of a multitude of product forms.

Three specific objectives should be top of mind with respect to this goal.

First, the agency and the Administration as a whole must work to correct the loss of competitive access to overseas markets for U.S. seafood exporters. Recent bilateral agreements with Korea and Japan excluded seafood, the ongoing bilateral dispute with China has cost U.S. harvesters dearly in what used to be their largest overseas market, and efforts to eliminate nontariff barriers in other markets either have stalled or are nonexistent.

Second, and as discussed above, NOAA Fisheries should more aggressively promote its fishery management system and the sustainability outcomes thereof, not only to Americans, but to other markets as well. The Plan should include specific actions for NOAA Fisheries to help bolster confidence in U.S. seafood, especially by promoting its FishWatch as *the* program for consumers, overseas buyers, and others to know that U.S. seafood *is* sustainable.

Third, NFI supports the agency emphasis on addressing illegal, unreported, and unregulated ("IUU") fishing. NFI and its member companies have a decades-long record of support for actions that meaningfully address the challenge of illegal fishing. The agency should focus on practical steps – such as devoting additional resources to agency development of the biennial IUU fishing report – that will lead to reduced IUU harvests. Expanding the agency's seafood import monitoring program is not one of them. As NFI has long argued, the program has not proven to be effective at combatting IUU, is not in fact risk-based, and imposes costly regulatory burdens that exacerbate the food inflation now harming lower- and middle-income American families.

Goal 4: Strengthen the entire U.S. seafood sector via the Blu e Economy, Seafood Infrastructure, and Workforce development

NFI certainly supports the goal of strengthening the seafood sector. The details of this goal, however, matter. In both the Strategy and Plan, NOAA must identify specific policies intended to strengthen U.S. seafood producers and the agency budgetary commitments necessary to make such policies real.

In doing so, of course, the agency and the Administration also must "do no harm" to a sector that in recent years has been buffeted by pandemic, lockdowns, inflation, and supply chain ruptures. For instance, the United States cannot support wild capture fisheries and develop a strong open ocean aquaculture industry while simultaneously planting offshore wind farms that disrupt, or even block access to, fishing grounds. If the Strategy is to provide a genuine roadmap for "strengthening the entire U.S. seafood sector via the Blue Economy," then NOAA must agree to ensure that offshore wind development hampers neither existing wild capture fisheries nor blocks access to federal waters where aquaculture development is likely to occur.

It is also important to understand that the nation's seafood sector includes more than just harvesters. The seafood supply chain includes processors, cold storage providers, wholesalers, distributors, retailers, and seafood restaurants. These companies rely on a mix of domestic and globally-sourced product to meet still-growing consumer demand and to keep their workers busy. Indeed, according to NOAA data, over 500,000 U.S. jobs rely on globally-sourced finfish and shellfish. Thus, in addition to ensuring a reliable, transparent trading system, the Administration can support U.S. industry by, for instance: improving U.S. port facilities; expanding interagency cooperation to reduce regulatory overlap; and rolling back duplicative regulation. That is to say nothing of steps – such as assisting with vessel modernization – that do pertain to the harvest link in the chain. These and steps like them will be critically important if the agency is to meet this goal.

NFI applauds the work of NOAA and NMFS on this Strategy and looks forward to the upcoming Plan, and appreciates the opportunity to share these views.

Sincerely,

Lisa Wallenda Picard

Lisa Wallenda Picard
President and CEO

Western
Pacific
Regional
Fishery
Management
Council

March 16, 2023

Janet Coit
Assistant Administrator for Fisheries
National Oceanic and Atmospheric Administration
1315 East-West Highway
Silver Spring, MD 20910

Dear Janet,

The Western Pacific Regional Fishery Management Council (Council) would like to thank you for the opportunity to provide comments on the draft NOAA National Seafood Strategy. The ability to provide sustainable seafood is critical to providing food and perpetuating culture in the Western Pacific. The National Seafood Strategy is crucial to continuing to provide the people in American Samoa, Guam, Hawaii and the Commonwealth of the Northern Mariana Islands with a healthy source of protein and food sovereignty in places where climate change and supply issues have larger impacts and fishing areas are continually shrinking due to outside forces. The draft strategy focuses on seafood being good to eat, does good for the economy, and does good for the planet. To do this, NOAA Fisheries plans to partner with many groups but we note that the regional fishery management councils are not listed.

Goal 1 of the strategy is to sustain or increase sustainable US wild capture production yet the Western Pacific region continues to face closures of the US EEZ and may very well be facing additional closures on the high seas. Climate change will have a significant impact upon the Pacific Islands with potential changes to the coral reef ecosystem and movement of pelagic fish. Added together, the goal of sustainable wild capture production may be unattainable, despite the fact that the fisheries in the region are sustainable. It is an admirable goal, but one that despite the Council's continued efforts, doesn't seem to be supported by NOAA.

The Council is glad to see its efforts to develop an aquaculture management framework supported by Goal 2, to increase sustainable US aquaculture production. The goal and efforts of the seafood strategy should complement what the regional fishery management councils aim to achieve with their management frameworks.

Our region continues to be affected by issues beyond the control of fisheries management, like discriminatory legislation and unfair international agreements. Goal 3 aims to "foster access to domestic and global markets" yet the US government has prohibited the ability to do so through actions targeted to our region, such as: 1) prohibiting the interstate sale of sustainably-harvested Western Pacific billfish to international and domestic markets, 2) prohibiting access of well-regulated US tuna fisheries from operating in large portions of the US EEZ, and 3) failure to negotiate fair international fishing privileges for US tuna fisheries in the

Pacific. How does a seafood strategy foster access when the market or fishing opportunities are unavailable to US fishermen? How do US fishermen compete with cheaper imports from fisheries that involve IUU fishing, forced labor, etc.? The National Seafood Strategy also must link to overarching international initiatives among multiple federal agencies, such as the Indo-Pacific Economic Framework. In the geopolitically important Pacific Islands, fisheries are the leading source of economic development. The Council linked fisheries with broader international initiatives and suggested improving international negotiations to promote U.S. interests (see attached information paper).

Strengthening the seafood sector in the US, as Goal 4 states, is an exciting undertaking that could address the graying of the fleet and getting the younger generation interested in fishing. The fishing and seafood industry isn't attracting the American population, thus many fisheries are dependent upon migrant workers. The development of the workforce through funding existing programs like the Marine Education and Training as well as the Community Demonstration Projects Program in our region will go a long way towards growing and attracting a seafood workforce.

The Council urges further development of the *Seafood Trade Task Force* that was constituted under Executive Order 13921 on Promoting American Seafood Competitiveness and Economic Growth. The *Seafood Trade Task Force* could provide an additional mechanism to achieve each of the goals and objectives in the National Seafood Strategy. The Council provided several recommendations to NMFS for this Seafood Trade Task Force, which are affixed to this letter.

Again, thank you for the opportunity to provide comments and we look forward to working with NOAA Fisheries on the implementation plan and specific actions and strategies to address regional concerns. Please contact me at kitty.simonds@wpcouncil.org or (808) 522-8220 if you have any questions.

Sincerely

Kitty Simonds
Executive Director

CC: Sam Rauch, Deputy Assistant Administrator for Regulatory Programs, NOAA Fisheries
John Gourley, Chair, Western Pacific Regional Fishery Management Council

Attached: (1) *Waning US Influence and Impacts to Major US Pacific Tuna Fisheries within the Western and Central Pacific Ocean (WCPO): A Call for a US Government Strategic Plan*
(2) Letter to A. Lawler and J. Sanford RE: Recommendations for a Comprehensive Interagency Seafood Trade Task Force, July 31, 2020

April 24, 2023

Dr. Michael Rubino
NOAA Fisheries
1315 East West Hwy, Bldg. SSMC3
Silver Spring, MD 20910-3282

Dear Dr. Rubino:

Thank you for your recent presentation to the Mid-Atlantic Fishery Management Council regarding NOAA's Draft National Seafood Strategy. We appreciate that the strategy recognizes the role of the U.S. seafood industry in meeting domestic nutritional needs, and we strongly support the agency's efforts to develop U.S. seafood markets and "put more U.S. seafood back on U.S. plates."

As you move forward with development of an implementation plan, we encourage you to explore opportunities to align the National Seafood Strategy with the Biden Administration's National Strategy on Hunger, Nutrition, and Health. The strategy, which calls for a whole-of-government approach to end hunger and increase healthy eating and physical activity by 2030, is organized around five pillars:

- Improving food access and affordability
- Integrating nutrition and health.
- Empowering all consumers to make and have access to healthy choices.
- Supporting physical activity for all.
- Enhancing nutrition and food security research.

The Council believes that U.S. seafood should be an integral component of national efforts to address hunger and nutrition. As you are aware, U.S. seafood is a highly nutritious and sustainable food source that provides numerous health benefits. Unfortunately, consumption in the United States remains low, with only 1 in 5 Americans consuming the recommended amount of seafood each week. Additionally, more than 70% of seafood consumed in the U.S. is imported from other countries, and about half of our wild catch is exported to overseas markets.

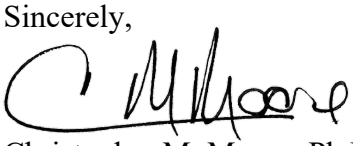
There is a clear alignment between the goals of the National Seafood Strategy and the National Strategy on Hunger, Nutrition, and Health. We recommend that NOAA work closely with its federal partners, including the USDA and FDA, to develop specific, actionable strategies to increase the presence of U.S. seafood in federal health and nutrition programs, increase consumption of U.S. seafood, and promote awareness of the benefits of seafood consumption. The Council offers the following suggestions for your consideration:

- Collaborate with the USDA to increase the use of U.S. seafood in federal nutrition assistance programs, including the National School Lunch Program

- Strengthen interagency cooperation to simplify and streamline supply chains, thereby increasing traceability and promoting a more direct relationship between harvesters and consumers
- Continue to develop messaging in a variety of formats to educate consumers on the health benefits of seafood, the sustainability of U.S. fisheries, how to access seafood affordably, how to prepare and store seafood safely, etc.
- Collaborate with industry and non-profit organizations to expand the utilization of U.S. seafood via food assistance programs (e.g., food banks)

Thank you for your consideration of these comments. We welcome the opportunity to provide further input on future implementation plans.

Sincerely,



Christopher M. Moore, Ph.D.
Executive Director

Public comments on NOAA Fisheries draft National Seafood Strategy received during public comment period: 2/14/23-3/31/23.

ntl seafood strategy comments

Thu, Mar 30, 2023 at 7:20 PM

I represent the members of the Southern Offshore Fishing Association, the Gulf of Mexico Commercial Grouper Fishermen, National Association of Charterboat Operators, the Voice of the For Hire Charter Boat Owners and Operators across the country, and the Panama City Boatmen Association, For Hire Charter Boat Owners and Operators from Bay County, FL.

I have sent comments previously but wish to add more here. We strongly feel that no National Seafood Strategy can be successful without first ensuring fair and equal representation to have balance on all 8 regional councils. Membership on the councils must include a balance of all sectors, commercial, for hire charter, and private recreational. These sectors include the multitude of professional on the water fishers who understand their regions, their fisheries, and the needs to properly manage them. Members selected for each sector must be active participants in their sector with experience to provide input to the management of their species.

The MSA requires a fair and balanced membership on the councils, and this must be strictly adhered to. Currently, the Gulf of Mexico has 1 true commercial member and 6 private recreational members, mostly of the same recreational association. The total membership is 17 so anyone can clearly see this council is out of balance and the recent management decisions clearly show the commercial sector in the GOM is being disadvantaged.

All sectors use our marine resources. All sectors provide benefits to the nation in their own way. Consumers in our country depend on a properly managed resource for fresh American Seafood whether catching their own or purchasing from markets and restaurants. Much like farmers of the land, commercial fishermen farm the sea and fair and balanced management is a must to be able to provide fresh American Seafood.

Fair and balanced council membership must be a priority in the National Seafood Strategy!!!

Thanks,

Capt Bob Zales, II

Fishery Management Consultant, SOFA

President, NACO

President, PCBA

Capt Bob Zales, II

www.fishpc.com

Public comments on NOAA Fisheries draft National Seafood Strategy received during public comment period: 2/14/23-3/31/23.

Seafood strategy

Charlie Bergmann Thu, Mar 30, 2023 at 7:58 PM

I think before any seafood strategy commences all regional fishery management councils must be balanced as required by the MSFCA and to pursue the making of state directors on the eight councils non-voting members.

Public comments on NOAA Fisheries draft National Seafood Strategy received during public comment period: 2/14/23-3/31/23.

Input

Fri, Mar 3, 2023 at 11:33 AM

Thank you for the chance to comment on your seafood strategy. I've been involved in the seafood industry for 40 years on both sides of the hoist. I've seen the good and bad, the smart and stupid parts of the business and management. If you want a thriving commercial fishing industry you have to open up access to the resource for the producers. We need to make meeting the maximum sustainable yield a top priority. We need to make sure that access is spread fairly between small, medium and large producers. In California we have to have minimum river flows for the salmon. They get the water first. We need to de-list humpback whales using the best available Science—not political optics— and we need to acknowledge that the ground fishery is rebuilt and get it open to the open access fleet as there won't be a salmon season this year. This is the access that NOAA needs to quickly make happen. Once fisherman can fish abundant stocks at the right market times of the year the industry will thrive. Thanks,
Larry Collins, Senior Consultant
San Francisco Crab Boat Owners Association

Groundfish Forum

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March 30, 2023

Re: Comments on NOAA's Draft National Seafood Strategy

Dear Assistant Administrator Coit,

Thank you for this opportunity to comment on NOAA's Draft National Seafood Strategy (NSS). Groundfish Forum (GFF) is a Washington-based trade association whose five member companies operate 17 trawl catcher-processor vessels in federally managed fisheries of the Bering Sea, Aleutian Islands (BSAI) and Gulf of Alaska (GOA). In 2022 our fleet of vessels, collectively known as the Amendment 80 (A80) sector and their 2,200 crew members sustainably harvested over 335,000 metric tons of various flatfish, Atka mackerel, Pacific ocean perch, Pacific cod and various rockfish from these waters with an estimated value of $400M. This fishing activity creates year-round family wage jobs for our hard-working crew members and their families and provide direct benefits to 65 western Alaska communities under the Community Development Quota (CDQ) program. In addition, our fishery creates thousands of maritime support sector jobs in Alaska and Washington State in the ports where we operate. These maritime support sector jobs represent a vast network of shipyards and repair facilities in the Puget Sound region, stevedores and labor unions to conduct offloads in Alaska, fuel and provision suppliers, maritime vendors and fishery observers.

Goal 1: Sustain or Increase Sustainable U.S. Wild Capture Production

Fisheries Science: Robust and well-funded stock assessments and surveys continue to be the bedrock for effective fisheries management in the BSAI and GOA. However, while existing core surveys must continue, NOAA must recognize that in the face of climate change, expanding surveys or increasing the frequency of "core surveys" is an absolute necessity to effectively monitor rapid environmental changes in these regions. GFF fully supports expanding fisheries science and research and accompanying budgets to better understand rapidly changing climate dynamics in fish and shellfish populations. NOAA must be bold in its expansion of critical surveys, fisheries science, and research. Without an expansion of these essential foundational activities, sustaining our wild capture fisheries is at risk.

Fisheries Management: We support NOAA's goal to sustainably maximize fishing opportunity and seafood production and would specifically note that Bering Sea flatfish stocks are generally under-utilized. Over the last five years, actual harvest of flatfish allocated to the A80 sector is less than 50% of allowable biological catch. NOAA stock assessments generally indicate that flatfish are at lower risk to be negatively impacted by climate change. If NOAA is truly seeking to increase wild capture of U.S. fish stocks, making management decisions which allow for increased harvest of BSAI flatfish stock is low-hanging fruit.

Habitat Conservation: GFF supports habitat conservation measures when backed by peer reviewed science. It is important to note that management measures already established by the North Pacific Fishery Management Council and NOAA prohibit fishing by the A80 sector within large swaths of the BSAI; collectively these areas total hundreds of thousands of square miles.

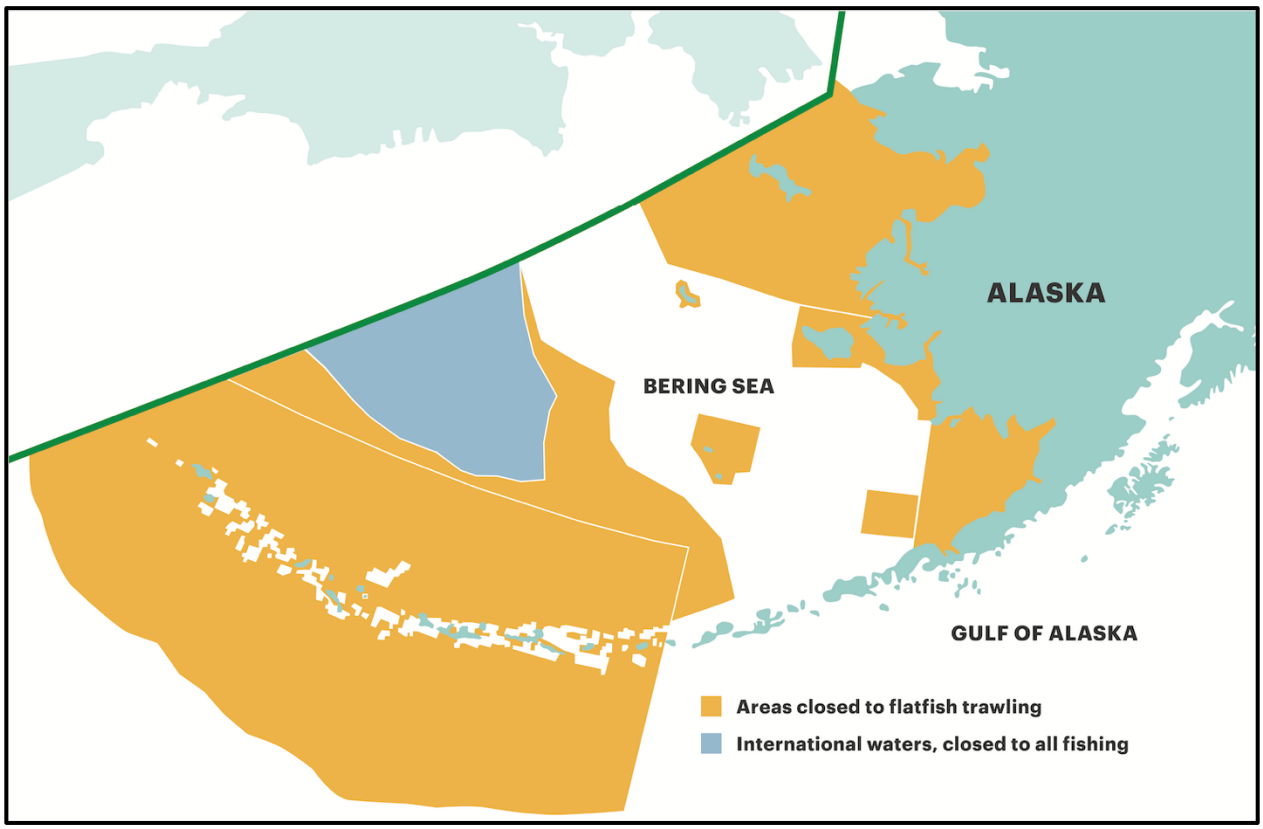

Figure 1: Areas Closed to Flatfish Trawling in the Bering Sea and Aleutian Islands.

Such permanent fixed closure areas are likely to be less effective in the face of climate change as fish stocks migrate and habitat needs for key species change. If NOAA is to be effective in building climate resilient fisheries, NOAA must reconsider its historic approach to habitat protections and invest in research to determine if there are better ways to conserve habitat and fish populations through dynamic closures.

Goal 3: Foster Access to Domestic and Global Markets for the U.S. Seafood Industry

Communications and Promotion: GFF strongly supports increasing domestic awareness of seafood sustainably harvested in U.S. fisheries by U.S. vessels and crew. One area where additional communications and promotion is greatly needed is in combatting dis-information regarding seafood harvested in Alaska. Films such as "Seaspiracy" and websites which are dedicated to promoting mis-information about commercial fishing negatively impact the public's perception of Alaska seafood. Additional local and regional efforts by NOAA are needed in Alaska to better promote and educate the public regarding sustainable seafood harvests.

U.S. Market Development: Our sector sustainably produces approximately 680,000,000 seafood meals annually for consumers across the globe. As such, GFF fully supports NOAA's efforts to put more U.S. harvested seafood back on U.S. plates. NOAA and federal partner agencies should consider creating processes and programs to address barriers which prevent cost-effective secondary processing of U.S. harvested fish on U.S. soil. Pilot programs, technology grants, and other means should be considered to

promote U.S. secondary processing with a focus on developing U.S. harvested fish products which appeal to U.S. consumer's desires.

Fair Trade: GFF appreciates NOAA's focus on IUU fishing and related harmful fishing practices. However, this narrow view of trade is not sufficiently broad for the NSS document and needs to be expanded. Specifically, NOAA (though the Department of Commerce), needs to provide expertise to the United States Trade Representative (USTR) to address major concerns of domestic producers of U.S. seafoods in Alaska who continue to struggle against tariff policies which are greatly harming U.S. seafood companies and crew members. GFF is strongly opposed to the continued imposition of Section 301 tariffs upon various soles and flounders which are caught in U.S. waters by U.S. flagged vessels. These tariffs have had an extremely negative impact upon the Alaska flatfish sector, U.S. fishing crews, Alaskan and Washington State communities where we operate, and U.S. consumers.

Goal 4: Strengthen the Entire U.S. Seafood Sector

Seafood Infrastructure: As noted in the previous section, developing management strategies which promote modernizing U.S. processing capability both on shore and at sea should be a top priority of NOAA. Groundfish Forum member companies have been a domestic leader building new, state-of-the-art catcher processors – since 2017 member companies within our sector have invested well over $250M in new vessels. New vessels reduce the carbon footprint of our fishery, provide for a safe working platform by incorporating the most modern safety construction standards for our crews, and allow our vessel to carry out additional value-added processing which allows our fleet to compete in a highly competitive international marketplace. With the cost of an individual new A80 catcher processor approaching $80 - 100M, NOAA must recognize that building new vessels requires fishery management measures which both promote regulatory stability and predictability.

We appreciate NOAA's desire to keep our fishing industry sector thriving through strategies that promote robust and sound scientific management of fish stocks and habitat; maximize domestic marketing and consumption of U.S. harvested seafood through fair trade practices; and ensure future growth and prosperity by adopting management policies which promote stability, and rationally balance competing needs.

Thank you for this opportunity to comment,

Chris Woodley
Executive Director, Groundfish Forum

March 16, 2023

To whom it may concern, NOAA Office of Communications

By Email: nmfs.seafoodstrategy@noaa.gov

Re: Comments on Draft National Seafood Strategy

Thank you for the opportunity to review and comment on the Draft National Seafood Strategy which, overall, is welcome and timely. I am writing in behalf of our family owned and operated, vertically integrated seafood company, Lund's Fisheries, established in Cape May, New Jersey in 1954. Like many multi-generational fishing businesses in our community, I represent the third generation and have been actively working at Lund's Fisheries in sales, production, and management roles since 1994.

Lund's Fisheries currently employs 150 people annually, between our Cape May and Bridgeton, New Jersey locations, and another 80-90 fishermen on our fleet of fishing vessels. We also work with many independent fishermen who also rely upon us to purchase their harvest and, together, develop domestic and export markets for local seafood products as they become available.

National Strategy on Hunger

In September of 2022 President Biden announced a goal of ending hunger and increasing healthy eating and physical activity by 2030 so fewer Americans experience diet-related diseases— while reducing related health disparities. To advance the President's goal—and build on the federal government's existing work to address hunger and diet-related diseases—this strategy identifies ambitious and achievable actions the Biden-Harris Administration will pursue across five pillars:

1) Improving food access and affordability
2) Integrating nutrition and health
3) Empowering all consumers to make and have access to healthy choices
4) Supporting physical activity for all
5) Enhancing nutrition and food security research

The Agency should see this initiative as naturally compatible with the Draft Seafood Strategy and should integrate US domestic seafood production into to this process.

Our comments, in bold italics, follow the outline of the draft strategy document

Purpose

The *National Seafood Strategy,* outlines our direction for supporting a thriving domestic U.S. seafood economy and enhancing the resilience of the seafood sector in the face of climate change and other stressors.

In our view, the seafood sector is naturally resilient and has been for at least 300 years; we do not attribute climate change to be a significant challenge to the sector's future resiliency. In fact, the USDA Climate Change Resource Center identifies climate change as cyclical in nature and not to be considered a "Stressor":

"Cyclical variations in the Earth's climate occur at multiple time scales, from years to decades, centuries, and millennia. Cycles at each scale are caused by a variety of physical mechanisms. Climate over any given period is an expression of all of these nested mechanisms and cycles operating together."

Our vision is to ensure that:

- U.S. seafood continues to be produced sustainably

A worthy goal however, by definition, every pound of U.S. seafood is sustainably managed by the MSA. We have been engaged in this process for nearly 50 years.

- The U.S. seafood sector contributes to the nation's climate-ready food production and to meeting critical domestic nutritional needs

Climate-ready fisheries should also include developing new fishing opportunities on emerging stocks in a warming Atlantic, however, this does not seem to be a current Agency priority. It is also important to understand that U.S. fisheries can and do feed customers in offshore markets, to aid in a resilient processing sector in the U.S.

- U.S. seafood production increases to support jobs, the economy, and the competitiveness of the U.S. seafood sector

Another worthy goal, however, the U.S. government does not offer programs to help existing businesses expand production capacity to help us compete with producers in other parts of the world where, in many cases tariffs and value-added taxes are employed against U.S. products to keep our products more expensive in important export markets.

- Supply chains and infrastructure are modernized with more value-added activity in the United States

See the comments immediately above.

- Opportunities are expanded for a diverse and growing seafood workforce

This is an important goal; however, our workforce continues to be diverse and with many young people in our community attracted to the year-round jobs we provide in a resort-oriented economy. We need people willing to work hard and we have been rewarded with employees who have been with us for decades.

Strategy Drivers

NOAA Fisheries' *National Seafood Strategy* supports the growing importance of seafood in meeting global needs and recognizes the unprecedented challenges faced by the U.S. seafood sector.

We appreciate this policy statement's recognition that U.S. seafood suppliers are in a global business, which should be understood and embraced by government and consumers alike.

Seafood is Good for People

Seafood is one of the best sources of nutrients essential for human health and well-being. It is also critical to providing food to a growing global population.

We agree and appreciate the strength of this statement.

Seafood is Good for the Economy

The U.S. harvests about 10 billion pounds of seafood annually with a dockside value of $6.3 billion. Domestic seafood is also an economic engine that supports 1.2 million jobs and generates $165 billion in sales across the broader economy.

Our people work hard, nearly 365 days a year, to contribute to the value of our seafood-producing sector; from boat to plate.

Seafood is Good for the Planet

Harvested responsibly, as it is in the United States, seafood is also an environmentally friendly way to produce a nutritious food given its relatively low carbon footprint and efficient use of resources, and is increasingly a critical part of food systems designed to reduce and mitigate the effects of climate change.

We support this statement and would like the Agency to prioritize these facts in regular statements to U.S. seafood consumers.

Strategy Framework

The *National Seafood Strategy* focuses on NOAA Fisheries' work to sustainably manage marine fisheries and produce seafood responsibly, based on sound science. It is one of a suite of strategies that describes how we will support the nation's fisheries and execute our mission in the face of climate change, market disruptions, and new ocean uses.

State and Federal fisheries scientists are our closest allies and our boats and our plant personnel continue to participate in cooperative fisheries research programs in the region. Climate issues should not be used as a reason to interject additional uncertainties in the quota allocation systems of the Councils and Commission.

As mentioned above, the domestic seafood industry has exhibited the ability to remain resilient and react to market and environmental changes for many decades and I predict we would remain so, even if we were believed to be on the verge of an ice age.

The *National Seafood Strategy* also allows NOAA Fisheries to address important national issues such as the resilience of coastal fishing communities; the financial viability of the seafood industry; the effects and opportunities of international trade; and the importance of seafood to nutrition, food security, food sovereignty, subsistence fishing, and traditional Tribal fishing rights.

We support and appreciate these broadly-stated goals.

To implement the *Seafood Strategy,* NOAA Fisheries will partner with state and other federal agencies, the National Sea Grant College Program, Tribes, non-government organizations, fishermen, seafood farmers, and other stakeholders to address the challenges facing the seafood sector, especially when resources are limited.

The importance of shoreside processors to fishing communities is missing from this list. We regret that government resources are limited in support of the strategy's goals and encourage the administration to establish a knowledgeable industry advisory group to guide its implementation.

GOAL 1: Sustain or increase sustainable U.S. wild capture production

Changes in ocean conditions and the resulting shifts in distribution and abundance of marine resources, as well as the intensity of damaging storms are affecting access to and production of seafood as well as subsistence and Tribal fishing. These factors, in addition to new ocean uses and advances in sampling technologies and data modernization call for an evolution in science and management frameworks for a climate-ready seafood sector, including:

- **Fisheries Science.** Provide the science and economic and social analyses necessary for fisheries management under changing ecosystem dynamics.

We strongly support this focus and point of emphasis.

- **Fisheries Management.** Maximize fishing opportunities and sustainable seafood production while ensuring the sustainability of fisheries through effective and efficient management. Support the commercial fishing industry and fishing communities in their efforts to adapt to climate change and thrive in a changing ocean economy.

Streamlining access to emerging fisheries should be a federal priority but we have yet to see this policy emerging…instead, its all 'Chicken Little, the sky is falling in', unfortunately.

- **Habitat Conservation in Support of Fisheries.** Protect and restore habitat important to our nation's fisheries and support resilient coastal communities.

Fisheries habitat is in excellent condition after 48 years of Federal management, gear modifications and necessary changes in fishery practices implemented over that time. Offshore wind development in our Atlantic region is the single largest threat to our ability to maintain the condition of essential fisheries habitat and preserve its productivity potential for the future.

GOAL 2: Increase sustainable U.S. aquaculture production

Seafood is a healthy and climate-friendly nutrition choice and demand is increasing. Aquaculture is one of few ways to significantly increase domestic seafood production—it's how the majority of growth in demand has been met in the last 20 years. Supporting gradual, diverse, and regionally-appropriate growth of the domestic industry will depend on an efficient, strategic, and science-based regulatory approach that considers and mitigates impacts on protected resources, essential fish habitat, and marine ecosystems.

- **Marine Aquaculture Management and Regulatory Efficiency**. Accelerate progress on implementing an efficient, predictable, timely, and science-based regulatory framework for marine aquaculture.
- **Aquaculture Science**. Provide science-based advice and tools to minimize potential effects of an aquaculture operation on the environment and conduct coordinated, applied scientific research in support of sustainable industry development.

Aquaculture is not a part of our core business although shellfish aquaculture has become an important part of the Cape May County economy. Aquaculture production, however, cannot be expected to, in any way, substitute for the volumes of seafood produced in the wild harvest fisheries of the region.

GOAL 3: Foster access to domestic and global markets for the U.S. seafood industry

A thriving, well-regulated domestic seafood industry—capable of competing at home and abroad—will translate into greater global seafood supply and food security from sustainable U.S. fisheries. It will also decrease our reliance on foreign fisheries that are at greater risk of overfishing, IUU fishing, and forced labor.

We agree, overall, with this goal and the point of emphasis highlighted below; however, many 'foreign fisheries' are well managed by the coastal states and it is important to avoid blacklisting other nations under the banner of eliminating foreign overfishing, IUU fishing and forced labor. On the other hand, U.S. fishery importers need clear federal guidelines, protocols, and documentation requirements, to help us to educate our trading partners and thereby assist us in avoiding illegal products in the U.S. fishery supply chain.

- **Communication and Promotion.** Increase public awareness of the availability, sustainability, and nutritional value of all U.S. seafood.
- **U.S. Market Development**. Work with federal partners and others to identify and develop U.S. seafood markets and put more U.S. seafood back on U.S. plates

- **Fair Trade.** Promote fair seafood trade by combating IUU fishing and related harmful fishing practices around the world and by expanding access to foreign markets for U.S. seafood.

GOAL 4: Strengthen the entire U.S. seafood sector

The COVID-19 market disruptions highlighted systemic challenges to the U.S. seafood industry and the importance of supporting the entire seafood/fisheries value chain, including after seafood hits the docks. Addressing these challenges will help the seafood industry to rebuild more quickly and enable the industry to be more resilient and flexible in the face of potential future crises and market shocks.

Our company's strategic value-added investments allowed us to weather COVID-19 disruptions by supplying seafood products that consumers could bring home to eat. Our company did not miss one day of work, either in our plants or on our boats, over the past three years.

- **Seafood as a Vital Part of the Blue Economy**. Support the U.S. commercial fishing, marine aquaculture, and seafood communities to adapt and thrive in a changing ocean economy and given new competing uses.

Changing environment or not, we are and will remain resilient and we don't expect much federal help in remaining so – private sector investments need to be recognized as the vehicle to realize this goal.

- **Seafood Infrastructure.** Work across federal agencies to modernize U.S. seafood infrastructure (e.g., vessels, hatcheries, port and dock facilities, processing, storage, working waterfronts) to strengthen and enhance opportunities for coastal seafood communities and regional food economies.

Again, while a welcomed goal, we do not expect to see federal investment partnerships emerging, to help us continue to make investments in our seafood processing infrastructure. The private sector deserves recognition as the vehicle to facilitate these outcomes.

- **Workforce Development.** Foster a growing and diverse seafood workforce and attract young fishermen and seafood farmers to the sector.

We continue to accomplish these workplace goals, and provide good jobs in the community, through our investments in equipment and people. Again, the private sector deserves more recognition here, we do not expect federal programs to take the place of good business investments and practices.

With best regards,

Wayne Reichle

Wayne Reichle, President; wreichle@lundsfish.com

NATIONAL Aquaculture ASSOCIATION

April 3, 2023

Dr. Michael Rubino
Senior Advisor for Seafood Strategy
NOAA Fisheries Directorate
Email: michael.rubino@noaa.gov

RE: Comments on the proposed National Seafood Strategy

Dear Michael:

The National Aquaculture Association[1] supports the proposed National Seafood Strategy for its focus on increasing seafood production by U.S. farmers and commercial fishermen. We request action by the National Oceanic and Atmospheric Administration to organize and hold a national seafood summit predicated upon the Strategy and informed by the draft Strategic Plan for Aquaculture Economic Development.

We believe that a national summit to stimulate farm-raised and wild-caught seafood production investment and growth in the United States is needed. Canada, Chile, China, India, Indonesia, Ireland, Norway or Vietnam, all of which are significant exporters of farm-raised and wild-caught seafood to the United States, have used national development initiatives to:

- Encourage infrastructure development such as working waterfront, transportation, feed production, cold storage and processing.
- Expedite technology transfer and adoption to reduce costs, increase production, and reduce environmental effects.
- Train an aquaculture and commercial fishing savvy workforce.
- Encourage entrepreneurial development by:
    - educating bankers and investors as to the opportunities for aquaculture and commercial fishing to create, sustain and strengthen rural economies, jobs and income,
    - improving and expanding existing financing programs,
    - creating investment incentives including tax credits,

[1] The National Aquaculture Association is a U.S. producer-based non-profit association founded in 1991 that supports the establishment of governmental programs that further the common interest of our membership, both as individual producers and as members of the aquaculture community. For over 32 years NAA has been the united voice of the domestic aquaculture sector committed to the continued growth of our industry, working with state and federal governments to create a business climate conducive to our success, and fostering cost-effective environmental stewardship and sustainability.

- developing risk management tools; and,
- creating incentives for states, provinces or regions that wish to step up and support commercial fishing and aquaculture.

The development of a national seafood summit should include private sector representatives, who understand what is required to build aquaculture farms, catch fish and operate successful ancillary businesses. A jointly led task force by the departments of Commerce and Agriculture composed of state and federal economic development representatives and fishing and aquaculture stakeholders should be an outcome of the summit to develop specific recommendations for actions that federal and state governments should take, a time table for those actions, and a series of metrics designed to measure program efficacy.

We suggest that to achieve the outcomes of the summit, an investment of federal resources equivalent to 5% of the annual seafood trade deficit is required. As the summit objects are met and the seafood trade deficit is reduced the need for government investment would decline.

We strongly encourage a summit partnership effort that can be facilitated by the National Aquaculture Association and stand ready to meet with you or your staff to begin organization and planning.

If you should have questions or require additional information, please do not hesitate to contact us.

Sincerely,

Sebastian Belle
President

Comments on NOAA Draft National Seafood Strategy

Frank Mirarchi

XII Northeast Fishery Sector, Inc.

March 1, 2023

XII Northeast Fishery Sector, Inc. is a cooperative association established under provisions of Amendment 16 to the Northeast Multispecies FMP in 2010. Its membership represents 23 multispecies permits and 6 active vessels based in Scituate, Mass. Our members share and support the vision statement provided in the Strategy Document. Our vessels are family owned and operated and are continuing a tradition that spans generations.

Having withstood the burdens and sacrifices imposed by two decades of regulations designed to rebuild overfished groundfish stocks, we find ourselves facing new challenges. Several of these, along with some proposed solutions or mitigations are listed below:

1. Fisheries science. For fishery managers and regulators to have timely and representative data it is imperative that we do more to incorporate fishery dependent data into stock assessments. Monitoring programs, both human observers and electronic systems, have evolved into assuring compliance and accuracy of counting regulatory discards with little attention to the biological condition of catches. Apparently, the port observer program, which collects aging information at processing facilities, has also been diminished leaving growing uncertainty over the age structure of catches as well.

   Our recommendation would be to train fishermen and compensate them for providing lengths and biological samples, such as otoliths, from representative catches. In addition, information on spawning condition could provide a broader picture than is now available from biennial fishery independent surveys.

2. Management. Enrollment in a sector has become a necessity for fishermen who depend on predictable access to the groundfish (multispecies) fishery.

The costs of sector operation have increased substantially due to the administrative burden of programs such as at sea monitoring. Ultimately, these costs are imposed on the fishermen through membership fees. Congress has agreed that costs for training and placing of at-sea monitors on multispecies trips are reimbursable. It is our belief that costs for this program imposed on sectors and ultimately borne by member vessels should be treated similarly.

3. Seafood infrastructure. There is a serious disconnect between the availability of groundfish stock and landed harvests. For example, for fishing year 2022, as of 2/21/23, with 85% of the fishing year elapsed only one stock (white hake) had been harvested at over 50% of the allocated ACL. For fishing year 2021 (5/01/21 through 4/20/22) the fishery landed 18,700 metric tons out of an allocated 131,400 metric ton allocation. This is 14% of the total allocation.
   A large factor in this poor performance is a lack of processing capacity. The industry lost a large part of capacity during the COVID business closures. As the economy rebounded, domestic groundfish species lost market share to imported products. Since then limited capacity to process has depressed ex-vessel prices and contributed to volatility adding an additional level of uncertainty to vessel owners' business planning.
   The industry desperately needs to upgrade infrastructure, especially in smaller ports. Capital costs for ice making, cold storage and processing machinery are presently beyond the reach of boat owners, and processors in these regions. A program of grants or loans designed to enable rebuilding is essential. Without investment in shoreside infrastructure, we will continue to lose opportunity for economic vitality and food security in this fishery.
   We urge you to consider the points listed here when developing a strategy implementation plan for our nation's fisheries.

Pacific Fishery Management Council

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Marc Gorelnik, Chair | Merrick J. Burden, Executive Director

March 16, 2023

Re: National Oceanic and Atmospheric Administration Draft Seafood Strategy

To Whom It May Concern:

The Pacific Fishery Management Council (Pacific Council) appreciates the opportunity to provide comments on the Draft National Seafood Strategy (Draft Strategy). Sustainable seafood production for both commercial and recreational fisheries is the fundamental mission of the Pacific Council. We support the vision of the Draft Strategy, which prioritizes sustainable seafood production, climate-ready fisheries and communities, economic competitiveness, and opportunities for a growing and diverse workforce. We also have some suggested changes. Successful implementation of the Draft Strategy will be dependent on National Oceanic and Atmospheric Administration Fisheries' commitment to fund and execute regional implementation plans. We offer the following comments on the Draft Strategy.

The Pacific Council is well positioned to contribute to the Draft Strategy goals of increasing sustainable wild capture production, fostering access to domestic and global markets, and strengthening the seafood sector. Pacific Coast fisheries have experienced enormous challenges in recent decades, such as overfished stocks, habitat degradation, climate change, market disruptions, and infrastructure declines. Although nearly all Federally managed stocks have been rebuilt, our West Coast fleets are in some cases prevented from achieving full utilization of several species, due to catch constraints or other factors. Achieving Optimum Yield and increasing opportunities for greater attainment of underutilized species represents excellent opportunities to address Goal 1 of the Draft Strategy, while also supporting Goals 3 and 4.

Increasing seafood production capacity would also increase the resilience of fishing-dependent communities. Revitalizing the seafood capacity and supply chain would support Goals 1, 3, and 4 of the Draft Strategy.

We believe that the Draft Strategy could be more inclusive by not excluding the recreational sector. We suggest the following changes:

- in the "Fisheries Management" bullet within Goal 1: "Support the recreational and commercial fishing industries and fishing communities in their efforts to adapt to climate change and thrive in a changing ocean economy."
- In the "Blue Economy" bullet in Goal 4: "Support the U.S. recreational fishing, commercial fishing, marine aquaculture, and seafood communities to adapt and thrive in a changing ocean economy and given new competing uses."

- Under the "Strategy Drivers" heading, we recommend that the "Seafood is Good for People" bullet articulate recreational benefits and the "Seafood is Good for the Economy" bullet incorporate the recreational fishing economics.

The Draft Strategy highlights the importance of protecting and restoring habitats important to our nation's fisheries, which in turn supports resilient coastal communities. The Pacific Council is proud of our actions to protect and conserve habitats vital to healthy and sustainable fisheries. We note that a vast majority of the benthic habitat within the Pacific Coast Exclusive Economic Zone is protected, and that nearly all the historic range (both ocean and freshwater) of Pacific salmon is designated essential fish habitat (EFH). However, more actions to protect fisheries habitat, especially in freshwater systems, should be a priority. These actions should include designating EFH in watersheds that are likely to become accessible to Pacific salmon via fish passage improvements, as well as ensuring more robust water quality standards in vital river systems such as the California Central Valley and Klamath systems. The final Strategy should include opportunities for NMFS to use its authorities to address these important habitat concerns. We note that improving habitats and water quality standards also benefits food security, food sovereignty, subsistence fishing, and traditional Tribal fishing rights, and supports resilient communities.

We would also like to emphasize the crucial role of scientific surveys and reliable stock assessments in fisheries management and seafood production. Best available scientific information is the foundation of sustainable fisheries management, and adequate funding is critical to support the surveys and the science that goes into sustainable fisheries management.

The Draft Strategy highlights many benefits of sustainable seafood production, which is good for food security and nutrition, for fishing-dependent communities, and for the U.S. economy. Goal 2 of the Draft Strategy addresses sustainable aquaculture production, which could play a role in seafood production. However, we strongly suggest that the most efficient and effective path to increasing seafood production is to capitalize on existing wild capture opportunities and utilize existing infrastructure.

Thank you for considering these comments, and please contact me with any questions or further discussion.

Sincerely,

Marc Gorelnik
Chairman

KFG:rdd

Cc: Pacific Council Members
Sarah Shoffler
Michael Rubino

March 27, 2023

To: Ms. Janet Coit
NOAA Assistant Administrator for Fisheries
1315 East-west Highway, 14th Floor
Silver Spring, MA 20910
via email: nmfs.seafoodstrategy@noaa.gov

From: Rick Marks
Robertson, Monagle & Eastaugh
LLC Email:

RE: Comments on the Draft National Seafood Strategy

Thank you for the opportunity to comment on the Draft National Seafood Strategy. These comments are informed by the needs of many of our Firm's clients across six Regional Fishery Management Council regions.

GOAL 1: Sustain or increase U.S. wild capture production

Achieving this goal is contingent on two key aspects, fisheries science and management. Obviously the first informs the second, and both of which allow us to achieve and maintain optimum yield from each fishery.

On improving fisheries science – the downward trend in the number of days-at-sea for the NOAA "White Boat" fleet is untenable. Contractual and unmanned survey work will not fill the gap. The impacts of offshore wind activity on long term surveys will only compound the problems. In addition to this, we are seeing a general reduction in cooperative research efforts in some regions which exacerbates data poor problems and further alienates the agency from some of its core constituents.

This is a fairly simple problem to fix, it is just not an easy one. The lack of data increases scientific uncertainty which leads to larger precautionary buffers, less fishing activity and ultimately, reduced wild capture production over time. The exact opposite of GOAL 1. Ironically, the 2006 amendments to the Magnuson-Stevens Act (MSA) *increased* the reliance on science to address fine scale ACL and AM requirements, among other things, but we have not seen a concomitant increase in the capacity of the overall system to adequately meet these new data requirements. For example, the lack of a timely, accurate and precise red snapper survey in the South Atlantic region has kept the fishery closed for many years and just the type of fixable problem that undermines achieving GOAL 1.

To resolve this situation NOAA and Commerce must clearly prioritize and aggressively pursue these issues in the policy and budgetary processes or we will see no improvement and the agency will fail to achieve GOAL 1.

In addition to fisheries science, protected species science also impacts the agency's ability to achieve GOAL 1. The lack of data and lag time related to protected species stock assessments,

declarations of optimum sustainable population (OSP) levels, and uncertainty around interaction/stranding data are hugely impactful to wild capture fisheries performance.

There are numerous examples where the agency has struggled with conservation decisions and use of questionable data to limit fishing activity. Here are a just a few examples: the AK trawl industry continues to suffer from restrictions designed to recover the Western Steller sea lion DPS despite the agency never having proven its forage-based hypothesis upon which the restrictions were originally based; and the lack of any survey for anecdotally-reported abundant neritic stage sea turtles in the Gulf of Mexico (relying solely on nesting success rates) did not stop the agency from time/area closures and reductions on the number of hooks used on longline vessels.

The agency's inability over many years to declare CA sea lions at OSP substantially delayed management actions and negatively impacted other marine resources in the region. More recently, record numbers of strandings by large whales in the Mid-Atlantic region, some in areas concurrent with offshore wind survey activity, has not been thoroughly addressed (~ 60% of whales still have no assigned direct or proximal cause of death; this includes for species other than humpbacks that are <u>not</u> undergoing a declared UME) which may well have long term impacts on wild fisheries production. As wind energy development expands on the West Coast this same scenario has the potential to create havoc in that region's fisheries.

I served on four MMPA Take Reduction Teams (TRT's) and one common theme from these experiences is the TRT's more often than not operate in extremely data poor situations. We are required to hold the industry to a very high level of accountability but we often do so with extremely limited information. This is a most unfortunate situation and the agency should prioritize increasing the amount of protected species-related data so there is less reliance on the precautionary approach which ultimately undermines GOAL 1.

The bottom line here is that while industry generally respects the need for conservation action there is a belief the agency should also put a similar level of effort toward gathering the proper data to make certain any restrictions are fully justified, quantifiable, and adaptive over time.

On improving fisheries management – perhaps one of the most important elements here is for the agency to revisit the fact that the American consumer's access to healthy affordable domestic seafood comes through commercial fishing and the actions of the Regional Fishery Management Council system. In some regions, such as the Mid-Atlantic, South Atlantic, and Gulf of Mexico, those councils are not properly balanced and subsequent decisions on allocations, alternative management measures, and overharvest by the recreational sector come at cost to commercial fishermen and consumers alike.

For example, one could easily argue that an unbalanced RFMC choosing to leave thousands of pounds of available but unharvested mahi mahi in the ocean just to enhance the pleasure of recreational fishermen (in a fishery that is not typically catch & release…) which then leaves U.S. consumers to eat imported mahi is not in the best interest of this Nation's food supply and food security, in achieving optimum yield, in reducing our seafood trade deficit, and toward achieving GOAL 1.

To NOAA's credit the most recent 2022 Report to Congress on the Regional Councils actually calls for increasing the membership for commercial fishing stakeholders in all three of the aforementioned regions. While I understand NOAA must respect nominations by governors the agency does have leeway under Section 302 regarding qualifications and choices that can be made from every slate of nominees. The agency must act now to rebalance these RFMCs if we are to start on the path toward achieving GOAL 1.

Finally, the agency must also strictly adhere to the fact that implementation of the Modernizing Recreational Fisheries Act by some of these currently unbalanced RFMCs must be consistent with all requirements of the Magnuson-Stevens Act. I am hopeful the agency will review all related RFMC actions in this proper context and reject those that undermine MSA integrity.

GOAL 3: Foster access to domestic and global markets for the U.S. seafood industry; and GOAL 4: Strengthen the entire U.S. seafood sector

Commerce (and NOAA) has obvious challenges when it comes to balancing the dual authorities that require both regulations for proper management and supporting/promoting the economy, sustainable fisheries and achieving optimum yield. Generally speaking, NOAA is viewed as an advocate for commercial fisheries in the federal system much in the way the Department of Agriculture is for American farmers. In recent years there is a growing perception in the industry that the agency's primary focus has shifted toward increased regulation and protectionism and away from promotion/jobs/economy/food production/food security and of strengthening the commercial seafood sector.

Take this Draft Strategy by example – it did not come from NOAA but rather was the result of an Administration directive to the agency. Hopefully, this Strategy and NOAA's focus on the "Blue Economy" are opportunities for the agency to change course and increase their efforts in support of GOAL 3 & 4.

To be clear, the agency has done some very helpful work with industry regarding international trade issues. Additionally, the Seafood Watch initiative has been constructive. I believe the industry would favor more such work, much more, perhaps with an expanded scope beyond the smaller boat-to-plate operations to include a broader segment of the commercial fishing and seafood sector. But for this to have any substantive effects it has to be positive, persistent and systemic.

Here is just one example to illustrate the point. Today (March 27, 2023) I logged onto the NOAA website. There is no mention of commercial fisheries or U.S. seafood production, no evidence whatsoever. Here, a member of the public can learn that it is national "Seal & Sea Lion Week", and that a sanctuary is being proposed by the Administration in the Pacific Remote Islands, but nothing else related to American seafood production. You actually have to go to the NOAA Fisheries page before you see a single story about seafood in a small Philadelphia community. Reversing this trend requires philosophical change that has to start with NOAA leadership.

When NOAA actively defends its successful management programs by default it supports the U.S. commercial fishing and seafood sector. Such actions can help to prevent harmful legislation from passing that undermines the Strategy. But when NOAA defers, bad things happen. For

example, in February 2020 the Department of Commerce openly opposed legislation banning the commercial use of shark fins in the U.S. NOAA rightfully and forcefully defended its sustainable shark fishery and the legislation did not pass.

However, NOAA leadership failed to lead on the issue after 2020 and this same unnecessary and harmful legislation passed Congress in 2022. This was a loss both for NOAA's sustainable fisheries management program and the U.S. commercial shark fishery which at one point was the 8th largest in the world. Wherever appropriate and as the responsible federal management agency NOAA must truthfully communicate the impacts of these issues that may undermine the U.S. industry. The *Forage Fish Conservation Act* is yet another recent example of potential fisheries legislation that if not stopped, would do more harm to U.S. seafood production than it will to help the environment.

NOAA also has leadership opportunities to work across agencies to help promote seafood that may not be so easily achieved by the industry operating alone. Using outreach and coordination with industry to add U.S. seafood products to national healthy eating initiatives and USDA food programs should all be a part of a broadly focused NOAA strategy to support U.S. seafood production wherever possible.

On the topic of cross agency support initiatives consistent with the Draft Strategy-- for many years the U.S. squid industry on the East and West Coasts, with the full support of the PFMC & MAFMC, have requested and failed to get NOAA's help to engage the USFWS to address the deficiencies in Interior's definition of "shellfish", and to stop the FWS from treating domestic squid the same as Lacey Act/ESA/CITIES-listed species under the Import/Export License requirements (at 50 CFR 14). The FWS authority over MSA managed species is unnecessarily harming domestic seafood production. Adequately resolving this situation would immediately strengthen the U.S. squid industry on both coasts.

Lastly, fishery disaster assistance is another area where NOAA's role is critical and where the agency can help the U.S. seafood sector. The passage of national fishery disaster reform legislation in late 2022 provides opportunities for improving the process in terms of speed and efficiency. I encourage NOAA to implement helpful changes as soon as possible. Furthermore, I have seen examples where State fishery disaster "spend plans" provide a disproportionate share of the funds to address state budget needs rather than going to the impacted industry stakeholders. To the degree NOAA recommends adjustments to spend plans I hope the agency will do all it can to ensure the appropriate level of assistance goes to those industry constituents most impacted and as quickly as possible.

Thank you for the opportunity to comment on the Draft National Seafood Strategy.

Respectfully submitted,
Rick Marks, Partner
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March 30, 2023

Dr. Michael Rubino, Senior Advisor for Seafood Strategy
NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

Dear Dr. Rubino;

Sea Watch International, Ltd. is a vertically-integrated harvester and processor of surf clams and ocean quahogs from US Federal waters offshore of the mid-Atlantic and New England. We are a leading supplier of clam meat, clam juice in frozen, canned and value-added products for industrial, foodservice and retail markets. We also own Look's Gourmet Foods, a Maine-based cannery that has a presence in 5,500 retail locations nationwide through the Bar Harbor brand. We have invested heavily in science to support stock assessments and improve operational efficiency through our involvement with the Science Center for Marine Fisheries. As a result of our efforts, we partnered with other companies in this sector to gain Marine Stewardship Council certification for the US surf clam and ocean quahog fishery.

We offer the following comments toward issues that we encounter that should be considered in crafting the National Seafood Strategy.

National Standard 1 of the Magnuson-Stevens Fishery Conservation and Management Act states that "*Conservation and management measures shall prevent overfishing while achieving, on a continuing basis, the optimum yield* (OY) *from each fishery for the United States fishing industry."* It is clearly abundant that the United States is a hallmark to the World in identifying overfishing and implementing measures to correct overfishing so that stocks can be economically rebuilt. Along with other examples[i], a feature the fishery in which we operate is that surf clams and ocean quahogs are an underutilized[ii] (p. 3) US fishery. In 2022, quota utilization for surf clams and ocean quahogs was [iii] 43.5% and 44.4% respectively and neither fishery has reached full quota utilization since 2003[iv] (p. 17). Underfishing represents the inability for a fishery to achieve OY. Therefore, underfishing should be elevated to the same status as overfishing[v] and

just like overfishing, efforts should be initiated to identify root causes and develop tangible plans to maximize US fishery resources.

US fisheries are being impacted by climate change. Our business has experienced this first-hand as the geographic footprint of surf clam populations has moves northwest and offshore over the past few decades. We helped fund the science that continues to understand and quantify the extent of these range shifts[vi]. These same range shifts are occurring with other fisheries means that Essential Fish Habitat (EFH) is also dynamic. However, the habitat protection measures that are designed to protect EFH tend to remain static polygons on a map protecting EFH for species of concern that are no longer meaningfully in these areas. Habitat protection needs a change in the "set it and forget it" default for establishing habitat closures, where species designed to be protected have moved out due to climate change. An even greater threat to optimizing US seafood production are initiatives such as the establishment of Marine Protected Areas under large policy initiatives such as "30 by 30." We believe that the regional fisheries management councils provide the proper forum to collaboratively establish Marine Protected Areas underpinned by scientific objectives.

We refer to comments on the impact of offshore wind to US Seafood in comments submitted separately by the Responsible Offshore Development Alliance (RODA). We add that offshore wind poses threats to future economic contribution by US seafood, approaches mitigation to the US fishing sector as an afterthought, threatens to stock assessments by permanency of structures that will forever impact mobile bottom tended gear. Using estimates from the USDA, EPA and DOE[vii], the American Biogas Council incorporated recent industry data to conclude that a fully-developed infrastructure of land-based renewable natural gas (RNG) in the United States could power 7.5 million homes[viii]. This is a significant, underdeveloped source of domestic renewal energy that would divert food and agricultural wastes that will be inevitably generated and disposed of by less than otherwise optimal means.

We believe there is an opportunity to increase the prevalence of US seafood in federal commodity programs. During the COVID-19 pandemic, we were approached with a handful of opportunities to develop products for clams and other seafood and aquaculture products. We found that seafood did not fit well in USDA Section 32 commodity purchase programs. We support the creation of criteria that allow seafood products to be considered on their own economic merits, rather than those created to accommodate terrestrial agricultural commodities. As an alternative, a program within the US Department of Commerce dedicated to special purchase programs for seafood commodities for nutrition and emergency feeding programs may be a better solution.

We feel like the original intent of the The Saltonstall-Kennedy (S-K) Act of 1954 (15 U.S.C. §713c-3) has been systematically and dramatically diluted providing less funds to the commercial Fishing Industry, Academic Research of domestic fisheries and the Marketing and development of Domestic Fisheries. These funds could be much more efficiently spent by private industries and non-governmental entities than dumping money into the general budget of the National Marine Fisheries and NOAA. According to the Congressional Research Service, R46335[ix], in 2018 the USDA transferred $154.7 million dollars, which is only 30% of the duties collected from imports of seafood to the Department of Commerce, of which $10.7 million

dollars made it to the S-K program which has to pay for grants, operating expenses and other S-K programs. Can you imagine the infrastructure development and healthy sustainable domestic seafood products that could be made available to the citizens of this still great country of ours, if only the funds were used as intended?

Thank you for the opportunity to help craft our National Seafood Strategy. We can and must do better to support the domestic and international competitiveness of US commercial fishing.

Sincerely.

Guy B. Simmons
Senior Vice President, Sales and Marketing

Joseph J. Myers
Senior Director, Innovation & Sustainability

[i] https://www.savingseafood.org/science/noaa-report-spotlights-underfishing/
[ii] https://www.congress.gov/116/meeting/house/111092/witnesses/HMTG-116-II00-Wstate-HilbornR-20201117.pdf
[iii] https://www.greateratlantic.fisheries.noaa.gov/ro/fso/reports/h/clam/FYALL_REPORTS//2022-12-22_clam_coast_qm.html
[iv] https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/633df2ef89cdc26dfcb7b390/1665004417479/SCOQ_SpeciesSeaprationRqmt_PHD.pdf
[v] https://www.fisheries.noaa.gov/national/sustainable-fisheries/status-stocks-2021
[vi] https://www.accesswire.com/viewarticle.aspx?id=709373
[vii] https://www.usda.gov/oce/reports/energy/Biogas_Opportunities_Roadmap_8-1-14.pdf
[viii] https://americanbiogascouncil.org/wp-content/uploads/2019/05/ABC-Handout-2019apr-vP3-1.pdf
[ix] https://sgp.fas.org/crs/misc/R46335.pdf

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March 24, 2023

TO: Janet Coit, Assistant Administrator for Fisheries, NOAA
Michael Rubino, Senior Advisor for Seafood Strategy, NOAA

FROM: John Williams, Executive Director, Southern Shrimp Alliance

RE: NOAA Fisheries Draft National Seafood Strategy

The Southern Shrimp Alliance (SSA) appreciates the opportunity to present these comments on the NOAA Fisheries Draft National Seafood Strategy. SSA also appreciated the opportunity to receive and provide inputs on a presentation of this Strategy by Mr. Rubino at the March 16, 2023, meeting of the Gulf of Mexico Fishery Management Council's Shrimp Advisory Panel on which several SSA representatives sit, including me. I note that some of the comments made at that Shrimp AP meeting by SSA representatives are further elaborated in these comments.

General Comments

Shrimp is the most popular seafood consumed in the U.S. Urner Barry reports that in 2020, U.S. shrimp consumption rose to 5.0 pounds per capita, a 25 percent increase over the previous five years, and in 2021 and 2022, rose still further to record highs at 5.8 pounds and 5.7 pounds, respectively [1]. According to NOAA's *Fisheries of the United States*, total U.S. seafood (fish and shellfish) consumption per capita in 2020 was 19.0 pounds [2]. From these figures, we can conclude that shrimp accounts for more than 30 percent of all seafood consumed in the U.S.

According to NOAA's foreign fishery trade and commercial landings databases, the total U.S. supply of shrimp to the U.S. market in 2021 was nearly 2.2 billion pounds, of which only 8.7 percent (188.7 million pounds) was landed by the U.S. Gulf and South Atlantic shrimp fisheries,

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1 https://www.urnerbarry.com/PDF/Consulting/shrimp_inventory_fcst.pdf

2 https://www.fisheries.noaa.gov/resource/document/fisheries-united-states-2020

while 91.3% (1.98 billion pounds) were imported. [3, 4] From these figures, we can conclude that approximately 27.4 percent (602 million pounds) of all seafood consumed annually in the U.S. is imported shrimp.

While precise estimates can be elusive, numerous federal and non-profit studies indicate that a substantial portion of shrimp imports consumed in the U.S. is produced in IUU fisheries and using forced or child labor in fisheries, processing facilities, the production of feed used by shrimp farms, and in the operations of those farms as well.

Further, the results of FDA's testing of farm-raised shrimp imports from nations that are the largest suppliers of shrimp imports to the U.S. confirm that a significant percentage of such shrimp is contaminated with residues of FDA-banned antibiotics used on those farms to prevent or treat disease outbreaks, increase stocking densities, and increase growth rates. The human health threats associated with those antibiotic residues in shrimp imports are both on the individual level – such as in the case of aplastic anemia – and on the global human population level – as in the case of contributing to anti-microbial resistance – something that many world health experts have identified as the greatest threat to human health in the coming decades.

We must also point out that in addition to being abhorrent abuses of human rights, threats to human health, and violations of fishery conservation objectives, these serious and illegal deficiencies in the standards and practices by which some significant percentage of shrimp imports consumed in the U.S. is produced provide those foreign shrimp producers – whether in wild capture fisheries, in processing facilities, or on shrimp farms – with a substantial competitive advantage in the U.S. market over shrimp produced in our domestic shrimp fisheries.

As is well documented by NOAA's own statistics, *ex vessel* prices for U.S caught shrimp, U.S. shrimp landings, U.S. shrimp fishing effort, and the number of active vessels in the U.S. shrimp fleet have all fallen to record lows in recent years since the massive and continued growth in U.S. shrimp imports over the past two decades that was fueled by the development and rapid expansion of shrimp farming in the major shrimp exporting nations.

This reality has today reached existential proportions for the domestic shrimp industry. Recent surges in shrimp imports have flooded the U.S. market and overwhelmed U.S. inventories to the point that shrimp processors can no longer purchase shrimp from U.S. shrimp fishermen. As a direct result, a substantial number of U.S. shrimp vessels are currently unable to fish at all and remain tied to the dock. Those that go fishing have found that they cannot sell their shrimp at a profit, if at all. Many believe that we are on the precipice of the collapse of this iconic American fishery – once the most valuable in the entire U.S. and today still the most valuable in the Gulf of Mexico.

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[3] https://www.fisheries.noaa.gov/national/sustainable-fisheries/foreign-fishery-trade-data

[4] https://www.fisheries.noaa.gov/foss/f?p=215:200:32165188631007:Mail::::

Consequently, no U.S. fishery has a more significant stake in NOAA's National Seafood Strategy than the domestic shrimp industry. For these reasons, SSA strongly supports the clear focus of this National Strategy on protecting and advancing U.S. seafood production, including shrimp, the most sustainable and safe seafood in the world.

SSA membership comprises shrimp fishermen, processors, and the associated shoreside enterprises and fishery-dependent communities throughout the Gulf and South Atlantic regions. Working on their behalf since its founding 20 years ago, SSA has shared many of the same purposes and priorities - along with the goals and the strategies to achieve them - as are reflected in this NOAA National Strategy. We strongly support this overall Strategy and look forward to working with NOAA to implement it. However, we must stress that there are several very important objectives and actions outside of NOAA's scope that other federal agencies and Congress must pursue to address the U.S. shrimp industry's current and long-term needs, and we plan to continue our work with those other agencies and Congress as well. We certainly encourage NOAA to do the same.

GOAL 1: Sustain or increase sustainable U.S. wild capture production

On its face, this Goal states a fundamental shrimp industry priority, and it sets forth specific science, management, and habitat protection objectives and strategies for fishery sustainability that are shared by the shrimp industry - not just in words but in actions.

SSA regularly partners with NOAA and non-federal scientists to generate the best scientific information available and participates extensively in the federal fishery management process through the Regional Councils, the Advisory Panels, and the agency's rulemaking process to sustainably manage our shrimp stocks, to minimize our bycatch to the extent practicable, and to protect sensitive marine habitats.

SSA looks forward to continuing its partnerships and collaborations with NOAA and its partner agencies in implementing this Goal through the following priorities, among others:

- Essential to the effective assessment of shrimp stocks and the management of the fishery to minimize bycatch and protect sensitive habitats is the collection and analysis of data that provides precise measures of shrimp fishing effort. The agency must complete its work with the Gulf Council and shrimp industry to implement a new system.

- As noted in the Strategy itself, "*new ocean uses*" competing with the shrimp industry for space present a new challenge to the Goal to "*sustain or increase sustainable U.S. wild capture production*" of shrimp, as well as to the goals of "*Maximizing fishing opportunities and sustainable seafood production…*". Therefore, NOAA must continue developing and applying spatial suitability modeling in collaboration with the shrimp industry and, as appropriate, with its partner agencies to deconflict such new ocean uses as offshore aquaculture and offshore wind energy development with the shrimp industry. We note that the availability of precise measures of shrimp fishing effort are also an essential element of this modeling.

GOAL 2: Increase sustainable U.S. aquaculture production

Once again, SSA shares the perspective reflected in this stated Goal of the Strategy:

> "*Supporting gradual, diverse, and regionally-appropriate growth of the domestic industry will depend on an efficient, strategic, and science-based regulatory approach that considers and mitigates impacts on protected resources, essential fish habitat, and marine ecosystems.*" (emphasis added)

SSA has engaged extensively to ensure that future offshore aquaculture development follows that necessary science-based approach. As noted above, SSA has collaborated with NOAA's National Centers for Coastal Ocean Sciences (NCCOS) in its spatial suitability modeling and the development of its Aquaculture Opportunity Areas (AOA) Atlas for the Gulf of Mexico. SSA is also providing extensive inputs addressing ecosystem and shrimp industry impacts to NOAA's ongoing development of a Programmatic Environmental Impact States (PEIS) for AOAs in the Gulf. [5] And, while serving as a Steering Committee Member, it brought the shrimp industry's perspectives and expertise to the Meridian Institute's noteworthy workshop addressing the future of U.S. marine aquaculture.[6]

SSA again looks forward to continuing its partnerships and collaborations with NOAA and its partner agencies in implementing this Goal through the following shrimp industry priority:

- The agency's implementation of this Goal must prioritize the sustainability of this industry to no less of a degree than it prioritizes the sustainability of wild capture fisheries – with respect to potential ecosystem and habitat impacts and with respect to deconflicting offshore aquaculture operations with the fishing industry both in the ocean environment and in the seafood marketplace.

GOAL 3: Foster access to domestic and global markets for the U.S. seafood industry

Of the goals of this Strategy to which the domestic shrimp industry most closely relates in today's circumstances of a completely import-dominated U.S. market are the following:

> *"A thriving, well-regulated domestic seafood industry—capable of competing at home and abroad—will translate into greater global seafood supply and food security from sustainable U.S. fisheries. It will also decrease our reliance on foreign fisheries that are at greater risk of overfishing, IUU fishing, and forced labor."* (emphasis added)
>
> "*Promote fair seafood trade by combating IUU fishing and related harmful fishing practices around the world…..*"

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[5] https://www.shrimpalliance.com/wp-content/uploads/2023/03/SSA-Comments-AOA-PEIS-notice-of-intent-7-21-22-.pdf

[6] https://www.dropbox.com/s/niiuoivqzvruxl0/U.S.%20Marine%20Aquaculture%20Workshop%20Synthesis_Spring%202022.pdf?dl=0

Since its founding, SSA has fought to combat unfair and illegal trade through the imposition of anti-dumping duties now in place for shrimp imports from China, India, Thailand, and Vietnam and by working with Congress and federal agencies to develop, strengthen, and implement policies and programs to prevent the importation of seafood produced in IUU fisheries or with the use of forced or child labor, with the use of illegal antibiotics, or imported through any fraudulent means such as product mischaracterization and mislabeling. Together with its commitment to achieving the highest level of sustainability for any shrimp fisheries in the world, SSA's extraordinary investment in combatting unfair and illegal seafood trade literally defines the organization.

Which brings us to the Strategy's additional and pivotal stated goal to *"put more U.S. seafood back on U.S. plates."* This, along with the focus of the entire Strategy on increasing U.S. seafood production and strengthening the resilience of the domestic seafood-producing sector in part by taking actions that level the playing field with imports, could not resonate more with the domestic shrimp industry. The agency has it absolutely right in this Strategy.

That said, the non-profit Seafood Nutrition Partnership (SNP) has advanced an initiative that would establish a National Seafood Council and provide that Council with $25 million of Congressional appropriations each year for five years for a national seafood marketing campaign (*Eat Seafood, America*) to promote seafood consumption in the U.S. [7]

As described by SNP on their website and in many posts, the campaign will promote an increase in U.S. seafood consumption by promoting - the human health benefits of eating seafood - the sustainability of seafood, especially as compared to other meat proteins (beef, pork, chicken) - and the many US jobs an increase in U.S. seafood consumption would create. The unfortunate problem is, however, this marketing campaign and the $125 million in taxpayer funds would be used to promote U.S. consumption of both domestic seafood production AND seafood imports.

For convenience here, using the often-cited statistic that roughly 90 percent of seafood consumed in the U.S. is imported, that means, effectively, that the campaign might use $112.5 million of U.S. taxpayer dollars to promote the U.S. consumption of seafood imports over those five years, assuming their expenditures were proportional to that 90 percent figure. Contrary to SNP's claims, seafood imports are often neither sustainable nor healthy, and they often compete unfairly—if not illegally—against U.S. fisheries and U.S. jobs in many ways we have referenced in these comments and elsewhere (e.g., IUU fishing, forced labor, product misrepresentation/fraud, substandard conservation standards, etc.).

If we consider just the International Trade Commission's 2021 Report indicating that approximately 11 percent of U.S. seafood imports were derived from IUU fishing in 2019, that would mean that the SNP campaign might proportionately end up spending $12.4 million of taxpayer funds over those five years on promoting the consumption in the U.S. of seafood derived from IUU fishing. [8]

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[7] https://www.seafoodnutrition.org/eat-seafood-america/

[8] https://www.usitc.gov/press_room/news_release/2021/er0318ll1740.htm

Given the extensive and much appreciated commitment and investment by NOAA in combatting IUU fishing, forced and child labor in the seafood supply chain, and all other forms of illegal seafood imports, we expect that NOAA and the Administration broadly would never support spending U.S. taxpayer dollars on promoting the U.S. consumption of seafood imports.

Indeed, we must recognize the extraordinary scope of authorities and programs to prevent illegal seafood imports that NOAA's Office of International Affairs, Trade, and Commerce is devoted to implementing and enforcing in collaboration with other Federal agency partners, such as the Seafood Import Monitoring Program (SIMP), the High Seas Driftnet Fishing Moratorium Protection Act, the Marine Mammal Protection Act, among others.

Indeed, given all of the deficiencies in the standards and practices associated with seafood imports identified to date, the clearly articulated purposes and goals and strategies of this NOAA National Seafood Strategy to promote and increase U.S. wild and aquaculture production, to "*decrease our reliance on foreign fisheries that are at greater risk of overfishing, IUU fishing, and forced labor*," and "*to put more U.S. seafood back on U.S. plates*" should ensure that NOAA would never support or participate in any activity such as the SNP campaign that would promote the U.S. consumption of seafood imports.

Indeed, promoting the U.S. consumption of seafood imports known to include seafood derived from IUU fisheries or produced using forced and child labor would be the antithesis of combatting those illegal and abhorrent practices. Such support or participation in the SNP campaign would be strikingly inconsistent with NOAA's National Seafood Strategy and the very purpose and mission of its own Office of International Affairs, Trade, and Commerce. It would represent a serious disservice to U.S. seafood consumers and their health, and a betrayal of the domestic wild capture and aquaculture production industries.

But wait….

The SNP website indicates that "*The Eat Seafood, America! campaign is a collaborative effort of the members of the Seafood4Health Action Coalition". It then lists the members of this Coalition, which includes "NOAA Fisheries*". [9]

Further, as reported by Cliff White in his November 3, 2022, *Seafood Source* article addressing the departure from NOAA Fisheries of Deputy Assistant Administrator Paul Doremus:

> *While working in partnership with the National Seafood Council Task Force over the past two years, Doremus played a key role in advocating for federal funding for the National Seafood Council, an industry-led effort supporting the Seafood Nutrition Partnership (SNP) with its efforts to promote seafood as a healthy food source, leveraging recommendations from NOAA's Marine Fisheries Advisory Council." (emphasis added)* [10]

[9] https://www.seafoodnutrition.org/eat-seafood-america/

[10] https://www.seafoodsource.com/news/premium/supply-trade/paul-doremus-leaving-noaa-joining-trident-not-expected-to-jeopardize-seafood-marketing-board-push

Indeed, while attending the 2022 Seafood Expo North America conference in Boston, SSA's representative heard first-hand Mr. Doremus's public expressions of strong support for the SNP's campaign to promote U.S. seafood consumption, including seafood imports, notwithstanding the fact that at the very same conference, more senior NOAA officials spoke extensively about the agency's commitment to and investments in combatting IUU fishing, the use of forced and child labor, and the substandard conservation practices associated with seafood import supply chains.

Still further, in that November 3, 2022, article Mr. White quotes SNP's President Linda Cornish as follows:

> *"Current NOAA Fisheries Assistant Administrator Janet Coit is a backer of the initiative, Cornish said."*

Clearly, NOAA needs to reassess its policies and priorities. SSA calls on NOAA to rescind its statements of support for spending federal taxpayer dollars on promoting the U.S. consumption of seafood imports and support for proposed legislation and appropriations that would have that result. SSA further calls on NOAA to cease and desist from any further participation in the SNP campaign so long as it continues to promote the U.S. consumption of seafood imports.

NOAA cannot adopt this National Seafood Strategy and at the same time support the objectives of or participate in that campaign.

SSA notes that SNP and its campaign participants still have the opportunity to reconsider and revise its priorities to promote only the U.S. consumption of U.S. seafood produced in U.S. wild capture fisheries and U.S. aquaculture operations. Hopefully, with NOAA's encouragement, they will do so.

GOAL 4: Strengthen the entire U.S. seafood sector

The U.S. shrimp market is flooded with imported shrimp to the extent that it threatens the future existence of the domestic shrimp fisheries. U.S. inventories are overwhelmed with shrimp imports. While the massive and continued growth in shrimp imports, especially farm-raised, has a long history, today the oversupply of cheap farm-raised shrimp imports that have overwhelmed U.S. shrimp inventories are, in significant part, a consequence of COVID-19 disruptions. As referenced earlier in these comments, the domestic shrimp industry also faces "*new competing uses*" on both the fishing grounds and in the working waterfronts, including offshore aquaculture and offshore wind energy development. And, like many U.S. fishing industries, the U.S. shrimp industry is also experiencing an aging workforce and must attract young fishermen.

SSA strongly supports the goals and objectives to strengthen the U.S. seafood sector and strategies to achieve them set forth in this Goal of the National Strategy and looks forward to working with NOAA to implement them.

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March 15, 2023

Re: Comments on *NOAA's National Seafood Strategy*

Dear NOAA Fisheries,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 37 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast. UFA recognizes the importance of a robust domestic seafood industry in protecting and strengthening our Nation's food security, and we value the opportunity to weigh in on a seafood strategy for America.

We appreciate NOAA's efforts to support a thriving domestic U.S. seafood economy, and to enhance resilience in the seafood sector and our coastal communities. *NOAA's National Seafood Strategy* (Strategy) provides a high-level framework and our comments highlight and expand on the specific components that we believe are the most important for our industry. When NOAA develops an implementation plan we request additional opportunity to comment on that more detailed plan.

UFA appreciates introductory comments in the Strategy document highlighting that wild seafood in the U.S. is responsibly harvested, and one of the best sources of essential nutrients. In Alaska we are incredibly proud of our sustainably managed commercial fisheries, and believe that characteristic distinguishes us from many foreign competitors. We encourage NOAA to continue pushing this message out to the American public to encourage more domestic consumption of U.S. seafood.

Goal 1: Sustain or increase sustainable U.S. wild capture production

Fisheries Science. This goal speaks to the importance of fisheries science, and UFA wholeheartedly agrees. Core fishery surveys provide necessary information that underpins our entire science-based management system. Existing core surveys must continue, and NOAA should consider expanding what is considered core (for example, adding regular surveys in the Northern Bering Sea or increasing surveys in the Gulf of Alaska to occur annually). UFA also recognizes the need for expanding fisheries science and research to better understand the impacts of rapidly changing ecosystem dynamics. However, this expansion cannot come at the cost of core fisheries surveys.

Fisheries Management. This goal speaks to the importance of maximizing fishing opportunities while ensuring the sustainability of fisheries through efficient and effective management, and supporting the commercial fishing industry and fishing communities to adapt and thrive in the face

of a changing ocean economy. As noted above, the Alaska seafood brand is built on a reputation for sustainability, and commercial fishing is the economic backbone of many of our Alaskan coastal communities. However, conditions are changing rapidly around us, including our supply chains, domestic and international markets, and ocean conditions. UFA strongly supports effective fisheries management that can respond to these changes, ensure sustainable fisheries for tomorrow while maximizing commercial harvest today, and allow our fishing businesses and coastal fishing communities to thrive.

Goal 2: Increase sustainable U.S. aquaculture production

Marine Aquaculture Management and Regulatory Efficiency. UFA recognizes the value of mariculture and aquaculture, but strongly advocates that each state retain the ability to choose which types of aquaculture activities are appropriate for themselves by including opt-out provisions.

Goal 3: Foster access to domestic and global markets for the U.S. seafood industry

Communication and Promotion and U.S. Market Development. UFA strongly supports increasing domestic awareness about the sustainability, availability, and excellent nutrition of U.S. seafood. Most of us are familiar with national campaigns promoting awareness of other foods ("Got Milk?", "The Incredible Edible Egg", "Where's The Beef?"), and there is tremendous opportunity to do the same for U.S. seafood. NOAA has a mechanism to help through the Saltonstall-Kennedy (SK) grant program, which was created to market and promote U.S. seafood. This program is funded through fees collected on seafood imports, and in FY2023 the SK program is slated to receive about 3% of the collected fees. UFA believes there is room to grow the SK grant program and supports allocating a higher percentage of the collected fees for industry grants targeted at marketing and promoting U.S. seafood.

Fair Trade. Most of Alaska's seafood competes in global markets, and UFA appreciates the attention to fair trade issues and recommends NOAA partner with the U.S. Trade Office. UFA representatives met with U.S. Trade Ambassador Tai in June 2022 and noted the following key trade challenges facing the Alaska seafood industry.

1. The U.S. Trade Office does not have dedicated staff for seafood, as it does for textiles and agricultural products. UFA recommends ensuring the Trade Office has the necessary expertise, awareness, and bandwidth to appropriately support U.S. seafood trade.
2. The U.S. seafood industry lacks U.S. trade policy support often afforded to farmers and manufacturers. For example, foreign seafood often enters the U.S. entirely duty-free, while seafood harvested in the U.S. and processed overseas is subject to high tariffs when entering U.S. markets.
3. Tariff barriers in key export markets continue to grow, including China and Japan where Phase One agreements should have increased purchases and opened markets. At the same time the U.S. continues to allow duty-free import of Russian-harvested pollock and crab.
4. Failure to address low-hanging fruit like removing Section 301 Tariffs on Alaskan flatfish; all other Alaskan seafood products were removed from the Section 301 lists and removing the last five flatfish product codes is truly low-hanging fruit.

Goal 4: Strengthen the entire U.S. seafood sector

Seafood Infrastructure. Alaska has aging fishing fleets and processing facilities and our seafood industry would greatly benefit from investments to modernize our infrastructure. Modernizing and

replacing commercial fishing vessels would increase efficiency and safety on the water, while modernizing processing facilities would increase efficiency while creating opportunities for more value-add processing in the U.S. Bringing more seafood processing back to the U.S., rather than continuing to ship product overseas, is a tremendous opportunity for U.S. seafood. Updating seafood industry infrastructure will benefit our coastal fishing communities, and increase local and national food security by eliminating the need to ship product overseas.

Workforce Development. UFA has long supported workforce development and training for the seafood industry, and trades necessary to support our fleets and infrastructure (e.g., refrigeration, welding, hydraulics, etc.) There is also growing concern that fewer young people are opting to become fishermen, and we support initiatives that will raise awareness and attract young people to the U.S. seafood sector to strengthen our nation's food security. In addition, rapidly changing fishery conditions have spawned an unprecedented number of fishery disasters in Alaska in recent years. This has highlighted the need for much faster disaster relief to fishermen and communities, and challenges with quickly identifying and accessing other mitigation measures when they are needed for fishing businesses and individual fishermen (e.g., SBA EIDL program, or job retraining resources).

We understand NOAA Fisheries will prepare an implementation plan that contains specific actions, timelines, partnerships, and milestones, and we request an opportunity to review and comment on that plan when it becomes available.

Thank you,

Matt Alward
President

Tracy Welch
Executive Director

West Coast Seafood Processors Association
P.O. Box 1127
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(503) 227-5076

March 31, 2023

NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910
Submitted online via – NOAA Fisheries Draft National Seafood Strategy

RE: Draft National Seafood Strategy – WCSPA Comments

To Whom It May Concern:

On behalf of the West Coast Seafood Processors Association (WCSPA), I submit the following comments on NOAA's Draft National Seafood Strategy. WCSPA represents shoreside seafood processing companies and related businesses located in California, Oregon, Washington, and Alaska. Our member companies also have plants and seafood distribution facilities in Texas, Hawaii, Nevada, Utah, Arizona, and Florida. WCSPA members process the majority of Pacific hake (whiting) and non-whiting groundfish (rockfish, sole, sablefish) landed on the U.S. West Coast, in addition to Dungeness crab, pink shrimp, salmon, albacore tuna, and other important commercial species. WCSPA processing companies range from "mom and pop" operations to some of the largest seafood companies in the United States, employing thousands of workers in harvesting, processing, transporting, and distributing seafood across the country and throughout the world. We are essential workers, we are food producers, and we contribute greatly to our Nation's food security.

WCSPA appreciates the opportunity to submit comments on NOAA's Draft National Seafood Strategy. In addition to the comments provided below, WCSPA signed a letter written by the Responsible Offshore Development Alliance (RODA) and submitted as part of the record of comments on the Draft National Seafood Strategy. The comments and recommendations provided herein are intended to supplement the comments submitted in the RODA letter and offer perspectives more unique to U.S. seafood processors.

General Comments

U.S. wild capture commercial fisheries are managed to ensure sustainability and adhere to all National Standards set forth in the Magnuson-Stevens Fisheries Conservation and Management Act (MSA). Fisheries management follows strict laws for sustaining stocks, conserving biodiversity (protecting habitat, marine mammals, and endangered species), and protecting the Nation's living marine resources. Moreover, robust U.S. laws mandate that fisheries and seafood production follow workplace safety and protection rules, that seafood is safe for consumers to eat, and that associated environmental impacts are minimized and mitigated (such as with clean water). Companies utilize internal controls and audits, backed by third-party verification, to maintain product traceability and integrity of their supply chains. For all of these reasons, **successfully implementing the National Seafood Strategy will require NOAA Fisheries to explicitly**

acknowledge the outstanding merits of the U.S. fishing and seafood industry and defend our industry against unwarranted threats.

Fishermen and seafood processors not only face changing environments, global supply chain vulnerabilities, and potential loss of access to fisheries, but they must also contend with increasing regulatory costs and burdens that threaten their viability and competitiveness with other nations. **NOAA Fisheries should include action items to address and counter these threats and stressors when implementing the National Seafood Strategy.**

We support NOAA's vision outlined in the Draft Seafood Strategy and NOAA's intent to enhance the resilience of the seafood sector in the face of climate change and other stressors. The fishing industry is on the front lines of the climate change crisis, and U.S. reliance on imported seafood has come at a climate cost. However, it is clear that the most significant threat the fishing and seafood industry faces is offshore wind development and its potential to produce devastating impacts on fisheries, fishing communities, and fisheries ecosystems. **We feel strongly that NOAA must more explicitly identify and address the threat of offshore wind development to the fishing/seafood industry in its National Seafood Strategy.**

The Draft Seafood Strategy is incorrect when it suggests that offshore wind will "potentially result in conflicts." Offshore wind, and other potential new ocean uses, *will result in significant conflicts for the U.S. seafood industry*. NOAA's Seafood Strategy must acknowledge this reality and establish clear action items to protect the U.S. fishing/seafood industry and strengthen our ability to provide nutritious food for the Nation. The Seafood Strategy should also strive to ensure that our science-driven fisheries management process is not compromised. We acknowledge and appreciate the work being conducted by NOAA's National Centers for Coastal Ocean Science (NCCOS) in developing a spatial modeling tool that can help in identifying areas on the outer continental shelf potentially suitable for offshore renewable energy developments. However, in determining suitable sea space for offshore wind development, **areas which are important to our commercial, recreational, tribal and subsistence fisheries should be deemed unsuitable for offshore wind development**. *NOAA Fisheries should adopt and advance this position in the National Seafood Strategy.*

Moreover, given some recent, significant marine mammal mortality events on the East Coast, we remain extremely concerned that the impacts of offshore wind development on protected species could become a major problem on the West Coast. Any negative impacts to West Coast humpback distinct population segments (DPSs) will wreak havoc on West Coast fisheries. By way of example, in May of 2022, NOAA sent a letter to the Bureau of Offshore Energy Management (BOEM) expressing concerns about offshore wind siting on the East Coast and recommending that offshore wind sites should be moved further offshore to protect migratory North Atlantic Right Whales, one of the most endangered large cetaceans and the focus of coastwide conservation efforts. To our knowledge, BOEM never responded to NOAA's letter.

Under Federal law, every ocean stakeholder group must work to protect conserve and protect marine mammals, in some cases losing economic opportunities to do so, yet BOEM appears to have free reign to build wind fields despite no clear understanding of the impacts of survey and construction activities on the marine environment. Once these large areas of our oceans are industrialized and developed for offshore wind, it will be too late to remedy the damage.

Concerns about the impacts of offshore wind development must be addressed as NOAA's top priority, and certainly to ensure any possibility of advancing the goals and objectives laid out in the Draft Seafood Strategy.

Comments on the Seafood Strategy Framework

Goal 1: Sustain or Increase Sustainable U.S. Wild Capture Production

Fisheries Science. Federal fisheries surveys and resulting long-running datasets are integral to our understanding of the marine environment (including impacts of climate change) and the foundation for stock assessments which are the cornerstones of our fisheries management processes. Disruptions to those surveys, or long-running datasets, result in less certainty for stock assessments and other tools utilized in setting harvest guidelines for our fisheries. We strongly support NOAA's formal recognition of fisheries science as a top priority, given the need to increase and expand surveys in a changing climate while facing increasing costs to do so.

NOAA's National Seafood Strategy should identify and require specific commitments and actions the Agency will undertake to better deliver this core function, including steps to ensure that Federal fisheries surveys are conducted regularly and sustained. NOAA should explicitly include a commitment in the Seafood Strategy to increase scientific surveys to meet growing needs for ecosystem and climate resilience.

Fisheries science must be a cornerstone of the National Seafood Strategy, and actions must be identified to ensure its longevity and integrity. We are extremely concerned that the siting and location of offshore wind projects will interfere with NOAA's scientific and research surveys, one of the most critical elements of our fisheries management system. BOEM has not conducted any sort of Environmental Impact Statement (EIS) to examine the impacts of offshore wind development on the West Coast marine environment, our critical upwelling ecosystems, and the migration of fish and marine mammals. The U.S. fishing and seafood industry is counting on NOAA to protect the environment as well as our access to healthy marine resources for U.S. consumers throughout the offshore wind development process.

Fisheries Management. In the Seafood Strategy, we urge NOAA Fisheries to state how the Agency will provide resources to support efforts to uphold the National Standards in the MSA, defend use of the best available science, and assist Regional Fishery Management Councils in the development of more flexible management actions to adapt to changing conditions.

The role of NOAA and impacts on industry and the marine environment from offshore wind development are major concerns for the fishing/seafood industry on both coasts. NOAA is the lead Agency for managing marine resources, and the impacts of offshore wind activities on those resources and on the stakeholders that depend on them are not well understood. Difficult as it may be under the current regulatory and political framework, **NOAA must firmly inject science and common sense into the currently-rushed approach to offshore wind energy development**.

Goal 2: Increase Sustainable U.S. Aquaculture Production

WCSPA recommends that the National Seafood Strategy: 1) clarify how NOAA will work with other Agencies, the seafood industry, and other stakeholders to identify aquaculture's impacts on marine life and habitats and how negative impacts will be avoided; 2) address challenges created by new ocean space allocation issues and changing environmental conditions; and 3) identify the impacts of aquaculture development on existing seafood markets and include measures to proactively address any conflicting interests of market sectors.

Goal 3: Foster Access to Domestic and Global Markets for the U.S. Seafood Industry

West Coast seafood producers face extraordinary challenges in the domestic and global marketplace, including – among other things – tremendous trade uncertainty in recent years, the strength of the dollar against most foreign currencies, and competition from low-cost seafood producers from nations that are not subject to environmental safeguards and labor protections like U.S. fisheries. In addition, joining these challenges is the sharp uphill battle recently created by the COVID-19 global pandemic, including the near worldwide shutdown of the foodservice industry, which generally accounts for a majority of seafood consumption, on top of the logistical difficulties we currently face throughout the global supply chain.

Communication and Promotion. NOAA is well-positioned as an authoritative source of science-based and factual public outreach about the availability, sustainability, and nutritional value of seafood harvested in the United States. **The Seafood Strategy should include specific actions for NOAA and NMFS to take to accomplish this goal**, **including investing in public outreach to bolster consumer confidence in U.S. seafood** and communicating the 2020-2025 U.S. Department of Agriculture (USDA) Dietary Guidelines for Americans that support eating more seafood.

In the Seafood Strategy, NOAA should increase public and inter-Agency outreach on seafood's role in meeting U.S. dietary needs. Towards this end, the Seafood Strategy should clearly articulate how NOAA will improve upon existing government market support programs. NOAA should actively partner with the USDA to provide more effective and timely support for its domestic food marketing and seafood purchase programs.

U.S. Market Development. As noted above, **NOAA's National Seafood Strategy must articulate how NOAA will work effectively with the USDA and the seafood industry to communicate the outstanding merits of seafood** to U.S. consumers so domestic markets will further develop and provide vital outlets for seafood producers. Toward this end, more seafood should be included in the USDA's National School Lunch Program (NSLP). The Seafood Strategy should also incorporate regular input from domestic seafood producers so NOAA can better understand the domestic market and related access challenges.

Fair Trade. While the volume of U.S. seafood produced from waters the West Coast and Pacific Northwest are large, it is a relatively small part of a global supply chain that encompasses large volumes of competing wild and farmed species, many of which see comparatively small production costs due to less stringent management and production efforts. The success of America's fisheries and seafood production systems, therefore, depends on the success of U.S. trade officials in facilitating fair global seafood market access.

Similar to the National Seafood Strategy, NOAA Fisheries should advance a National Trade Policy for the seafood industry, through which NOAA Fisheries could work with the International Trade Administration (ITA) and the Office of the United States Trade Representative (USTR) in designing and implementing a targeted plan for pursuing free and fair trade.

Illegal, Unreported and Unregulated (IUU) fishing degrades marine ecosystems, and forced labor is an affront to human decency. These practices in any part of global seafood production hurt American producers by undercutting U.S.-harvested seafood in U.S. and global markets. Our companies are held to high sustainability and other standards. Those standards should be more broadly applied to fisheries around the world in ways that directly target bad actors and do not impose undue burdens on lawful U.S. seafood trade.

WCSPA supports the National Seafood Strategy objective to combat IUU fishing. The Strategy should include items that make full use of current authorities and programs to fight IUU fishing and exploitative labor practices worldwide, and in particular to leverage the cross-sector collaboration and governmental coordination functions called for in the Maritime SAFE Act. Current authorities also allow agencies to address cases of domestic seafood fraud, and the Plan should ensure these foreign IUU fishing and fraud enforcement programs are fully resourced. WCSPA recognizes that NOAA Fisheries faces pressure to do more domestically to combat foreign IUU fishing, such as expanding the Seafood Import Monitoring Program (SIMP). If the National Seafood Strategy addresses SIMP, WCSPA strongly recommends that it remain focused on only a few of the highest-risk categories. Given its administrative complexity, high costs, risks to lawful seafood trade, and lack of effectiveness in identifying IUU fish, *we strongly oppose expanding SIMP*.

Goal 4: Strengthen the Entire U.S. Seafood Sector

WCSPA supports this goal and emphasizes the need to integrate the National Seafood Strategy with the Federal government's strategy for enhancing food security and creating resilient food supply chains.

Seafood as a Vital Part of the Blue Economy. NOAA's Seafood Strategy must explain, in detail, how NOAA will invest in and help fishing and seafood-dependent communities "thrive" as competing uses for ocean space increase and erode access to sustainable fisheries. Specifically, the Seafood Strategy must explain how NOAA will bolster fishing community support and promote access to sustainable fishing, based on fully articulated values of seafood-based economies, while other Federal Agencies like BOEM seek to develop offshore industries with little to no assessment and consideration of impacts to fisheries and marine ecosystems.

The Seafood Strategy should state that before actions are taken to displace fisheries from ocean space, NOAA and other agencies managing the action (i.e., BOEM) must proactively identify the full range of economic impacts (e.g., losses to jobs, income, reinvestment, tax revenue, etc.) and commit to avoid and mitigate those impacts.

In addition, the Seafood Strategy should state how NOAA can help drive government investment to Blue Economy communities in the form of technologies, infrastructure, and market access, thereby increasing their long-term ability to compete in seafood markets.

Seafood Infrastructure. WCSPA supports the objective of modernizing U.S. seafood infrastructure and supply chain components to advance the resilience of fishing and seafood communities and regional food economies. In the Seafood Strategy, **NOAA should identify every opportunity to better understand the U.S. seafood supply chain** – from harvest to consumer – and work with the fishing/seafood industry to identify infrastructure needs at the local level. NOAA can then best understand how to use its authorities and/or work with states and partner agencies to increase technical assistance and direct grant programs for vessel modernization and recapitalization, port facilities, processing and storage facilities, and programs for modernizing seafood storage and shipment.

To support resilient coastal communities, **WCSPA urges NOAA to include specific items in the Seafood Strategy advancing partnerships with coastal communities to improve resilience and fortification for coasts and coastal infrastructure**. In addition, we recommend NOAA focus on the infrastructure capacity and modernization needs of seafood-dependent communities, particularly those in rural locations. We recommend close consultation with local fishermen, seafood processors, and community leadership to identify priority community resilience and infrastructure projects.

Workforce Development. WCSPA strongly supports this objective. The best way to attract commercial fishermen and seafood producers is to clearly facilitate economic success and further signal to the national economy that domestic seafood is a national priority.

The Seafood Strategy should state how NOAA Fisheries will help minimize industry cost, burden, risk, and uncertainty – and how it will help ensure that seafood jobs are in demand, pay well, and attract investments. It should explain how NOAA will work collaboratively with other agencies, educators, and seafood employers to expand workforce development, training, and extension programs, which are needed to instill valuable and unique fishing and seafood processing skillsets.

Toward this end, **we recommend NOAA Fisheries work with the USDA to enhance supply chains for seafood production**. By way of example, the USDA Rural Development administers a Meat and Poultry Processing Expansion Program (MPPEP) to provide grants to help eligible processors expand their capacity. USDA Rural Development designed the MPPEP to encourage competition and sustainable growth in the U.S. meat processing sector, and to help improve supply chain resiliency. A similar grant program for seafood processors would help strengthen the entire U.S. seafood sector and enhance opportunities for coastal seafood communities and regional food economies.

As lack of workforce continues to be one of the major issues plaguing the seafood processing industry, automated fish processing machinery is needed to supplement lack of hand filleters while increasing throughput, but often requires multimillion dollar investments that are often unattainable. Funds to support seafood processors could be used to offset significant capital expenditures on cutting edge fish processing machinery.

Thank you for the opportunity to provide comments on the Draft National Seafood Strategy. Ultimately, it remains incumbent on NOAA Fisheries to lead and effectively partner with many other agencies to implement this Strategy through an interagency approach, with NOAA Fisheries at the helm. We look forward to the opportunity to work with NOAA Fisheries to implement the National Seafood Strategy.

Sincerely,

Lori Steele
Executive Director

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March 29, 2023

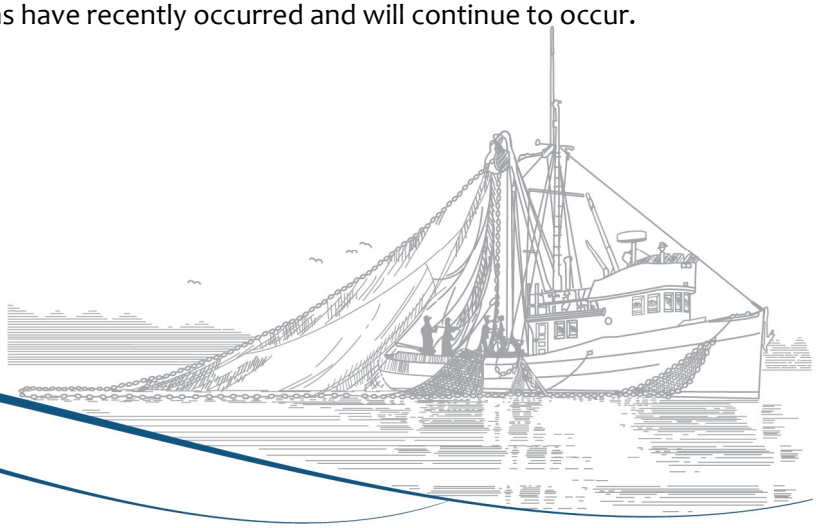
Ms. Janet Coit, Assistant Administrator
NOAA Fisheries Directorate
1315 East-West Highway, 14th Floor
Silver Spring, MD 20910

Re: National Seafood Strategy

Dear Ms. Coit:

I am pleased to have the opportunity to comment on the National Marine Fisheries Services' National Seafood Strategy on behalf of the California Wetfish Producers Association (CWPA). CWPA represents California's coastal pelagic species fishing industry whose harvests include sardine, anchovy, mackerels and market squid and who produces more than half of the volume of all seafood landed in the State. Our members form the backbone of California's fishing economy, an essential asset to the State overall, as well as to communities such as Monterey/Moss Landing, Ventura, Port Hueneme and San Pedro/Terminal Island, where we support both fishing infrastructure and significant regional employment. Thank you for developing a strategy consistent with your continuing recognition of the seafood industry's contributions to food security, coastal communities' economies and identities, and our Nation's interests. We are optimistic that you will use this strategy to further strengthen and stabilize the industry's position in the U.S. and international food supply networks and economies.

We fully support the strategy's first goal of sustaining or increasing production from sustainable U.S. wild-capture fisheries. We appreciate the focus on science as the basis for achieving this objective and the recognition of the challenges as we adapt to changing climate and ocean conditions. Unanticipated ocean conditions have recently occurred and will continue to occur.



These changes will alter fish stocks and their distribution in both predictable and unpredictable ways. Keeping pace of these changes is necessary for both constraining fishing opportunities as stocks contract or move from an area and expanding fishing opportunities as stocks expand or enter new areas. Survey data are critical to understanding the implications of these ocean changes and developing appropriate responses. We strongly encourage NMFS to prioritize fishery surveys in its implementation plan to improve its ability to effectively respond to changes.

NMFS has come to rely extensively on modeling for assessing fish stocks, habitat, and the ecosystem. We face ocean condition changes beyond those previously seen. Extension of model results beyond conditions previously observed is always challenging. To achieve the best results and make the best use of the modeling capacity developed at NMFS, current and comprehensive data for model development, validation, and update are needed. Without maintaining (or even improving on) existing data streams accurate modeling of the dynamic environment is not possible. To that end, NMFS efforts to achieve efficiencies in its fishery surveys, such as exploring consolidation of the West Coast coastal pelagic species and whiting surveys, are laudable. So too is its recognition that any consolidation of those surveys must maintain the integrity of both. We are optimistic that NMFS staff will develop survey methodologies that realize efficiencies without sacrificing the integrity of data. We believe achieving the stated goal of maximizing fishing opportunities and seafood production while ensuring sustainability requires, first and foremost, the best available data to support our understanding of the marine environment. We strongly encourage NMFS to prioritize collection of survey data as it develops its implementation plan.

We strongly support the goal of fostering U.S. seafood's access to domestic and global markets. We are also encouraged by NMFS recognition of the need to promote fair trade of seafood and additional access to international markets. Efforts to achieve this goal should include working to streamline trade regulations (including coordination with partner agencies to streamline their regulations) to minimize unintended and unnecessary burdens to seafood reaching both domestic and international markets.

We also support NMFS's goal of strengthening the entire seafood sector. To achieve this objective, it is critical that NMFS defend both its sustainable management of U.S. fisheries and the fisheries themselves against competing actions. We ask that NMFS use its scientific knowledge of fisheries and modeling capabilities to ensure that the estimates of the impacts of potential competing actions are accurate and fully considered in policymaking processes. Initiatives of other agencies, such as a rapid move to develop offshore wind power and administration wide initiatives to meet target set asides, pose great risk to existing sustainable fisheries. Fairly weighing the tradeoffs of different actions requires an understanding of both direct impacts (such as direct conflicts that prevent fishing in areas being developed or set aside) and indirect impacts (such as the impacts on habitat that might occur from changes in upwelling that are far from the areas being developed). Generalized analyses with broad-based conclusions are not sufficient for this purpose. These considerations require specific analyses of proposed actions. NMFS staff are best equipped and able to complete these analyses. A complete analysis of tradeoffs that involve seafood sectors also requires consideration of the need for

substitute food sources that may have greater environmental and climate impacts than wild capture seafood.

NMFS should encourage a more gradual series of actions over large scale actions when an action is novel or its impacts are less certain. Pacing of actions in this manner can allow for better understanding of impacts and balancing of interests, which should yield overall greater public benefit from actions. Longer term analyses of realized effects from actions taken are needed to assess whether projections were accurate and appropriately plan future actions. A commitment to both the analysis of potential impacts of proposed actions and studies of realized impacts should be a part of the implementation plan.

NMFS should strongly defend fisheries from encroachment that cannot be fully justified on its merits and should also ensure that losses of investment to displaced fishery participants are fully compensated. Policy changes that displace fishery participants who have made sound investments based on the existing regulatory environment may at times be defensible, but having those participants bear the losses from that displacement is not. NMFS implementation plan should include defending and advocating for fishermen to prevent undue displacement and minimize and compensate for losses from displacement that advance the overall public good.

We strongly encourage NMFS to work closely with partners in federal, state, local, and tribal governments, as well as industry to effectively implement its strategy. Sharing of information and coordination of efforts across agencies and governments with industry input is the best way to ensure that seafood has its rightful place in the country's food supply and economy.

We look forward to NMFS implementing its strategy to expand their understanding and the appreciation of the benefits of seafood as a nutritious and environmentally friendly food source.

Thank you for the opportunity to comment.

Best regards,

Mark Fina

March 31, 2023

Ms. Janet Coit
Assistant Administrator for Fisheries
NOAA Fisheries
1315 East West Highway
Silver Spring, MD 20910

Dear Asst. Administrator Coit,

Thank you for this opportunity to provide feedback on NOAA Fisheries' Draft National Seafood Strategy. Don't Cage Our Oceans endorses the comments of our member organization, North American Marine Alliance (NAMA), and would like to provide additional comments. First, we welcome an open conversation on how NOAA Fisheries can support national seafood systems in a way that benefits people and the planet. Coastal communities, local seaweed and shellfish aquaculture producers, and fishing families should be active designers of these systems, and the economic proceeds of catching and growing seafood should go back to those who live and work in the affected communities.

A Deeper Dive into GOAL 2 of the Draft National Seafood Strategy

Goal 2 of the draft National Seafood Strategy, entitled, "Increase sustainable U.S. aquaculture production," would not normally be a cause for concern when taken at face value. However, our coalition members and allies in coastal communities have witnessed time and time again that the agency is operating with a very loose interpretation of the word "sustainable." Offshore finfish aquaculture has been proven worldwide to be harmful to the ocean ecosystem, and to coastal communities and their economies. The practice, more akin to floating factory farms, exhibits many of the same characteristics of its land-based cousins: massive fecal pollution and excess nutrient discharge, parasitic disease incubation and spread, toxic chemical dosing and overuse of antibiotics, and extremely high carbon-intensive feed inputs.

Research & Development in this field generally focuses on minor, mitigative measures, yet contrary to industry statements, the underlying broken factory farming model of using the ocean as a receiving body for agricultural waste remains the same. The industry mantra that "the solution to pollution is dilution" may have been a wishful hypothesis in the 18th Century, but it is contrary to modern scientific understanding in the fields of oceanography, biology, and microbiology, and undermines the precautionary principle. The entire offshore finfish farming

industry relies upon key decision makers to subscribe to this false mantra for it to succeed in obtaining permits.

For the federal government to endorse and fund offshore finfish farming at the expense of existing small businesses and coastal residents runs contrary to NOAA's mission and does a disservice to all Americans. Furthermore, NOAA does not have the legal authority to regulate aquaculture, as ruled by the U.S. Fifth Circuit Court of Appeals.[1] Offshore fish farming on a large scale will only benefit massive corporations who are far from needing any extra economic support. This makes NOAA's multi-million dollar effort to fund these agribusiness-backed interests even more shocking; indeed, from 2017-2022, NOAA spent $36.3 million directly backing offshore aquaculture interests via the Sea Grant program, S-K grant program, and SBIR grants. NOAA's Aquaculture Opportunity Area (AOA) Atlas is already attracting the interest of foreign aquaculture companies.

Seafood should not replicate the failures of land-based agribusiness practices

NOAA's strategy makes several broad-stroke claims about seafood being good for people, the planet, and the economy, but this is only true under certain scenarios. Mismanaging our marine resources and deferring to industry's judgment regarding the best ways to privately exploit our publicly-held waters means that we, as a nation, will collectively fail on delivering any of these stated goals. With industrial-scale offshore fish farming, we would *actively harm* public health, the environment, and our coastal economies.

We saw a similar trajectory when the so-called "green revolution" in agriculture favored large agribusinesses with destructive business models. The result was consolidated access to markets, land, and supplies. This shifted our country away from community-based and regional food systems. Our seafood system must avoid those same mistakes. Truly sustainable aquaculture should focus on seaweed and shellfish aquaculture that is community-driven and supported, and land-based *recirculating* aquaculture systems that focus on growing low-impact and more affordable finfish, such as tilapia and catfish. Supporting these forms of aquaculture would be better for the planet and actually feed the people, and must be coupled with an economy that supports a living wage for everyone in the supply chain, not just record profits at the top.

NOAA's AOA process so far has valued profit over people

Currently, the strategy fails to acknowledge that NOAA's stated goals regarding the promotion and development of offshore aquaculture run counter to and directly conflict with the very principles that the agency purports to uplift. People are not being heard. In the recent comments and listening sessions on the proposed Aquaculture Opportunity Areas, the overwhelming majority of comments were in opposition to offshore fish farms. In the Gulf of Mexico and Southern California AOA proposals, only 4.9% and 7.9% of respondents, respectively, actually supported the agency's proposals. Unsurprisingly, these comments came almost exclusively from those who stand to profit from offshore aquaculture. NOAA has a responsibility to listen to

[1] *See* Gulf Fishermens Ass'n v. Nat'l Marine Fisheries Serv., N. 19-30006, 2020 WL 4433100, (5th Cir. 3 August 2020).

and incorporate feedback from the public as it determines its policies with regard to aquaculture in federal waters. Currently, the American public is not supportive of finfish aquaculture. If stakeholders' input were actually being considered, this public opposition should have halted the AOA proposals dead in their tracks. Instead, the voices of a small but vocal coalition of private interests – including some of the largest agriculture, pharmaceutical, and food service corporations in the nation – have much greater weight in NOAA's strategies and decision making processes. When independent fishermen and coastal communities are unable to meaningfully engage in the management of their fishery or coastal resources, companies with the most resources are empowered to heavily skew decision-making in their favor. The success and monetary profits of corporate fish farm proposals directly rely upon other existing stakeholders to lose out. Coastal economies and marine ecosystems will suffer in order for these profits to be made.

We appreciate the opportunity to provide feedback to this seafood strategy. There are many people in fishing and coastal communities who are excited and determined to ensure our seafood is sustainable - both environmentally and economically - and we hope that their numerous voices are heard over offshore fish farming conglomerates, agribusiness and pharmaceutical companies. There is still time to turn this ship around.

Sincerely,

James Mitchell
Legislative Director
Don't Cage our Oceans

Environmental Defense Fund

March 30, 2023

Janet Coit
Assistant Administrator
NOAA Fisheries
1315 East-West Highway
Silver Spring, Maryland 20910

Re: NOAA Fisheries Draft National Seafood Strategy

Dear Ms. Coit:

Thank you for the opportunity to provide Environmental Defense Fund's perspective on NOAA Fisheries' (Agency) National Seafood Strategy (Strategy) and share our recommendations for a robust and resilient seafood sector in the United States. Seafood is a critical fixture of coastal communities across the U.S., providing commercial fishing and seafood processing jobs, opportunities for recreation on the water, and cultural connectivity through food and natural resource stewardship. In the face of impacts from climate change, stressors on supply chains, and increasing global demand for seafood, it is imperative that the Agency is intentional in its actions to ensure a thriving seafood economy while ensuring the conservation and sustainable use of the ocean and its vast resources.

We share the Agency's vision for a sustainable, climate-ready, and inclusive U.S. seafood sector. The challenges facing the seafood industry mentioned in the Strategy—impacts from climate change, disrupted markets in the aftermath of the coronavirus pandemic, new conflicts for ocean space, and labor shortages—are significant. These challenges, however, also offer opportunities to increase the sector's resilience and economic prosperity. We appreciate that the Agency continues to be forward-thinking and adaptive to meet these challenges and ensure the long-term wellbeing of coastal communities, American economies, and our ocean resources. Accordingly, please accept the following comments on the Strategy. We welcome the opportunity to discuss our recommendations further and work with you on furthering a sustainable and resilient U.S. seafood sector.

Goal 1: Sustain or Increase Sustainable U.S. Wild Capture Production

We agree that climate-informed and adaptive fishery management are imperative to ensure the sustainability of U.S. fisheries in the face of impacts from climate change. We encourage the Agency to provide resources and guidance to the regional fishery management councils on actions they can take to ensure climate information is integrated into fishery management and to encourage cross-regional collaboration to share knowledge and solutions.

We support the Strategy's statement that advances in data modernization and an evolution in management and science frameworks are critical to ensuring a climate-ready seafood sector. Modern data that allows managers and scientists to track catch and current ocean conditions, as well as predict

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possible future scenarios, enables resilient management of ocean resources and uses. Therefore, we encourage the Agency to further expand the use of electronic technologies and modernize the agency's data management, storage, and governance policies and infrastructure to improve fishery independent and dependent data collection and use in management.

Warming waters and changing ocean conditions have impacts on the abundance and productivity of certain fish stocks. Combined with geographical shifts in stock distribution, securing access to fishery resources for future generations relies on precautionary management that ends and prevents overfishing and ensures fishery sustainability. The recent collapse of Alaskan snow crab and Bristol Bay red king crab provide relevant examples. With this consideration, we encourage the Agency to provide additional clarity in how the Agency's plans to implement its' first goal to sustain or increase wild caught fishery yields in the face of worsening stock abundance, productivity, and geographical location. EDF, in collaboration with the University of California, Santa Barbara (UCSB) recently published a paper with recommendations for climate-informed harvest control rules that the Agency may find helpful as it clarifies this goal in the implementation plan[1].

We also urge the Agency to thoroughly investigate increasing marine use to meet its objective for conserving vital fishing habitat. The rise in offshore wind, marine protected areas, and possibility of offshore aquaculture necessitate that the Agency engage early and often with relevant stakeholders, including fishermen, as well as improve and employ science-based marine spatial planning to minimize conflicts.

Goal 2: Increase Sustainable U.S. Aquaculture Production

EDF sees the rising demand for responsibly sourced seafood and agrees that sustainable aquaculture can be an important part of increasing U.S. seafood production if deployed in a manner based in science and that reduces possible negative consequences on the marine environment and those that depend on it. Marine aquaculture siting and operations must be informed by community needs, regionally appropriate, and thoroughly examined to ensure there is sufficient information on potential risks to coastal communities, local and regional ecosystems, and to mitigate scenarios due to new risks of farming the open ocean environment.

We encourage the Agency to clarify the metrics they are considering using to "accelerate progress" on a regulatory framework that would ensure there is sufficient data and analysis to make informed decisions with aquaculture stakeholders and relevant communities. To encourage inclusivity and equity in the aquaculture supply chain, we recommend that the Agency provide outreach in multiple languages and with the advice or support of social scientists to local communities and workers to ensure they are included in the development process as well as in the outcomes, such as potential benefits, of expanded aquaculture production.

Goal 3: Foster Access to Domestic and Global Markets for the U.S. Seafood Industry

We appreciate and agree that more sustainable, U.S. seafood is key for global seafood supply and food security. When done responsibly, increasing domestic supply can ensure the seafood Americans eat is responsibly sourced. Seafood must be a part of the long-term strategy for U.S. food security and resilience of coastal communities while we reduce emissions and prioritize eating local, nutrient-rich food. Any communication and promotion strategy should not only highlight the sustainability of wild caught fish in U.S. waters, but also increase education and visibility for U.S. aquaculture—educating

[1] https://onlinelibrary.wiley.com/doi/10.1111/faf.12724

consumers on responsible aquaculture practices and how far the industry has come in recent decades through scientific advances and technology.

Given that most seafood consumed in the United States is imported from other countries, key benefits from strengthening our domestic seafood industry include increased local food supplies in coastal communities and built-up local economies, but also the potential to reduce greenhouse gas emissions from transit. We appreciate the goal of "U.S. seafood on U.S. plates," and suggest clarity on how this interplays with increasing global markets and exports. We encourage the Agency to identify metrics for how increasing seafood supply, especially through expanding U.S. aquaculture, can benefit U.S. communities, especially those who have been historically underserved and may not currently be able to access or afford quality, domestic seafood commodities.

Goal 4: Strengthen the Entire U.S. Seafood Sector

We appreciate the focus on strengthening the U.S. seafood supply chain, especially as it relates to seafood processing. Current methods of exporting seafood to be processed in foreign countries only to reimport it are not just exporting jobs but increasing the carbon footprint of our domestic seafood. We encourage a more robust plan that will strengthen the infrastructure necessary for seafood processing in the United States to localize jobs and decrease impacts on our environment.

Strengthening the seafood sector also means ensuring it has a future of sustainability-minded fishermen and aquaculture practitioners. Especially as fleets are aging, we encourage the Agency to invest in practices that recruit and retain diverse fishermen and aquaculture farmers to expand access to good-paying jobs and create a new generation of stewards for our natural resources. This also includes creating knowledge sharing networks for seafood farmers to share best practices and learn how to grow sustainable and profitable farms. Focusing on a new generation of the seafood workforce provides an opportunity to insert equity and environmental justice principles at every step—we encourage the Agency to integrate the principles, goals, and metrics from the Agency's Equity and Environmental Justice strategy into the expansion of the Seafood Strategy.

EDF agrees that there is an opportunity to grow the U.S. seafood industry and that the United States can set best practices in an era of economic and environmental upheaval. We appreciate the Agency's focus on opportunities that the seafood industry can provide to support local communities, the U.S. economy, and global food systems. We encourage further development on metrics that can evaluate the economic and equitable benefits of seafood production to local communities as well as practices that center minimizing harm to the surrounding environment. We welcome the opportunity to further discuss our recommendations, the Strategy, and additional opportunities to develop a sustainable, inclusive, and equitable seafood industry.

Sincerely,

Reggie Paros
Acting Lead, U.S. Fisheries & Oceans
Environmental Defense Fund

Re: Draft National Seafood Strategy

To Whom It May Concern,

Thank you for the opportunity to comment on NOAA's Draft National Seafood Strategy. I am a graduate student in an environmental masters program at the University of Colorado in Boulder. I received my bachelors of science in forestry and natural resource management from the University of Minnesota and I'm currently working on a project looking at sustainable governance through one of my courses.

I would like to raise concerns regarding the Draft National Seafood Strategy:

1. Goal 1 of the Strategy assumes there's an existing baseline knowledge around the current state of US fisheries and does not account for ecosystem health.
2. Goal 4 discusses a need to modernize seafood infrastructure without discussing the side effects of the infrastructure itself and their impacts on our climate.

In summary, the language in Goal 1 needs to address the current lack of information regarding ecosystem overfishing before suggesting sustaining or increasing wild fish capture. Goal 4 needs to address the intersectionality between seafood infrastructure, bycatch, and the environmental impacts of the infrastructure itself. Please see below for additional details and pertinent literature.

Sincerely,

Sydney Dynek

University of Colorado Boulder Masters Candidate

MAIN COMMENT TEXT

Point 1

Historically fisheries in the US have analyzed fish stocks as isolated populations rather than looking at their place in the broader ecosystem. When this broader lens is taken, 2 out of the 8 large marine fisheries in the US exhibit indications of ecosystem overfishing (Link, 2021). While the subheadings of this goal call for an increase in fisheries science, fisheries management, and habitat conservation in support of fisheries, none of these methods speak to reducing current wild capture if they find the fisheries are in fact being overfished. This is problematic as it leaves the fisheries in question more at risk for overfishing or collapse before the extent of the degradation is realized.

Thinking about human well-being, overfishing of specific fish populations has resulted in cultural shifts leading people to consume more predator fish. After it's released by humans and natural sources, the neurotoxin methylmercury accumulates in the ocean, and the due to the

nature of the trophic structure, these predator fish have increasingly high concentrations of this neurotoxin (Schartup, 2019). An over exposure to this toxin can cause long term neurocognitive deficits in humans, a health consideration that was not accounted for when these long-term international fishery policies were developed. Without consideration of the impacts of shifting human consumption of fish species to account for overfishing of other species, this health impact could be experienced by an unnecessarily large number of people.

Additionally, the description of Goal 4 speaks to Tribal community and subsistence fisher people needs but does not include consultation or collaboration with them at any part in this process. There are several case studies of fisheries in Canada that have started to work towards more empowering coexistence of knowledge forms using the Two-Eyed Seeing methodology to address this need (Reid et al., 2021).

Point 2

Different fish harvesting technologies result in different amounts of bycatch of unintended fish species, resulting in different ecological and climate impacts (McKuin et al., 2021). Lost fishing nets alone account for approximately 0.6 Mt of primary plastic pollution in our oceans (Boucher, 2017). If new infrastructure is brought into the system without action taken to mitigate and remediate from the previous ecological harms of the previous infrastructure, this exercise will merely serve to increase ocean pollutants instead of affecting positive change.

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Anderson Cabot Center for Ocean Life
at the New England Aquarium

Central Wharf, Boston, MA 02110-3399
617-973-5200 www.neaq.org

March 16, 2023

NOAA Fisheries

RE: Anderson Cabot Center for Ocean Life Comments on the *NOAA Fisheries Draft National Seafood Strategy*

Dear NOAA Fisheries:

Thank you for the opportunity to provide comments and recommendations on the *NOAA Fisheries Draft National Seafood Strategy*.

The New England Aquarium (Aquarium) is one of the preeminent aquariums in the United States and a global leader in ocean exploration and marine conservation. In addition to our exhibit halls, which educate over a million visitors a year on marine and aquatic ecosystems and their inhabitants, the Aquarium is also a leading ocean conservation organization with research scientists and experts working around the globe for the preservation and sustainable use of ocean resources.

As active stakeholders with institutional expertise on a range of ocean science and management issues, including fisheries and aquaculture, we offer the following comments and recommendations. If you have any questions or require further clarification, please do not hesitate to contact us.

Sincerely,

Matt Thompson

Michelle Cho

Lena Weiss

Anderson Cabot Center for Ocean Life
at the New England Aquarium

General Comments

It is unclear what time period that the National Seafood Strategy will cover. Is this a one, five- or ten-year strategy? When will it be renewed or revised?

Comments on Specific Sections of the Document

Page	Section	Comment
2	GOAL 1	Suggest changing Goal 1. In the draft, it is to "*Sustain or increase U.S. wild capture production*". Under the Magnuson–Stevens Fishery Conservation and Management Act, however, U.S. fisheries production is already managed at Maximum Sustainable Yield (MSY), therefore this goal should more appropriately focus on promoting underutilized species or recovering fisheries stocks that have been overfished or are experiencing overfishing, as well as improving fishery and fishing gear efficiency while continuing to minimize bycatch.
2	GOAL 1	Suggest the focus of the Fisheries Science section also include tools to minimize potential effects of fishing on the environment, including protected resources, essential fish habitat, and marine ecosystems.
3	GOAL 1-2	Suggest Goals 1 & 2 also include a bullet to focus on quantifying the trade-offs between different responsible ocean uses, such as between seafood production (wild and farmed) and offshore wind, and enable informed decision-making regarding spatial use.
3	GOAL 2	Suggest Goal 2 include a focus on alternative feed ingredients to supplement fishmeal and fish oil, including novel feed ingredients (microalgae, insect, and single-cell proteins).
3	GOAL 3	Suggest Goal 3 include a bullet point on diversifying American seafood preferences towards seafood sources that may have a lower environmental footprint and that could be farmed at scale in U.S. waters, such as promoting consumption of farmed seaweeds or shellfish.
3	GOAL 3	Suggest GOAL 3 include a bullet on encouraging improvement in global fishing practices to achieve comparability on regulation and environmental performance with U.S. seafood production.
4	GOAL 4	Suggest Goal 4 include a bullet supporting blue technology and innovative solutions that can boost U.S. seafood production and help address sustainability challenges.

March 13, 2023

Ms. Janet Coit, Assistant Administrator
National Marine Fisheries Service
1315 East-West Highway, Room 14636
Silver Spring, MD 20610

Dear Director Coit:

The Net Gains Alliance (NGA) is a non-partisan, independent initiative that works to improve the collection, management, and use of data and information to enhance the benefits obtained from sustainable management of fisheries and marine ecosystems. Since our launch in 2017, we've funded over $1m in projects to promote fisheries data modernization, issued multiple reports and recommendations, and continuously engage a community of more than 1,000 fishermen, advocates, academics, ocean innovators, managers, and agency staff in conversations and programming around digital transformation in the fisheries sector. NGA believes that data management by NOAA Fisheries should be executed in a systematic, coordinated, modern, and transparent manner to ensure the highest and best current and future use of all data.

We generally support the goals and strategies contained in the draft National Seafood Strategy. Much of NGA's work over the past five years has emphasized the value of data modernization for core fisheries science and management in support of our vision for a data-driven future, such as simplifying electronic catch reporting to enable better in-season management and creating unique trip identifiers to link multiple records. We are seeing the agency invest in these areas and we expect that work will support Goal 1 of the Strategy. In these comments, we focus on additional areas where data modernization is needed to advance the Strategy, and the interconnected portfolio of NOAA and NMFS goals.

Working toward and achieving these goals and strategies will require timely, data-informed actions by NOAA Fisheries staff and partners throughout the seafood supply and value chains, including both wild-caught fish and aquacultured products. Modern, interoperable data systems will benefit science, management, and business operations and will require a robust data system that incorporates the following attributes:

- Interoperability, including increased findability and reusability of datasets across program silos
- Transparency, including revision of data confidentiality restrictions on data access
- Procurement and programs based on data and performance standards, not hardware or software requirements, to allow technologies to keep pace with innovation

Further, integration of the multiple aspects of fisheries science and management, businesses and supply chains, and economic and social justice issues will require NOAA Fisheries to commit to improvements and investments in staffing in the following areas:

1. Improve data resolution

In order to support the commercial fishing industry and fishing communities in "their efforts to adapt to climate change and thrive in a changing ocean economy … given new competing uses" (Goals 1 & 4), NMFS needs to know much more about who is fishing and where, and the social and economic characteristics of those communities and locations. As we've seen in efforts to provide disaster relief to fishing communities, it can be difficult to identify captains, crew, and business owners, much less their demographics and economic dependencies or those of the broader, connected coastal communities. More and better data are needed to inform workforce development and seafood infrastructure investments, understand skills gaps and support equitable outcomes across places and communities.

2. Invest in – and share – human dimensions data

Human dimensions data has emerged as a top priority in NOAA Fisheries' Next Generation Data Acquisition Plan process, indicating a broad consensus that NOAA Fisheries should invest in infrastructure and expertise to support this work. The Strategy rightly recognizes under Goal 4 that strengthening the U.S. seafood sector depends on supporting resilient communities, infrastructure, and employment. A successful National Seafood Strategy should also connect to the goals set out in NOAA Fisheries' 2022 Equity and Environmental Justice strategy.

Improved economic and social science data will support more effective decision-making in the face of a changing climate. Seafood policies can be better tailored to specific contexts if local, regional, and national economic data are robust. High quality "asset class" data is also in demand by investors, insurers, and third-party certification programs, such as the Marine and Aquaculture Stewardship Councils and the Task Force on Nature Related Financial Disclosures. To be competitive and well-positioned for the future, tomorrow's U.S. domestic seafood businesses will need to demonstrate they meet safety, sustainability, and social impact standards. NOAA should be a data partner in helping businesses do so.

3. Rethinking data sharing, within and outside NOAA Fisheries

One of the most common complaints NGA hears from stakeholders is the difficulty accessing their own data from NOAA Fisheries and the limited ability to integrate NOAA reporting data with third-party software. Fisheries and aquaculture businesses should be able to prepare a report and submit it to all necessary recipients - buyers, exporters, sustainability certifiers, and government agencies - and that report should become a verified record for all partners. That would mean an importer can double check the location of a catch (or farm, in the case of aquaculture) by viewing the certified landing receipt, rather than calling the captain or business owner. To do this, NOAA Fisheries needs to rethink its data sharing and interoperability policies, setting up more role-based access permissions and allowing cross checking between outside vendor systems and regulatory reporting systems.

To find success with the Strategy and more broadly, the agency needs to prioritize investing in these upgrades through staffing, training, and data infrastructure. The overlapping responsibilities of multiple government agencies overseeing these issues and the potential for environmental, economic, and social impacts on vulnerable coastal communities renders the work complex and difficult. However, investing in modernized data systems and protocols now will bolster the entire effort and assists in identifying and managing the local, regional, and national impacts of human induced climate change, a crowding ocean space with diverse participants, and a rapidly expanding aquaculture sector.

We congratulate you and your team for this important, timely work and stand ready to leverage our expertise and position as a respected and neutral convener to assist NOAA Fisheries in implementing this effort.

Sincerely,

on behalf of the Net Gains Alliance Leadership Team:

George Chmael II
George Lapointe
Katie Latanich
Jill Stevenson
Kate Wing

OREGON TRAWL COMMISSION

March 31, 2023

NOAA Fisheries

Re: NOAA Fisheries Draft National Seafood Strategy

Submitted online via - NOAA Fisheries Draft National Seafood Strategy

I am submitting the following comments on behalf of the Oregon Trawl Commission (OTC) on the NOAA Fisheries Draft National Seafood Strategy (Draft Strategy). OTC is an industry-funded state government agency, established in 1963 by the Oregon state legislative assembly to support the Oregon trawl industry and promote its economic viability. Our industry participates in the state-managed Oregon pink shrimp fishery as well as the federally managed bottom trawl groundfish and the shorebased pacific whiting fishery. All three of our fisheries have been certified against the rigorous seafood sustainability standards of the Marine Stewardship Council (MSC).

Commercial fisheries play an important role in the U.S. economy, generating substantial employment and economic value for a multitude of businesses, including fishing operations, processing plants, retailers, restaurants, to name a few. Wild fisheries have great potential to support marine conservation initiatives and tourism activities, providing important ecological and economic benefits to our coastal communities. In the context of food security and nutrition, if managed sustainably, wild fisheries is the only source of renewable food. In the face of the changing climate and its increasing impacts to food and agricultural production around the globe, it is essential we start thinking of the U.S. fisheries and the domestic fishing/seafood industry as a national resource of strategic importance. We applaud NOAA Fisheries (the Agency) for their efforts that seek to make US seafood a thriving and a more competitive industry in the US and global markets. We support the development of the National Seafood Strategy and offer our recommendations below, specifically to Goal 1, Goal 3, and Goal 4, as outlined in the Draft Strategy.

We appreciate and fully support comments submitted by the Responsible Offshore Development Alliance (RODA) on this topic.

GOAL 1: Sustain or increase sustainable U.S. wild capture production

We are pleased to see that the Agency recognizes the importance of sustaining or increasing sustainable wild catch. While not every fishery can support increased landings, some do like the West Coast Groundfish fishery, which once achieved, will present a tremendous opportunity for the industry and consumers.

As we are entering the era of rapid ocean industrialization with numerous new competing uses of the ocean, we are concerned that some of those large-scale developments, specifically offshore wind energy, can impact the attainability of this goal, throwing the long-term viability of the domestic seafood industry into question.

Fisheries science

Through its surveys, NOAA Fisheries assesses the status of nearly half a million fishery stocks, 200 marine mammals and over a hundred threatened and endangered species.[1] For fisheries, the value and importance of this data cannot be overstated. For example, the bottom trawl groundfish survey, which is done collaboratively with the west coast fishing industry, fosters a better understanding of the fishery's dynamics with its 90+ species, helping inform management decisions and ensuring the fishery is sustainable for this and future generations, among other things. The data obtained from this survey supports stock assessments- an information that is critically important for setting harvest guidelines. In addition, this information provides the foundation for the MSC assessments of the status of the fishery resources. Without this information, our industry is risking losing the MSC certification for its 18 individually certified groundfish species, as it already happened in early 2022 for pacific cod in the west coast groundfish fishery complex.[2]

With the rise of competing ocean use from offshore wind energy farms, our industry is highly concerned for the future of the bottom trawl groundfish and acoustic hake surveys on the west coast as well as with NOAA's ability to effectively mitigate for negative impacts from offshore wind development to fishery surveys. As NOAA's website states, "*Offshore wind development can adversely affect NOAA Fisheries' surveys by precluding access to sampling areas, impacting statistical design, altering habitats, and interfering with survey operations.*" [3] We completely agree with the RODA's comments that "*Offshore wind, and other potential new ocean uses, will result in conflicts for the U.S. fishing industry*."

Fisheries management

NOAA Fisheries can strengthen the industry's resiliency by exploring alternative management solutions that help minimize regulatory financial burdens to fishery participants. One great example is the Electronic Monitoring Program in the west coast groundfish fishery. We appreciate the Agency's commitment to development of a cost-effective alternative to human observers for at-sea monitoring while minimizing the cost to the industry and ensuring the integrity of monitoring.

GOAL 3: Foster access to domestic and global markets for the U.S. seafood industry

With the rise of cheap imported seafoods, often backed by large marketing campaigns, US consumers have turned away from many domestic seafood products which are often sold at a higher price point. Often, we are simply not able to compete on price with foreign competition in our own market because many (if not most) imported seafood products come from countries with less stringent laws and regulations if they are enforced at all. Furthermore, some of the major nations-suppliers of seafood for American consumers, including China, have implicated themselves in serious labor violations from human rights abuse to forced labor.[4] In addition, it has been

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[1] www.fisheries.noaa.gov/feature-story/efforts-mitigate-impacts-offshore-wind-energy-development-noaa-fisheries-surveys#:~:text=Offshore%20wind%20development%20can%20adversely,and%20interfering%20with%20survey%20operations.

[2] www.cert.msc.org/FileLoader/FileLinkDownload.asmx/GetFile?encryptedKey=MKIMbbJ5W7uDGXq6Bwg2BaF75a5XxpxQ3WjxEqOyiQrZ91GbX8+iZWZff+E2xOdf

[3] www.fisheries.noaa.gov/feature-story/efforts-mitigate-impacts-offshore-wind-energy-development-noaa-fisheries-surveys#:~:text=Offshore%20wind%20development%20can%20adversely,and%20interfering%20with%20survey%20operations.

[4] www.china.usembassy-china.org.cn/report-to-congress-human-trafficking-in-the-seafood-supply-chain/

established that labor violations can often be linked to Illegal, Unreported, Unregulated (IUU) fishing.[5] With all of that in mind, it is reasonable to assume that the lack of the level playing field for sustainable U.S. seafood is, perhaps, due to the fact that it may be competing with products produced with free labor and/or harvested in IUU fisheries, both of which would undoubtedly help keep their costs exceptionally low. Increasing presence of cheap imported seafood is creating a significant financial pressure on the domestic seafood industry. Lower prices mean there is less incentive to innovate and provide premium seafood offerings, resulting in decreased margins and opportunities for domestic producers.

For the Oregon trawl fisheries, this goal is highly important. While we produce some of the most sustainable seafood products, effectively accessing domestic and international markets for our products remains to be a challenge, requiring commitment of substantial resources our industry does not have.

Prioritize education

NOAA Fisheries should prioritize education of both consumers and buyers about sustainable U.S. seafood, and what makes it a superior product as it relates to (a) sustainability, (b) food safety, (c) product quality and (d) labor practices. It is important that the American consumer understands the value domestic seafood products bring to their dining table, and how it benefits their health and health of our beloved oceans and fishing communities. The Agency should work with the industry and other stakeholders (e.g. Sea Grant) to develop the framework, messaging and determine modes of dissemination of information.

Establish National Seafood Council

In 2020, NOAA's Marine Fisheries Advisory Committee (MAFAC) produced a report with the recommendations to establish a National Seafood Council authorized under the Fish and Seafood Promotion Act of 1986.[6] We support the recommendations made in their report and ask the Agency to establish the National Seafood Council for the benefit of the domestic fishing/seafood industry. The mission of the Council should include goals of (a) increasing awareness for domestic seafood with US consumer and (b) increasing demand for U.S. seafood in the domestic and global markets. The fact that so many Americans choose imported seafood of likely inferior quality and possibly produced with unethical practices underscores the importance of consumer education and building greater awareness for healthy sustainable seafood produced in the U.S.. Both goals are also supported by the most recent USDA dietary guidelines which reveal that Americans of all ages need to eat more seafood to meet their nutritional needs.[7]

To support those goals, the Council should employ non-branded marketing and promotion campaigns as well as engage in research activities, among other. As MAFAC's report states such Council can be established in the same way as other commodity boards operating under the oversight of the U.S. Department of Agriculture (USDA). NOAA Fisheries should work closely with USDA to leverage their expertise in dealing with commodity boards which can be an effective tool in elevating consumer awareness and providing much-needed sales boost to commodity industries.

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[5] www.nature.com/articles/s41467-022-28916-2

[6] www.media.fisheries.noaa.gov/dam-migration/mafac_report_establishing_a_national_seafood_council.pdf

[7] www.dietaryguidelines.gov/sites/default/files/2021-03/Dietary_Guidelines_for_Americans-2020-2025.pdf

Think "Got milk?" campaign with numerous celebrities rocking a milk mustache in the 90s, which helped the American dairy industry "re-brand" itself with the American consumer and, more importantly, helped increase the sales of milk in subsequent years.[8]

GOAL 4: Strengthen the entire U.S. seafood sector

The Agency should explore options to expand funding opportunities for the domestic fishing/seafood industry and their projects.

Saltonstall-Kennedy (SK) grant

A highly competitive grant, SK is a primary funding source available for the industry with roughly $10 million distributed among 40 projects each year.[9] NOAA Fisheries should advocate for the need to boost the funding available under this grant both in terms of the total amount allocated to the grant and the maximum amount allowed per grant recipient, which is currently capped at $300,000 per applicant. While this amount is generous, there is no guarantee an applicant would be able to secure funds more than once, in which case, $300,000 is hardly enough for projects involving marketing and promotion activities.

Developing other grant opportunities

NOAA Fisheries should pursue greater collaboration with USDA on questions of expanding existing funding opportunities currently available for land-based food and agricultural products to also include wild capture seafood. Because seafood is not under the purview of USDA, it may be prioritized not as much as other products under the USDA's jurisdiction for USDA funding opportunities. NOAA Fisheries should advocate with USDA to recognize seafood as an important component of the U.S. food system and allow it the same benefits other food and agricultural products enjoy.

To conclude, we believe within this initiative, NOAA Fisheries has a unique opportunity to help U.S. fishing/seafood industry re-position itself in the domestic and global markets as the best choice seafood and help it realize its full economic potential. Not only the US produces the most sustainable seafood in the world, it does so against the stringent product quality and food safety standards and requirements, making U.S. seafood the most sustainable and safest choice.

Thank you for your consideration of our comments on this important topic. Please feel free to contact me with any questions at yelena@ortrawl.org.

Sincerely,

Yelena Nowak
Executive Director, Oregon Trawl Commission

[8] www.civileats.com/2022/03/01/as-a-national-seafood-council-takes-shape-whose-interests-will-it-serve/
[9] www.fisheries.noaa.gov/grant/saltonstall-kennedy-grant-competition

Finless FOODS

NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

Re: Finless Food's Response to NOAA's National Seafood Strategy

To whom it may concern,

Finless Foods appreciates the opportunity to offer comments on NOAA's National Seafood Strategy. Finless Foods is a plant-based and cell-cultured seafood company with a mission to create a future for seafood where the ocean thrives. We use groundbreaking technology to revolutionize the way the world sources seafood.

We believe that cell-cultured seafood (seafood produced by culturing animal cells in vitro) should be an integral component when shaping priorities for sustainable seafood, ocean health, and climate-resilient food systems and supply chains. We need an "all of the above" approach to ensure we are meeting consumer demands for healthy sustainable seafood. Research and development are underway by Finless Foods and other cell-cultured seafood companies to create this additional sustainable seafood option. But in order for us to make an effective impact, the federal government must also promote cell-cultured seafood. This is why we at Finless Foods believe that cell-cultured seafood should be included alongside sustainable wild-caught and farmed seafood in NOAA's National Seafood Strategy, to support a thriving domestic U.S. seafood economy and enhance the resilience of the seafood sector in the face of climate change and other stressors.

One of the three Draft National Seafood Strategy drivers states that *Seafood is critical to providing food to a growing global population*. We couldn't agree more. While attending the Seafood Expo North America in Boston, Massachusetts on March 12, Finless had a chance to listen to the NOAA Leadership Update in which Janet Coit stated that wild capture seafood has plateaued, and that NOAA would be investing more into aquaculture innovation. While we agree that additional funds should be invested in aquaculture, we also believe that cell-cultured seafood production has the ability to become a significant and diversified source of sustainable seafood for the growing global population. For this reason, we strongly recommend that NOAA include cell-cultured seafood production into the Draft National Seafood Strategy to ensure a more resilient, secure, and sustainable seafood production system.

Finless Foods also sees as a strategic path forward for cell-cultured seafood, in conjunction with its wild-caught and aquaculture counterparts, in Draft National Seafood Strategy *Goal 3: Foster access to domestic and global markets for the U.S. seafood industry*, to achieve its three objectives:

Finless FOODS

- **Communication and Promotion:** Cell-cultured seafood production is another method to sustainably and nationally source seafood products that are comparable in taste, texture, and nutrition to the wild-caught and aquaculture counterparts. Therefore, Finless Foods recommends including cell-cultured seafood in the communication and promotion strategies for seafood, such as the National Seafood Council.
- **U.S. Market Development:** With the need to increase national seafood production within the U.S.in support of resilient, sustainable, and secure food systems, Finless Foods recommends investing in the expansion of cell-cultured seafood production as a strategic path forward. Currently, the top cell-cultured seafood companies in the world are U.S. founded, funded, and based. These companies are currently undergoing a rigorous pre-market safety approval process with the U.S. FDA. Finless Foods recommends support and investment into cell-cultured seafood production to further U.S. seafood market expansion and development.
- **Fair Trade:** Finless Food's cell-cultured seafood production starts and ends in the U.S., and will undergo rigorous traceability, transparency, and labeling requirements. As such, U.S. cell-cultured seafood would not further contribute to IUU fishing and harmful fishing practices and more easily lends itself to strengthened traceability and transparency.

The cell-cultured food industry is poised to not only diversify seafood supply chains, but also to provide sustainable alternatives to meet growing global demand for seafood. Foreign governments are aggressively investing in this sector. Singapore is the first country in the world to bring cell-cultured foods to market. As a country that imports 90 percent of its food, Singapore is betting on cell-cultured food playing a major role in its goal to produce 30 percent of its food domestically by 2030. The Netherlands just invested €60 million and additional €25 million in financing to build an "ecosystem" for cell cultured technologies that will include an innovation hub, pilot scale-up facility, and education programs. China has made growing the cell cultured technology sector a priority in its five-year plan. The U.S. has long been a leader in technological advances in food and it is essential that the U.S. is not left behind as other nations drive investment in innovation in this space. As a country that imports 75-80 percent of its seafood, the U.S. needs to capitalize on U.S. cell-culture seafood as a priority for American competitiveness, an increase in jobs, and to help shift us away from foreign reliance on seafood.

The Biden Administration has already recognized the cell-cultured food industry as a cutting-edge climate solution. We were so pleased to see the September 12, 2022, Executive Order to coordinate a whole-of-government approach to advance biotechnology and biomanufacturing towards innovative solutions in climate change, food security, and supply chain resilience, which specifically called out cell-cultured foods and represents a recognition of the importance of this industry for the country. On March 22, 2023, the Biden Administration doubled down on prioritizing this field by setting Bold Goals and Priorities to advance cell-cultured foods. In addition, The Food and Drug Administration (FDA) provided preliminary approval to cell-

Finless FOODS

cultured chicken produced by Upside Foods and GOOD Meat, indicating many others may be close behind. Just like the whole-of-government approach to ensuring U.S. competitiveness in the global bioeconomy, we need a whole-of-economy approach to supporting a thriving domestic U.S. seafood economy.

We respectfully recommend that NOAA articulate a vision for the future of U.S. seafood that includes cell-cultured seafood all while supporting our fishermen, coastal communities, and ocean as part of the National Seafood Strategy.

Sincerely,

Shannon Cosentino-Roush
Chief Strategy Officer
Finless Foods

March 16, 2023

Ms. Janet Coit
Assistant Administrator
NOAA Fisheries
National Oceanic & Atmospheric Administration
1315 East West Highway
Silver Spring, MD 20910

Re: NOAA Fisheries Draft National Seafood Strategy

Dear Administrator Coit,

The Florida Fish and Wildlife Conservation Commission (FWC) appreciates the opportunity to comment on the NOAA Fisheries Draft National Seafood Strategy. FWC applauds NOAA Fisheries for their commitment to supporting commercial seafood sector resilience while building on continuing efforts and partnerships to do so.

Florida is known as the Fishing Capital of the World, supporting vibrant commercial and recreational fisheries. Commercial fishing and seafood production are a vital part of Florida's economy, communities, and culture. According to the NOAA's Fisheries Economics of the United States 2020 Report, Florida's Seafood Industry generated over $3.4 billion in income and provided over 76,000 jobs. However, in the wake of climate change influences, the COVID-19 pandemic, labor shortages, and the loss of infrastructure, Florida and U.S. seafood industries are facing unprecedented challenges. FWC shares NOAA Fisheries interest in maintaining a healthy domestic U.S. seafood economy and enhancing the resilience of the seafood sector.

A thriving, well-regulated domestic seafood industry can help with global seafood supply, address food security, and stimulate economic growth. FWC strongly supports the efforts of Goal 3 to promote U.S. seafood and reduce reliance on foreign fisheries. Dependable markets for local, sustainably sourced seafood is critical to ensuring U.S. seafood remains local and is not substituted by imported product. The promotion of U.S. seafood should celebrate that U.S. fisheries are known globally for some of the most sustainably and well managed fisheries across the world, largely due to the principles outlined in the Magnuson-Stevens Act and collaborative partnerships between state and federal management agencies. As NOAA Fisheries works to secure access to existing and new markets, the communication message should promote factual information about the value and sustainability of U.S. seafood production.

Vibrant, sustainable U.S. seafood production supports jobs, economies, and increases competitiveness in global markets. FWC supports Goal 4 to modernize U.S. seafood infrastructure, including vessels, port and dock facilities, processing, storage and working water fronts, to strengthen and enhance opportunities for coastal communities. One of the reasons Florida is a top tourism destination is due to access to fresh, local, sustainable seafood; however, continued coastal development often results in the loss of fishing industry infrastructure. This is a growing threat to the long-term survival of U.S. commercial fisheries, as well as the recreational for-hire industry. Another challenge facing the commercial industry is the labor shortage and a lack of new entrants into the seafood industry. While Florida has a strong commercial fishing industry, the industry is aging, and there is a lack of incoming workforce participants as the current generation retires. NOAA Fisheries should also include the support of programs to train new

Florida Fish and Wildlife Conservation Commission

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entrants into the seafood industry in Goal 4, which will improve resiliency of the industry as well as maintain or grow capacity.

To sustainably manage our marine fisheries and produce sustainable seafood responsibly, management must be based on sound science. Unfortunately, many of our fisheries, especially in the southeast U.S., face chronic data deficiencies. Due to these data gaps, significant uncertainty buffers are applied to decisions about catch levels. These buffers based on uncertainty may be leading to a loss of revenue and may be hampering the maintenance of markets and domestic seafood supply. To achieve Goal 1 of sustainable seafood production, sound science is necessary. Thus, FWC supports increased funding and resources to obtain more timely and precise fisheries data, population monitoring, and stock assessments to improve management and maximize opportunities and access.

COVID-19 market disruptions highlighted the systemic challenges facing the U.S. seafood industry and underscored the need to create a more resilient and flexible industry in the face of potential future crises. In the wake of climate change and extreme weather events, fisheries disasters are becoming a common reality, especially in Florida. FWC believes that a more rapid response to fisheries disasters is key to sustaining wild capture production as well as maintaining stable markets and access for U.S. seafood production. FWC, along with many other states, are frustrated in the inability to get federal fisheries disaster relief funding to impacted individuals in a timely manner. These funds are necessary to rebuild or replace infrastructure, to repair vessels and equipment, and get fishermen and seafood processors back to work. This loss also extends to the for-hire recreational industry, as they are significantly impacted by these fisheries disasters in a similar manner. Putting money in for-hire operations, fishermen, and seafood processors' pockets as soon as possible after a disaster would help stabilize an industry more quickly, so that they can provide the services that consumers expect, which is critical to Goals 1 and 4. Further, it would enable them to be part of the larger economic engine that restores coastal communities after they have been ravaged by storms.

Lastly, though FWC is encouraged by NOAA Fisheries' National Seafood Strategy to support a domestic seafood economy and enhance resilience of the seafood sector, we request that equal consideration is given to the recreational fishing sector. Fisheries in the U.S. uniquely support thriving communities of both commercial and recreational fishermen and their associated economies. Our fisheries resources, which are held in public trust, should be available to and managed for the benefit of both sectors. Sound fisheries management and policy should be designed to continue to provide access and healthy fisheries for both commercial and recreational participants.

FWC supports the Goals of the National Seafood Strategy and commends NOAA Fisheries on identifying the many significant threats to the seafood economy. We appreciate the opportunity to provide these comments and look forward to continued collaboration. Please reach out if you require any additional information.

Sincerely,

Jessica McCawley
Director

LCN Listening Session - Draft National Seafood Strategy

Mar 6, 2023
Note taker: Sahir Advani, UMaine

TRIGGER QUESTIONS

1. Input on the content of the draft National Seafood Strategy

A. From your perspective, does the draft strategy capture what is important to you?
B. What else do you want to see/What is missing?
C. What would strengthen the strategy?

2. Feedback on what to include in a future implementation plan

A. Do you have recommendations on what actions to prioritize within each element of the strategy?
B. How can the agency engage with small-scale and community-based entities in the implementation phase?

1:08 PM: 28 participants
1:15: 31 participants.

Mike Rubino:
20 years of combatting overfishing, but there are still issues.
Covid disrupted seafood markets
Climate change continues to affect thng

What can NOAA do to increase resiliency?
This draft strategy is the result of these conversations as well as roundtable discussions hosted by Janet Coit.
This strategy is one of several strategies developed by the agency. Other egs include climate change strategy, aquaculture strategy, equity and diversity, etc. All these strategies intersect with one another and fit in with NOAA's 5 year priorities.

Sarah Shoffler: We really appreciate you taking the time to provide us with feedback. Our agency doesnt have a history of many of these things and this is an opportunity for the agency to explore these dimensions.

Larry Collins - 40 yrs in the seafood industry. Tuna, crab, rock cod, halibut. In 2011 they opened a co-op in pier 45 in San Francisco. 25 boats supplying. 3 things are needed - access, infrastructure, and markets. They haven't had a fuel dock in SF for many years, trucks bring in fuel. Ice machines are old.

The first thing to work on is access in California. Salmon includes habitat considerations - rivers count as salmon habitats and they run dry. Issues with fisheries closures.

Money from a lot more fish hitting that dock will take care of the money for that ice machine. We're slipping away from Magnuson(-Stevens Act). We're supposed to be employing as many people as possible under Magnuson(-Stevens Act). But we're not doing that.

Andrea Tomlinson: New England. Access an issue. We're at 10% of the ground fishing population. Access and capital requirement necessary to get from deck to wheelhouse is a big challenge.
I would love for NOAA to be really aware of that access issue to be linked to capital requirements. Requests NOAA - Budget line a first time federal permit holder subsidy. Increasing funding for organizations that support advancement in fleet. More funding towards small and medium-sized fishing organizations would help support the movement towards this. Straight line funding without grant applications would be awesome!

Jim Kendall: 3 points about ability. impacts the industry in different ways. 1. Sustainability - Wind farms may affect fishing opportunities.
2. Manageability: Councils need to be able to adapt to the conditions we're seeing out there - in terms of climate change, wind farms etc. It's slow to move these things.
3. Marketability: We have to be able to market our own products. Imports killing us. Shrimp imports have driven prices down.

Jon Russell: Cool to see this strategy - kudos for getting the wheel rolling on this.
Potential missing point: Naming the role of consumers into this. Access to consumers is also super important. The more people who are in the culture of wanting seafood, the more people we have entering at various points in the supply chain.
A necessity in the strategy is to remove some of the top-down layers in the implementation of this strategy. NOAA alone is not going to have the diversity of knowledge and connections to communities. Crowdsourcing with community leaders who can be liaisons to help with the implementation of the strategy would be great.

Maria Steyaart: Hook and line fisher SE Alaska - sell seafood in Vermont. Some things missing is a consideration of bringing fishermen into these plans, supported by funding. Funding funding funding. Food resiliency - so grateful that Petersburg, AK provides a community cold storage.

What's missing is an ice chute. If you want food resiliency and less fishing, provide support to fishers to make more money for their fish. Support marketing and then they don't have to catch as much due to the better price per pound. Land ag is 20 years ahead in terms of funding support for farmers.

Michael Rubino: Funding to the agency is fairly constant, but doesn't account for inflation. NMFS is strapped for funding. USDA gets a lot more. We can help find other pots of money.

Deborah Granger: We represent a group of 140 members in the working waterfront in Bellingham. Members want to upgrade their diesel engines, but there's no funding. Diesel Emissions Reduction Act (DERA), is available to tribes and tug boats, but they can't access it as yet.

Jim Kendall: The wind companies may be a pot of funding to look towards - particularly in light of how they'll affect fishing. Use it wisely.
Greening of the industry - the MA fishermens partnership is helping upgrade vessels. Money is more for the study in terms of how they're going to do it.

Les Brown: How is this strategy any different from stuff done in the past?

Michael Rubino: This is a new initiative. Some of these extraordinary stressors like covid and climate change have been a wake-up call for the agency. The areas where NMFS can work with industry are all there, but we'd like to focus on working with people and the supply chain sector could help in the long term.

Kate Masury: Highlight the importance of the small and midsize seafood businesses - these businesses really increase access to seafood. These small businesses are better able to adapt to climate-change fisheries targets. If we want to increase access, we need to understand which markets help link food desserts to seafood. New opportunities are on the horizon.

Bailey Bowden: Down East Maine. He's involved with river herring and whiting. Habitat loss - man-made dams affect the source of these fish that are so imp. To ecosystem. What have we done to the chemical composition of the water by damming these systems?
Aquaculture: it's a big push in Maine. Lots of oyster aquaculture. They weren't here earlier, but are now surviving and reproducing. Shores littered with feral oysters. They're showing up in scallop beds and are affecting a lucrative fishery. Shouldn't give up the needs of the many for the profit of the few.

In chat: **Melissa Mahoney**: In case you don't get to me, I also wanted to speak to Aquaculture policy aimed at increasing production. There is a perceived/real conflict between wild capture and fish farming, so this strategy should include ways to minimize conflicts/spatial and otherwise between wild/farmed production. Thank you for this meeting.

Amanda Wlaysewski: Custom processor in AK - Direct marketing is great, fishermen do a great job in connecting folks with seafood and celebrating their catch. One of the biggest challenges in Bristol Bay is the lack of small custom processors is a huge barrier.

Melissa Mahoney: Exec Dir. Monterey Bay Fisheries Trust -Aquaculture in California is already an economic liability and threatens wild capture fisheries. Can the strategy perceive and mitigate these conflicts? Comment on Goal 3 - they're working on seafood accessibility. Connect fishers and food banks. It's become a thing here now. Other communities have done that. The accessibility for a lot of people in low-income groups to fresh seafood is so imp. Think about accessibility for all.

Nicolas Gomez: Representing a young fishermen's association in PR. Comments related to wording - fisheries sci wording diminishes the economic and social dynamics. Impacts to local economy and livelihoods from aquaculture. 4th goal - to strengthen the entire seafood sector - pre-harvest stage such as gear shortages also need to be addressed.

Linda Behnken- Sitka AK. Longline fishermen's association - Need for this strategy to support small and medium scale fisheries. Promotes community resilience and health. Agree with the need to invest in infrastructure in rural communities. Boatyards, working waterfronts generally, as well as cold storage capacity, and resilience regionally and locally.

Investment - climate change already affecting. Lower barrier to entry. Help SSF move from one fishery to the next. Anchoring some of the access to fisheries in communities. Invest in aqua in a way that avoids conflict, coz otherwise we're working against ourselves. Think of ways to develop aqua to be complementary, avoid industrialization, and not promote aquaculture rearing of wild capture species that already have viable markets.

Michael Rubino: Over the next couple of months they'll take in all these comments and may rephrase. But really need to consider how they're going to implement this.

From **Nicole Wright**, Ohio Sea Grant: Is there a way to link this strategy to the separate aquaculture and fisheries strategic plans NOAA has? Also, regarding language: Great Lakes fisheries, both wild caught and aquaculture are not directly mentioned and supported by the current wording of the draft.

Re: NOAA's National Seafood Strategy

To NOAA Fisheries,

FishWise's mission is to sustain ocean ecosystems and the people who depend on them by transforming global seafood supply chains. We strongly believe that the health of people and ecosystems is inextricably linked and work to implement a holistic approach to sustainability in pursuing our mission. We focus on markets as the key lever of change through direct engagement with companies, participation in pre-competitive forums, and collaboration with the government. Our consultative approach stems from 18+ years of experience in seafood supply chain engagement, and our expertise is trusted by human rights groups, conservation organizations, seafood buyers and suppliers, and government representatives alike.

We are excited to see NOAA's new strategy for supporting the domestic seafood sector and think the four strategic goals are a great start to address the critical challenges (nicely outlined by NOAA) facing the US seafood sector. There are key topics, however, that are not addressed either explicitly or in enough detail within this draft.

We believe the below topics, whether incorporated within the four relevant Goals or specifically during the Strategy Implementation, would greatly support NOAA's National Seafood Strategy and overall purpose.

- **Alignment with existing initiatives**
    - The seafood sector as a whole is at an inflection point, with many end buyers and mid-supply companies' sustainability commitments coming to an end or primed for revision. The industry and supporting NGOs are working to increase alignment and leverage existing international frameworks to help organize and communicate sustainability work with the public. This is aimed at addressing two challenges communicated by the industry: the complexity of seafood sustainability and difficulty communicating the work to the public in an accurate and simplified manner.
    - We suggest aligning or at least internally mapping these Goals to existing initiatives for added impact and increased efficiencies (eg UN Sustainable Development Goals, UNGPs on Buisness and Human rights, OECD Due Diligence for Responsible Buisness Conduct, Conservation Alliance for Seafood Solutions etc).
    - Sourcing US-caught and processed seafood is a great solution to both sustainability and communication challenges, but additionally, mapping how US-sourced seafood translates to global impact will help companies and NGOs alike monitor progress and communicate benefits to the public.

- **Direct and intentional collaboration with seafood supply chains**
    - The industry is integral in shaping inclusive policies, and NOAA should strive to include their experiences, feedback, and suggestions in this strategy and implementation. Creating a range of pathways for different segments of the supply chain to provide feedback and ideas is critical for operational success.
    - Once work is underway, communication about final work plans, effective socialization about resources available to the industry, and transparency into progress against the work plan should occur.

- **Traceability, verification, and transparency**
    - Although technology is mentioned, specific mentions of how improved traceability of seafood, verification of data, and increased transparency across the sector would be beneficial.
    - Data underpins the majority of sustainability work and is critical for food safety, legality, and business operations. Seafood companies are working hard to implement best practices, and US fishery regulations are some of the most stringent, so continuing to encourage traceability and supporting verification efforts by utilizing the data already being collected by US government will help progress this strategy's goals.
    - For example, ideally, there would also be some mention of supporting technological advances under Goal 1, not just under Goal 4, since technological advances at the harvest level help achieve Goal 1 (and Goal 2).
    - For example, ideally, Goal 3 would also include traceability and or verification. Strengthening the electronic traceability of the US seafood sectors helps reduce the risk of IUU entering the supply chain, helps increase public trust in US seafood products, and supports broader FDA food safety initiatives. This could perhaps fit under Goal 4 as well.

- **Improving working conditions and advancing human rights**
    - There is no mention of how NOAA will work with other government agencies to improve the seafood sector working conditions and ensure the US industry is free of any labor or human rights violations. Based on the recent findings in the EU and what is happening in other sectors in the US, this should not be overlooked.
    - In addition to growing and diversifying the seafood workforce, NOAA should also ensure that the US seafood workforce has access to a safe and healthy workplace. Ensuring the safety of our workforce shows we value them, and in turn, the industry as a whole will strengthen and grow.
    - An example of a mental health initiative for seafood workers in New Zealand can be found here.

FishWise is interested in supporting NOAA with the implementation of its new strategy and looks forward to aligning our work with it to expedite results for the US seafood sector. I thank NOAA for taking leadership on this important topic, allowing for the opportunity to provide input, and for its work to date.

Sincerely,

Michelle Beritzhoff-Law
Sr Project Director
FishWise

March 30, 2023

Ms. Janet Coit
Assistant Administrator for Fisheries
NOAA Fisheries
1315 East West Highway
Silver Spring, MD 20910

Dear Asst. Administrator Coit,

Thank you for this opportunity to provide feedback on the Draft National Seafood Strategy announced by NOAA Fisheries on February 14th, 2023. We are excited to see an open conversation taking place that considers how we can build out our national seafood systems in a way that is good for the people and the planet while also being economically viable. NAMA is led by fishermen and coastal community members across the country who share this sentiment and work to ensure these systems remain beneficial for the coastal communities associated with them.

Purpose

The purpose laid out for this seafood strategy aligns with NAMA's mission and the work we support through our active and engaged network of fishing folks. Wherever possible, NAMA seeks to highlight stand-out seafood operations to raise the collective skillset of our network, build deeper relationships among small- and medium-scale producers of sustainable seafood, and learn directly from those with on-the-water knowledge in how values-driven seafood systems can be built and moved forward. We rely on these relationships to have a good pulse on the health of the oceans and coastal communities.

As the concept of 'sustainability' has gained prominence in mainstream food production and among policymakers, the term itself has, in some cases, lost its grounding in small-scale, localized production. Discussions around sustainability are often difficult in these spaces because the sustainability of any two fisheries can require extremely different tools, people, knowledge, etc. NAMA strongly believes that a broad network of communities who are intimately familiar with and dependent on any given fishery is required for impactful environmental restoration and protection. Any strategy aiming to sustainably grow our fishing communities must be as wide-reaching and diverse as the fisheries themselves.

Strategy

This strategy is driven by the truth that seafood is good for people, the planet, and the economy is great, but as with anything healthy, the mismanagement of it can cause it to not only lose its health benefits, but become something harmful altogether. Fortunately, we have many historical parallels to draw from. If we look at the growth of agriculture, we can see that a shift away from

community-based and regional food systems created troves of problems to our domestic agriculture. We want to ensure that any strategy moving forward is supportive of a seafood system that will be good for all people, good for the planet in the long-term, and creating an economy that supports a living wage for everyone in the supply chain, not just record profits at the top of the chain.

Currently the strategy fails to acknowledge that there are active policies in place driving our seafood to not meet the very goals that are named. It is one thing to build and promote seafood operations that meet these goals and foster the healthy future we all want. Equally important is to address policies that have been a detriment to our communities, environment, and economy. Offshore aquaculture is proven by many different entities globally to be incredibly harmful to the ocean and operates at a scale that only benefits massive corporations who are far from needing any extra economic support.[1] Additionally, the commodification of permits under the catch share system is continuing threaten the livelihoods of small-boat fisherman while allowing international private equity firms to consolidate these permits as a form of long-term investment. This is making it nearly impossible for coastal communities to access fishing rights and it is taking massive amounts of wealth away from them and the country altogether.[2] Attempts to challenge this consolidation at Regional Fishery Management Councils are often thwarted due to the reality that the companies with the most resources can most easily maneuver through these council meetings and heavily skew decision-making in their favor.[3]

A Community-Informed Just Strategy

Ultimately, what will truly strengthen our seafood sector is a seafood strategy that is grounded in finding key allies across the country who can speak to their community's issues and advocate for the people who will be the most impacted. Currently there needs to be acknowledgement of systems and policies that are not working for small- and medium-scale fishermen and coastal communities. Once that has been named, steps should be taken to meaningfully connect with the people who can represent the communities most impacted and bring them in to help shape the core of any strategy moving forward.

Conclusion and Gratitude

We have a lot of appreciation for the opportunity to provide feedback to this seafood strategy. There are so many people in fishing communities who are excited and determined to ensure our seafood is sustainable, both environmentally and economically, and we hope that is heard loudly through all the comments.

Sincerely,
North American Marine Alliance

1: "The Foodprint of Farmed Seafood." *FoodPrint*, GRACE Communications, 19 Oct. 2020, https://foodprint.org/reports/the-foodprint-of-farmed-seafood/#section_4.

2: Sennott, Will. "How Foreign Private Equity Hooked New England's Fishing Industry." *ProPublica*, 6 July 2022, https://www.propublica.org/article/fishing-new-bedford-private-equity.

3: Touchstone Consulting Group. 2011. A Review of the New England Fishery Management Process. Report to NMFS April 2011

Thank you for the opportunity to comment on the National Seafood Strategy. It is critical time for the US domestic fishing industry.

Boutique fisheries, low trip limits, years to fish increased quotas, step downs for precautionary measures, imbalanced councils, recreational discards, low quotas, re-allocations, shrimp boats tied to docks because domestic shrimp is becoming very hard to sell against the flood of imports, loss of infrastructure for the domestic fleet, incorrect information being distributed by special interest groups villainizing the domestic fisheries, commercial fishing boats being sold out of the country to participate in foreign countries fisheries that then will import to the US…..these practices are succeeding in destroying the small fishing industry and infrastructure that remains.

Goal #1 will not be met unless the councils are balanced with council members that are experienced and knowledgeable in the fisheries. There must be balanced representation representing commercial fishing and the non-boating seafood consumer. Uncertainty buffers need to be addressed to maximize optimal yield. Fishery data and decisions made regarding the data need to be implemented much quicker. Correct and current information for economic data should be used-exvessel price should not be the benchmark for a commercially landed product.

A major goal under #3 would be to create an equal playing field for domestic seafood and imports. This is critical for the food security in the US. It would be a huge step in becoming independent of foreign countries food for US citizens. We saw this issue during COVID. Also under this goal, NOAA should be promoting the sustainability of our fisheries and participating in letting the public know when false information is being distributed. Special interest groups have been given the liberty to spread misinformation regarding the US fishing fleet. Any product harvested under MSA should be certified sustainable by NOAA.

Goal #4 will not be met as long as boats are leaving the fisheries and docks are being sold for other uses. Once the infrastructure is gone, it will be very hard to bring it back. We have witnessed this down through the years-and the downsizing continues. It has become harder and harder to make a profit in this business.

I have great hope that the National Seafood Strategy will stabilize and re-vitalize the commercial fishing industry, put more domestic product on consumer's plates, and the seafood consumer will be well educated so they can make wise food choices while becoming more independent of imported food.

Janet Coit
Assistant Administrator
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
1325 East-West Highway
Silver Spring, MD 20910

March 31, 2023

Dear Administrator Coit,

The undersigned individuals and entities are members and representatives of the U.S. commercial fishing industry, a category that includes vessel owners, captains, crewmembers, port associations, and seafood businesses.

Although we hail from diverse ports and participate in many different fisheries, we are united by our shared support of fishery friendly climate action that *simultaneously* reduces, sequesters, or avoids GHG emissions at scales sufficient to hold warming well below 2°C (while pursuing efforts to limit warming to 1.5°C), while *also:*

- Avoiding collateral impacts on ocean, coastal, estuarine, and watershed environments;
- Avoiding interference with the harvest and provision of wild seafood for the public;
- Contributing conservation co-benefits that enhance the resilience of these ecosystems to climate change and other stressors; and/or
- Facilitating the voluntary adoption of cost-effective, locally appropriate technologies and practices to reduce fuel use and greenhouse gas emissions by fishing vessels and shoreside businesses.

We submit this letter in response to NOAA's solicitation for public comment on its draft National Seafood Strategy. Many of the undersigned have submitted additional responses to this call, and this letter neither supersedes, affirms, nor contradicts those other letters. Instead, its purpose is to lend additional emphasis and guidance to the critical and timely topic of ensuring that the NOAA National Seafood Strategy supports climate action that works *for* U.S. fisheries and not at their expense.

In this letter, we focus our comments on the first and fourth focal areas in the draft Strategy, namely "sustain or increase sustainable U.S. wild capture production" and "strengthen the entire U.S. seafood sector." As the draft correctly points out, both climate change and many ocean-based climate solutions represent drivers of unprecedented disruption to the U.S. fishing and seafood system. The draft also points out that seafood itself is a relatively low-carbon source of protein that offers particular promise in the context of food systems designed to reduce and mitigate the effects of climate change. Furthermore, the draft highlights the importance of themes such as: strengthening habitat conservation in support of fisheries; modernizing seafood infrastructure (e.g., vessels, port and dock facilities, working waterfronts); and fostering a growing and diverse seafood workforce.

Building on these themes, we outline below two priorities that should be considered in NOAA's National Seafood Strategy.

1. Illuminate a road to net-zero emissions that is "fishery friendly."

The years 2021-2022 marked a turning point in the U.S.' commitment to addressing its contribution to the crisis of global climate change, with the White House and Congress signaling unprecedented ambition through domestic reinstatement of the Paris Agreement's internationally embraced greenhouse gas reduction goals and the passage of two groundbreaking pieces of climate legislation: the Inflation Reduction Act and Bipartisan Infrastructure Law.

While these steps are commendable and necessary, it is not enough to ensure that our nation's ecosystems and wild places are spared the worst effects of climate change. An equally important step, which the federal government has yet to take, is to ensure that these ecosystems are *also* protected from potentially harmful impacts of some of the technologies and approaches that are likely to be deployed in the march towards net-zero.

In the context of the National Seafood Strategy, the ecosystems that produce wild seafood may experience negative impacts from rapid development of industrial offshore wind, deployment of risky forms of marine carbon dioxide removal, escalated levels of extraction of copper and critical minerals in sensitive watersheds, irresponsible forest removal for energy development or biofuel production, large-scale hydroelectric power, and assorted other decarbonization strategies that, especially when done hastily and without care, may impact the marine, coastal, and watershed environments that support U.S. seafood. Conversely, production of wild seafood may experience *positive* impacts from some decarbonization solutions, such as farmland and forest conservation, which can offer win-wins for the climate and ecosystems by improving upstream water quality while sequestering carbon in soils and long-lived woody biomass.

While NOAA's direct role in deploying and permitting decarbonization solutions is limited, NOAA's expertise in oceans and fisheries make the agency indispensable in bringing to light the potential negative *and* positive impacts of proposed decarbonization solutions to fishery ecosystems. NOAA scientists have a unique role to play in sorting "fishery friendly" from "fishery risky" decarbonization solutions and in developing guidelines that would result in the prioritization of "friendly" over "risky" investments, including in the context of investments and actions executed by other federal agencies.

Therefore, the signers of this letter implore NOAA to leverage its expertise at this pivotal time, and to make a sustained and strenuous effort to support fishery and seafood stakeholders when working with other agencies, as well as the White House's National Climate Task Force, National Climate Advisory, Office on Clean Energy Innovation and Implementation, and Office of Science and Technology Policy, in preferentially promoting climate-related investments and actions that *avoid* negative impacts and *promote* positive benefits to fishery ecosystems and seafood economies. This approach to stakeholder representation is currently missing from the seafood strategy and the agency's approach generally, and it is sorely needed.

To support this role, we ask NOAA to amend the National Seafood Strategy's Goal #1, as follows:

> Changes in ocean conditions and the resulting shifts in distribution and abundance of marine resources, as well as the intensity of damaging storms are affecting access to and production of seafood as well as subsistence and Tribal fishing. *Meanwhile, the oceans, coasts, and waterways that support U.S. fisheries are increasingly called into action to support ambitious decarbonization strategies, with the goal of reducing further the U.S. contribution to global climate change.* These factors, in addition to new ocean uses and advances in sampling technologies and data modernization call for an evolution in science and management frameworks for a climate-ready seafood sector, including:
>
> - **Fisheries Science.** Provide the science and economic and social analyses necessary for fisheries management under changing ecosystem dynamics *and to project and assess impacts of decarbonization strategies to fishery ecosystems and fisheries*….
> - **Habitat Conservation in Support of Fisheries.** Protect and restore habitat important to our nation's fisheries and support resilient coastal communities, *including from any negative impacts posed by decarbonization strategies to fishery ecosystems and fisheries.*

2. Accelerate a transition to a low-carbon fishing fleet by supporting locally led, bottom-up innovation and planning.

Since the passage of the Inflation Reduction Act (IRA) in August 2022, members of the commercial fishing industry have submitted at least four letters to various federal agencies, including NOAA, asking that some portion of the Act's $369 billion for decarbonization programs be apportioned to support a transition to low-carbon fishing vessels. For example:

- In a November 2022 letter, 190 associations, individuals, and businesses (facilitated by the North American Marine Alliance) asked NOAA to allocate $100 million of the $2.6 billion that the agency received under the IRA for coastal resilience projects, to support and/or finance clean energy opportunities for the nation's small-boat fishing fleet, including vessel retrofits and electric conversions, pilot projects demonstrating new technologies, and outreach and education.
- In a November 2022 letter, 14 associations and 34 individuals and businesses in the fishing industry wrote to the White House Office of Science and Technology on the creation of an Ocean Climate Action Plan, calling for the streamlining of existing federal programs (e.g., Diesel Emissions Reduction Act) as well as the establishment of new and diverse dedicated funding streams to support bottom-up planning and innovation.
- In December 2022 letter, 7 fishing industry associations wrote to the Environmental Protection Agency (EPA) regarding the IRA Greenhouse Gas Reduction Fund (which allocates $27 billion for competitive grants for the provision of financial and technical assistance to projects that reduce or avoid greenhouse gas emissions and other forms of air pollution) asking the agency to design the program in such a way that funds might be available to fishing vessels and shoreside operators for investments in greenhouse gas reduction activities on board fishing vessels and in fishing ports;

- In a January 2023 letter, 14 associations and 35 individuals and businesses in the fishing industry submitted a letter to the EPA regarding the IRA Clean Ports Program (which allocates $3 billion to provide grants related to reducing air pollution at ports) asking the agency to set aside ten percent of program funds, or $300 million, for investments in US fishing and seafood facilities, vessels, and related working waterfront infrastructure in ports across the nation.

These letters also urged the EPA and NOAA to ensure that commercial fishing is given an opportunity to participate in emissions reductions initiatives through goals including creative approaches to financing, bottom-up incentives, and robust engagement based on common understanding and objective sharing. Additionally, the letters noted that due to the diverse characteristics of fishing ports, the best mix of low- and zero-emissions technologies will not be universal, and consequently, planning and investment must be locally led and tailored to the unique uses, challenges, and opportunities found in each port.

Furthermore, these letters stressed the fact that application of high-efficiency and zero-emissions technologies on fishing vessels in the U.S. is currently at a pilot stage, and technologies are prohibitively expensive. As a result, wraparound support is needed to launch more pilot programs, develop fisherman-led educational exchanges to vet and build confidence in new technologies, work with port managers and energy systems experts to design linked vessel-port decarbonization plans, and then ultimately, to bring the costs of zero-emissions technologies down to a level that is competitive with diesel engines via grants, tax incentives, and/or other financial mechanisms.

The White House's Ocean Climate Action Plan (OCAP), published in March 2023, integrates these recommendations in part, by recommending that NOAA work with the Departments of Energy (DOE) and Transportation (DOT) in the next 6-12 months to conduct scoping on opportunities related to fishing fleet decarbonization, and to explore the potential expansion of existing (or the creation of new) funding programs to support this transition. Although the OCAP recommendation on fishing fleet decarbonization is fairly cursory and technologically limited when contrasted with the OCAP's expansive three-page section on green ports and shipping, signers of this letter are broadly supportive of this goal and stand ready to offer our assistance. In fact, many of us are already collaborating on a bicoastal, fishing industry-led scoping project called "Accelerating a Transition to a Low Carbon Fishing Fleet," with an estimated publication date of November 2023. More information may be found at https://www.fisheryfriendlyclimateaction.org/projects

The need to accelerate a transition to a low-carbon fishing fleet intersects with two elements of the National Seafood Strategy: Goal #1's emphasis on the impacts of greenhouse gas emissions to seafood ecosystems and Goal #4's emphasis on modernizing seafood infrastructure and fostering a resilient seafood and fishing workforce. Therefore, we encourage NOAA to elevate the priorities articulated by the fishing industry in this and previous letters by amending the second bullet point under Goal #4 of the National Seafood Strategy, as follows:

> **Seafood Infrastructure.** Work across federal agencies to modernize U.S. seafood infrastructure (e.g., vessels, hatcheries, port and dock facilities, processing, storage,

working waterfronts) to strengthen and enhance opportunities for coastal seafood communities and regional food economies *and to promote locally led, cost-effective opportunities to pursue low-carbon innovation in the fishing and seafood sectors.*

Conclusion

As the National Seafood Strategy moves towards completion and then implementation, we encourage NOAA to work with fishery stakeholders to advance fishery friendly climate action by communicating and coordinating through the Fishery Friendly Climate Action campaign, a national network that convenes fishing businesses, fishermen, and seafood-related businesses to promote fishery friendly climate action at all levels through coordination, information sharing, and communications support. More information is available at fisheryfriendlyclimateaction.org.

We invite NOAA to coordinate and communicate with fishery stakeholders through the infrastructure provided by the Fishery Friendly Climate Action campaign, in order to jointly advance fishery friendly pathways to reaching net-zero targets, including but not limited to the adoption of low- and zero-carbon technologies and practices within our own industry.

NOAA leadership can enhance coordination and communication for these purposes by updating the Seafood Strategy so that it is easier to establish partnerships between NOAA and organizations/businesses that achieve the following goals and objectives:

1. Facilitating interagency coordination, i.e., with NOAA line offices and other federal agencies, and support and encourage coordination efforts with other federal agencies and entities, including the Environmental Protection Agency, Department of Agriculture, relevant White House offices, and others where appropriate.

2. Assisting with interagency coordination through the National Climate Task Force, and other relevant interagency bodies as appropriate.

3. Facilitating and supporting data sharing and analysis with fishing communities in support of fishing community supported efforts to promote fishery friendly climate action.

4. Contributing appropriate federal resources and subject matter expertise to support these efforts.

Thank you for the opportunity to provide comment. Responses to this letter may be sent on our behalf to Sarah Schumann, coordinator of the Fishery Friendly Climate Action campaign, at shiningseaconsulting@gmail.com.

Sincerely,

Pete Granger
Vice-President
Working Waterfront Coalition of Whatcom County
Bellingham, WA

Angela Sanfilippo
Executive Director
Massachusetts Fishermen's Partnership
Gloucester, MA

Linda Behnken
Director,
Alaska Longline Fishermen's Association
Sitka, AK

Andrea Tomlinson
Executive Director
New England Young Fishermen's Alliance

Glen Spain, J.D.
Acting Executive Director
Pacific Coast Federation of
Fishermen's Associations (PCFFA)
San Francisco, CA

Fred Mattera
Executive Director
Commercial Fisheries Center of Rhode Island
Wakefield, RI

Joel Kawahara
President
Coastal Trollers Association
Auburn, WA

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Angela Sanfilippo
President
Gloucester Fishermen's Wives Association
Gloucester, MA

Aubrey Ellertson Church
Policy Manager
Cape Cod Commercial Fishermen's Alliance
Chatham, MA

Eric Jordan
F/V I GOTTA
I Gotta Salmon
Sitka, AK

Vince Mortillaro
President
Mortillaro Lobster
Gloucester, MA

Kent Barkhau
Managing Director
Woodstock Fisheries LLC
Sitka, AK

Richard Nelson
Commercial fisherman, retired
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Mark Chandler
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Chandler Fisheries Inc.
Kodiak, AK

Jim Kendall
Owner
New Bedford Seafood Consulting
New Bedford, MA

Tav Ammu
F/V Sea La Vie
Dillingham, AK

Sarah Schumann
Crewmember, various vessels
Point Judith, RI & Bristol Bay, AK

Amy Grondin
Co-Owner
Duna Fisheries
Port Townsend, WA

Greg Friedrichs
Commercial Fisherman
F/V Arminta
Port Townsend, WA

Jackson Combs
Icy Cape Seafoods, LLC
Hoonah, AK

Robert Nagle
Vice President of Operations
John Nagle Co.
Boston, MA

Shirley Zuanich
Pure Alaska Salmon Co LLC
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Jeff Farvour
Owner Operator F/V Apollo
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F/V Endeavour
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Kevin Scribner
Forever Wild Seafood
Walla Walla, WA

James Moore
F/V Aljac
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Michael Kohan
Science and Policy Director
Sitka Salmon Shares
Juneau, AK

Bob Morris
F/V Living Waters
Bristol, RI

Larry Collins
F/V Autumn Gale
President
San Francisco Community Fishing Association
San Francisco, CA

Jennifer Custer
F/V Miss Kathleen
Westport, WA

Todd Goodell and Susan McHugh
F/V Kingfisher
Martha's Vineyard, MA

Lindsey Bloom
F/V Rainy Dawn
Juneau, AK

Joshua Mims
F/V Shadow
Crescent City, CA

Tim Rovinelli
F/V P.O.S.
Providence, RI

Southeast Alaska Fishermen's Alliance

1008 Fish Creek Rd

Juneau, AK 99801

Fax: 907-917-5470 Website: http://www.seafa.org

March 16, 2023

The Honorable Richard Spinrad, Ph.D
Administrator, National Oceanic and Atmospheric Administration
1401 Constitution Avenue NW
Washington, DC 20230

RE: Comments on Draft National Seafood Strategy

Southeast Alaska Fishermen's Alliance appreciates the opportunity to comment on the draft National Seafood Strategy. Overall, the strategy appears to touch on many of the issues we believe are important, but it is a high level look at the priorities and goals. What NOAA/NMFS actually puts in the implementation plan for specific actions, timelines and milestones, final comments may result in different comments. **To that end, we would request a second comment period after the implementation plan is drafted and before being adopted.** We are providing some comments for consideration in developing more detailed aspects of the plan.

Southeast Alaska Fishermen's Alliance (SEAFA) is a non-profit multi-gear, small boat commercial fishing association representing our 330 members involved in the salmon, crab, shrimp and longline fisheries mainly in Southeast Alaska.

SEAFA appreciates that U.S. wild capture seafood is highlighted as being responsibly harvested. SEAFA supports the Purpose statement, Strategy Drivers and Framework of the draft strategy document. Below are comments on specific goals for consideration.

GOAL 1:

Fisheries Science: **SEAFA supports maintaining core fishery surveys** and increasing where possible without impacting the core fishery surveys that provides the necessary information for the sustainable management of the nation's fishery resources. Climate change and changing ecosystems dynamics will necessitate additional science resources but this can not come at the expense of long-term core fishery surveys.

GOAL 2:

SEAFA agrees that a gradual, and regionally-appropriate growth of the domestic aquaculture industry depends upon a science-based regulatory approach. That said, **a state needs the ability to opt-out of any type of aquaculture** that they are not interested in having off their coast.

Increasing aquaculture opportunities should not come at the expense of U.S. sustainable wild capture fisheries either by harm to the regional resources through the introduction of aquaculture **nor through competition in the marketplace**.

SEAFA **opposes the use of genetically modified aquaculture species being introduced into the waters of the US**. Introducing new species is the equivalent of adding an invasive species into the environment.

GOAL 3:

SEAFA supports increasing domestic knowledge about U.S. sustainable seafood, it's excellent nutritional benefits and availability. In addition, NOAA should partner with the U.S. Trade Office and provide the necessary expertise and awareness to appropriately support U.S. seafood trade.

GOAL 4:

SEAFA would remind NOAA when working on a seafood strategy that they have a wide variety of seafood harvesters from very small boats to very large factory trawlers and that initiatives need to be scaled to help all and not a single segment of the industry.

SEAFA would remind you that before adoption of the implementation plan, another comment period would be beneficial and appropriate.

Sincerely,

Kathy Hansen
Executive Director

February 14, 2023/HSWRI Edits March 24 2023

NOAA's National Seafood Strategy

Purpose

The *National Seafood Strategy,* outlines our direction for supporting a thriving domestic U.S. seafood economy and enhancing the resilience of the seafood sector in the face of climate change and other stressors. Our vision is to ensure that:

- U.S. seafood continues to be produced sustainably
- The U.S. seafood sector contributes to the nation's climate-ready food production and to meeting critical domestic nutritional needs
- U.S. seafood production increases to support jobs, the economy, and the competitiveness of the U.S. seafood sector
- Supply chains and infrastructure are modernized with more value-added activity in the United States
- Opportunities are expanded for a diverse and growing seafood workforce
- Promote a more secure supply of seafood for American consumers

Strategy Drivers

NOAA Fisheries' *National Seafood Strategy* supports the growing importance of seafood in meeting global needs and recognizes the unprecedented challenges faced by the U.S. seafood sector.

Seafood is Good for People

Seafood is one of the best sources of nutrients essential for human health and well-being. It is also critical to providing food to a growing global population.

Seafood is Good for the Economy

The U.S. harvests about 10 billion pounds of seafood annually with a dockside value of $6.3 billion. Domestic seafood is also an economic engine that supports 1.2 million jobs and generates $165 billion in sales across the broader economy.

Seafood is Good for the Planet

Harvested and grown responsibly, as it is in the United States, seafood is also an environmentally friendly way to produce a nutritious food given its relatively low carbon footprint and efficient use of resources, and is increasingly a critical part of food systems designed to reduce and mitigate the effects of climate change.

The U.S. seafood industry is facing unprecedented challenges.

Climate change is rapidly altering species location, size, and composition. It is also intensifying storms and impacts on infrastructure.

The **coronavirus pandemic** disrupted markets and trade, decreasing the economic viability of the seafood industry and limiting access to some seafood.

New technologies and other ocean uses, such as offshore wind energy, will affect use of ocean space and potentially result in conflicts.

Significant **labor shortages** plus aging harvesting, processing, and distribution **infrastructure** affect production, safety, and cost effectiveness in the industry.

Commercial fishing cannot produce all the seafood needed, and aquaculture has emerged as a global imperative

February 14, 2023

Strategy Framework

The *National Seafood Strategy* focuses on NOAA Fisheries' work to sustainably manage marine fisheries and produce seafood responsibly, based on sound science. It is one of a suite of strategies that describes how we will support the nation's fisheries and execute our mission in the face of climate change, market disruptions, and new ocean uses.

The *National Seafood Strategy* also allows NOAA Fisheries to address important national issues such as the resilience of coastal fishing communities; the role that aquaculture must play in the seafood supply chain; the financial viability of the seafood industry; the effects and opportunities of international trade; and the importance of seafood to nutrition, food security, food sovereignty, subsistence fishing, and traditional Tribal fishing rights.

To implement the *Seafood Strategy,* NOAA Fisheries will partner with state and other federal agencies, the National Sea Grant College Program, Tribes, non-government organizations, fishermen, seafood farmers, and other stakeholders to address the challenges facing the seafood sector, especially when resources are limited.

GOAL 1: Sustain or increase sustainable U.S. wild capture production

Changes in ocean conditions and the resulting shifts in distribution and abundance of marine resources, as well as the intensity of damaging storms are affecting access to and production of seafood as well as subsistence and Tribal fishing. These factors, in addition to new ocean uses and advances in sampling technologies and data modernization call for an evolution in science and management frameworks for a climate-ready seafood sector, including:

- **Fisheries Science.** Provide the science and economic and social analyses necessary for fisheries management under changing ecosystem dynamics.
- **Fisheries Management.** Maximize fishing opportunities and sustainable seafood production while ensuring the sustainability of fisheries through effective and efficient management. Support the commercial fishing industry and fishing communities in their efforts to adapt to climate change and thrive in a changing ocean economy.

- **Habitat Conservation in Support of Fisheries.** Protect and restore habitat important to our nation's fisheries and support resilient coastal communities.

February 14, 2023

GOAL 2: Increase sustainable U.S. aquaculture production

Seafood is a healthy and climate-friendly nutrition choice and demand is increasing. Aquaculture is one of few ways to significantly increase domestic seafood production—it's how the majority of growth in demand has been met in the last 20 years. Supporting gradual, diverse, and regionally-appropriate growth of the domestic industry will depend on an efficient, strategic, and science-based regulatory approach that considers and mitigates impacts on protected resources, essential fish habitat, and marine ecosystems.

- **Marine Aquaculture Management and Regulatory Efficiency**. Accelerate progress on implementing an efficient, predictable, timely, and science-based regulatory framework for marine aquaculture.
- **Aquaculture Science**. Provide science-based advice and tools to minimize potential effects of an aquaculture operation on the environment and conduct coordinated, applied scientific research in support of sustainable industry development.

GOAL 3: Foster access to domestic and global markets for the U.S. seafood industry

A thriving, well-regulated domestic seafood industry—capable of competing at home and abroad—will translate into greater global seafood supply and food security from sustainable U.S. fisheries. It will also decrease our reliance on foreign fisheries that are at greater risk of overfishing, IUU fishing, and forced labor.

- **Communication and Promotion.** Increase public awareness of the availability, sustainability, and nutritional value of all U.S. seafood.
- **U.S. Market Development**. Work with federal partners and others to identify and develop U.S. seafood markets and put more U.S. seafood back on U.S. plates
- **Fair Trade.** Promote fair seafood trade by combating IUU fishing and related harmful fishing practices around the world and by expanding access to foreign markets for U.S. seafood.

GOAL 4: Strengthen the entire U.S. seafood sector

The COVID-19 market disruptions highlighted systemic challenges to the U.S. seafood industry and the importance of supporting the entire seafood/fisheries value chain, including after seafood hits the docks. Addressing these challenges will help the seafood industry to rebuild more quickly and enable the industry to be more resilient and flexible in the face of potential future crises and market shocks.

February 14, 2023

- **Seafood as a Vital Part of the Blue Economy**. Support the U.S. commercial fishing, marine aquaculture, and seafood communities to adapt and thrive in a changing ocean economy and given new competing uses.
- **Seafood Infrastructure.** Work across federal agencies to modernize U.S. seafood infrastructure (e.g., vessels, hatcheries, port and dock facilities, processing, storage, working waterfronts) to strengthen and enhance opportunities for coastal seafood communities and regional food economies.

- **Workforce Development.** Foster a growing and diverse seafood workforce and attract young fishermen and seafood farmers to the sector.

Strategy Implementation

Informed by public comment and advice from our partners, NOAA Fisheries will prepare an implementation plan for the National Seafood Strategy with specific actions, timelines, partnerships, and milestones.

February 14, 2023

NOAA's National Seafood Strategy

Purpose

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- U.S. seafood continues to be produced sustainably
- The U.S. seafood sector contributes to the nation's climate-ready food production and to meeting critical domestic nutritional needs
- U.S. seafood production increases to support jobs, the economy, and the competitiveness of the U.S. seafood sector
- Supply chains and infrastructure are modernized with more value-added activity in the United States
- Opportunities are expanded for a diverse and growing seafood workforce

Strategy Drivers

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resources, and is increasingly a critical part of food systems designed to reduce and mitigate the effects of climate change.

Strategy Framework

The *National Seafood Strategy* focuses on NOAA Fisheries' work to sustainably manage marine fisheries and produce seafood responsibly, based on sound science. It is one of a suite of strategies that describes how we will support the nation's fisheries and execute our mission in the face of climate change, market disruptions, and new ocean uses.

The *National Seafood Strategy* also allows NOAA Fisheries to address important national issues such as the resilience of coastal fishing communities; the financial viability of the seafood industry; the effects and opportunities of international trade; and the importance of seafood to nutrition, food security, food sovereignty, subsistence fishing, and traditional Tribal fishing rights.

To implement the *Seafood Strategy,* NOAA Fisheries will partner with state and other federal agencies, the National Sea Grant College Program, Tribes, non-government organizations, fishermen, seafood farmers, and other stakeholders to address the challenges facing the seafood sector, especially when resources are limited.

GOAL 1: Sustain or increase sustainable U.S. wild capture production

Changes in ocean conditions and the resulting shifts in distribution and abundance of marine resources, as well as the intensity of damaging storms are affecting access to and production of seafood as well as subsistence and Tribal fishing. These factors, in addition to new ocean uses and advances in sampling technologies and data modernization call for an evolution in science and management frameworks for a climate-ready seafood sector, including:

- **Fisheries Science.** Provide ~~the science and economic and social analyses~~ necessary for fisheries management under changing ecosystem dynamics.
- **Fisheries Management.** Maximize fishing opportunities and sustainable seafood production while ensuring the sustainability of fisheries through effective and efficient management. Support the commercial fishing industry and fishing communities in their efforts to adapt to climate change and thrive in a changing ocean economy.
- **Habitat Conservation in Support of Fisheries.** Protect and restore habitat important to our nation's fisheries and support resilient coastal communities.

GOAL 2: Increase sustainable U.S. aquaculture production

Seafood is a healthy and climate-friendly nutrition choice and demand is increasing. Aquaculture is one of few ways to significantly increase domestic seafood production—it's how the majority of growth in demand has been met in the last 20 years. Supporting gradual, diverse, and regionally-appropriate growth of the domestic industry will depend on an efficient, strategic, and science-based regulatory approach that considers and mitigates impacts on protected resources, essential fish habitat, and marine ecosystems.

- **Marine Aquaculture Management and Regulatory Efficiency**. Accelerate progress on implementing an efficient, predictable, timely, and science-based regulatory framework for marine aquaculture.
- **Aquaculture Science**. Provide science-based advice and tools to minimize potential effects of an aquaculture operation on the environment and conduct coordinated, applied scientific research in support of sustainable industry development.

GOAL 3: Foster access to domestic and global markets for the U.S. seafood industry

A thriving, well-regulated domestic seafood industry—capable of competing at home and abroad—will translate into greater global seafood supply and food security from sustainable U.S. fisheries. It will also decrease our reliance on foreign fisheries that are at greater risk of overfishing, IUU fishing, and forced labor.

- **Communication and Promotion.** Increase public awareness of the availability, sustainability, and nutritional value of all U.S. seafood.
- **U.S. Market Development**. Work with federal partners and others to identify and develop U.S. seafood markets and put more U.S. seafood back on U.S. plates
- **Fair Trade.** Promote fair seafood trade by combating IUU fishing and related harmful fishing practices around the world and by expanding access to foreign markets for U.S. seafood.

GOAL 4: Strengthen the entire U.S. seafood sector

The COVID-19 market disruptions highlighted systemic challenges to the U.S. seafood industry and the importance of supporting the entire seafood/fisheries value chain, including after seafood hits the docks. Addressing these challenges will help the seafood industry to rebuild more quickly and enable the industry to be more resilient and flexible in the face of potential future crises and market shocks.

- **Seafood as a Vital Part of the Blue Economy**. Support the U.S. commercial fishing, marine aquaculture, and seafood communities to adapt and thrive in a changing ocean economy and given new competing uses.
- **Seafood Infrastructure.** Work across federal agencies to modernize U.S. seafood infrastructure (e.g., vessels, hatcheries, port and dock facilities, processing, storage, working waterfronts) to strengthen and enhance opportunities for coastal seafood communities and regional food economies.
- **Workforce Development.** Foster a growing and diverse seafood workforce and attract young fishermen and seafood farmers to the sector.

Strategy Implementation

Informed by public comment and advice from our partners, NOAA Fisheries will prepare an implementation plan for the National Seafood Strategy with specific actions, timelines, partnerships, and milestones.

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PORT AUTHORITY

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March 31, 2023

NOAA's NATIONAL SEAFOOD STRATEGY

The Port of New Bedford is the most economically valuable fishing port in the country. Commercial fishing is a $5.5 billion dollar industry in the United States and the Northeast alone is responsible for 30% of landings. New Bedford ex-vessel landings alone are almost half a billion dollars ($451m in 2020) with over $300 million from the scallop industry alone.

That number does not consider the countless jobs and shoreside economy supporting the industry. A 2019 economic impact study of the Port of New Bedford and Fairhaven Harbor conducted by Martin Associates and Foth-CLE Engineering Group calculated that 39,697 jobs and $11 billion in total economic contribution are provided by our local seafood and commercial fishing industry. A total of $162.8 million of direct, induced, and indirect state and local tax revenue was generated by processing activity at the Port of New Bedford with another $391.1 million of federal taxes. In addition, $228.3 million of state and local taxes and $608.2 million federal taxes were supported due to economic activity of the related users utilizing the Port of New Bedford.

The seafood industry is facing unprecedented challenges, as laid out in the seafood strategy document, it is therefore imperative that there is a significant investment in new technologies, research development, and mitigation from new industries that will share our waters. Fishermen and the industry as whole have been dealing with varying degrees of federal regulations over the years and have a deep concern that the government may not always be doing what is best to maintain a thriving and profitable fishing industry now and in the future. NOAA's National Seafood Strategy will have a positive effect on our domestic U.S. seafood economy; however any strategy cannot lose site of the factors impeding industry growth.

Goal #1 Sustain or increase sustainable U.S. wild capture production

While it is important to establish protected areas to help preserve fish stocks and protect fragile habitats from overfishing and pollution, as the emergence of offshore wind development is generating many more questions than answers when it comes to sustainability. Therefore, proper, and extensive monitoring and data collection funded by the offshore wind industry will assist in identifying areas of concern and assessing the true impact of the offshore wind industry on commercial fishing and fisheries. An increased effort is needed to identify potential new "open areas" for fishermen especially if new industries will add to current, often burdensome, regulations in place or projected. There must be a more flexible approach to restrictive fishing regulations to allow for adaptations in real time that address fisheries impacts as they are

occurring. This is particularly the case when multiple wind lease areas are constructed in a confined area, thereby compounding the impact on commercial fishing.

There are ways to sustain or increase seafood sustainability and production in place of just limiting days at sea or extended closed areas. Some approaches may include:

- Encourage sustainable fishing practices by providing incentives to fishermen who use environmentally friendly methods.
- Invest in research initiatives that monitor the health of fisheries resources and identify trends in population and habitat health.
- Develop targeted programs to reduce bycatch, or accidental catch of non-targeted species, which can have an impact on marine ecosystems.
- Establish incentives to promote responsible fishing practices such as gear restrictions and modernization.

Goal #2 Increase sustainable U.S. aquaculture production

Countries around the world are implementing regulations and best practices to ensure that aquaculture operations are carried out in a sustainable manner, taking into account environmental, social, and economic considerations. U.S. aquaculture offers Americans safe, affordable, and healthy food choices produced with minimal impacts on the environment. Expanding U.S. aquaculture will diversify and complement our well-managed fisheries and terrestrial food production systems by adding an important underdeveloped sector to enhance the resiliency of the overall US food supply.

The goal of increasing sustainable U.S. aquaculture production and economic growth through aquaculture should focus on regional and local aquaculture projects to reduce dependence on imported seafood products while creating jobs in coastal communities. A recent report prepared by The National Science and Technology Council Subcommittee on Aquaculture titled *"A NATIONAL STRATEGIC PLAN FOR AQUACULTURE RESEARCH"* laid out critical objectives and goals to increase sustainability in aquaculture production. These include, but are not limited to:

- Identifying market opportunities for U.S. aquaculture products
- Educating and training a skilled aquaculture workforce
- Developing production technologies that minimize environmental impacts
- Promoting the safety and nutritional value of U.S. aquaculture products

https://www.ars.usda.gov/sca/Documents/2022%20NSTC%20Subcomittee%20on%20Aquaculture%20Research%20Plan_Final%20508%20compliant.pdf

NOAA has been a key partner in identifying the strategic expansion of US aquaculture. This foundational support is critical and should continue to expand by working with our state and local partners. Investments of time and resources by NOAA is much needed in the development

of this new and promising industry as communities and companies alike will continue to need guidance and support.

Goal #3 Foster access to domestic and global markets for the U.S. seafood industry

Locally generated, or even U.S. produced, product consumption is far more attractive than the global importing of often questionable seafood products. Increased regulation on domestic fisheries increases prices and incentivizes purchase of cheaper products from other foreign sources. Communicating and promoting a responsible seafood supply chain by labeling who, what, where and how fish are caught will allow consumers to make informed decisions about their seafood purchases.

Other ways to foster access to markets could include:

- An increase in the availability of fresh, locally sourced seafood through farmers markets and grocery stores.
- The creation of materials and videos showcasing companies with the trademarked message of "American Seafood is Sustainable Seafood"
- More direct and simple supply chains to help maximize value to the fishermen and consumer. Traceable and simple supply chains promote trust and a more direct relationship between fishermen, the public, consumers, retailers, and wholesalers.
- Taking the lead on tackling illegal fishing operations worldwide by strengthening international cooperation between countries' law enforcement agencies and adopting sanctions against vessels caught engaging in illegal activities.
- Raising awareness with the American public of the negative environmental and species impacts from the foreign illegal fishing methods, to help them better appreciate the contrasts and importance of supporting domestic wild caught seafood.

NOAA and our other federal partners should collaborate with academic institutions, economic development agencies, local ocean clusters, and organizations such as the Local Catch Network (LCN) which was established in 2011 and is a hub for knowledge exchange and innovation to support and catalyze local and community-based seafood systems. Today, the network is made up of more than 500 members, including 200 seafood businesses from across North America. In doing so, we can collaboratively support fisheries initiatives that provide economic opportunities for coastal communities while also promoting sustainable fisheries management practices.

Goal #4 Strengthen the entire U.S. seafood sector

It is imperative that NOAA works with Congress to identify the challenges our current fishing industry is facing. In doing so, legislative action will be needed in the areas of amending the Magnuson-Stevens Act with extensive input from the industry, re-opening the Northeast Canyons and Seamounts Marine National Monument area to sustainable commercial fishing, and the mitigation and compensation to the entire fishing industry from the potential negative effects of offshore wind development.

To date, the Bureau of Ocean Energy Management ("BOEM") has auctioned over 24.7 million acres for offshore wind in the Atlantic. With these leases comes significant revenue for the federal government. This lease revenue, or a portion thereof, should be used to support scientific survey mitigation work and activities to avoid, minimize and mitigate the environmental and economic impacts of offshore wind.

We, and the fishing industry as whole, also have deep concerns with Administration's "30 by 30" order committing 30 percent of our lands and oceans to conservation by 2030. Fisheries in all Federal waters are already conserved under the Magnuson-Stevens Act, which has been praised for its success by nearly every major environmental organization. Numerous global studies have found U.S. fisheries to be among the most sustainably managed fisheries in the world. We therefore believe that fisheries in all Federal waters outside formal properly-created marine *sanctuaries*, including fisheries in marine monuments, should be managed sustainably under the Magnuson-Stevens Act. There is no scientific justification for the 30% number, and no likelihood of increasing our national food security to be derived from closing 30% of U.S. waters to sustainable commercial fishing.

Between offshore wind and the stated conservation goals, the potential impact in the commercial fishing industry is daunting. There must be a concerted effort to use the offshore lease funds to research and encourage new technologies, new areas and lessen barriers to entry into fisheries before it is too late. As aforementioned, fisheries management must be nimble and adaptable and based on sound scientific data especially due to climate change and the new development of offshore wind. We would not want to see a shift in demand to less sustainable seafood sources abroad, creating disadvantages for our domestic industry stakeholders.

Seafood supply chains and policies should foster and strengthen community-based fisheries. Fisheries access should be kept available to future generations and must be balanced against the needs and limits of the ocean as well as fishermen's ability to sustain a livelihood with pride. Building a better seafood system requires creativity and innovation. It also requires that forward-thinking ideas are not isolated but rather spread through a network of diverse stakeholders working together, aligning around shared values. Creativity and networking fosters knowledge sharing and collective understanding to have a truly sustainable and successful seafood trade on a local, national and global level.

Sincerely,

Gordon M. Carr
Executive Director
New Bedford Port Authority

Comments on NOAA Draft National Seafood Strategy

Frank Mirarchi

XII Northeast Fishery Sector, Inc.

March 1, 2023

XII Northeast Fishery Sector, Inc. is a cooperative association established under provisions of Amendment 16 to the Northeast Multispecies FMP in 2010. Its membership represents 23 multispecies permits and 6 active vessels based in Scituate, Mass. Our members share and support the vision statement provided in the Strategy Document. Our vessels are family owned and operated and are continuing a tradition that spans generations.

Having withstood the burdens and sacrifices imposed by two decades of regulations designed to rebuild overfished groundfish stocks, we find ourselves facing new challenges. Several of these, along with some proposed solutions or mitigations are listed below:

1. Fisheries science. For fishery managers and regulators to have timely and representative data it is imperative that we do more to incorporate fishery dependent data into stock assessments. Monitoring programs, both human observers and electronic systems, have evolved into assuring compliance and accuracy of counting regulatory discards with little attention to the biological condition of catches. Apparently, the port observer program, which collects aging information at processing facilities, has also been diminished leaving growing uncertainty over the age structure of catches as well.

   Our recommendation would be to train fishermen and compensate them for providing lengths and biological samples, such as otoliths, from representative catches. In addition, information on spawning condition could provide a broader picture than is now available from biennial fishery independent surveys.

2. Management. Enrollment in a sector has become a necessity for fishermen who depend on predictable access to the groundfish (multispecies) fishery.

The costs of sector operation have increased substantially due to the administrative burden of programs such as at sea monitoring. Ultimately, these costs are imposed on the fishermen through membership fees. Congress has agreed that costs for training and placing of at-sea monitors on multispecies trips are reimbursable. It is our belief that costs for this program imposed on sectors and ultimately borne by member vessels should be treated similarly.

3. Seafood infrastructure. There is a serious disconnect between the availability of groundfish stock and landed harvests. For example, for fishing year 2022, as of 2/21/23, with 85% of the fishing year elapsed only one stock (white hake) had been harvested at over 50% of the allocated ACL. For fishing year 2021 (5/01/21 through 4/20/22) the fishery landed 18,700 metric tons out of an allocated 131,400 metric ton allocation. This is 14% of the total allocation.
   A large factor in this poor performance is a lack of processing capacity. The industry lost a large part of capacity during the COVID business closures. As the economy rebounded, domestic groundfish species lost market share to imported products. Since then limited capacity to process has depressed ex-vessel prices and contributed to volatility adding an additional level of uncertainty to vessel owners' business planning.
   The industry desperately needs to upgrade infrastructure, especially in smaller ports. Capital costs for ice making, cold storage and processing machinery are presently beyond the reach of boat owners, and processors in these regions. A program of grants or loans designed to enable rebuilding is essential. Without investment in shoreside infrastructure, we will continue to lose opportunity for economic vitality and food security in this fishery.
   We urge you to consider the points listed here when developing a strategy implementation plan for our nation's fisheries.

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Quonset Point February 27, 2023

Comments on the draft National Seafood Strategy.

To achieve this vision, I would recommend funding, for ten years, a professionally operated marketing campaign that targeted domestic seafood consumption. With increased demand all the infrastructure issues will fall into place.

With regards to the implementation strategy, I would offer a few thoughts on how to increase sustainable U.S. aquaculture production:

1. Simplify/streamline the permitting process for aquaculture in federal waters. This would include a long-term lease for the water rights.
2. Form a private/public partnership that would install and operate properly engineered mussel and kelp farms. These commercial scale model farms would become platforms for research by Governments at all levels, NGOs, industry, fishing interests, all stakeholders.
3. The farm designs would be engineered with whale sensing technology.
4. These model farms will be a benchmark that permitting authorities can evaluate future applications against.
5. These farms will be the business model that will facilitate the expansion of the industry.

Sincerely,

Bill Silkes
President

Port of
Port Orford

The Port of Port Orford appreciates this opportunity to comment on the NOAA Draft Seafood Strategy. Port Orford is a small rural community located on the southern Oregon coast, with a population of about 1,100, which has not grown appreciably in many decades. Approximately 30% of the local workforce is employed in the commercial fishing industry, and the Port of Port Orford is the center of this commercial seafood activity. For its size, the fleet of approximately 40 vessels is disproportionally productive, landing an average of more than $5M in ex-vessel value seafood annually, and contributing approximately $12M to Oregon's economy annually, with the greatest values occurring in the last 10 years. Like most Oregon ports, Dungeness crab is king here, and makes up the largest portion of the value, but the Port Orford fleet also specializes in value added innovations such as live fish, which can fetch 6-7 times as much when kept alive and transported to live fish markets and restaurants in the San Francisco Bay Area, Portland, and Seattle markets. The Port Orford fleet is also a leader in proactive efforts to protect fish populations, by proposing and supporting the Redfish Rocks Marine Reserve and Marine Protected Area more than ten years ago. The Port is generally supportive of NOAA's draft Seafood Strategy and is providing some feedback and suggestions regarding each of the goals outlined in the strategy, as follows.

GOAL 1: Sustain or increase sustainable U.S. wild capture production.

As outlined above, the Port of Port Orford and the local fleet are an integral part of the Port Orford community, comprise a substantial portion of the local economy, and are an essential part of its culture. In short, there is no Port Orford without the Port. We encourage NOAA to recognize and support the vitality of small rural fishing communities like Port Orford, and the revitalization of these working waterfronts, once at the core of these communities.

Fisheries Science: In addition to the other initiatives outlined in Goal 1 concerning including changes in ecosystem dynamics in fisheries management, we encourage NOAA/NMFS to promote and support collaborative fisheries research and collaborative data collection to inform fisheries management using more "real time" data.

Fisheries Management - We support effective and efficient fisheries management that supports fishing communities in our efforts to adapt to climate change and to thrive in a changing ocean economy. In addition, we encourage NOAA to promote and support community-based fisheries management, using real time data to inform in-season adjustments, and streamlining the fisheries management decision making process. We encourage NOAA to promote and support efforts to engage in emerging fisheries in response to range shifts due to ocean warming.

Habitat Conservation - In addition to NOAA's efforts to protect and restore habitat that is vital to the health of commercially fish stocks, we encourage NOAA to promote and support efforts to protect and restore kelp forest habitats, on which many groundfish species depend in our

region, and to promote and restore wild salmon habitat, without which the wild salmon runs cannot endure.

Goal 2: Increase sustainable U.S. aquaculture production.

We support the goal of *gradual, diverse, regionally appropriate growth* in the aquaculture sector. We do not support large scale, rapid growth approaches to open ocean aquaculture, which has not been tested, and for which consequences are unknown at this time.

We support NOAA's goal of science-based approaches that mitigate impacts on protected resources, Essential Fish Habitat, and marine ecosystems. In addition, we support appropriately scaled restorative mariculture approaches that are appropriate to the local region. We support science-based approaches, and regulatory efficiency, as long as it does not "fast track" aquaculture projects the consequences of which are not adequately understood.

Goal 3 – Access to Domestic and Global Markets for US Seafood.

We promote the goals of improved communication and promotion of US Seafood, with a focus on local and regional markets. We support market development, with a focus on local seafood market opportunities, and promoting equity in access to local seafood. We support fair trade in seafood and NOAA's efforts to combat IUU fishing, which places small fishing communities like ours at an economic disadvantage.

Goal 4 - Strengthen the entire U.S. seafood sector.

We support NOAA's goal of strengthening the *entire* seafood sector and fisheries value chain, including after seafood has hit the dock. We encourage efforts to promote resilience and flexibility in the face of changes to the oceans and to seafood markets.

Seafood is a vital part of the Blue Economy We agree and are an example of the essential nature of the major role played by the seafood sector, particularly in small fishing communities like ours, where 30% of the local workforce is employed in commercial fishing sector. We also support the development of living wage jobs in this sector so that community members can remain in their community as these new opportunities develop.

Seafood Infrastructure

We agree that it will be important to work across federal agencies to modernize U.S. seafood infrastructure (e.g., modernized vessels, port and dock facilities, processing, storage, working waterfronts) to strengthen and enhance opportunities for coastal seafood communities and regional food economies. The Port of Port Orford is currently launching an ambitious but long overdue Redevelopment Program to revitalize our working waterfront, and prepare for the fisheries of the future, ocean and fisheries research, restorative mariculture, and outdoor recreation that respects the ocean environment. This program includes a proposal to the Economic Development Administration to upgrade a high-capacity pump ashore seawater system to supply undiluted seawater uniquely available at our ocean direct location. This project will supply expanded value-added commercial seafood operations, retail and wholesale, ocean research, aquaculture, and emerging ocean innovations. This program also includes a FEMA project to strengthen the sole access road to our Port, increasing our capacity to ship product, while making the Port safer by providing a tsunami evacuate route, and a MARAD/PIDP proposal for port infrastructure to upgrade vessel, product, and personnel transportation, holding, processing, packing, and shipping operations. We are happy to be working with NOAA Fisheries on this strategy, and welcome opportunities to engage in interagency consultation to realize the full potential of the Port of Port Orford, and to serve as an example for other small

ports. We are also actively exploring opportunities to build a low carbon emissions commercial fishing fleet for those who wish to embrace this new technology and are seeking opportunities to pair this with clean energy generation and supportive infrastructure as we look toward a clean energy future in the maritime sector.

Workforce development – Finally, we agree with NOAA's goal to foster a growing and diverse seafood workforce and attract young fishermen and seafood farmers to the sector. The Port of Port Orford shares this goal and is embracing opportunities to support a more diverse workforce and seeks to attract a new generation of commercial fishermen and seafood farmers. In collaboration with our fleet members and partners at Oregon State University, we have identified several initiatives that we think will be essential components of a successful program to achieve this goal.

Elements of successful workforce development in Port Orford and similar rural fishing communities:

- Workforce housing – like many coastal communities, real estate speculation is buying up housing stock and converting it to vacation rentals, eliminating workforce housing, which is a major obstacle for fishermen and deckhands seeking to live in the community.
- Access to capital – new generation fishermen and women are facing substantial investment to enter commercial fishing and need access to low interest loans and other small business development strategies to enter the commercial fishing business.
- Continuous safety training will be essential to ensure the ongoing safety of new entrants into the fishing business.
- New generation fishermen are embracing collaborative research, and NOAA should promote and embrace this unique opportunity to diversify and enrich fisheries research. One challenge is the need for creative approaches to insuring commercial fishing vessels so that small vessel fishermen can competitively bid on research contracts with agencies and universities to conduct collaborative fisheries research.
- Climate change is leading to range shifts in stocks and this and other drivers are resulting in emerging fisheries. NOAA should support opportunities for more rapid fisheries diversification to keep up with rapid changes in ocean ecosystems.
- NOAA should explore ways to support the development of community led fishermen's associations in rural communities where this capacity is needed.

To Whom it May Concern,

My name is Anna Woods. My husband, Eric Woods, and I own a commercial fishing business that harvests seafood of all kinds from the Gulf of Mexico. It is our top priority to maintain the integrity of ALL of the fisheries available in Gulf waters, especially those we target. We are proud of the work we do and we believe our business plays an important role in our economy. We are able to bring fresh seafood to the tables of American consumers, who otherwise, would never get the opportunity to enjoy these natural resources and important sources of nutrition. We would like to show our support for NOAA's National Seafood Strategy and believe it is a necessary initiative to manage, not only the sustainability of marine fisheries, but of the commercial fishing industry as a whole.

To ensure this strategy comes to fruition, I also believe it is of the utmost importance to provide support to our commercial sector. Our Gulf Council has little support for the commercial fishing industry. I would like to see more commercial sector advocates hold seats on the Gulf Council for a more balanced, unbiased group of individuals. This will ensure sound decisions being made that are best for the Gulf of Mexico, NOT political or personal agendas. As said earlier, we commercial fisherman are the biggest proponents of sustainability, accountability and growth in the Gulf of Mexico. It is our priority to see our Gulf species thrive for future fisherman and consumers alike. We would appreciate support from NOAA to encourage higher officials to reconsider Gulf Council seats for more balanced representation of the commercial industry. We care about our Gulf!

Sincerely,

Anna Woods

March 20, 2023

Re: Comments on *NOAA's National Seafood Strategy*

Dear NOAA Fisheries,

Alaska Seafood Marketing Institute (ASMI) is a public-partnership between the State of Alaska and the Alaska seafood industry representing over 60,000 Alaskan harvesters, processors and businesses that take pride in providing nutritious, wild, natural and sustainable seafood to consumers worldwide. The seafood industry is the largest private sector industry in the state of Alaska and naturally produces over 60 percent of all seafood in the United States. Nationally, seafood from Alaska annually generates over $6 billion in labor income and nearly $15 billion in economic output.

ASMI's work to boost the value of Alaska's seafood product portfolio is accomplished through a variety of tactics, including partnerships with retail grocers, foodservice distributors, restaurant chains, foodservice operators, universities, culinary schools, and the media. ASMI conducts consumer campaigns, public relations and advertising activities, and aligns with industry efforts for maximum effectiveness. ASMI also functions as a global brand manager of the Alaska Seafood family of brands.

The Association of Genuine Alaska Pollock Producers (GAPP) is a nonprofit trade association that advocates for one of the world's most sustainable and nutritious seafood products, U.S.-caught Wild Alaska Pollock. Wild Alaska Pollock is the most consumed wild-caught fish in the world and the fourth most consumed fish in the U.S. GAPP's mission is to build demand and awareness for the fish through driving product innovation, conducting research, and creating awareness about product quality and the responsibly managed fishery the product comes from. GAPP's membership encompasses the entire fishery from harvest to processing and includes those that both support the industry as well as help bring the product to retail and foodservice markets around the world. Included in GAPP's membership are the Community Development Quota (CDQ) groups that have ownership of shares of the Wild Alaska Pollock quota and use that ownership to benefit their communities. GAPP works in collaboration with ASMI to raise awareness of Wild Alaska Pollock's attributes and build the brand for Wild Alaska Pollock beyond an anonymous whitefish.

We appreciate NOAA's efforts to support a thriving domestic U.S. seafood economy, and to enhance resilience in the seafood sector and our coastal communities. *NOAA's National Seafood Strategy* (Strategy) provides a high-level framework, and our comments highlight and expand on the specific components that we believe are the most important for our industry. When NOAA develops an implementation plan, we request additional opportunity to comment on that more detailed plan.

ASMI & GAPP appreciate introductory comments in the Strategy document highlighting that wild seafood in the U.S. is responsibly harvested and one of the best sources of essential nutrients. In Alaska, we are incredibly proud of our sustainably managed commercial fisheries and believe that characteristic distinguishes us from many foreign competitors. We encourage NOAA to continue pushing this message out to the American public to encourage more domestic consumption of U.S. seafood.

Goal 1: Sustain or increase sustainable U.S. wild capture production
Fisheries Science. Core fishery surveys provide necessary information that underpins our entire science-based management system. Existing core surveys must continue, and NOAA should consider expanding what is considered core (for example, adding regular surveys in the Northern Bering Sea or increasing surveys in the Gulf of Alaska to occur annually). There is also a need for expanding fisheries science and research to better understand the impacts of rapidly changing ecosystem dynamics. However, any expansion made must be in addition to existing efforts and not come at the cost of core fisheries surveys.

Fisheries Management. This goal speaks to the importance of maximizing fishing opportunities while ensuring the sustainability of fisheries through efficient and effective management and supporting the commercial fishing industry and fishing communities to adapt and thrive in the face of a changing ocean economy. Conditions are changing rapidly, including supply chains, domestic and international markets, and ocean conditions. ASMI & GAPP support effective fisheries management that can respond to these changes, ensure sustainable fisheries for tomorrow while maximizing commercial harvest today, and allow our fishing businesses and coastal fishing communities to thrive.

Goal 2: Increase sustainable U.S. aquaculture production
Marine Aquaculture Management and Regulatory Efficiency. ASMI & GAPP recognize the value of mariculture and aquaculture and advocates that each state retain the ability to choose which types of aquaculture activities are appropriate for themselves by including opt-out provisions.

Goal 3: Foster access to domestic and global markets for the U.S. seafood industry
Communication and Promotion and U.S. Market Development. ASMI & GAPP support increasing domestic awareness about the sustainability, availability and nutrition of U.S. seafood. There is tremendous opportunity to better promote U.S. seafood. The Saltonstall-Kennedy (SK) grant program, which was created to market and promote U.S. seafood, should be better utilized to promote U.S. seafood. The program is funded through fees collected on seafood imports, and in FY2023 the SK program is slated to receive about 3% of the collected fees. ASMI believes there is room to grow the SK grant program and supports allocating a higher percentage of the collected fees for industry grants targeted at marketing and promoting U.S. seafood.

Fair Trade. Most of Alaska's seafood competes in global markets. ASMI recommends NOAA establish a formal partnership with the U.S. Trade Office and the USDA to align U.S. seafood trade objectives. For example, Alaska seafood industry representatives met with U.S. Trade Ambassador Tai in June 2022 and noted the following key trade challenges facing the Alaska seafood industry.

1. The U.S. Trade Office does not have dedicated staff for seafood, as it does for textiles and agricultural products. ASMI & GAPP recommend ensuring the Trade Office has the necessary expertise, awareness and bandwidth to appropriately support U.S. seafood trade.
2. The U.S. seafood industry lacks U.S. trade policy support often afforded to farmers and manufacturers. For example, foreign seafood often enters the U.S. entirely duty-free, while seafood harvested in the U.S. and processed overseas is subject to high tariffs when entering U.S. markets.
3. Tariff barriers in key export markets continue to grow, including China and Japan where Phase One agreements should have increased purchases and opened

markets. At the same time, the U.S. continues to allow import of Russian-harvested pollock and crab via third-party countries which undercuts the value of Alaska seafood within its most important market – the U.S.

4. Failure to address low-hanging fruit like removing Section 301 Tariffs on Alaskan flatfish; all other Alaskan seafood products were removed from the Section 301 lists and removing the last five flatfish product codes is truly low-hanging fruit.

Goal 4: Strengthen the entire U.S. seafood sector

Seafood Infrastructure. Alaska has aging fishing fleets and processing facilities and our seafood industry would greatly benefit from investments to modernize its infrastructure. Modernizing and replacing commercial fishing vessels would increase efficiency and safety on the water, while modernizing processing facilities would increase efficiency while creating opportunities for more value-add processing in the U.S. and an ability to be more competitive with foreign seafood production. Bringing more seafood processing back to the U.S., rather than continuing to ship product overseas, is a tremendous opportunity for U.S. seafood and the U.S. economy. Updating seafood industry infrastructure will benefit our coastal fishing communities and increase local and national food security.

Workforce Development. ASMI & GAPP support workforce development and training for the seafood industry, and trades necessary to support our fleets and infrastructure. There is also growing concern that fewer young people are opting to become fishermen, and we support initiatives that will raise awareness and attract the next generation into the U.S. seafood sector to strengthen our nation's food security. In addition, rapidly changing fishery conditions have led to an unprecedented number of fishery disasters in Alaska in recent years. This has highlighted the need for much faster disaster relief to fishermen and communities, and challenges with quickly identifying and accessing other mitigation measures when they are needed for fishing businesses and individual fishermen (e.g., SBA EIDL program, or job retraining resources).

We understand NOAA Fisheries will prepare an implementation plan that contains specific actions, timelines, partnerships and milestones, and we request an opportunity to review and comment on that plan when it becomes available.

As the marketing representatives for the largest seafood producing region in the U.S., ASMI & GAPP are willing partners to help NOAA achieve its near and long-term goals of an economically strong, resilient, sustainable and thriving U.S. seafood sector.

Thank you,

Craig A. Morris, Ph.D.
Chief Executive Officer
Association of Genuine Alaska Pollock Producers

GENUINE ALASKA POLLOCK PRODUCERS

Jeremy Woodrow
Executive Director
Alaska Seafood Marketing Institute

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Dear Michael Rubino and Sarah Shoffler,

Thank you for the opportunity to provide input on NOAA Fisheries' Draft National Seafood Strategy. We appreciate the agency's efforts to develop a strategic vision for the seafood sector in these unprecedented times and your commitment to integrating input from public comments and listening sessions. As a group of researchers and practitioners involved in seafood systems in the United States, we offer the comments below to encourage an inclusive, resilient, and community-focused Strategy.

The Strategy should directly address issues of access, distribution of benefits, and the retention of those benefits in U.S. communities. The benefits of fisheries and aquaculture in the U.S. should be widely distributed among communities within the U.S. There is an urgent need to address consolidation of seafood system benefits among a small number of actors. The wealth and non-monetary benefits generated by U.S. fisheries must have a clear path to benefiting seafood producers and consumers at local, regional, and national scales. Small-scale, community-based, and Indigenous harvesters and businesses in the U.S. and people who rely on seafood require access to fisheries, working waterfronts, and scale-appropriate infrastructure. Such considerations are essential to the goals of food security, thriving economies, and healthy ecosystems.

The Strategy should address seafood system resilience using best available science. In the wake of the hardship to seafood communities caused by the COVID-19 pandemic response and in the face of climate change, we see an opportunity to center resilience in the Strategy. There is robust evidence that local and regional seafood supply chains offer food system resilience, particularly during times of crisis. This resilience is critical to ensuring food security and stable seafood livelihoods for people in the U.S. and must be supported. The draft Strategy's aims of "meeting critical domestic nutritional needs" and "expanding access to foreign markets" are contradictory without further elaboration and do not adequately incorporate the body of research demonstrating that food system resilience is rooted in local supply chains. Similarly, the goal of increased wild catch seems counterintuitive to the Strategy's overarching goal of adapting to climate change. Rather than increasing the quantity of catch, we suggest the Strategy should focus on creating more value from current production, including improved distribution of seafood to domestic consumers and improved retention of value for producers. With respect to decision-making, the Strategy should meaningfully include local and Indigenous Traditional Ecological Knowledge (ITEK), as well as social and natural science, in the information considered as the 'best available science' to inform decision-making.

Aquaculture and fisheries should be more integrated in the Strategy. Aquaculture and fisheries co-exist in our seafood system. They share infrastructure, ecosystems, markets, and in some cases are inseparably integrated (e.g., salmon ranching via hatchery). The Strategy should take a more holistic approach to the spectrum of aquaculture to wild-caught seafood that prioritizes the community benefits of fisheries and aquaculture. Doing so could serve to minimize conflicts as aquaculture production increases.

The Strategy should address the next generation of seafood and should be explicit about expanding access for people from historically marginalized backgrounds. In its current form, the Strategy addresses symptoms, rather than root causes, of unequal opportunity to participate in the U.S. seafood system. Young and new entrants to the seafood industry face numerous barriers to establishing or

accessing livelihoods, including but not limited to access to limited-entry fisheries and workforce training. The Strategy should address challenges young people face accessing capital, permits/quota, health insurance, waterfront access, and scale-appropriate infrastructure, among other barriers. The Strategy should explicitly address the need to diversify access to seafood livelihoods and meaningful inclusion in governance, particularly for people from historically marginalized backgrounds. Expanding access will be critical to address the aging workforce, the distribution of benefits from seafood, and enhancing the creativity and innovation within seafood systems to address pressing challenges.

The Strategy could be strengthened if aligned with existing federal mandates and other NOAA commitments and will better address some of the gaps and contradictions illustrated above. A non-exhaustive list to consider includes:

- The NOAA Draft National Strategy on Equity and Environmental Justice lists among its six core objectives, "Ensure that our policies promote equal opportunities for all and do not create unintended inequities or unequal burdens for underserved communities," "Distribute benefits equitably among stakeholders by increasing the access to opportunities for underserved communities," and "Provide for the meaningful involvement of underserved communities in the decision-making processes."
- The 2012 DOC Environmental Justice Strategy states that all populations should share in (and not be excluded from) benefits of Departmental programs, policies, and activities affecting human health or the environment.
- Executive Order 13175 (Consultation and Coordination With Indian Tribal Governments) states, "Tribes shall, on a government-to-government basis, be afforded regular and meaningful consultation and collaboration opportunities in the development of Department policies that have Tribal implications."
- The White House's Guidance on Indigenous Traditional Ecological Knowledge (ITEK) for Federal Agencies "commits to elevating ITEK in federal scientific and policy processes."
- Executive Order 13985 (Advancing Racial Equity and Support for Underserved Communities Through the Federal Government) states, "Because advancing equity requires a systematic approach to embedding fairness in decision-making processes, executive departments and agencies must recognize and work to redress inequities in their policies and programs that serve as barriers to equal opportunity."
- Executive Order 14008 (Tackling the Climate Crisis at Home and Abroad) directs Federal agencies to make achieving environmental justice part of their missions by developing programs, policies, and activities to address the disproportionately high and adverse human health, environmental, climate-related, and other cumulative impacts on disadvantaged communities, as well as the accompanying economic challenges of such impacts.
- Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations) directs each federal agency, "[t]o the greatest extent practicable and permitted by law…" to identify and address, as appropriate, the disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations.
- The Magnuson-Stevens Act ensures, "...preservation of a way of life for fishermen and their families, dependence of local communities on a fishery (e.g., involvement in fisheries and ability to adapt to change),... non-fishery related indicators (e.g., unemployment rates, percent of

population below the poverty level, population density, etc.),...[and] the cultural place of subsistence fishing, obligations under Tribal treaties, proportions of affected minority and low-income groups, and worldwide nutritional needs" (50 C.F.R. 600.310(e)(3)(iii)(B)(1))."

- Executive Order 14017 (America's Supply Chains) states, "Resilient American supply chains will… support small businesses, promote prosperity, advance the fight against climate change, and encourage economic growth in communities of color and economically distressed areas."

We thank you for your leadership in developing the National Seafood Strategy. We look forward to seeing the next iteration of the Strategy and would welcome the opportunity to be involved in the implementation process.

Respectfully,

Caroline Ferguson, PhD
University of Maine

Hannah Harrison, PhD
Dalhousie University

Nicolás Gómez Andújar
Asociación Pesquera de Culebra, Puerto Rico
(Culebra Fishing Association, Puerto Rico)

Phoebe Racine
UC Santa Barbara

Joshua Stoll, PhD
University of Maine

March 9, 2023

Ms. Janet Coit
Assistant Administrator for Fisheries
NOAA Fisheries
1315 East West Highway
Silver Spring, MD 20910

Dear Assistant Administrator Coit:

Thank you for the opportunity to comment on NOAA Fisheries' Draft National Seafood Strategy (Strategy). Stronger America Through Seafood (SATS), an industry coalition that advocates for increasing Americans' access to healthful, sustainable, and affordable seafood, applauds NOAA Fisheries for recognizing the need to increase U.S. aquaculture production. Our members include seafood processors and distributors, feed ingredient suppliers, aquaculture farmers, technology providers, and capital partners. With supply chain disruptions due to COVID-19 and uncertainty for wild capture in the face of climate change, it has never been more important for the U.S. to diversify its seafood supply through U.S. offshore aquaculture. The growth of domestic aquaculture is an important part of a holistic approach to a more diverse, sustainable, healthful food strategy.

SATS fully supports Goal Two of the Strategy which calls for increasing sustainable U.S. aquaculture production. We applaud the agency's plan to accelerate progress towards an efficient, predictable, timely, and science-based regulatory framework for marine aquaculture. Further, we recognize the value of NOAA Fisheries' science-based advice and tools and coordinated, applied scientific research in support of sustainable industry development. We encourage the continued progress in these areas.

Responsible marine aquaculture has the potential to feed a growing population, mitigate climate change, increase the resilience of the global food system, and be a major economic engine for the country. The U.S. aquaculture supply chain supports many American industries on land and sea. If we expanded the industry to the deep Pacific and Atlantic waters off our coasts, it would boost the fish feed market and seafood retail businesses and supply restaurants, markets and grocery stores with locally grown, sustainable seafood. In addition to boosting growth for the seafood industry, American aquaculture would provide a new market for U.S. farmers, specifically for crops such soybeans, corn and peas, which can be used to create fish feed and ease pressure on ocean resources. The growth of aquaculture production would also spur job creation and revenue across the country and lessen dependence on the uncertainty of foreign trade relationships.

Further, offshore aquaculture has been recognized as one of the most resource-efficient methods for producing animal protein. Modern science and technology have helped make the production of sustainable seafood possible, fueling the growth of the aquaculture industry worldwide. With a far

lower environmental impact than most terrestrial means of food production, aquaculture has been identified as a remedy to address threats to global food security resulting from climate change and a growing population.

Use of advanced technology combined with careful management and science-based techniques, continue to build the case for aquaculture as a safe and environmentally responsible way to produce seafood. Applications of emerging technology in aquaculture, such as AI and machine learning, computer vision, sensors, and biotechnology, help fish farmers produce healthy fish efficiently and sustainably. We support NOAA Fisheries' commitment to providing science-based advice and tools to minimize potential effects of an aquaculture operation on the environment and conducting applied scientific research in support of sustainable industry development.

There is great potential for expansion of U.S. marine aquaculture where vast expanses of favorable growing areas with suitable depths, current speeds, temperatures, and access to ports create some of the highest production potential in the world. **However, the lack of a comprehensive, nationwide system for permitting in federal waters is limiting the development of U.S. marine aquaculture farms. Few venture capital investors and even fewer entrepreneurs are willing to invest without the certainty of obtaining long term permits or licenses.** The agency's focus on developing an efficient, predictable, timely, and science-based regulatory framework for marine aquaculture is essential to creating a thriving offshore aquaculture industry and the benefits it provides.

SATS supports a clear permitting process for U.S. marine aquaculture that also prioritizes environmental and societal health as provided for in the bipartisan Advancing the Quality and Understanding of American Aquaculture (AQUAA) Act. For example, the proposed AQUAA legislation would establish National Standards for Sustainable Offshore Aquaculture which, like the National Standards for commercial fishing outlined in the Magnuson Stevens Act, are guiding principles for growing coastal economies, protecting ecosystems, and avoiding conflict among stakeholders. AQUAA leverages modern siting and monitoring technologies to mitigate potential environmental impacts. It also provides for strict federal enforcement and includes a process for robust public input which ensures that coastal communities and states are considered prior to permitting new operations. In short, AQUAA provides much-needed regulatory certainty for U.S. marine farmers while also preserving the environment, local economies, and public health.

Thank you again for recognizing the importance of a thriving U.S. aquaculture industry to the seafood economy and the resilience of the seafood sector in the face of climate change and other stressors. We appreciate the opportunity to comment.

Sincerely,

Drue Banta Winters
Campaign Manag**er**
Stronger America Through Seafood

CO-OP
HANOVER CONSUMER COOPERATIVE SOCIETY, INC.
SERVING THE COMMUNITY SINCE 1936

Dear Sarah Shoffler and Michael Rubino,

Thank you for the opportunity to provide commentary on NOAA Fisheries' Draft National Seafood Strategy. Developing a comprehensive framework to guide us into the next era of sea-based community and industry is a daunting task. I sincerely thank you for your commitment to this process, and offer the below comments from the perspective of the Hanover Co-op Food Stores of Vermont and New Hampshire. We are a $90 million community owned cooperative that works to strengthen our local and regional food shed, while providing our customers with accessible, high quality, and nutritious foods.

I also write from my capacity as the Board Treasurer for New Hampshire Community Seafood, a small multi-stakeholder cooperative based out of Portsmouth, New Hampshire. Our mission is to provide the highest quality New Hampshire landed fish and seafood to ours consumers through a weekly CSF style pick-up of fish filets as well as shell-fish shares. We only purchase seafood that can be traced directly to small boat fishermen off of the coast of New Hampshire, and pay a 50 cent premium above market prices to our fishermen. Our customers love the delicious fresh seafood, and their connection to the local working waterfront. Notably, we had our highest sales to date in 2020, when other food supply chains faltered under the pressures of the pandemic.

Taking a broad view of our opportunities and strategies moving forward, I encourage you to continue advocating for small and medium scale seafood businesses. These smaller players are often left out of incentives and funding opportunities, when in fact they are the backbone of working waterfronts and sustainable seafood culture. We should strongly prioritize creating a diverse seafood harvesting industry through education, funding for appropriately sized processing facilities within reasonable distance to docks, and the promotion of the benefits of seafood in a healthy diet and lifestyle.

In reading the draft strategy, I was struck by the inherent contradiction between "meeting critical domestic nutritional needs" and "expanding access to foreign markets." As the political climate and global markets have changed over the last several decades, the US has responded across many agricultural sectors by encouraging exponentially scaling up individual powers, who gobble up smaller producers and harvesters by running them out of resources and market share, only to export their products leaving many consumers with lower quality and under-regulated imported seafood options at the store.

Even carefully crafted strategic supports can only succeed if our leadership meaningfully addresses the barriers that beginning fishermen face. Without access to training and capital, health insurance, and waterfront access, we will continue to see the numbers of fishing communities dwindling. I would like to take this opportunity to highlight the work of the New England Young Fisherman's Alliance. NEYFA provides grants and training in: business management, collaborative marketing, industry regulation and permitting, and cooperative research opportunities to seafood professionals who are establishing unique businesses. These program graduates are the future of our local seafood industry. For many of these small seafood producers access to shared infrastructure determines their ability to successfully enter into their local food markets. Left to commodity species pricing, we are neglecting the critical needs of these emerging community assets.

In conclusion, I offer my sincere thanks and collaboration in the development of this strategy. By prioritizing building an essential domestic seafood industry, and subsequent domestic processing and distribution channels, we can grow the value of US commercial fisheries. Through your leadership and attention to the complexities and nuance that comprise our working shorelines, we work towards a bright future afforded by our marine resources.

Respectfully,

Rebecca J. H. White (she/they)
Public & Government Affairs Associate
Hanover Co-op Food Stores

July 26, 2023

Janet Coit
Assistant Administrator for Fisheries
National Oceanic and Atmospheric Administration
NOAA Fisheries Directorate
1315 East-West Highway, 14th Floor
Silver Spring, MD 20910

Dear Assistant Administrator Coit:

The Seafood Nutrition Partnership is pleased to submit comments in response to the National Oceanic and Atmospheric Administration's (NOAA's) Request for Public Comment on its draft "National Seafood Strategy." We appreciate the leadership of NOAA taking the first step to develop a national seafood strategy – a welcome policy shift for the entire seafood community. Our comments are as follows.

Seafood is Good for People: Seafood is good for overall public health. The 2020-2025 U.S. Dietary Guidelines recommend eating at least two servings of seafood per week, especially for pregnant women and those with heart conditions. Research shows that people who regularly eat seafood are 20 percent less likely than their peers to experience depression and live an average of 2.2 years longer than those who do not. Seafood consumption also provides unique health benefits as a lean protein and is the best source for Omega-3 fatty acids, which are healthy fats essential to human health and development.

Seafood is Good for the Economy: In 2020 alone, U.S. commercial and recreational fishing generated $253 billion in sales impacts, contributed $117 billion to gross domestic product, and supported 1.7 million jobs in the U.S. marine fishing sector and across the broader economy.

Seafood is Good for the Planet: Seafood is recognized as a climate friendly protein. With the Earth's population projected to reach 9 to 10 billion people by 2050 and with limitations of land based agriculture, we must look to the ocean to ensure our future food security.

Strategy Framework: To successfully implement a national seafood strategy for Goal 3, it is imperative a convening entity takes the leading role. NOAA should heed the recommendations of the Marine Fisheries Advisory Committee and establish an industry-led National Seafood Council, which should be tasked with implementation of a national seafood promotion campaign. The Council would also conduct education, research, promotion, and marketing on behalf of U.S. seafood – including both wild-capture fisheries and aquaculture.

Goal 3: Communication and Promotion. Increase public awareness of the availability, sustainability, and nutritional value of all U.S. seafood: A comprehensive national seafood marketing campaign for consumers that features the value of seafood for health and nutritional benefits should be a goal that would help existing U.S. seafood marketing efforts amplify their messages and strengthen the U.S. seafood sector as a whole.

We appreciate the opportunity to submit these comments. As NOAA continues to build out and implement its national seafood strategy, we urge you to consider the Seafood Nutrition Partnership as a resource.

Thank you for your consideration.

Sincerely,
Linda Cornish
Founder & President

Mar 31, 2023

To: Ms. Janet Coit
Assistant Administrator, National Marine Fisheries Service
1314 East-West Highway
Silver Spring, MD 20910
Submitted electronically

Re: Comments on NOAA's National Seafood Strategy

Dear Assistant Administrator Coit,

On behalf of Businesses for Conservation and Climate Action (BCCA) and the community-based enterprises we represent, thank you for the opportunity to provide input on NOAA's national seafood strategy. We are grateful for the work NOAA is doing to support the domestic fishing industry as well as the sustainable aquaculture industry and enhance stewardship, oversight, and opportunity in our oceans.

BCCA is a coalition of Indigenous and non-Indigenous community-scale, resource-dependent business leaders from across the country. Our mission is to establish national policies that recognize sustainable businesses as compatible with healthy lands and oceans, and to include those businesses in conversations about resource access at every step of the decision-making process. Our work is guided by a firm commitment to social equity, local and traditional wisdom, and triple bottom line solutions that restore social, ecological and economic health.

We support the broad strokes of this seafood strategy - NOAA's stated purpose is well-aligned with our own and many of our partners'. We'd like to take this opportunity to advocate for a true community engagement process that centers community-scale and tribal fisheries to help you build out the actions, timelines, and milestones for this roadmap.

The process of building this strategy needs to begin with fishing and fishery-dependent communities. Strategic, adaptive, and hard-working, community-scale fishermen are your eyes on the water. Not only are they on the front lines of climate change and climate adaptation, these business leaders are committed to feeding their communities. In terms of building out this strategy, what better place to start?

Engaging in genuine partnership from the ground up can help inform our country's seafood strategy going forward. Please make deep community engagement the starting point for the next phase of development of this strategy. Start with community-scale fishermen and fishery-dependent tribes, and engage with their ideas as you pull together the details of this strategy. Additional comment periods should be built into the process along the way.

Community-scale fishing businesses are the backbone of the commercial fishing industry and their needs should be centered in any evolution of fisheries management policies. Furthermore, policies that help sustain and/or increase sustainable domestic wild capture production should be designed to meet the needs of community scale fishermen. Working with community partners across the country will grant NOAA the opportunity to co-design strategies that are keyed to different fisheries, with their different needs, in all regions of the country.

The rising cost of fishery access means small scale fishermen are struggling to remain viable participants in local fisheries. . Fishery trusts and community permit banks have worked to anchor access in fishery dependent communities while also preventing overfishing. Providing capital and low interest loans to fishery trusts and permit banks will support access for community-based young fishermen, fishermen of color, and others who have historically been shut out of permit or quota systems Ultimately, we want to see investment in a strategy that supports living wages for all workers along the supply chain.

When strengthening the overall seafood sector, more investment is needed for infrastructure and working waterfronts. Investment on this level can help keep both

jobs and seafood in local communities. Concerted investment is needed in these areas (especially in rural communities), not just to sustain the industry but to propel it forward, especially if that investment promotes decarbonization and value-added processes - which are essential to the future development of the industry.

Aquaculture is often touted as the way to feed a growing population and we agree that a robust sustainable low-trophic mariculture sector is a key piece of domestic food security as well as a factor in growing our blue economy. However, offshore open-ocean aquaculture is often at odds with commercial fisheries and we urge you to support an aquaculture opt-out on the state level. Any investment by NOAA in aquaculture should complement rather than compete with wild capture fisheries, and net pen finfish aquaculture, which NOAA does not regulate, should not be a part of the agency's seafood strategy. The further development of the farmed shellfish and seaweed industries should take precedence over ocean-based finfish aquaculture. This includes investment in shoreside infrastructure to help boost local processing capacity and create jobs in the blue economy.

Our final recommendation concerns the Strategy's implementation plan, wherein specific actions and partnerships will be listed. This plan should specifically call for the establishment of partnerships between NOAA and external organizations representing Tribal Governments, coastal communities, and coalitions of fishing and seafood businesses. Memoranda of understanding for the development of policy strategies and engagement with small-scale fishing and seafood businesses, similar to the agreement our organization recently signed with the Department of the Interior (available at bit.ly/ASBN-DOI-MOU), would serve NOAA well as it seeks to become a more stakeholder-focused organization and enhance its service model. Truly productive, mutually beneficial, bilateral partnerships should be the most vigorously pursued result of NOAA's Seafood Strategy implementation.

Once again, we thank you for the opportunity to provide feedback and recommendations on NOAA's seafood strategy. BCCA is just one part of a much broader network of fishing communities around our country's coasts who are working at building a more socially and ecologically sustainable blue economy, and we hope NOAA will look to this network for guidance as you build out your strategy.

Sincerely,
Businesses for Conservation and Climate Action

NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

March 24, 2023

SUBMITTED ONLINE

RE: Draft National Seafood Strategy – Request for Public Input

To Whom it May Concern:

We appreciate the opportunity to submit comments on the Draft National Seafood Strategy (the Draft). From our humble beginnings in 1941, Pacific Seafood has grown to employ more than 3,000 team members across 41 facilities in 11 states. Still family owned, Pacific Seafood manages all parts of the supply chain from harvesting/fishing to processing, and distribution in order to provide customers with fresh, sustainable, high-quality products.

Pacific Seafood is in full support of the Draft's Purpose, Strategy Drivers, Strategy Framework, and Goals, but we wish to provide two recommendations specific to some of the stated Purposes and Goals of the Draft to help inform the Strategy Implementation Plan.

Recommendation #1: More West Coast seafood needs to be included in the U.S. Department of Agriculture's (USDA) National School Lunch Program (NSLP). The Draft's Purpose states: *"Our vision is to ensure that: The U.S. seafood sector contributes to the nation's climate-ready food production and to meeting critical domestic nutritional needs."* The Draft's GOAL 3: *"Foster access to domestic and global markets for the U.S. seafood industry"* points to the need for U.S. (seafood) Market Development and to *"Work with federal partners and others to identify and develop U.S. seafood markets and put more U.S. seafood back on U.S. plates."*

The USDA's NSLP provides healthy meals to millions of kids from low-income households. Dietary guidelines show school age kids should eat 4-10 oz. of seafood weekly. Shockingly, a recent study[1] from the U.S Government Accountability Office

[1] https://www.gao.gov/products/gao-23-105179

(GAO) found seafood made up just 1-2% of all animal proteins that USDA purchased for the program (about 3 oz. per student per year) in FYs 2014-19. This identifies a glaring opportunity to address the Draft's GOAL 3 to "develop U.S. seafood markets and put more U.S. seafood back on U.S. plates."

The GAO study points to several factors — allergy concerns, student preferences, and cost—that affected states' and school food authorities' efforts to offer seafood. While the USDA could support them by providing nutrition education, allergen and food safety training, and recipes, the issue of cost remains to be a hurdle that is preventing West Coast seafood from making it on to more of our kid's lunch plates at school.

Furthermore, school districts can currently choose to bypass existing Buy American provisions and purchase imported food products if they document a "significant cost differential" between domestic and imported products. To help address this, Pacific Seafood submitted comments2 on November 2, 2021, in response to the USDA's Request for Information: Buy American in the National School Lunch Program and School Breakfast Program. We recommended that the "significant cost differential" exception to the existing Buy American provisions be eliminated. Currently, there is no Food and Nutrition Service standard that provides sufficient assurance that domestic seafood producers and processors need to competitively compete with cheaper, lower quality, and less sustainable foreign produced goods which are typically associated with increased carbon emissions compared to domestic sources. Instead, its application, permitting foreign-sourced products into school lunches, has disrupted West Coast seafood sales into the school food program. This is particularly problematic at the present time when the entire U.S. seafood industry is working to recover from the disruption of COVID-19 and the devastating impact it has had on the entire U.S. seafood market chain. This cost exception is an open invitation for foreign suppliers to take over school food markets.

We want NOAA Fisheries, the USDA, and the world to know that Pacific Seafood and the rest of the West Coast seafood industry is fully committed to providing the NSLP with the highest quality, sustainable seafood now and far into the future. Today, Pacific

[2] https://www.regulations.gov/comment/FNS-2021-0027-0151

Seafood offers 34 Marine Stewardship Council (MSC)-certified species and 20 MSC-certified sustainable facilities, plus our Best Aquaculture Practices (BAP)-certified steelhead farm and being the first and ONLY company in the world to offer BAP Four-Star certification. Our West Coast seafood products are not only 100% sustainably sourced and processed in the U.S. by the hands of U.S. workers, but they are also available year-round and at a reasonable price.

In addition to being 100% sustainably sourced and processed in the U.S. and available year-round at a reasonable price, West Coast seafood is also very nutritious. Up until recently, there was no species-specific nutrient information available for West Coast Groundfish species. That was until 2022 when Positively Groundfish, a non-profit trade association, set out to fill this knowledge gap. They commissioned Exact Scientific Services Lab, a certified food analysis lab in Bellingham, WA, to carry out an independent study of 10 of the most common groundfish species.[3] The analysis revealed that West Coast groundfish species are some of the most nutritious foods in existence, not just compared to other seafood, but all animal proteins. While seafood is overall healthy, some species analyzed in this new study pack a much greater nutritional punch than other popular species. For example, calorie for calorie Lingcod has twice as much protein as wild Alaska King Salmon, and Pacific Dover Sole likely[4] has the highest protein content of any food. This new study helps to highlight how introducing more West Coast seafood into the USDA's NSLP comports to the Purpose of the Draft as far as "*meeting critical domestic nutritional needs.*"

Recommendation #2: Work with USDA Rural Development to create a Seafood Processing Expansion Program that provides grants to help eligible processors expand their capacity.

Although several COVID-era USDA programs provided funds to address issues with the supply chains of other proteins such as beef and poultry, the same was not true for seafood, and we believe there is an opportunity to address various supply chain issues.

[3] https://www.positivelygroundfish.org/nutrition

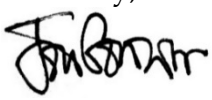
[4] "likely" because there may be foods that are not in the USDA's nutrient database or have never been analyzed.

USDA Rural Development administers a Meat and Poultry Processing Expansion Program (MPPEP)[5] to provide grants to help eligible processors expand their capacity. USDA Rural Development designed the MPPEP to encourage competition and sustainable growth in the U.S. meat processing sector, and to help improve supply chain resiliency. A similar grant program for seafood processors would help NMFS to address the Draft's GOAL 4 to *"Strengthen the entire U.S. seafood sector"* and the need to *"Work across federal agencies to modernize U.S. seafood infrastructure (e.g., vessels, hatcheries, port and dock facilities, processing, storage, working waterfronts) to strengthen and enhance opportunities for coastal seafood communities and regional food economies."*

As lack of workforce continues to be one of the major issues plaguing the seafood processing industry, automated fish processing machinery is needed to supplement lack of hand filleters while increasing throughput but requires multimillion dollar investments that are often unattainable. Funds from a Seafood Processing Expansion Program grant could be used to offset significant capital expenditures on cutting edge fish processing machinery. Such grants could also be used to invest in additional tunnel freezers to expand cold storage capacity, and repairing the aging docks that support critical shoreside infrastructure.

We thank you for the opportunity to provide comments. We look forward to the opportunity to work with NOAA Fisheries and USDA officials to maximize opportunities for West Coast seafood procurement for the benefit of our U.S. seafood industry and to benefit the health of over 30 million children across the U.S.

Sincerely,



Jonathan Gonzalez
Government Affairs Manager

[5] https://www.rd.usda.gov/programs-services/business-programs/meat-and-poultry-processing-expansion-program

PACIFIC COAST FEDERATION of FISHERMEN'S ASSOCIATIONS

Please Respond to:

☐ **California Office**
P.O. Box 29370
San Francisco, CA 94129-0370
Tel: (541) 689-2000

www.pcffa.org

[X] Northwest Office
P.O. Box 11170
Eugene, OR 97440-3370
Tel: (541) 689-2000

17 March 2023
Reply Email: fish1ifr@aol.com

Comments Re: Draft National Seafood Strategy

Dear Ms. Diedrick:

Thank you for requesting our input on the draft National Seafood Strategy. We hope that you will take our comments as an in-kind contribution to the overall success of your efforts. The key to restoring fishing infrastructure, markets, local food security, a younger fleet, and resilient fishing communities is fishing opportunity to access sustainably managed fish stocks. To that end, the Pacific Fisheries Management council requires a "harvestable surplus," above minimum numbers needed for viable reproduction, before commercial, recreational, or subsistence fishing. It also depends upon access to fishing areas, which is getting more and more limited by other uses of the ocean.

The Pacific Coast Federation of Fishermen's Associations ("PCFFA") is the West Coast's largest trade organization for commercial fishing vessel owners and family commercial fishing operations. For nearly fifty years, PCFFA has advocated to ensure the rights of individual fishermen and to fight for the long-term survival of commercial fishing as a livelihood and way of life. The livelihoods of PCFFA's members who rely on ocean harvest of Pacific salmon are greatly affected by the damaged health and abundance of once numerous salmon. The decline of California's salmon species has severely impacted PCFFA members by limiting commercial

harvest opportunities, both through lost production of impaired stocks and because of closures imposed on the fishing fleet to protect impaired salmon populations.

The Institute for Fisheries Resources ("IFR") is a nonprofit, public interest, marine resources protection and conservation organization dedicated to protecting the natural resources and seafood bounty of the Pacific Ocean along the western seaboard of North America. IFR was founded in 1992 by the Pacific Coast Federation of Fishermen's Associations (PCFFA) when West Coast salmon fishing was being shut down because too many salmon bearing rivers have been blocked, diverted or polluted over the past decades to maintain these valuable salmon runs, severely impacting the economic health of several local communities.

IFR's mission is to support working fishing families and crews to protect, restore and maintain salmon and other fish stocks and their "critical habitats" in order to produce a "harvestable surplus" well above the self-sustaining levels required by the ESA. Since our future is tied to the future of several ESA listed salmon stocks, we are committed to the salmon Habitat Protection Policy established by the Pacific Fisheries Management Council (PFMC) in 1986, the primary goal of which is "...no net loss in the productive capacity of any marine, estuarine or freshwater habitats that sustain Pacific Salmon."

The attempt to meet the challenges stated in the Draft National Seafood Strategy are admirable. However, there are some problems that still need to be addressed. For example, you omitted one of the most important challenges facing our West Coast fishing communities: the near extinction of one of the most valuable commercial stocks, Pacific salmon.

California's three biggest historical salmon-producing river systems -- the Sacramento, the Klamath and the Eel -- are all in trouble. Egg-to-fry survival (ETF) of winter-run Chinook in the Sacramento River System was only 2.56% in 2021, and 2.17% in 2022, (back-to-back record lows) when the average ETF survival rate for this ESA-listed stock from 2002 to 2020 was 23.4%. Returns of Chinook salmon to the Eel River System are now around 1.5-2% of historical numbers of fish. Klamath River Chinook natural spawner salmon escapement this year is around 20,000 fish, and requires a minimum recruitment of 40,700 natural spawners before any fishing can take place. The 2023 projection for Sacramento River fall-run Chinook, estimated at 169,767 adults, is one of the lowest forecasts since 2008. The Klamath fall-run Chinook forecast is 103,793 adults, the second lowest forecast since 1997. As a result, the Pacific Fisheries Management Council has recommended a complete closure of the salmon season for California and most of Oregon this year (see reference below).

The severe decline of our robust salmon fisheries greatly accelerated in the 1970's (although the destruction of their habitat began with the beaver, gold, and timber "rushes") and has continued to dive until only a tiny percentage of the salmon are left, and most are listed as threatened or endangered under state and federal ESA criteria. We have zero salmon fishing opportunity in the ocean this year, and likely for several years to come. In NOAA's Socioeconomic section, it is clear that NOAA has the data showing the decline. Therefore, we were surprised to hear Michael Robino, Senior Advisor for Seafood Strategy, say on a NOAA "listening session" that the West Coast fish stocks have been recovered. Although certain rockfish (*Sebastes* complex) have

recovered faster than expected, and many others are doing well, salmon have declined to near extinction.

Meanwhile, other alternate fisheries were becoming more limited by closures for stock rebuilding programs, such as the Rockfish Area Closures and trawler buybacks. Small hook-and-line boats were shut out of the remaining rockfish quotas. Privatization of this public resource by gifting of Individual Quota Shares also concentrated the wealth upward and out of local communities.

Access:

Marine Protected Areas (MPA's) are being presented as a cure-all for international fishing problems, at the expense of access to local seafood. See Appendices for PCFFA's policy on MPA's. Also, the 30x30 program needs to recognize sustainable fishing as conservation, and not shift fishing effort into smaller and smaller areas with more fishing closures. The Pacific Fisheries Management Council is already managing fisheries very conservatively, including providing protections for critical marine ecosystems and habitat. Additionally, fish stocks move around in the ocean as the climate shifts, so closed areas are not necessarily protecting moving stocks.

NOAA says they want to help fishermen not get run over by offshore wind, but we have not seen any evidence of NOAA involvement yet, and the fishermen have been dealing with it for years already.

Public Participation:

In responding to NOAA's request for public input on the "listening sessions," it was surprising that only a handful of people spoke on such a vital national issue. It makes us wonder how serious/effective NOAA is about outreach for public input. In the Draft, it says that the Seafood Policy is part of a "suite of strategies," but you don't say what they are. It was only by searching deeply into NOAA webpage layers that we discovered that the Seafood Policy is a small part of a larger NOAA Fisheries Strategy Plan for 2022-2025, and that is part of a Department of Commerce Strategy Plan for 2022-2026. Most people will not have the time or skills to search for these documents. NOAA did not elaborate about these programs, which seem to have multiple overlapping parts. It is not clear how the different programs work together; for example, habitat is an essential part of seafood resilience, but is a separate program.

In response to a process question on one of the "listening sessions" it was stated that there are five "focus areas" involved in NOAA fisheries strategy. A search for NOAA "focus areas" turned up only the Habitat Blueprint, which focuses resources to a few certain places. On the West Coast, in California, the Russian River was chosen in 2013, it says, to receive focused funding and science in order to "improve habitat conditions that support fisheries, coastal communities, and marine life, and provide environmental, economic, and cultural benefits" and "maximize its investments and the benefits to marine resources and coastal communities." Focusing on the Russian River won't achieve your goals. However, habitat is the key to all your other goals, so having separate programs is part of the problem.

Our coastwide commercial fishing group did not hear about input opportunities for choosing the Russian River as the "focus area" for resources to support habitat. There should always be a process for wide public input on such decisions. That choice shows a complete lack of

understanding of the situation here concerning protecting, restoring and maintaining resilient fisheries and fishing communities. The Russian River is the wrong river to invest in to achieve your goals; our three major salmon producing river systems are the Sacramento, Klamath, and the Eel.

Markets:

Salmon fishing was the mainstay of California and West Coast fisheries for decades, until their spawning and rearing habitat became so multiply impacted by inland extractive practices across the landscape that by now the runs have declined to almost nothing. Thousands of family businesses went under—a boat and permits become worthless without fishing opportunity. We lost our world markets from lack of production—our New York lox market, our French market, our Japanese market. Declines of the natural runs occurred at the same time as imports of farmed salmon from Norway, Chile, and British Columbia were booming. These markets are difficult to recover. Complicating world markets, fish exports and imports are often used as bargaining chips in international trade tariff conflicts.

Additionally, with loss of fish production, attrition reduced multiple competing fish processors to one main monopoly company, Pacific Seafood, with a record of settling anti-trust violations for $520 million (see reference below). This year the *ex-vessel* price for choice Dungeness crab, an alternate fishery whose stocks have remained strong, started at $2/lb., less than half of last year's price, while the retail cost in the store is dollars per pound higher than last year, while operating costs have soared. Finally, Pacific Seafood is being sued again for alleged price-fixing (see reference below).

Habitat:

In recent years, the destruction of these already ESA-listed salmon populations has been nearly completed by the Bureau of Reclamation water release policies, prioritizing water contracts over salmon, that have cooked the salmon fry and made the rivers uninhabitable. NOAA Fisheries has apparently not been able to ensure that endangered and threatened salmon get the cold water that NOAA and California Department of Fish and Wildlife say they need in the Klamath and Sacramento River Systems. Cold water temperatures provided at the right seasons could help reverse that process.

When the draft talks about "protecting and restoring" habitat, the third part and most important part is "maintaining" those stocks/conditions. This has not been done for so long that the salmon have now declined to the point where it will be very difficult to recover them.

Penalties for violations of current state regulations on illegal diversion and sediment pollution are inadequate, so damage to the water quality resources that support salmon are written off by serial violators as the cost of doing business.

Here are our comments to specific sections, as follows:

1. *Sustain or increase sustainable U.S. wild capture production*

The problems of infrastructure decay, loss of markets, and monopoly of processors, graying of the fleet and its operators, all can be addressed by increasing access to sustainably fished and recovered stocks, and by protection, restoration, and maintenance of ESA-listed anadromous

salmon stocks to a level of having a "harvestable surplus" above and beyond the viable, self-sustaining populations needed for ESA de-listing.

Unfortunately, inland habitat for these stocks have been declining for several decades, until the ocean salmon season is completely closed this year.

2. Increase sustainable U.S. aquaculture production

Aquaculture needs to be regulated so that it doesn't pollute freshwater, groundwater, or estuaries. Offshore pen-raising of fish has been outlawed in Washington State after massive escapes of genetically different species, and they are also a large source of pollution due to fecal waste matter concentrations, like concentrated feed lots. Atlantic salmon farms in British Colombia have been a source of sea lice infestations on wild salmon stocks. Inshore facilities such as the proposed Nordic Aquaculture facility in Samoa, California, is proposing to pump 10 million gallons/day of Humboldt Bay estuary water through their buildings and release it into the sea at a higher temperature. It would be difficult to ensure that entrainment of larvae does not occur. Temperature and low oxygen pollution may be a problem for the increase in toxic algal blooms that have increasingly impacted markets and marine mammals. Additionally, such large aquaculture projects require a large investment of infrastructure by local agencies that can detract from efforts to recover native stocks, require massive amounts of electricity, and compete in markets for wild seafood products.

3. Foster access to domestic and global markets for the U.S. seafood industry

Product is first required, to create access to markets. Fisheries have long been used by federal agencies as bargaining chips in international and border trade and tariff negotiations.

4. Strengthen the entire U.S. seafood sector

The Magnuson-Stevens Fisheries Management Act was passed in 1976 and created the Fisheries Management Councils. The Pacific Fisheries Management Council has a Habitat Committee, and in 1986 they developed the following Habitat Policy. The NOAA could approach their goals by including and using this policy:

"Pacific Fisheries Management Council, Habitat Committee
Salmon Habitat Protection Policy, 1986

- There shall be no net loss in the productive capacity of any marine estuarine or freshwater habitats that sustain Pacific salmon;

- Pacific salmon shall be assured co-equal treatment with other purposes of water and land resource development programs;

- There shall be vigorous efforts by responsible public agencies to restore and strengthen salmon stocks.

- State and federal regulatory agencies should be strict in requiring the best management practices available for timber harvest, mining, water development, agriculture and other activities under their control that can have adverse effects on salmon; and

- Water development programs should be reviewed and undertaken on a comprehensive or programmatic basis, in order to identify and eliminate cumulative or "synergistic" impacts in drainages where salmon spawn and rear."

The federal criteria for ESA listing and de-listing describe the problems that must be overcome to develop actions to recover the fishing industry and achieve the goals of NOAA's National Seafood Strategy. Pacific salmon populations must be de-listed before we can have the thriving "harvestable surplus" we need to have resilient fishing communities.

> "Under the ESA, a species must be listed if it is threatened or endangered because of any of the following 5 factors:
>
> 1. Present or threatened destruction, modification, or curtailment of its habitat or range;
> 2. Over-utilization of the species for commercial, recreational, scientific, or educational purposes;
> 3. Disease or predation;
> 4. Inadequacy of existing regulatory mechanisms; and
> 5. Other natural or manmade factors affecting its continued existence.
>
> …Once a species is listed under the ESA, NOAA Fisheries must determine whether there are areas that meet the definition of critical habitat."
>
> (https://www.fisheries.noaa.gov/national/endangered-species-conservation/listing-species-under-endangered-species-act)

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Thank you for considering our comments.

PCFFA/IFR Comments
Re: Draft National Seafood Strategy
17 March 2023

Glen Spain,

Acting Executive Director
PCFFA/IFR

Vivian Helliwell,

Watershed Conservation Director
PCFFA/IFR

Cc: Gina M. Raimondo, Commerce Secretary
Janet Coit, Assistant Administrator NOAA Fisheries
Kelly Denit, Director of Office of Sustainable Fisheries
Kim Damon-Randall, Office of Protected Species
Carrie Selberg Robinson, Office of Habitat Conservation
Laura Diedrick, External Affairs
Michael Robino, Senior Advisor for Seafood Strategy
Sarah M Shoffler, National Seafood Strategy Coordinator
Gabriela McMurtry, Fishery Policy Analyst

PCFFA/IFR Comments
Re: Draft National Seafood Strategy
17 March 2023

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APPENDIX

Marine Protected Areas (MPAs)and Fishermen (PCFFA Statement February, 2002)

PRINCIPLES OF THE PACIFIC COAST FEDERATION OF FISHERMEN'S ASSOCIATIONS REGARDING MARINE PROTECTED AREAS

Marine Protected Areas (MPAs) occur along the coast of California and many other coastal areas of the nation. The sizes, purposes, and regulations on use of these areas vary greatly, as do the terms to describe them. Some, for example, have few restrictions, while others may be complete 'no-take' areas. MPAs have garnered much attention recently among researchers and marine advocacy groups as a tool for fishery management, protecting marine habitats, or preserving unique marine ecosystems. While MPAs may offer promise for the conservation and management of marine fisheries and their habitats, much is unknown about what benefit, if any, has been derived from existing MPAs for the conservation and management of marine fish and their habitats (other than in small, localized areas) or what benefit may be derived from the establishment of new MPAs. To date, there has been a great deal of hype, but precious little science.

Although MPAs may offer potential benefits for marine fish resources and their habitats, they may pose a real danger, too, if strict adherence to good science is not maintained regarding their purposes and siting. MPAs, particularly those imposing no-take, could result in vast areas of prime fishing grounds being 'locked up', which could needlessly impact fishery production. Moreover, no-take MPAs may result in heavier fishing or other activities outside of their boundaries, exacerbating rather than resolving fish resource problems. MPAs, by themselves, may also create a false sense of security about fishery resources – neither fish nor currents respect artificial boundaries.

In California, for example, reserves have been in existence for as long as 39 years, yet little data exists regarding their overall performance. To date no funding has been dedicated to ongoing monitoring of these reserves, even in the developing Channel Islands process. The fishing industry does not support the establishment of any reserve without a structure for assessing its performance and the funding for that assessment, nor of any reserve whose establishment is inconsistent with the principles of this document.

To initiate a rational and science-based discussion on MPAs, mindful of the need to conserve and manage fish resources on a sustainable basis, and to protect marine habitats and ecosystems and the fisheries that depend on these fish resources, the Pacific Coast Federation of Fishermen's Associations establishes the following principles:

1. No establishment of an MPA shall inhibit sustainable fisheries within that MPA that have negligible impacts on the habitats or species of concern.

2. MPAs are not a substitute for other forms of fishery management, including seasons, quotas, or gear restrictions, nor shall MPAs be a substitute for prohibitions on pollution, dumping, or the introduction of exotic species.

3. MPAs shall not be used as a tool to reallocate resource use. Creation of any zones for recreational fishing only, or for dive fishing only, must be balanced by creation of zones of comparable value for commercial fishing only.

4. Planning and management for the marine environment must be done on a regional scale, and be catch-based and multiple-use. The planning approach must ensure participation by stakeholders and other interested parties from the beginning. Land use and other non-fishing impacts must also be addressed.

5. Methodologies and criteria for assessing performance of all MPAs must be developed before new MPAs are implemented; this includes funding for performance assessments.

6. The review of the effectiveness of existing MPAs, as well as the siting and establishment of any new MPAs, must include fishing men and women from both the commercial and sport sectors. This is necessary not only because MPAs affect or could affect fishing areas, but more importantly because fishermen have an intimate and working knowledge of the marine environment, including that of many areas of the ocean where there has been no research.

7. **A thorough and science-based review needs to take place of all existing marine protected areas along the U.S. Pacific coast** to determine their effectiveness for either: a) providing baseline research information; b) protecting critical marine habitats; or c) protecting specific marine fish or organisms. This

review should be undertaken by a panel, including marine scientists, appropriate fishery agency representatives, knowledgeable commercial and sport fishermen, and knowledgeable marine conservation representatives, and will include a report with recommendations for each existing MPA and no-fishing zone as to its effectiveness and whether there should be any changes in regulations and boundaries, and whether it should be maintained, reduced, expanded, or eliminated, and why.

A similar review must be conducted of the types and effectiveness of MPAs in use in other parts of the world to provide the state, scientists, and the fishing industry guidance on whether new MPAs should be established offshore California and other states and, if so, what their objectives should be, their appropriate size, and types of regulations for their use. It is important to recognize the uniqueness of the U.S. Pacific Coast when developing objectives. Measures that are appropriate in tropical waters may not be appropriate here.

8. If, after thorough review, there is a decision to proceed with revising current MPAs or establishing new ones**, the objectives of each MPA must be stated clearly;** i.e., whether it is to provide baseline research, protect habitat, or protect specific species, or some combination thereof. Regulations for use of the MPA must be appropriate to the objectives. A reasonable time frame for meeting the MPA's objectives must be included.

9. The regulation of the types of use to be permitted in each MPA can and should vary depending on the objectives of the MPA, with MPAs established as any one of three or more types, including those to protect habitats, those to protect specific species of marine fish or organisms, and those where take is prohibited.

10. Where no-take MPAs may be established, not only must all types of fishing be prohibited, but so too must any unpermitted scientific collection or any other form of removal from within the boundary of the MPA be prohibited. **No dumping or introduction of pollutants shall be permitted in any no-take MPA,** and human access shall be greatly restricted in order to maintain the pristine condition of the MPA and its value for baseline research.

11. In the siting of any new MPAs, factors to be considered shall include the uniqueness of the area, its biological productivity/diversity or special habitats, the human impacts on that area (including fishing, other types of aquatic harvesting

or collection, pollution, and structural changes such as dumping, artificial reefs, or oil rigs). **Siting shall be based solely on the evidence regarding the site itself** and without regard to proximity of existing parks, marine sanctuaries, or research institutions.

12. Recent changes in fishery management practices, fishing effort, and gear types used must be included in consideration of any new MPAs so as not to use MPAs to address problems already addressed by existing fisheries management. **The entire existing and proposed web of federal and state fisheries regulations applicable to the area must be considered in designing any new MPA.**

13. In the establishment of any new MPAs, **careful consideration shall be given to what, if any, impacts the establishment may have on fishing**, or the use of certain types of fishing gear, what impacts an MPA may have on fishing effort outside the MPA boundary, and what steps can be taken to mitigate any impacts on fishing from the establishment of an MPA. **Any such impacts shall be distributed among fishermen in a fair and equitable manner.** Every effort shall be made to protect existing fisheries, consistent with the science-based selection of unique or productive areas deserving of some level of protection under MPA status.

14. Where significant reduction in fisheries is an unavoidable consequence of establishment of an MPA consistent with the above guidelines**, funding for the compensation of fishermen in proportion with the reduction of the fishery shall be part of the establishment of the MPA.**

15. Recognizing a changing ocean environment and the continuing increase in human knowledge of the marine environment**, MPAs shall be subject to adaptive management,** with regular reviews conducted of their performance while recognizing that regulatory or protective measures may not have immediate results. Reviews should include assessment of non-fishing factors that inhibit the productivity of an MPA, including non-point source pollution problems. Under an adaptive management program, utilizing experts from the fishery agencies, marine researchers, social scientists, and the fishing and conservation community**, MPAs should be subject to periodic review of their regulations, boundaries, and whether some existing ones should be eliminated and/or new ones established.** #####

PSPA
PACIFIC SEAFOOD
PROCESSORS ASSOCIATION

March 24, 2023

Ms. Janet Coit
Assistant Administrator, NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910
Via email: janet.coit@noaa.gov

Dear Assistant Administrator Coit:

NOAA Fisheries' draft National Seafood Strategy (Strategy) envisions a thriving and resilient domestic U.S. seafood economy that can deliver sustainable, responsibly produced, and nutritious U.S. seafood to consumers at home and around the world. In doing so, it can deliver sustainable benefits to commercial fishing families, communities, and seafood support businesses across the United States. *This vision will only happen, however, if the Strategy's high-level words are translated into meaningful actions at all levels of the Administration and implemented through whole-of-government coordinated policy and regulatory approaches, many of which would be unprecedented*. Members of the Pacific Seafood Processors Association (PSPA) support the stated purpose of the Strategy and strongly urge vigorous implementation of it, recognizing that it provides the best opportunity for launching the interagency policy leadership and collaboration needed to ensure the future viability and competitiveness of U.S. seafood producers.

PSPA members are among the largest seafood processing companies operating in and off Alaska, positioned at the center of the United States' largest seafood supply chain. Our members are deeply invested in supporting the health and sustainability of Federal and State of Alaska fisheries. Members companies buy billions of pounds of sustainably harvested wild Alaska pollock, cod, salmon, halibut, crab, and other fish, which they turn into premium seafood products for consumers at home and around the world. We are, therefore, deeply engaged in the Federal government's roles in supporting the operational and commercial aspects of the seafood supply chain. Alaska's seafood industry generates $15 billion in total U.S. economic output annually, including spending for safe operations, capital reinvestments, regulatory compliance, payroll and compensation, marketing, innovation, and other costs. Alaska's industry supports more than 31,000 commercial fishermen and 27,000 processing workers in 160 shore-based plants, 52 catcher-processor vessels, and 30 floating processors in Alaska.

PSPA reviewed an early draft of this Strategy, supplying written comments to NOAA Fisheries in March 2022. PSPA staff and members were guided by the following considerations, which we repeat here:

> First, we recognize that managing fisheries for sustainable production and supporting seafood markets occur in separate, but highly interdependent, spheres. Fisheries

production requires a highly technical and science-based process for setting responsible catch limits and other rules for fish harvest, and this process is the foundation upon which the U.S. seafood industry is based. In turn, seafood markets are complex economic and distribution systems that determine the prices ultimately paid for fish, and fair, competitive access to these markets enables seafood producers to successfully generate and return economic benefits to fisheries and seafood stakeholders. The U.S. seafood supply chain integrates both fisheries production and seafood markets. Supporting this supply chain holistically will deliver the greatest overall benefits to the Nation, as directed by the optimum yield and other provisions of the Magnuson-Stevens Act (MSA). In fact, commitment to comprehensive U.S. seafood supply chain support should not only be included in the goals in this Strategy – it should be embraced by NOAA Fisheries' leadership and staff, carried forward in the agency's core mission, and deployed through sustained agency operations in the regions.

Second, we understand that in developing and implementing this Strategy to advance resilience and competitiveness, NOAA Fisheries must operate within the bounds of current statutory authorities. Statutory mandates and their resulting policies and regulations affecting fisheries and seafood production are exceedingly complex and present tremendous cost to multiple agencies and regulated entities. A strategic approach to policy and regulation under existing authorities will enhance the efficiency and effectiveness of NOAA Fisheries and other agencies that regulate the U.S. seafood supply chain. Importantly, it will also identify opportunities for NOAA Fisheries to best exercise its discretion, both internally and in collaborating with other agencies, in support of statutory responsibilities and common policy goals.

Third, and perhaps most importantly, developing and successfully implementing a Seafood Strategy will require NOAA Fisheries' leadership to recognize the outstanding merits of the U.S. fisheries and seafood industries *and* defend against unwarranted threats. By any measure, this industry achieves remarkable performance. U.S. wild capture commercial fisheries are managed to ensure sustainability and advance all National Standards under MSA. Fisheries management follows laws for sustaining stocks, conserving biodiversity (protecting habitat, marine mammals, and endangered species), and protecting cultural and historical resources. Robust U.S. laws mandate that fisheries and seafood production follow workplace safety and protection rules, that seafood is safe for consumers to eat, and that associated environmental impacts are minimized and mitigated (such as with clean water). Companies utilize internal controls and audits, backed by third-party verification, to maintain product traceability and integrity of their supply chains. Wild seafood production, such as Alaska pollock, has among the lowest carbon footprints of any animal protein. The USDA's Dietary Guidelines for Americans highlight remarkable health benefits of seafood, including for pregnant women and early child development, and recommends increasing consumption levels for improved public health. U.S. seafood is ideally suited to meet public health and nutrition needs, as well as promote compliance with the Biden Administration's "Buy American" initiatives.

> Given these qualities, U.S. commercial fishermen and seafood processors are well-positioned to provide global leadership for commercial fisheries, support jobs and communities, and thrive as a vital food source. Without priority consideration in NOAA Fisheries' core mission and leadership in delivering an effective strategy, this may not come to pass. This Strategy to advance resilience and competitiveness must recognize that fishermen and seafood processors not only face changing environments and global supply chain vulnerabilities, but they must also contend with increasing regulatory costs and burdens that threaten their viability and competitiveness with other nations. Access to fishing grounds is increasingly threatened by competing uses for ocean space, including calls for arbitrary numerical targets for "no fishing" zones. U.S. producers' access to foreign seafood markets is stifled by foreign quotas and tariffs on U.S. exports and ever-changing non-tariff trade barriers. Consumers are inundated with misinformation by special interest campaigns meant to undermine confidence in U.S. seafood sustainability, safety, and responsible production. Yet, in reality, U.S. seafood is one of the best protein choices in all regards. NOAA Fisheries should address and counter these threats in building its Strategy for seafood resilience and competitiveness.

In light of these considerations, PSPA reviewed the very high-level vision, strategy drivers, and challenges conveyed in the Strategy and supports these statements, but we also find them to be incomplete. First, we suggest adding a bullet to the list of challenges on page 1 of the Strategy document, recognizing that domestic seafood producers are at a competitive disadvantage in seafood markets compared to producers in other countries that do not operate with the same regulatory costs and commitments to responsible production upheld by U.S. seafood producers. Throughout the strategy, NOAA should specifically recognize this and seek to level the playing field in seafood markets as a key objective in its National Seafood Strategy.

Second, while the Strategy does reference the role of Federal partners on some elements, PSPA recommends that NOAA Fisheries add additional emphasis and detail in the Strategy framework section on how interagency work will be pursued. Domestic seafood producers and our supply chain depend on many agencies working on trade and commerce; food chain support, safety, and security; and workforce and economic development. Effective seafood support, especially for Goals 3 and 4 (below), cannot be achieved without effective engagement; therefore, NOAA's strategy should establish a firm commitment to building effective and durable interagency functions for collaborating and coordinating on domestic seafood industry support.

Finally, the Strategy Implementation section on page 4 notes that NOAA Fisheries intends to prepare an Implementation Plan (Plan) with specific actions, timelines, and milestones. PSPA offers the following recommendations for implementing each section of the Plan.

Wild Capture Fisheries

Goal 1 of the draft Strategy is to sustain or increase sustainable production of U.S. wild-capture seafood through an evolution in science and management frameworks. PSPA strongly supports this goal, and we offer additional recommendations for implementation:

- Fisheries Science. The draft Strategy states NOAA Fisheries will provide the science and economic and social analyses necessary for fisheries management, which is already a decades-long core function of NOAA Fisheries. We strongly support NOAA's formal recognition of fisheries science as a top priority, given the need to increase and expand surveys in a changing climate while facing increasing costs to do so. The Plan will require specific commitments and actions that the agency will undertake to better deliver this core function, including steps to ensure fisheries management decisions are based on the best available science and that Federal fisheries surveys are conducted. *We find that fully-funded, reliable, and sustained stock assessments and vessel-based surveys are the most important form of support NOAA can provide to councils to facilitate sustainable fishing in the face of climate and ecosystem change*, especially in areas undergoing rapid change such as Alaska. We recommend that NOAA explicitly include in the Plan a commitment to *increase* (not just adjust) surveys to meet growing needs for ecosystem and climate resilience in the Alaska region, and NOAA should firmly commit to delivering the vessel-based surveys necessary for long-term continuity of key biological datasets including species distribution, condition, diet, age, sex, and genetics. The Plan should clarify that any NOAA effort to utilize new data collection systems (e.g., acoustics, uncrewed systems) to meet more complex scientific needs associated with understanding climate impacts on marine resources will supplement, not replace, vessel-based surveys. This commitment is especially important in the face of increasing challenges facing the NOAA vessel fleet, which is at risk of being under continual repair, understaffed, and diverted to uses other than fisheries surveys.

- Fisheries Management. We support NOAA's stated objective to maximize fishing opportunities while ensuring sustainability. This is consistent with the agency's long-standing mandate under MSA to achieve optimum yields, as defined in MSA to include the greatest overall benefit to the Nation and maximizing fish production while accounting for other factors. Therefore, we again look to the Plan as the vehicle for delivering meaningful improvements for fisheries management. *We urge NOAA Fisheries to state how it will support efforts to uphold MSA National Standards, defend use of the best available science, assist councils in the development of more flexible management actions to adapt to changing conditions, and maintain the necessary regional NMFS and science center staff to support the development of council analyses and rulemaking*. NOAA should articulate in the Plan how it will ensure councils will manage fisheries throughout the EEZ, an MSA requirement, in the face of competing uses or creation of no-fishing zones outside the MSA process. We urge implementation actions that seek continual improvement in regulatory streamlining, informed by an audit of the true regulatory costs and burdens necessary to comply with complicated legal requirements and efforts to reduce those costs and burdens. NOAA Fisheries should include implementation actions aimed at communicating the strong scientific basis for fisheries management actions to improve public awareness of fisheries sustainability under MSA.

- Habitat Conservation in Support of Fisheries. This objective states NOAA Fisheries will "protect and restore" habitat and support resilient coastal communities. First, PSPA notes that habitat conservation is not simply a matter of protecting and restoring

habitat; in reality, it also embodies a full range of actions aimed at proactively conserving resources and reducing impacts. In the Plan, NOAA Fisheries should explicitly state how it will recognize the full range of all actions undertaken under myriad authorities in the ocean space to conserve, protect, and restore habitat and biodiversity contained therein, including the area-based conservation measures established by councils under MSA authority. In the "America the Beautiful" initiative, NOAA Fisheries should make sure all forms of area-based marine conservation are accounted for, and it should only pursue additional area-based conservation measures in coordination with fishery management councils.

To support resilient coastal communities, PSPA urges NOAA to include specific items in the Plan advancing partnerships with coastal communities to improve resilience and fortification for coasts and coastal infrastructure. In addition, we recommend NOAA focus on the infrastructure capacity and modernization needs of seafood-dependent communities, particularly those in rural locations. We recommend close consultation with local fishermen, seafood processors, and community leadership to identify priority community resilience and infrastructure projects, including those authorized by the Infrastructure Investment and Jobs Act (P.L. 117-58).

Aquaculture

Goal 2 of the draft Strategy is focused on increasing domestic aquaculture production. Given PSPA members' full dependence on processing fish harvested in wild commercial fisheries, our comments here are limited.

- Marine Aquaculture Management and Regulatory Efficiency. NOAA Fisheries states it will advance an efficient, predictable, timely, and science-based aquaculture regulatory framework. Achieving this long-standing agency goal will require additional funding, authority, and – most importantly – transparency for all stakeholders, including those concerned about the environmental, economic, and social impacts of advancing a new offshore industry and potentially adding more seafood into domestic and global markets. We recommend that the Plan 1) clarify how the agency will work with other agencies, the seafood industry, and other stakeholders to identify aquaculture's impacts on marine life and habitats and how negative impacts will be avoided, minimized, and paid for by aquaculture operators; 2) address challenges created by new ocean space allocation issues and changing environmental conditions; and 3) identify aquaculture's impacts on existing seafood markets and measures to proactively address any conflicting interests of market sectors. The Plan should clearly state that Aquaculture Opportunity Areas in Alaska would be developed in close consultation with the State of Alaska and fisheries managers and be limited to mariculture in state waters. On any Congressional advocacy by NOAA related to aquaculture bills, the Plan should recognize the importance of overcoming key objections by accommodating state interests, including language to leave certain Federal waters off-limits to finfish aquaculture.

- Aquaculture Science. We appreciate a commitment to science-based aquaculture production and the need for science-based reduction of environmental impacts. Any expansion of effort in this area, however, should not come at the expense of science in support of other long-standing core science functions. We recommend clearly stating in the Plan that aquaculture-oriented science will not reduce NOAA's funding, staff, and other resources needed for wild fisheries science and surveys in support of councils' fisheries management and climate resilience work.

Market Access

The third goal of the draft Strategy is to foster access to domestic and global markets for the U.S. seafood industry. In pursuing this goal, NOAA Fisheries must recognize that seafood is a global commodity, and the economic benefits of harvesting this public resource depend on U.S. seafood producers' abilities to compete in all markets. In defining this goal, the agency should also recognize that delivering on this goal will require vigorous new forms of trade policy and interagency advocacy for terms of trade that do not put U.S. seafood producers at a competitive disadvantage. PSPA continues to urge priority focus on seafood exports in particular, as three-fourths of the volume of Alaska seafood – and tens of thousands of U.S. fishermen and hundreds of thousands of seafood supply chain workers – depend upon competitive access to seafood export markets.

- Communication and Promotion. NOAA is well-positioned as an authoritative source of science-based outreach on fish and seafood, and PSPA supports the objective of conveying the availability, sustainability, and nutritional value of U.S. seafood. The Plan should include specific actions for NOAA Fisheries to take, including maximizing its public outreach to bolster consumer confidence in U.S. seafood and communicating the 2020-2025 USDA Dietary Guidelines for Americans that support eating more seafood. In the Plan, NOAA should advance its current FishWatch program as a primary source for consumers to understand sustainable seafood choices and increase public and interagency outreach on seafood's role in meeting U.S. dietary needs (e.g., through the White House's initiative on hunger, nutrition, and health). The Plan should articulate how NOAA will improve upon existing government market support programs by 1) ensuring sufficient and stable funding for Saltonstall-Kennedy grants and effective operation of the American Fisheries Advisory Committee that guides S-K decisions, 2) partnering with USDA to provide more effective and timely support for its domestic food marketing and seafood purchase programs, and 3) working to help deliver on the goals of President Biden's "Buy American" initiatives. PSPA supports the intent of a National Seafood Council, but unresolved questions about its relation to existing programs, operation, funding sources, and long-term viability need clarity *before* NOAA establishes it as a priority program.

- U.S. Market Development. The second objective of the Market Access goal is to identify and develop U.S. seafood markets and put more U.S. seafood on U.S. plates. PSPA finds this objective laudable, yet it is largely redundant with the Communication and Promotion objective described above. We find that if NOAA Fisheries works more

effectively with USDA and seafood stakeholders on communicating the outstanding merits of seafood to U.S. consumers, domestic markets will further develop and provide vital outlets for seafood producers. Therefore, PSPA's recommendations for the Plan on this objective are the same as above, with the additional recommendation to regularly consult with domestic seafood producers to better understand their domestic market access issues, such as ensuring reliable access to shelf space, controlling costs to ensure competitive prices, and identifying barriers to and opportunities for product innovation. NOAA must recognize that costs of seafood production cannot continually be absorbed or passed along to consumers before they simply buy other proteins; therefore, cost burdens (regulatory, operational, and other) for U.S. seafood processors must be understood and accounted for in government actions.

- Fair Trade. NOAA Fisheries' third objective under Market Access is to promote fair seafood trade by combatting IUU fishing and expanding access to foreign markets. In the simplest terms, this objective is about leveling the playing field, which PSPA strongly supports. Like other items in this Strategy, however, the true value of this intent will only be realized if the Implementation Plan promotes meaningful interagency actions. PSPA recommends, therefore, the following for inclusion in the Plan:

    - NOAA Fisheries should advance work toward a National Trade Policy for the seafood industry, through which NOAA Fisheries would work with the International Trade Administration (ITA) and the Office of the United States Trade Representative (USTR) in designing and implementing a targeted plan for pursuing free and fair trade. As you know, on May 7, 2020 the White House issued Executive Order 13921, Promoting American Seafood Competitiveness and Economic Growth. Section 11 of that EO created an Interagency Seafood Trade Task Force and charged it with delivering a national Seafood Trade Strategy. PSPA provided comments on that strategy (letter dated July 22, 2020, attached). Our key recommendations remain applicable to this new Strategy and its Implementation Plan. Specifically, we continue to recommend that seafood trade receive priority consideration in NOAA, ITA, and USTR and that these agencies work collaboratively to prioritize seafood exports in both limited "phase" and full international trade agreements. Agencies should pursue this work through outcome-oriented action plans specific to key seafood export markets, including China, Japan, Russia, the EU, and UK, with a goal of removing tariff and non-tariff trade barriers to foreign market access. These agencies should create a standing interagency committee on seafood trade and competitiveness to coordinate and be accountable for effective seafood trade actions and oversee frequent and effective communications between the Administration and U.S. seafood exporters.

    - In addition to developing plans to advance free and fair seafood trade, PSPA recommends that the Plan include collaboration between the USDA's Foreign Agricultural Service and the other trade-related agencies to help ensure that U.S.

overseas seafood marketing programs and U.S. seafood export action plans are working collaboratively toward common goals.

- We further recommend that NOAA Fisheries' Office of Seafood Inspection is integrated in this part of the Plan to maintain robust support for seafood health certification and other U.S. seafood export requirements, including strategies for rapid resolution of unforeseen certification problems and strategies to facilitate sustained government support and engagement with U.S. seafood exporters. We further request that NOAA develop and seek public input on a plan for stabilizing the Seafood Inspection Program as needed to avoid the substantial and rapid price increases over the last two years, and to ensure consistency and efficiency in service levels and audit functions across regions.

- PSPA supports the objective to combat Illegal, Unreported and Unregulated (IUU) fishing. The Plan should include items that make full use of current authorities and programs to fight IUU fishing and exploitative labor practices worldwide, and in particular to leverage the cross-sector collaboration and governmental coordination functions called for in the Maritime SAFE Act. Current authorities also allow agencies to address cases of domestic seafood fraud, and the Plan should ensure these foreign IUU fishing and fraud enforcement programs are fully resourced.

- PSPA recognizes that NOAA Fisheries faces pressure to do more domestically to combat foreign IUU fishing, such as expanding the Seafood Import Monitoring Program (SIMP). If the Plan addresses SIMP, PSPA strongly recommends that it remain focused on only a few of the highest-risk categories. Given its administrative complexity, high costs, risks to lawful seafood trade, and lack of effectiveness in identifying IUU fish, we strongly oppose expanding SIMP.

- PSPA also finds that any WTO agreement to ban subsidies linked to IUU or unsustainable fishing should not inadvertently affect beneficial government support programs for sustainable fisheries in the U.S., including a range of widely used domestic fisheries and seafood programs (e.g., disaster relief, marketing support, government seafood purchases addressing food security, etc.). The Plan should explicitly reinforce that Federal funding for programs supporting sustainable fisheries will not be affected by the WTO agreement.

Seafood Sector Support

The fourth goal of the Strategy is to strengthen the entire seafood sector value chain through actions that support industry resilience and flexibility, infrastructure modernization, and workforce development, all of which are vital in helping the industry evolve and respond to chronic and acute challenges. PSPA supports this goal and suggests additional focus on the roles of NOAA's technical infrastructure (e.g., seafood inspection services and quality assessments), interagency coordination on immigration policy to facilitate domestic seafood

production, and the need to integrate this US seafood strategy with the Federal government strategy for food security and resilient food supply chains.

- Seafood as a Vital Part of the Blue Economy. This objective establishes that NOAA Fisheries will support seafood producing communities and help them adapt and thrive in a changing ocean economy with new competing uses. The Plan must explain, in detail, how NOAA will invest in and help fishing and seafood-dependent communities "thrive" as competing uses for ocean space increase and erode access to fish stocks. *Specifically, it must explain how NOAA will bolster fishing community support and promote access to sustainable fishing, based on fully articulated values of seafood-based economies, while other parts of NOAA (and other agencies in the Administration) seek to develop offshore industries and/or block commercial fishing access from other parts of the ocean to protect non-fishery resources*. The Plan should state that before actions are taken to remove commercial fishing from ocean space, NOAA must proactively identify the full range of economic impacts (e.g., losses to jobs, income, reinvestment, tax revenue, etc.) throughout the seafood value chain and commit to avoid and mitigate those impacts. At the same time, the Plan should state how NOAA can help drive government investment to Blue Economy communities in the form of technologies, infrastructure, and market access, thereby increasing their long-term ability to compete in seafood markets.

  Additional Objective: Following the point on seafood in the Blue Economy, NOAA should add a section to the Implementation Plan recognizing and upholding seafood's role in domestic food security. Domestic wild seafood is a sustainable, reliable, and abundant source of protein, essential fatty acids, and nutrients, and the United States produces up to 10 billion pounds annually. Fishing and seafood processing employers are part of the United States' essential and critical infrastructure, as recognized by the Department of Homeland Security's (DHS) Cybersecurity and Infrastructure Security Agency.[1] Threats against domestic food supplies, including fish and seafood, are addressed in a 2021 public-private analysis with participants from DHS and the Office of the Director of National Intelligence.[2] This analysis highlights many foreign and domestic threats to our seafood supply chain, including many issues (e.g., seafood sustainability and inspection, regulatory and cost burdens on domestic producers, dependence on foreign seafood produced at lower cost, the need for climate resilience) in which NOAA Fisheries is active. Specifically, the Plan should articulate how NOAA Fisheries will work with DHS, USDA, and other agencies on domestic food security, to ensure agencies are sharing information about – and taking action to address – threats (domestic and foreign) that could destabilize domestic seafood production and delivery to American consumers, including through USDA public nutrition programs that provide food for millions of underserved and food insecure Americans.

[1] U.S. Department of Homeland Security, Cybersecurity and Infrastructure Security Agency, Office of the Director. Advisory Memorandum on Identification of Essential Critical Infrastructure Workers During COVID-19 Response. March 28, 2020 (and subsequent guidance on August 10, 2021).
[2] Public Private Analytic Exchange Program. Threats to Food and Agriculture Resources. 2021.

- Seafood Infrastructure. PSPA supports the objective of modernizing U.S. seafood infrastructure and supply chain components to advance the resilience of fishing and seafood communities and regional food economies. In the Plan, we recommend that NOAA look for every opportunity to better understand the U.S. seafood supply chain – from harvest to consumer – and work with industry to identify infrastructure needs at the local level. NOAA can then best understand how to use its authorities and/or work with states and partner agencies to increase technical assistance and direct grant programs for vessel modernization and recapitalization, port facilities, processing and storage facilities, and programs for modernizing seafood storage and shipment.

- Workforce Development. In the third objective of this goal, NOAA plans to foster a growing and diverse seafood workforce and attract new industry entrants. PSPA supports this goal, and *we find that the best way to attract commercial fishermen and seafood producers is to clearly facilitate economic success and further signal to the entire economy that domestic seafood is a national priority*. The Plan should state how NOAA Fisheries will help minimize industry cost, burden, risk, and uncertainty – and how it will help ensure that seafood jobs are in demand, pay well, and attract investments. It should explain how NOAA will work collaboratively with other agencies, educators, and seafood employers to expand workforce development, training, and extension programs, which are needed to instill valuable and unique fishing and seafood processing skillsets.

  Additional Objective: PSPA recommends that NOAA Fisheries add a new objective on workforce issues, specifically supporting the role of non-immigrant, seasonal visa guest workers in U.S. seafood processing. H-2B visas are a critical link in Alaska's seafood supply chain, and NOAA should work with the Department of Labor (DOL) and the DHS to prioritize access to the limited number of H-2B visas for Alaska's seafood processors. *While we understand that NOAA does not have a role in administering the H-2B visa program, we urge NOAA to use its discretion to make sure DOL and DHS understand their roles in facilitating the Administration's purpose of achieving optimum yields,* delivering the greatest overall benefit to the Nation, and maximizing domestic fisheries production while accounting for other needs. Shortfalls in the processing workforce have cascading impacts: fishermen may have to halt fishing and product volumes decrease due to limited processor capacity, processors produce lower value seafood products domestically (higher value products require more labor), choices for seafood markets and consumers are constrained, jobs and income in support sectors and distribution systems are impacted, and states and local communities receive fewer fish tax revenues from processors. The Plan should state how NOAA will engage with DOL and DHS to communicate urgency for using any discretion to ensure timely and effective delivery of these visas for Alaska's seafood employers.

NOAA Fisheries' leadership on the National Seafood Strategy and subsequent Implementation Plan are essential to our industry, as no other Federal agency's primary responsibility is to return the greatest overall benefit of fishery resources to the Nation, as directed by MSA.

Delivering this National benefit requires holistic, comprehensive support for domestic seafood producers. Therefore, it remains incumbent on NOAA Fisheries to lead and effectively partner with many other agencies to implement this Strategy through an all-of-government approach, with NOAA Fisheries at the helm. The need to establish formal interagency coordination bodies is particularly clear for goals 3 and 4, and PSPA encourages NOAA Fisheries to address this need more directly in both its Strategy and Implementation Plan.

PSPA offers this input with a sincere desire to facilitate the success of this Strategy, and to embed the Strategy's objectives in NOAA Fisheries' core mission. Thank you for carefully considering our input.

Sincerely,

Mark JoHahnson
Chairman

Pacific Fishery Management Council

7700 NE Ambassador Place, Suite 101 Portland, OR 97220-1384
Phone 503-820-2280 | Toll free 866-806-7204 | Fax 503-820-2299 | www.pcouncil.org
Marc Gorelnik, Chair | Merrick J. Burden, Executive Director

March 16, 2023

Re: National Oceanic and Atmospheric Administration Draft Seafood Strategy

To Whom It May Concern:

The Pacific Fishery Management Council (Pacific Council) appreciates the opportunity to provide comments on the Draft National Seafood Strategy (Draft Strategy). Sustainable seafood production for both commercial and recreational fisheries is the fundamental mission of the Pacific Council. We support the vision of the Draft Strategy, which prioritizes sustainable seafood production, climate-ready fisheries and communities, economic competitiveness, and opportunities for a growing and diverse workforce. We also have some suggested changes. Successful implementation of the Draft Strategy will be dependent on National Oceanic and Atmospheric Administration Fisheries' commitment to fund and execute regional implementation plans. We offer the following comments on the Draft Strategy.

The Pacific Council is well positioned to contribute to the Draft Strategy goals of increasing sustainable wild capture production, fostering access to domestic and global markets, and strengthening the seafood sector. Pacific Coast fisheries have experienced enormous challenges in recent decades, such as overfished stocks, habitat degradation, climate change, market disruptions, and infrastructure declines. Although nearly all Federally managed stocks have been rebuilt, our West Coast fleets are in some cases prevented from achieving full utilization of several species, due to catch constraints or other factors. Achieving Optimum Yield and increasing opportunities for greater attainment of underutilized species represents excellent opportunities to address Goal 1 of the Draft Strategy, while also supporting Goals 3 and 4.

Increasing seafood production capacity would also increase the resilience of fishing-dependent communities. Revitalizing the seafood capacity and supply chain would support Goals 1, 3, and 4 of the Draft Strategy.

We believe that the Draft Strategy could be more inclusive by not excluding the recreational sector. We suggest the following changes:

- in the "Fisheries Management" bullet within Goal 1: "Support the recreational and commercial fishing industries and fishing communities in their efforts to adapt to climate change and thrive in a changing ocean economy."
- In the "Blue Economy" bullet in Goal 4: "Support the U.S. recreational fishing, commercial fishing, marine aquaculture, and seafood communities to adapt and thrive in a changing ocean economy and given new competing uses."

- Under the "Strategy Drivers" heading, we recommend that the "Seafood is Good for People" bullet articulate recreational benefits and the "Seafood is Good for the Economy" bullet incorporate the recreational fishing economics.

The Draft Strategy highlights the importance of protecting and restoring habitats important to our nation's fisheries, which in turn supports resilient coastal communities. The Pacific Council is proud of our actions to protect and conserve habitats vital to healthy and sustainable fisheries. We note that a vast majority of the benthic habitat within the Pacific Coast Exclusive Economic Zone is protected, and that nearly all the historic range (both ocean and freshwater) of Pacific salmon is designated essential fish habitat (EFH). However, more actions to protect fisheries habitat, especially in freshwater systems, should be a priority. These actions should include designating EFH in watersheds that are likely to become accessible to Pacific salmon via fish passage improvements, as well as ensuring more robust water quality standards in vital river systems such as the California Central Valley and Klamath systems. The final Strategy should include opportunities for NMFS to use its authorities to address these important habitat concerns. We note that improving habitats and water quality standards also benefits food security, food sovereignty, subsistence fishing, and traditional Tribal fishing rights, and supports resilient communities.

We would also like to emphasize the crucial role of scientific surveys and reliable stock assessments in fisheries management and seafood production. Best available scientific information is the foundation of sustainable fisheries management, and adequate funding is critical to support the surveys and the science that goes into sustainable fisheries management.

The Draft Strategy highlights many benefits of sustainable seafood production, which is good for food security and nutrition, for fishing-dependent communities, and for the U.S. economy. Goal 2 of the Draft Strategy addresses sustainable aquaculture production, which could play a role in seafood production. However, we strongly suggest that the most efficient and effective path to increasing seafood production is to capitalize on existing wild capture opportunities and utilize existing infrastructure.

Thank you for considering these comments, and please contact me with any questions or further discussion.

Sincerely,

Marc Gorelnik
Chairman

KFG:rdd

Cc: Pacific Council Members
Sarah Shoffler
Michael Rubino

LOUISIANA SHRIMP ASSOCIATION
109 17th Place, Larose, La. 70373
504-382-9341

March 29, 2023

Michael Rubino, Ph.D.,
Senior Advisor for Seafood Strategy
NOAA Fisheries Office,
NOAA Fisheries Directorate

"National Seafood Strategy"
WRITTEN COMMENT
NOAA Fisheries Draft National Seafood Strategy

The Louisiana Shrimp Association (LSA) is a nonprofit organization formed by commercial shrimpers throughout the State of Louisiana. Membership consists of commercial shrimp fisherman, wholesale and retail seafood dealers, statewide merchants, and individuals concerned about issues related to domestic seafood and shrimp production as well as the preservation of the culture and heritage of the traditional Louisiana shrimper.

Dr. Rubino,
We thank you for taking the time to read our comments and consider them for NOAA's National Seafood Strategy.
Louisiana Shrimp Association (LSA) was formed in 2002 when the European Union started banning contaminated shrimp from global aquaculture farms. These shiploads of imported shrimp, unfit for human consumption in Europe, were then shipped to the United States and sold at undervalued prices and ruined our domestic market.
Now, (21 years later), these contaminated shrimp, (antibiotics, pesticides, salmonella, MRSA, etc.) are being allowed into our country. We now (21 years later) have a worldwide antibiotic resistance problem. According to CDC reports, 35/50 thousand deaths in the United States alone, 1.27 million deaths worldwide and is associated with 5 million deaths worldwide.
* *see footnote links to articles connecting this to shrimp aquaculture.*

As we see, you are one of the people at the top to improve domestic aquaculture. If we cannot compete against the influx of contaminated, undervalued seafood coming into our country, there is no way for a domestic aquaculture industry to survive.

**footnote links:*
https://sentientmedia.org/farmed-shrimp-india/

https://www.google.com/search?q=farm+raised+shrimp+antibiotic+resistance&ie=UTF-8&oe=UTF-8&hl=en-us&client=safari#fpstate=ive&vld=cid:56565cae,vid:OJVrCnjL4a8

Recommendations to the National Seafood Strategy:

1. Increase testing and destroying all contaminated products being imported and stored in cold storage facilities in our country. Yes, this includes the ones already in our stores also through board of health testing or whatever means necessary.

2. The American domestic seafood Industry paid for, fought for, and did the work for the tariffs on these dumped shrimp. Please ask our government to return it to the industry by way of fuel subsidies, grants for improvements etc. but mainly to the harvesters because they are the ones that took the brunt of the price drop. We feel that it belongs to the industry and not our government.

3. We would like our Federal Government to hold foreign imports to the same standards as American Aquaculture (American aquaculture will never be able to compete against forced labor, cheap labor and the use of antibiotics to increase production of shrimp). We believe this to be important for food independence and public health during war time.

Thank you for your time and remember we are supposed to have standards above any country in the world but yet (21 years later) the European Union standards of imported seafood are better than ours in the United States. Raising our standards would be a more level playing field for both industries (wild caught and aquaculture) to stand a chance to thrive while saving lives.

Fair trade is not fair unless other countries are held to the same standards.

Thank you for your time. We forward to working with your agency on future industry issues.

Sincerely,
Acy J. Cooper

Acy J. Cooper
President LSA

March 31, 2023

To: Michael Rubino, Ph.D., Senior Advisor for Seafood Strategy
NOAA Fisheries Office, NOAA Fisheries Directorate

From: The domestic shrimp industry of the Gulf of Mexico and South Atlantic United States

Re: Comments on the Draft National Seafood Strategy

Dr. Rubino,

Thank you for the opportunity to comment on the NOAA Draft National Seafood Strategy. We commend NOAA Fisheries for recognizing the value of stakeholder input in addressing the many opportunities and challenges facing our domestic seafood sectors.

We are a group of **20 allied organizations and companies** representing more than 4,000 seafood businesses of the U.S. Gulf of Mexico and South Atlantic region involved in the harvesting, processing, and distribution of wild shrimp. Through this letter, we hope to briefly highlight our background and status and to emphasize three practical recommendations for addressing the economic vulnerability of our industry.

Background

The commercial harvesting of shrimp dates to the mid-1700s and is one of America's oldest seafood sectors. The U.S. domestic shrimp industry experienced rapid growth throughout most of the 20th Century, rising in prominence to become one of the nation's largest marine commodities by volume and value. In the past 40 years, dockside revenues for **U.S. landed shrimp have exceeded $500 million annually, with more than a billion in value-added sales supporting many thousands of sector-dependent business and jobs**. Nearly all of this activity derives from commercial operations in the U.S Gulf of Mexico and South Atlantic region. These shrimping families represent the foundation of the local cultural fabric and basis of localized economies.

During this same period, shrimp have emerged as the nation's most popular seafood, accounting for the largest percentage of seafood market share and per capita consumption. Most of this recent growth, however, has been driven by imported shrimp.

From initial production trials in the 1960s, the global shrimp aquaculture industry has grown to an economic juggernaut, with an annual volume approaching 5 million tons. This production derives primarily from countries of the Asian-Pacific Rim, and for decades the primary importer has been the Unites States. **The amount of shrimp imported to the U.S. rose from 225 million pounds in 1980 to more than 2 billion pounds in 2021.** The value of these imports exceeded $7.8 billion dollars in 2022.

Status

The influx of imported shrimp and the resulting commoditization of the global shrimp market has proven especially problematic for domestic harvesters. Despite rising costs for fuel and labor, the price of Gulf shrimp, for example, has not increased since 1980. For the past 40 years, the average dockside price of Gulf shrimp (all species and grades combined) has ranged from $1.50-$2.00 per

pound. **Adjusted for inflation, this stagnation equates to a 70% reduction in the real price of shrimp paid to domestic harvesters since 1980**. As the profitability of domestic shrimp harvesting has decreased, increases in shrimp demand have been serviced by imports - and the share of domestic landings in the U.S. shrimp market has dwindled from 90% to less than 10%. As a result of these forces, the U.S. now has less than 40% of the shrimp harvesting vessels it had just 20 years ago**. The remnant fleet, which for years has operated on increasingly thin margins, is now at a threshold that will prove devastating in the absence of intervention.** Last year, and this year, many of our vessels could no longer afford to operate, and will remain in port during much of the season. Recent articles from seafood news media have conveyed the crisis with headlines like ***Brink of Collapse*** and ***Verge of Extinction.*** The value of the shrimp fishery is not purely economic but cultural and personal as well. Generations of people have carried forth this industry and its rich history. The connection of this industry to food on the table is not readily understood by the consumers who should be made aware of its importance. We feel that the American market demand for good quality shrimp is sufficient to support our wild caught shrimping industry if mechanisms are in place to give domestically harvested product priority access to the American consumers.

Recommendations

At the height of our crisis, we are heartened to see that the Draft National Seafood Strategy already highlights several issues of tremendous importance to our industry. We are particularly encouraged to see an emphasis on **fair trade** and **domestic markets** under Goal 3, and the focus on **seafood security** under Goal 4.

We agree that a viable National Seafood Strategy (to quote the Draft Plan) should address important issues such as:

> *"…the **resilience of coastal fishing communities**; the **financial viability of the seafood industry**; the **effects and opportunities of international trade**; and the **importance of seafood*** (to) ***food security…"***

To this extent we strongly encourage that **three critical issues** be fully addressed in the final revisions to the National Seafood Strategy.

1. **<u>Expand the capacity for seafood import inspection and enforcement</u>**

   The Draft Plan recognizes the need to *"…decrease our reliance on foreign fisheries that are at greater risk of overfishing, Illegal, Unreported, and Ungulated (IUU) fishing, and forced labor"*. We contend that the final document should also include *foreign aquaculture* as an additional source of these concerns. There are many well-documented cases of IUU and labor issues in foreign aquaculture. Foreign shrimp farming continues to be challenged by environmental degradation and the use of harmful substances. In comparison, domestic shrimp are highly-regulated and free from banned chemicals and antibiotics.

   We encourage NOAA to specifically acknowledge and endorse the more than 20 goals and objectives called for by the Food and Drug Administration (FDA) in their February 2023 report: "*Activities for the Safety of Imported Seafood*". **We request that NOAA Fisheries acknowledge this report in the revised plan and reiterate the call for increased capacity and training for seafood import inspection agents, increased border surveillance, public awareness of consumption risk, and more rapid and effective response to seafood import violations.**

2. <u>Develop new programs to improve domestic seafood security</u>

It is commendable that the issue of *food security* has been included in the Draft Plan. Indeed, an increasing national focus on food security has grown from supply chain vulnerabilities exposed by the Covid-19 pandemic. American consumers are coming to grips with how dependent they have been on foreign sources especially in times of international stress. Going forward*,* ***seafood*** **must be included in this emerging national focus of food security.** We encourage NOAA Fisheries to acknowledge in the National Seafood Strategy the need for programs and policies for seafood that are similar to those implemented for agricultural security under the U.S. Farm Bill. There are many potential approaches, including domestic price supports, tax incentives, increased fuel credits and institutional purchases of domestic seafood commodities that should be implemented on a continuing basis to ensure ongoing national food security.

Beginning in 2020, the Agricultural Marketing Service (AMS) branch of the United States Department of Agriculture (USDA) increased its purchase and distribution of food products by $159.4 million. **This expansion included the largest institutional purchase of American seafood in our nation's history.** Embedded in the seafood purchase was the first-ever inclusion of wild-caught American shrimp, never before considered eligible for the USDA/AMS program. **From 2021 to 2022, a total of $50 million in cash from USDA was infused into the shrimping industry**, and 7.6 million pounds of domestic shrimp taken out of inventory and distributed nationwide. We request that NOAA Fisheries specifically acknowledge this initiative in the revised plan. **Expanded institutional purchases are vital to securing domestic seafood security and sustaining our domestic shrimp sector**.

3. <u>Reevaluate the distribution seafood import duties</u>

Section 32 of the Agricultural Adjustment Act of 1935 authorizes the federal government to redistribute public funds in support of agricultural prices and markets. In the context of seafood imports, **the law allows for the collection of trade duties to provide financial assistance to domestic shrimp producers that may be negatively affected by imports** of seafood products.

The two billion pounds of foreign shrimp imported annually account for the largest volume of any U.S. imported seafood commodity. The U.S. Department of Commerce has worked through the International Trade Commission (ITC) to impose anti-dumping duties on shrimp imports from six countries (Brazil, Ecuador, China, India, Thailand, and Vietnam). **These import duties have resulted in almost a half billion dollars in government collections from 2010-2020. Yet the businesses for which these duties are collected to protect rarely see direct support from this program.**

Although seafood import duties do support the domestic industry indirectly by funding government operations (NOAA Fisheries) and targeted research (Saltonstall-Kennedy), we call on your office to **revisit the original intent of Section 32 and to identify more direct and equitable ways to allocate these funds across the industry, including harvesters. Without some realignment and intervention, there will be no domestic shrimp sector to protect.**

We understand these recommendations come with a substantial commitment of time and effort by NOAA Fisheries and other federal agencies. Our organizations have spent decades on the front line of these issues, and we are prepared to continue working with federal agencies and our congressional delegations to achieve much needed progress.

Our overriding request is that the 3 issues outlined above be fully addressed in the final version of the National Seafood Strategy. Please let us know when and where we can expect to receive feedback from your office. Responses can be sent to the email addresses below.

NOAA Fisheries has an opportunity to signal its commitment and support to one of the nation's oldest seafood sectors. In doing so, your office will provide hope to the many coastal communities, business, families, and individuals who depend on domestic seafood for their heritage and livelihood.

We thank you again Dr. Rubino for the opportunity to provide our collective input to this important document and we look forward with great anticipation to working with you and your office.

With appreciation,

Organization Signees

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Gulf Vietnamese Commercial Fishermen Association

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Quality Seafood

Gary Graham - glgshrimp@embarqmail.com
Teal Trawlers LLC

CC: Congressional delegations of Texas, Louisiana, Mississippi, Alabama, Florida, Georgia, South Carolina, and North Carolina.

March 31, 2023

To: Michael Rubino, Ph.D., Senior Advisor for Seafood Strategy
NOAA Fisheries Office, NOAA Fisheries Directorate

From: The domestic shrimp industry of the Gulf of Mexico and South Atlantic United States

Re: Comments on the Draft National Seafood Strategy

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Background

The commercial harvesting of shrimp dates to the mid-1700s and is one of America's oldest seafood sectors. The U.S. domestic shrimp industry experienced rapid growth throughout most of the 20th Century, rising in prominence to become one of the nation's largest marine commodities by volume and value. In the past 40 years, dockside revenues for **U.S. landed shrimp have exceeded $500 million annually, with more than a billion in value-added sales supporting many thousands of sector-dependent business and jobs**. Nearly all of this activity derives from commercial operations in the U.S Gulf of Mexico and South Atlantic region. These shrimping families represent the foundation of the local cultural fabric and basis of localized economies.

During this same period, shrimp have emerged as the nation's most popular seafood, accounting for the largest percentage of seafood market share and per capita consumption. Most of this recent growth, however, has been driven by imported shrimp.

From initial production trials in the 1960s, the global shrimp aquaculture industry has grown to an economic juggernaut, with an annual volume approaching 5 million tons. This production derives primarily from countries of the Asian-Pacific Rim, and for decades the primary importer has been the Unites States. **The amount of shrimp imported to the U.S. rose from 225 million pounds in 1980 to more than 2 billion pounds in 2021.** The value of these imports exceeded $7.8 billion dollars in 2022.

Status

The influx of imported shrimp and the resulting commoditization of the global shrimp market has proven especially problematic for domestic harvesters. Despite rising costs for fuel and labor, the price of Gulf shrimp, for example, has not increased since 1980. For the past 40 years, the average dockside price of Gulf shrimp (all species and grades combined) has ranged from $1.50-$2.00 per

pound. **Adjusted for inflation, this stagnation equates to a 70% reduction in the real price of shrimp paid to domestic harvesters since 1980**. As the profitability of domestic shrimp harvesting has decreased, increases in shrimp demand have been serviced by imports - and the share of domestic landings in the U.S. shrimp market has dwindled from 90% to less than 10%. As a result of these forces, the U.S. now has less than 40% of the shrimp harvesting vessels it had just 20 years ago**. The remnant fleet, which for years has operated on increasingly thin margins, is now at a threshold that will prove devastating in the absence of intervention.** Last year, and this year, many of our vessels could no longer afford to operate, and will remain in port during much of the season. Recent articles from seafood news media have conveyed the crisis with headlines like ***Brink of Collapse*** and ***Verge of Extinction.*** The value of the shrimp fishery is not purely economic but cultural and personal as well. Generations of people have carried forth this industry and its rich history. The connection of this industry to food on the table is not readily understood by the consumers who should be made aware of its importance. We feel that the American market demand for good quality shrimp is sufficient to support our wild caught shrimping industry if mechanisms are in place to give domestically harvested product priority access to the American consumers.

Recommendations

At the height of our crisis, we are heartened to see that the Draft National Seafood Strategy already highlights several issues of tremendous importance to our industry. We are particularly encouraged to see an emphasis on **fair trade** and **domestic markets** under Goal 3, and the focus on **seafood security** under Goal 4.

We agree that a viable National Seafood Strategy (to quote the Draft Plan) should address important issues such as:

> *"…the **resilience of coastal fishing communities**; the **financial viability of the seafood industry**; the **effects and opportunities of international trade**; and the **importance of seafood*** (to) ***food security…"***

To this extent we strongly encourage that **three critical issues** be fully addressed in the final revisions to the National Seafood Strategy.

1. **<u>Expand the capacity for seafood import inspection and enforcement</u>**

   The Draft Plan recognizes the need to *"…decrease our reliance on foreign fisheries that are at greater risk of overfishing, Illegal, Unreported, and Ungulated (IUU) fishing, and forced labor"*. We contend that the final document should also include *foreign aquaculture* as an additional source of these concerns. There are many well-documented cases of IUU and labor issues in foreign aquaculture. Foreign shrimp farming continues to be challenged by environmental degradation and the use of harmful substances. In comparison, domestic shrimp are highly-regulated and free from banned chemicals and antibiotics.

   We encourage NOAA to specifically acknowledge and endorse the more than 20 goals and objectives called for by the Food and Drug Administration (FDA) in their February 2023 report: "*Activities for the Safety of Imported Seafood*". **We request that NOAA Fisheries acknowledge this report in the revised plan and reiterate the call for increased capacity and training for seafood import inspection agents, increased border surveillance, public awareness of consumption risk, and more rapid and effective response to seafood import violations.**

2. <u>Develop new programs to improve domestic seafood security</u>

It is commendable that the issue of *food security* has been included in the Draft Plan. Indeed, an increasing national focus on food security has grown from supply chain vulnerabilities exposed by the Covid-19 pandemic. American consumers are coming to grips with how dependent they have been on foreign sources especially in times of international stress. Going forward*,* ***seafood*** **must be included in this emerging national focus of food security.** We encourage NOAA Fisheries to acknowledge in the National Seafood Strategy the need for programs and policies for seafood that are similar to those implemented for agricultural security under the U.S. Farm Bill. There are many potential approaches, including domestic price supports, tax incentives, increased fuel credits and institutional purchases of domestic seafood commodities that should be implemented on a continuing basis to ensure ongoing national food security.

Beginning in 2020, the Agricultural Marketing Service (AMS) branch of the United States Department of Agriculture (USDA) increased its purchase and distribution of food products by $159.4 million. **This expansion included the largest institutional purchase of American seafood in our nation's history.** Embedded in the seafood purchase was the first-ever inclusion of wild-caught American shrimp, never before considered eligible for the USDA/AMS program. **From 2021 to 2022, a total of $50 million in cash from USDA was infused into the shrimping industry**, and 7.6 million pounds of domestic shrimp taken out of inventory and distributed nationwide. We request that NOAA Fisheries specifically acknowledge this initiative in the revised plan. **Expanded institutional purchases are vital to securing domestic seafood security and sustaining our domestic shrimp sector**.

3. <u>Reevaluate the distribution seafood import duties</u>

Section 32 of the Agricultural Adjustment Act of 1935 authorizes the federal government to redistribute public funds in support of agricultural prices and markets. In the context of seafood imports, **the law allows for the collection of trade duties to provide financial assistance to domestic shrimp producers that may be negatively affected by imports** of seafood products.

The two billion pounds of foreign shrimp imported annually account for the largest volume of any U.S. imported seafood commodity. The U.S. Department of Commerce has worked through the International Trade Commission (ITC) to impose anti-dumping duties on shrimp imports from six countries (Brazil, Ecuador, China, India, Thailand, and Vietnam). **These import duties have resulted in almost a half billion dollars in government collections from 2010-2020. Yet the businesses for which these duties are collected to protect rarely see direct support from this program.**

Although seafood import duties do support the domestic industry indirectly by funding government operations (NOAA Fisheries) and targeted research (Saltonstall-Kennedy), we call on your office to **revisit the original intent of Section 32 and to identify more direct and equitable ways to allocate these funds across the industry, including harvesters. Without some realignment and intervention, there will be no domestic shrimp sector to protect.**

We understand these recommendations come with a substantial commitment of time and effort by NOAA Fisheries and other federal agencies. Our organizations have spent decades on the front line of these issues, and we are prepared to continue working with federal agencies and our congressional delegations to achieve much needed progress.

Our overriding request is that the 3 issues outlined above be fully addressed in the final version of the National Seafood Strategy. Please let us know when and where we can expect to receive feedback from your office. Responses can be sent to the email addresses below.

NOAA Fisheries has an opportunity to signal its commitment and support to one of the nation's oldest seafood sectors. In doing so, your office will provide hope to the many coastal communities, business, families, and individuals who depend on domestic seafood for their heritage and livelihood.

We thank you again Dr. Rubino for the opportunity to provide our collective input to this important document and we look forward with great anticipation to working with you and your office.

With appreciation,

Organiza ion Signees

Capt. George P McShea, Jr. -
Apostleship of the Sea of the United States

Crystal Truong -
Galveston Area Vietnamese Shrimp Fleet

Nuoi Bui -
Gulf Vietnamese Commercial Fishermen Association

Lieutenant Governor William "Billy" Nungesser -
Louisiana Department of Culture, Recreation, and Tourism

Samantha Carrol -
Louisiana Seafood Promotion and Marketing Board

Acy J Cooper -
Louisiana Shrimp Association

Acy J Cooper -
Louisiana Shrimp Task Force

Thuy Vu -
Palacios Area Vietnamese Shrimp Fleet

Capt. Kyle Kimball -
Port Arthur Area Shrimpers Association

Capt. James B Robertson
Port Arthur International Seafarers' Center

Huger McClellan -
McClellanville Watermen's Association

John Williams -
Southern Shrimp Alliance

Very Reverend Sinclair Oubre, JCL, AFNI -
Stella Maris Diocese of Beaumont

Andrea Hance -
Texas Shrimp Association

Other Signees

Earnest "Earnie" Aparicio -
Anchor Seafood

Chris Londrie -
Co-Pak

Dung Bui -
Intracoastal Seafood

Devan Phan -
Palmer Foods

Ken Garcia -
Quality Seafood

Gary Graham -
Teal Trawlers LLC

CC: Congressional delegations of Texas, Louisiana, Mississippi, Alabama, Florida, Georgia, South Carolina, and North Carolina.

March 31, 2023

To: Michael Rubino, Ph.D., Senior Advisor for Seafood Strategy
NOAA Fisheries Office, NOAA Fisheries Directorate

From: The domestic shrimp industry of the Gulf of Mexico and South Atlantic United States

Re: Comments on the Draft National Seafood Strategy

Dr. Rubino,

Thank you for the opportunity to comment on the NOAA Draft National Seafood Strategy. We commend NOAA Fisheries for recognizing the value of stakeholder input in addressing the many opportunities and challenges facing our domestic seafood sectors.

We are a group of **20 allied organizations and companies** representing more than 4,000 seafood businesses of the U.S. Gulf of Mexico and South Atlantic region involved in the harvesting, processing, and distribution of wild shrimp. Through this letter, we hope to briefly highlight our background and status and to emphasize three practical recommendations for addressing the economic vulnerability of our industry.

Background

The commercial harvesting of shrimp dates to the mid-1700s and is one of America's oldest seafood sectors. The U.S. domestic shrimp industry experienced rapid growth throughout most of the 20th Century, rising in prominence to become one of the nation's largest marine commodities by volume and value. In the past 40 years, dockside revenues for **U.S. landed shrimp have exceeded $500 million annually, with more than a billion in value-added sales supporting many thousands of sector-dependent business and jobs**. Nearly all of this activity derives from commercial operations in the U.S Gulf of Mexico and South Atlantic region. These shrimping families represent the foundation of the local cultural fabric and basis of localized economies.

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With appreciation,

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John Williams - john@shrimpalliance.com
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Andrea Hance - andreahance@texasshrimpassociation.com
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Dung Bui - dungthibui@gmail.com
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Devan Phan - annahphan@gmail.com
Palmer Foods

Ken Garcia - kengarcia09@yahoo.com
Quality Seafood

Gary Graham - glgshrimp@embarqmail.com
Teal Trawlers LLC

CC: Congressional delegations of Texas, Louisiana, Mississippi, Alabama, Florida, Georgia, South Carolina, and North Carolina.

Southern Shrimp Alliance
P.O. Box 1577 Tarpon Springs, FL 34688
955 E. MLK Dr. Suite D Tarpon Springs, FL 34689
727-934-5090 Fax 727-934-5362

March 24, 2023

TO: Janet Coit, Assistant Administrator for Fisheries, NOAA
Michael Rubino, Senior Advisor for Seafood Strategy, NOAA

FROM: John Williams, Executive Director, Southern Shrimp Alliance

RE: NOAA Fisheries Draft National Seafood Strategy

The Southern Shrimp Alliance (SSA) appreciates the opportunity to present these comments on the NOAA Fisheries Draft National Seafood Strategy. SSA also appreciated the opportunity to receive and provide inputs on a presentation of this Strategy by Mr. Rubino at the March 16, 2023, meeting of the Gulf of Mexico Fishery Management Council's Shrimp Advisory Panel on which several SSA representatives sit, including me. I note that some of the comments made at that Shrimp AP meeting by SSA representatives are further elaborated in these comments.

General Comments

Shrimp is the most popular seafood consumed in the U.S. Urner Barry reports that in 2020, U.S. shrimp consumption rose to 5.0 pounds per capita, a 25 percent increase over the previous five years, and in 2021 and 2022, rose still further to record highs at 5.8 pounds and 5.7 pounds, respectively [1]. According to NOAA's *Fisheries of the United States*, total U.S. seafood (fish and shellfish) consumption per capita in 2020 was 19.0 pounds [2]. From these figures, we can conclude that shrimp accounts for more than 30 percent of all seafood consumed in the U.S.

According to NOAA's foreign fishery trade and commercial landings databases, the total U.S. supply of shrimp to the U.S. market in 2021 was nearly 2.2 billion pounds, of which only 8.7 percent (188.7 million pounds) was landed by the U.S. Gulf and South Atlantic shrimp fisheries,

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1 https://www.urnerbarry.com/PDF/Consulting/shrimp_inventory_fcst.pdf

2 https://www.fisheries.noaa.gov/resource/document/fisheries-united-states-2020

while 91.3% (1.98 billion pounds) were imported. [3, 4] From these figures, we can conclude that approximately 27.4 percent (602 million pounds) of all seafood consumed annually in the U.S. is imported shrimp.

While precise estimates can be elusive, numerous federal and non-profit studies indicate that a substantial portion of shrimp imports consumed in the U.S. is produced in IUU fisheries and using forced or child labor in fisheries, processing facilities, the production of feed used by shrimp farms, and in the operations of those farms as well.

Further, the results of FDA's testing of farm-raised shrimp imports from nations that are the largest suppliers of shrimp imports to the U.S. confirm that a significant percentage of such shrimp is contaminated with residues of FDA-banned antibiotics used on those farms to prevent or treat disease outbreaks, increase stocking densities, and increase growth rates. The human health threats associated with those antibiotic residues in shrimp imports are both on the individual level – such as in the case of aplastic anemia – and on the global human population level – as in the case of contributing to anti-microbial resistance – something that many world health experts have identified as the greatest threat to human health in the coming decades.

We must also point out that in addition to being abhorrent abuses of human rights, threats to human health, and violations of fishery conservation objectives, these serious and illegal deficiencies in the standards and practices by which some significant percentage of shrimp imports consumed in the U.S. is produced provide those foreign shrimp producers – whether in wild capture fisheries, in processing facilities, or on shrimp farms – with a substantial competitive advantage in the U.S. market over shrimp produced in our domestic shrimp fisheries.

As is well documented by NOAA's own statistics, *ex vessel* prices for U.S caught shrimp, U.S. shrimp landings, U.S. shrimp fishing effort, and the number of active vessels in the U.S. shrimp fleet have all fallen to record lows in recent years since the massive and continued growth in U.S. shrimp imports over the past two decades that was fueled by the development and rapid expansion of shrimp farming in the major shrimp exporting nations.

This reality has today reached existential proportions for the domestic shrimp industry. Recent surges in shrimp imports have flooded the U.S. market and overwhelmed U.S. inventories to the point that shrimp processors can no longer purchase shrimp from U.S. shrimp fishermen. As a direct result, a substantial number of U.S. shrimp vessels are currently unable to fish at all and remain tied to the dock. Those that go fishing have found that they cannot sell their shrimp at a profit, if at all. Many believe that we are on the precipice of the collapse of this iconic American fishery – once the most valuable in the entire U.S. and today still the most valuable in the Gulf of Mexico.

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[3] https://www.fisheries.noaa.gov/national/sustainable-fisheries/foreign-fishery-trade-data

[4] https://www.fisheries.noaa.gov/foss/f?p=215:200:32165188631007:Mail::::

Consequently, no U.S. fishery has a more significant stake in NOAA's National Seafood Strategy than the domestic shrimp industry. For these reasons, SSA strongly supports the clear focus of this National Strategy on protecting and advancing U.S. seafood production, including shrimp, the most sustainable and safe seafood in the world.

SSA membership comprises shrimp fishermen, processors, and the associated shoreside enterprises and fishery-dependent communities throughout the Gulf and South Atlantic regions. Working on their behalf since its founding 20 years ago, SSA has shared many of the same purposes and priorities - along with the goals and the strategies to achieve them - as are reflected in this NOAA National Strategy. We strongly support this overall Strategy and look forward to working with NOAA to implement it. However, we must stress that there are several very important objectives and actions outside of NOAA's scope that other federal agencies and Congress must pursue to address the U.S. shrimp industry's current and long-term needs, and we plan to continue our work with those other agencies and Congress as well. We certainly encourage NOAA to do the same.

GOAL 1: Sustain or increase sustainable U.S. wild capture production

On its face, this Goal states a fundamental shrimp industry priority, and it sets forth specific science, management, and habitat protection objectives and strategies for fishery sustainability that are shared by the shrimp industry - not just in words but in actions.

SSA regularly partners with NOAA and non-federal scientists to generate the best scientific information available and participates extensively in the federal fishery management process through the Regional Councils, the Advisory Panels, and the agency's rulemaking process to sustainably manage our shrimp stocks, to minimize our bycatch to the extent practicable, and to protect sensitive marine habitats.

SSA looks forward to continuing its partnerships and collaborations with NOAA and its partner agencies in implementing this Goal through the following priorities, among others:

- Essential to the effective assessment of shrimp stocks and the management of the fishery to minimize bycatch and protect sensitive habitats is the collection and analysis of data that provides precise measures of shrimp fishing effort. The agency must complete its work with the Gulf Council and shrimp industry to implement a new system.

- As noted in the Strategy itself, "*new ocean uses*" competing with the shrimp industry for space present a new challenge to the Goal to "*sustain or increase sustainable U.S. wild capture production*" of shrimp, as well as to the goals of "*Maximizing fishing opportunities and sustainable seafood production…*". Therefore, NOAA must continue developing and applying spatial suitability modeling in collaboration with the shrimp industry and, as appropriate, with its partner agencies to deconflict such new ocean uses as offshore aquaculture and offshore wind energy development with the shrimp industry. We note that the availability of precise measures of shrimp fishing effort are also an essential element of this modeling.

GOAL 2: Increase sustainable U.S. aquaculture production

Once again, SSA shares the perspective reflected in this stated Goal of the Strategy:

> "*Supporting gradual, diverse, and regionally-appropriate growth of the domestic industry will depend on an efficient, strategic, and science-based regulatory approach that considers and mitigates impacts on protected resources, essential fish habitat, and marine ecosystems.*" (emphasis added)

SSA has engaged extensively to ensure that future offshore aquaculture development follows that necessary science-based approach. As noted above, SSA has collaborated with NOAA's National Centers for Coastal Ocean Sciences (NCCOS) in its spatial suitability modeling and the development of its Aquaculture Opportunity Areas (AOA) Atlas for the Gulf of Mexico. SSA is also providing extensive inputs addressing ecosystem and shrimp industry impacts to NOAA's ongoing development of a Programmatic Environmental Impact States (PEIS) for AOAs in the Gulf. [5] And, while serving as a Steering Committee Member, it brought the shrimp industry's perspectives and expertise to the Meridian Institute's noteworthy workshop addressing the future of U.S. marine aquaculture.[6]

SSA again looks forward to continuing its partnerships and collaborations with NOAA and its partner agencies in implementing this Goal through the following shrimp industry priority:

- The agency's implementation of this Goal must prioritize the sustainability of this industry to no less of a degree than it prioritizes the sustainability of wild capture fisheries – with respect to potential ecosystem and habitat impacts and with respect to deconflicting offshore aquaculture operations with the fishing industry both in the ocean environment and in the seafood marketplace.

GOAL 3: Foster access to domestic and global markets for the U.S. seafood industry

Of the goals of this Strategy to which the domestic shrimp industry most closely relates in today's circumstances of a completely import-dominated U.S. market are the following:

> *"A thriving, well-regulated domestic seafood industry—capable of competing at home and abroad—will translate into greater global seafood supply and food security from sustainable U.S. fisheries. It will also decrease our reliance on foreign fisheries that are at greater risk of overfishing, IUU fishing, and forced labor."* (emphasis added)
>
> "*Promote fair seafood trade by combating IUU fishing and related harmful fishing practices around the world…..*"

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[5] https://www.shrimpalliance.com/wp-content/uploads/2023/03/SSA-Comments-AOA-PEIS-notice-of-intent-7-21-22-.pdf

[6] https://www.dropbox.com/s/niiuoivqzvruxl0/U.S.%20Marine%20Aquaculture%20Workshop%20Synthesis_Spring%202022.pdf?dl=0

Since its founding, SSA has fought to combat unfair and illegal trade through the imposition of anti-dumping duties now in place for shrimp imports from China, India, Thailand, and Vietnam and by working with Congress and federal agencies to develop, strengthen, and implement policies and programs to prevent the importation of seafood produced in IUU fisheries or with the use of forced or child labor, with the use of illegal antibiotics, or imported through any fraudulent means such as product mischaracterization and mislabeling. Together with its commitment to achieving the highest level of sustainability for any shrimp fisheries in the world, SSA's extraordinary investment in combatting unfair and illegal seafood trade literally defines the organization.

Which brings us to the Strategy's additional and pivotal stated goal to *"put more U.S. seafood back on U.S. plates."* This, along with the focus of the entire Strategy on increasing U.S. seafood production and strengthening the resilience of the domestic seafood-producing sector in part by taking actions that level the playing field with imports, could not resonate more with the domestic shrimp industry. The agency has it absolutely right in this Strategy.

That said, the non-profit Seafood Nutrition Partnership (SNP) has advanced an initiative that would establish a National Seafood Council and provide that Council with $25 million of Congressional appropriations each year for five years for a national seafood marketing campaign (*Eat Seafood, America*) to promote seafood consumption in the U.S. [7]

As described by SNP on their website and in many posts, the campaign will promote an increase in U.S. seafood consumption by promoting - the human health benefits of eating seafood - the sustainability of seafood, especially as compared to other meat proteins (beef, pork, chicken) - and the many US jobs an increase in U.S. seafood consumption would create. The unfortunate problem is, however, this marketing campaign and the $125 million in taxpayer funds would be used to promote U.S. consumption of both domestic seafood production AND seafood imports.

For convenience here, using the often-cited statistic that roughly 90 percent of seafood consumed in the U.S. is imported, that means, effectively, that the campaign might use $112.5 million of U.S. taxpayer dollars to promote the U.S. consumption of seafood imports over those five years, assuming their expenditures were proportional to that 90 percent figure. Contrary to SNP's claims, seafood imports are often neither sustainable nor healthy, and they often compete unfairly—if not illegally—against U.S. fisheries and U.S. jobs in many ways we have referenced in these comments and elsewhere (e.g., IUU fishing, forced labor, product misrepresentation/fraud, substandard conservation standards, etc.).

If we consider just the International Trade Commission's 2021 Report indicating that approximately 11 percent of U.S. seafood imports were derived from IUU fishing in 2019, that would mean that the SNP campaign might proportionately end up spending $12.4 million of taxpayer funds over those five years on promoting the consumption in the U.S. of seafood derived from IUU fishing. [8]

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[7] https://www.seafoodnutrition.org/eat-seafood-america/

[8] https://www.usitc.gov/press_room/news_release/2021/er0318ll1740.htm

Given the extensive and much appreciated commitment and investment by NOAA in combatting IUU fishing, forced and child labor in the seafood supply chain, and all other forms of illegal seafood imports, we expect that NOAA and the Administration broadly would never support spending U.S. taxpayer dollars on promoting the U.S. consumption of seafood imports.

Indeed, we must recognize the extraordinary scope of authorities and programs to prevent illegal seafood imports that NOAA's Office of International Affairs, Trade, and Commerce is devoted to implementing and enforcing in collaboration with other Federal agency partners, such as the Seafood Import Monitoring Program (SIMP), the High Seas Driftnet Fishing Moratorium Protection Act, the Marine Mammal Protection Act, among others.

Indeed, given all of the deficiencies in the standards and practices associated with seafood imports identified to date, the clearly articulated purposes and goals and strategies of this NOAA National Seafood Strategy to promote and increase U.S. wild and aquaculture production, to "*decrease our reliance on foreign fisheries that are at greater risk of overfishing, IUU fishing, and forced labor*," and "*to put more U.S. seafood back on U.S. plates*" should ensure that NOAA would never support or participate in any activity such as the SNP campaign that would promote the U.S. consumption of seafood imports.

Indeed, promoting the U.S. consumption of seafood imports known to include seafood derived from IUU fisheries or produced using forced and child labor would be the antithesis of combatting those illegal and abhorrent practices. Such support or participation in the SNP campaign would be strikingly inconsistent with NOAA's National Seafood Strategy and the very purpose and mission of its own Office of International Affairs, Trade, and Commerce. It would represent a serious disservice to U.S. seafood consumers and their health, and a betrayal of the domestic wild capture and aquaculture production industries.

But wait….

The SNP website indicates that "*The Eat Seafood, America! campaign is a collaborative effort of the members of the Seafood4Health Action Coalition". It then lists the members of this Coalition, which includes "NOAA Fisheries*". [9]

Further, as reported by Cliff White in his November 3, 2022, *Seafood Source* article addressing the departure from NOAA Fisheries of Deputy Assistant Administrator Paul Doremus:

> *While working in partnership with the National Seafood Council Task Force over the past two years, Doremus played a key role in advocating for federal funding for the National Seafood Council, an industry-led effort supporting the Seafood Nutrition Partnership (SNP) with its efforts to promote seafood as a healthy food source, leveraging recommendations from NOAA's Marine Fisheries Advisory Council." (emphasis added)* [10]

[9] https://www.seafoodnutrition.org/eat-seafood-america/

[10] https://www.seafoodsource.com/news/premium/supply-trade/paul-doremus-leaving-noaa-joining-trident-not-expected-to-jeopardize-seafood-marketing-board-push

Indeed, while attending the 2022 Seafood Expo North America conference in Boston, SSA's representative heard first-hand Mr. Doremus's public expressions of strong support for the SNP's campaign to promote U.S. seafood consumption, including seafood imports, notwithstanding the fact that at the very same conference, more senior NOAA officials spoke extensively about the agency's commitment to and investments in combatting IUU fishing, the use of forced and child labor, and the substandard conservation practices associated with seafood import supply chains.

Still further, in that November 3, 2022, article Mr. White quotes SNP's President Linda Cornish as follows:

> *"Current NOAA Fisheries Assistant Administrator Janet Coit is a backer of the initiative, Cornish said."*

Clearly, NOAA needs to reassess its policies and priorities. SSA calls on NOAA to rescind its statements of support for spending federal taxpayer dollars on promoting the U.S. consumption of seafood imports and support for proposed legislation and appropriations that would have that result. SSA further calls on NOAA to cease and desist from any further participation in the SNP campaign so long as it continues to promote the U.S. consumption of seafood imports.

NOAA cannot adopt this National Seafood Strategy and at the same time support the objectives of or participate in that campaign.

SSA notes that SNP and its campaign participants still have the opportunity to reconsider and revise its priorities to promote only the U.S. consumption of U.S. seafood produced in U.S. wild capture fisheries and U.S. aquaculture operations. Hopefully, with NOAA's encouragement, they will do so.

GOAL 4: Strengthen the entire U.S. seafood sector

The U.S. shrimp market is flooded with imported shrimp to the extent that it threatens the future existence of the domestic shrimp fisheries. U.S. inventories are overwhelmed with shrimp imports. While the massive and continued growth in shrimp imports, especially farm-raised, has a long history, today the oversupply of cheap farm-raised shrimp imports that have overwhelmed U.S. shrimp inventories are, in significant part, a consequence of COVID-19 disruptions. As referenced earlier in these comments, the domestic shrimp industry also faces "*new competing uses*" on both the fishing grounds and in the working waterfronts, including offshore aquaculture and offshore wind energy development. And, like many U.S. fishing industries, the U.S. shrimp industry is also experiencing an aging workforce and must attract young fishermen.

SSA strongly supports the goals and objectives to strengthen the U.S. seafood sector and strategies to achieve them set forth in this Goal of the National Strategy and looks forward to working with NOAA to implement them.

March 16, 2023

Via online submission portal
Laura Diederick
NOAA Fisheries
1315 East-West Highway, 14th Floor
Silver Spring, MD 20910

RE: Taylor Shellfish Company, Inc. Comments on Draft National Seafood Strategy

Dear Ms. Diederick:

On behalf of Taylor Shellfish Company, Inc. ("Taylor Shellfish"), thank you for providing an opportunity to comment on the Draft National Seafood Strategy, an outline of NOAA Fisheries' direction for supporting a thriving domestic U.S. seafood economy.

Taylor Shellfish is a fifth-generation, family-owned company headquartered in Shelton, Washington. The Taylor family has grown shellfish on Washington State shorelines since the 1890s. The company currently cultivates a variety of shellfish species on thousands of acres of tidelands and bedlands throughout Washington State's marine waters, including oysters, clams, geoduck, and mussels.

Taylor Shellfish employs over 500 workers in Washington State who grow, process, sell, and serve the company's shellfish. The company's farms and employees are largely located in rural areas, and Taylor's farms help sustain and diversify these local economies.

Taylor Shellfish has a strong commitment to sustainable shellfish cultivation in all areas that it farms, and it has received numerous recognitions for its sustainable practices. The company has received independent, third-party sustainability certification from Food Alliance, and its clams, mussels, and oysters are considered "best choices" by the Monterey Bay Aquarium's Seafood Watch Program. Most recently, Taylor Shellfish was recognized by Seafood Source as one of the top 25 seafood companies in North America leading in its sustainability and conservation practices.[1]

I. Taylor Shellfish Supports the Draft National Seafood Strategy

Taylor Shellfish strongly supports the aim of the Draft National Seafood Strategy to support a thriving domestic U.S. seafood economy and enhance the resilience of the seafood sector in the face of climate change and other stressors. The Goals outlined within the Draft National Seafood Strategy are critical to ensure that the United States continues to produce healthy, sustainable

[1] https://www.seafoodsource.com/news/environment-sustainability/the-top-25-seafood-sustainability-conservation?mkt_tok=eyJpIjoiTURaak56UTNNelV6TnpZeSIsInQiOiIwQldNZHFZOXlCV0J6Uk1UdHVtUDhDNGpcL1RMY0RZR3VtOWdSQzJVWFBQWWh4TmN0Y2Y0bDJJZCtqcnBPZG5ocjJSOVJ6TlNLaFJ4TG5iVTdRS2JDekRXdmoweGhlVDFTbWUrd0J5YmpGbTA1K2NzU21vN01sR1Uxa3UxMG9vM0cifQ%3D%3D&content%5Bb1a7c925-1ed6-4bc4-ab97-58e281440ce3%5D=30.

seafood and supports vibrant coastal communities now and into the future. We are hopeful that NOAA's actions and investments through the National Seafood Strategy will help strengthen the seafood sector and stimulate aquaculture development in the United States.

Taylor Shellfish also appreciates NOAA's leadership on the Subcommittee on Aquaculture ("SCA"), National Science & Technology Council ("NSTC"), and encourages NOAA to continue its work on the SCA and to ensure that the National Seafood Strategy and future implementation plan are aligned with the SCA's efforts, including: (1) National Strategic Plan for Aquaculture Research, (2) Strategic Plan to Enhance Regulatory Efficiency in Aquaculture, and (3) Draft Economic Development Plan.[2]

II. Comments on Goals and Objectives

Taylor Shellfish offers the following comments and recommendations on Goals 2 and 4 of the Draft National Seafood Strategy.

A. Goal 2. Increase Sustainable U.S. Aquaculture Production

The Draft National Seafood Strategy recognizes that growth of sustainable aquaculture is one of only a few ways to increase the availability of domestic seafood. It further identifies "Marine Aquaculture Management and Regulatory Efficiency" as a key strategy to support this growth by accelerating progress on implementing an efficient, predictable, timely, and science-based regulatory framework for marine aquaculture. Taylor Shellfish strongly supports this aim as a critical element in meeting Goal 2.

In 1980, Congress passed the National Aquaculture Act in response to findings that the nation has potential for significant aquaculture growth, but that this growth is inhibited by many scientific, economic, legal, and production factors. The Act was designed to address these limitations, but instead these challenges have significantly worsened over the last 40-plus years, as described in the Draft National Strategic Plan for Aquaculture Research 2021-2025, a Report by the Science Planning Task Force of the SCA, NSTC Committee on Environment:

> By value, nearly 90 percent of the seafood we eat comes from abroad, more than half of it from aquaculture. The 90 percent figure includes seafood caught in the United States, processed abroad, and imported in the processed form back into the United States. Driven by imports, the U.S. seafood trade deficit had grown to $14 billion in 2016.[3]

[2] The SCA's strategic plans are available on its website: https://www.ars.usda.gov/sca/.

[3] Draft National Strategic Plan for Aquaculture Research 2021, A Report by the Science Planning Task Force Subcommittee on Aquaculture, Committee on Environment of the National Science & Technology Council (2021) https://www.ars.usda.gov/SCA/Documents/DRAFT_2021%20NSTC%20Subcommittee%20on%20Aquaculture%20Research%20Plan.pdf).

Although NOAA has made great efforts to stimulate growth of domestic aquaculture production through initiatives such as the Marine Aquaculture Policy and the National Shellfish Initiative,[4] academic studies continue to show "developed countries may have depressed their growth rates even further through regulatory regimes that do not utilize current knowledge and are inefficient in other respects."[5]

Additionally, the National Ocean Council's National Ocean Policy Implementation Plan stresses "[t]he aquaculture industry will benefit from streamlined Federal permitting and coordinated research efforts to support sustainable aquaculture."[6] And NOAA's FY 2023-2028 Aquaculture Strategic Plan identifies regulatory efficiency as "Goal 1" to expanding sustainable marine aquaculture production in the country, with multiple objectives and strategies designed to improve upon existing permit processes.[7]

These federal laws and programs recognizing the importance of a robust aquaculture industry are reinforced at the state and local level, including in Washington State where most of Taylor's farms are located. The legislative findings of Washington State's Bush and Callow Acts reinforce that it is "the policy of this state to encourage the development and expansion of shellfish farming within the state and to promote the development of a diverse shellfish farming industry…."[8] Moreover, the Washington State Shoreline Management Act, which strives to achieve coordinated planning for the State's shorelines, identifies aquaculture as a preferred, water-dependent use that can have long-term benefits and protect the resources and ecology of the shoreline.[9]

Consistent with these legislative and policy directives, former Governor Christine Gregoire launched the Washington Shellfish Initiative in 2011 to encourage shellfish farming in the State. The Washington Shellfish Initiative recognizes shellfish aquaculture is critically important to the

[4] NOAA Marine Aquaculture Policy (http://www.nmfs.noaa.gov/aquaculture/docs/policy/noaa_aquaculture_policy_2011.pdf); NOAA National Shellfish Initiative Fact Sheet. (http://www.nmfs.noaa.gov/aquaculture/docs/policy/natl_shellfish_init_factsheet_summer_2013.pdf). Key strategies of the National Shellfish Initiative include improving permitting processes to make them more transparent, predictable, and efficient, and supporting innovative commercial culture and conservation techniques.

[5] Abate et al., Stringency of environmental regulation and aquaculture growth: A cross-country analysis, Aquaculture Economics & Management, 2016 Vol. 20, No. 2, 201-221, 219. (http://www.tandfonline.com/doi/pdf/10.1080/13657305.2016.1156191). Taylor Shellfish is not opposed to efficient and science-based regulatory requirements. However, as recognized by multiple stakeholders, the current permitting regime for commercial shellfish aquaculture in the United States is overly complex and inefficient, and this inefficiency limits our country's aquaculture potential, preventing economic growth, and endangering food security.

[6] National Ocean Policy Implementation Plan, p. 3 (https://www.whitehouse.gov/sites/default/files/national_ocean_policy_implementation_plan.pdf).

[7] NOAA Fisheries Aquaculture Strategic Plan FY 2023-2028, pp. 7-9 (https://media.fisheries.noaa.gov/2022-10/Strategic-Plan-102422-web.pdf).

[8] Wash. ESHB 2819 (2002 c 123 § 1).

[9] RCW 90.58.020; WAC 173-26-241(3)(b).

State's ecology, economy, and culture.[10] Shellfish help filter and improve the quality of marine waters and are an important part of the solution to restore and preserve the health of endangered waters.[11] Washington State leads the country in the production of farmed clams, oysters, and mussels with an estimated total economic contribution of $184 million in 2010, and shellfish growers directly and indirectly employ over 2,700 people in the State and are among the largest private employers in some counties.[12] A key goal of Phase II of the Washington Shellfish Initiative is to improve permitting processes to maintain and increase sustainable aquaculture.[13] Streamlining permitting requirements is critical to increasing shellfish production in Washington State, as shellfish farmers are subject to numerous federal, state, and local permitting requirements that can be extremely costly and difficult to navigate.

Another key effort of the Washington Shellfish Initiative is the creation of the Shellfish Interagency Permitting ("SIP") Team—a multi-agency team that includes the U.S. Corps of Engineers Corps ("Corps") and is designed to address issues around the permitting process. The SIP Team has identified numerous recommendations to improve efficiencies in the extensive and complex permitting process for shellfish farming activities in Washington State.[14]

In an attempt to address some of these regulatory inefficiencies, Taylor Shellfish is working with the National Marine Fisheries Service and U.S. Fish and Wildlife Service in development of a Habitat Conservation Plan ("HCP"). Taylor has made significant investments in pursuit of an HCP in hopes that it will both achieve better outcomes of sensitive species and habitat as well as assist the company in overcoming complex regulatory challenges through a robust, science-based farm management process. Taylor expects the HCP to not only foster its own operations but also maximize benefits for the critical habitats and coastal communities in and around its farms.

B. Goal 4. Strengthen the Entire U.S. Seafood Sector

The Draft National Seafood Strategy also identifies the importance of building resilience in the U.S. seafood sector and aims to strengthen the industry through support for communities to adapt and thrive in a changing ocean economy, modernization of seafood infrastructure, and encouragement of a growing and diverse seafood workforce. Taylor strongly supports this Goal, which addresses key challenges facing the company as well as the broader seafood sector.

[10] Washington Shellfish Initiative, p. 1 (http://pcsga.org/wprs/wp-content/uploads/2013/04/Washington-Shellfish-Initiative.pdf).
[11] *Id.*
[12] Washington Shellfish Initiative – Phase II Policy Brief, p. 1 (http://www.governor.wa.gov/sites/default/files/shellfishoverview.pdf).
[13] Washington Shellfish Initiative – Phase II Work Plan pp. 10-11 (http://www.governor.wa.gov/sites/default/files/ShellfishWorkPlan.pdf).
[14] Shellfish Interagency Permitting Team Phase I Report, May 5, 2016, pp. 7-8. https://ecology.wa.gov/DOE/files/44/446c9a20-fe38-4a23-85ba-f25b87da05b8.pdf.

Investments in rural coastal communities are necessary to the success of Taylor Shellfish and other seafood farmers. Similar to the Draft National Seafood Strategy, Taylor Shellfish has identified workforce development as a current and future need critical to the company's ability to support its operations. Taylor currently struggles to fill positions on its farms and in its processing facilities, and this challenge is expected to worsen as the company continues to grow. Further, a robust aquaculture industry must be increasingly diverse and attract new entrants.

Improvements in infrastructure, especially processing and port and dock facilities, are also essential to Taylor Shellfish and foundational to a strong and resilient Blue Economy. Aging and failing infrastructure in our working waterfronts poses challenges to the company's operations and inhibits growth. Funding assistance for undertaking essential upgrades and improvements to these facilities is frequently needed, and hence this is a highly effective means by which to strengthen the seafood sector.

Finally, the U.S. shellfish aquaculture sector lags behind other countries when it comes to farming and processing technologies. Taylor Shellfish has benefitted immensely from visiting shellfish farming and processing facilities in other countries and importing equipment that is not available domestically. This equipment has helped Taylor improve processing efficiency and product quality as well as address labor shortages. Implementation of Goal 4 relative to seafood infrastructure (perhaps within the details of the Draft Economic Development Plan) should include opportunities for the aquaculture sector to benefit from farming and processing technology in other regions of the world.

Taylor Shellfish thanks you for your consideration of these comments. Please do not hesitate to contact us if you have any questions.

Sincerely,

Bill Dewey
Director of Public Affairs

Robert Rohde
P.O. Box 2893
McKinleyville, CA 95519
March 2023

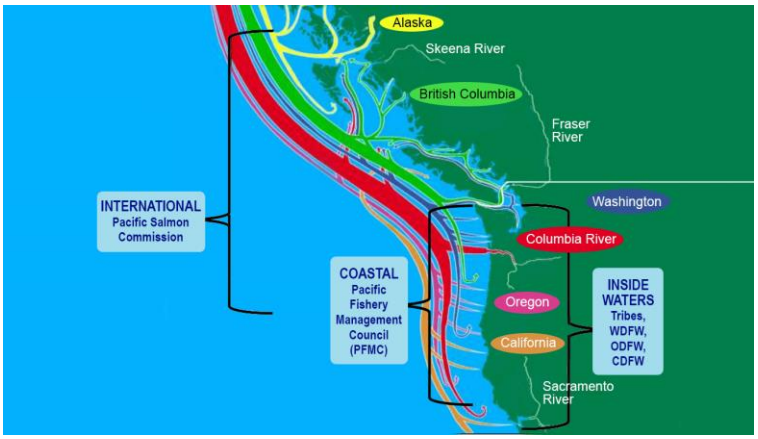
RE: NOAA's National Seafood Policy is Biased Toward Exploitation

National Security

The US Department of Commerce, through its National Seafood Policy has again demonstrated its bias toward fishery exploitation at the expense of US economic stability. The National Oceanic and Atmospheric Administration (NOAA) Fisheries agency within the US Department of Commerce intends to exploit our nations struggling fishery at the expense of national security. Since 1977, salmon fisheries in the exclusive economic zone 3 to 200 miles off the coast of Washington, Oregon, and California haven been managed under the Magnuson-Stevens Act and amendments. As a targeted commercial and recreation fish, Salmon are managed under the Theory of Optimum Yield for fish food production and recreational opportunities.

The Theory of Optimum Yield is Prescribed based on the Theoretical Basis of Maximum Sustainable Yield (MSY). "MSY is a theoretical concept that, for the purposes of the Magnuson-Stevens Act, is defined as the largest long-term average catch or yield that can be taken from a stock or stock complex under prevailing ecological and environmental conditions and fishery technological characteristics, and distribution of catch among fleets (Pacific Coast Salmon Fishery Management Plan, Pacific Fishery Management Council 7700 NE Ambassador Place, Suite 101 Portland, Oregon 97220-1384)."

"The map below illustrates the different organizations that work together to guide Pacific salmon and steelhead fisheries management throughout their range. Each colored line represents the migratory patterns of where Pacific salmon of a given region travel. These colored paths show where the Pacific salmon begin their life cycle, the distances salmon can travel along the West Coast as they mature, and where adult salmon may be caught (NOAA Fisheries, West Coast Salmon and Steelhead Fisheries Management Map, NOAA.gov)."



This approach to fishery management is biased toward exploitation of the fish, rather than fish population protection and management. So, since 1977 salmon fish populations have steadily declined to threatened and endangered levels putting America at risk of seafood shortages, economic decline, and national insecurity as China and other competing nations increase their global presence.

If you are counting the number of fish, then you have caught too many fish already. I started counting fish in the Klamath River watershed in 1992 as Natural Resources Manager for the Karuk Tribe. The fish have been crashing since the gold mining era and the Department of Commerce's bias toward exploitation has allowed it to happen through poor incompetent management.

All commercially viable stocks of fish have been severely impacted due to western exploitation principles that have left the US and other partners in jeopardy of long-term seafood insecurity.

The National Seafood Policy is a whitewash of US fish management failures. The US Department of Commerce no longer serves America's best interest in managing our nation's fishery. To avoid further decline of America's vital seafood and recreational opportunities the Biden administration needs to transfer protection and management of our nation's commercial and recreational fishery to the US Fish and Wildlife Service, through executive order to avoid continued and prolonged seafood shortages.

Background

- "*Until the end of last Ice Age, around 11,000 B.C., all peoples on all continents were still hunter-gatherers* (Diamond, 1999)."

Around 11,000 years ago, as glaciers began to recede toward the poles, a small group of people who hunted and gathered, converted over to the use of irrigated agriculture and domesticated animals as their primary sources of food.

"*Once people began to produce food and become sedentary, they could shorten the birth spacing and produce still more people, requiring still more food* (Diamond, pg. 29). This increase in humans caused once previously abundant fish, wildlife and plants to disappear resulting in even more people and has led to the overpopulation of the world.

This approach to living changed the natural balance of the world. Humans now had the ability to exceed the carrying capacity of their environment. *"Between the sixteenth and seventeenth centuries the image of an organic cosmos with a living female earth at its center gave way to a mechanistic world view in which nature was reconstructed as dead and passive, to be dominated and controlled by humans (Merchant, pg. xvi)."* The Scientific Revolution was occurring at the same time that commercialism, industrialization, and domination of humans over nature spread throughout the world. The US Department of Commerce still operates on

these outdated and harmful management principals by promoting economic prosperity at the expense of environmental sustainability that has dramatically reduced our nation's food supply.

References

- Diamond, Jared, 1999. Guns, Germs, and Steel, The Fates of Human Societies. W.W. Norton & Company, New York, New York.
- Merchant, Carolyn, 1980. The Death of Nature, Women, Ecology and the Scientific Revolution. Published by Harper Collins Publishers, 10 East 53rd Street, New York, New York.

Bycatch

"For NOAA Fisheries, bycatch refers to "discarded catch of marine species and unobserved mortality due to a direct encounter with fishing vessels and gear. These unintentionally caught animals often suffer injuries or die." "Fisheries bycatch is a threat to marine mammals worldwide. Bycatch occurs when marine mammals are incidentally caught in fishing gear (e.g., hooked, entangled, or trapped) or when they eat bait or catch. Bycatch of marine mammals can occur during active fishing operations using mobile or fixed fishing gear, and it also can result when fishing gear has been lost, discarded, or is otherwise no longer being used to harvest fish (also known as marine debris) ((NOAA, What is Bycatch, https://www.fisheries.noaa.gov/insight/understanding-bycatch#what-is-bycatch?)

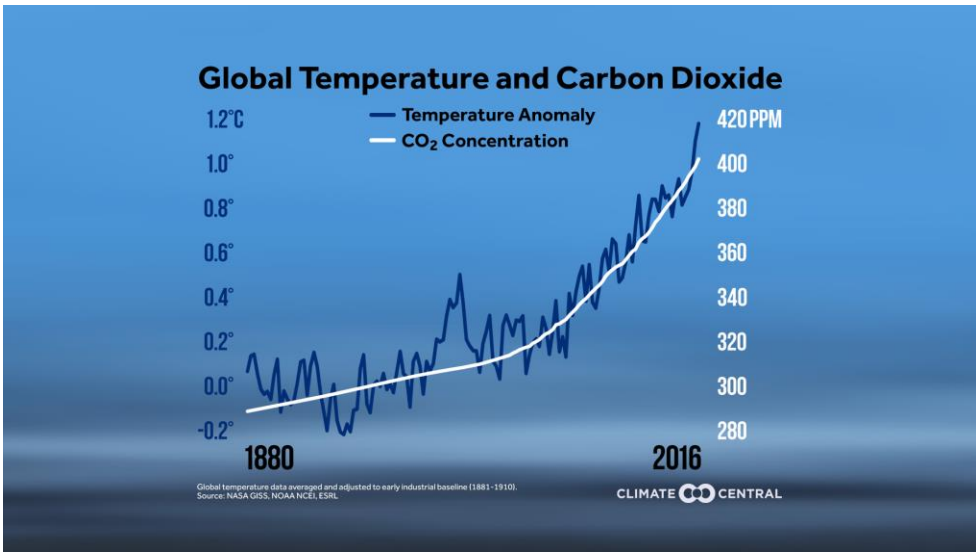
Salmon that swim in territorial and international waters are considered as bycatch for some types of commercial fishing, such as trawlers. At any point in their travels, west coast salmon that originate from Washington, Oregon and California are unintentionally caught as bycatch, further diminishing the abundance of west coast salmon populations.

Removing bycatch as a management option would protect the fish from being caught accidently. The US Fish and Wildlife Service is better suited to address the needs of the fish first with tempered harvest within the limits of full fishery abundance. NOAA Fisheries should be abandoned as an agency within the US Department of Commerce and their funds should instead be redistributed to the US Fish and Wildlife Service to avoid long-term impacts to American seafood supply in the face of totalitarian advancement.

Climate Change

Over billions of years Earth's atmosphere has changed over time. Early Earth had large quantities of carbon dioxide in the atmosphere. After millions of years, carbon dioxide concentrations decreased while oxygen has increased allowing a Lower and Upper atmosphere to form. The burning of oil and gas builds up in the Lower Atmosphere and moves Earth back in time when carbon dioxide levels were much greater and the Lower Atmosphere was uncomfortably hot and humid.

The warming of Earth's atmosphere tracks atmospheric carbon dioxide levels closely. As carbon dioxide levels increase in the lower atmosphere so does atmospheric temperature, as shown below:



Lower atmosphere temperature increases as carbon dioxide increases over time, from years 1880 to 2016.

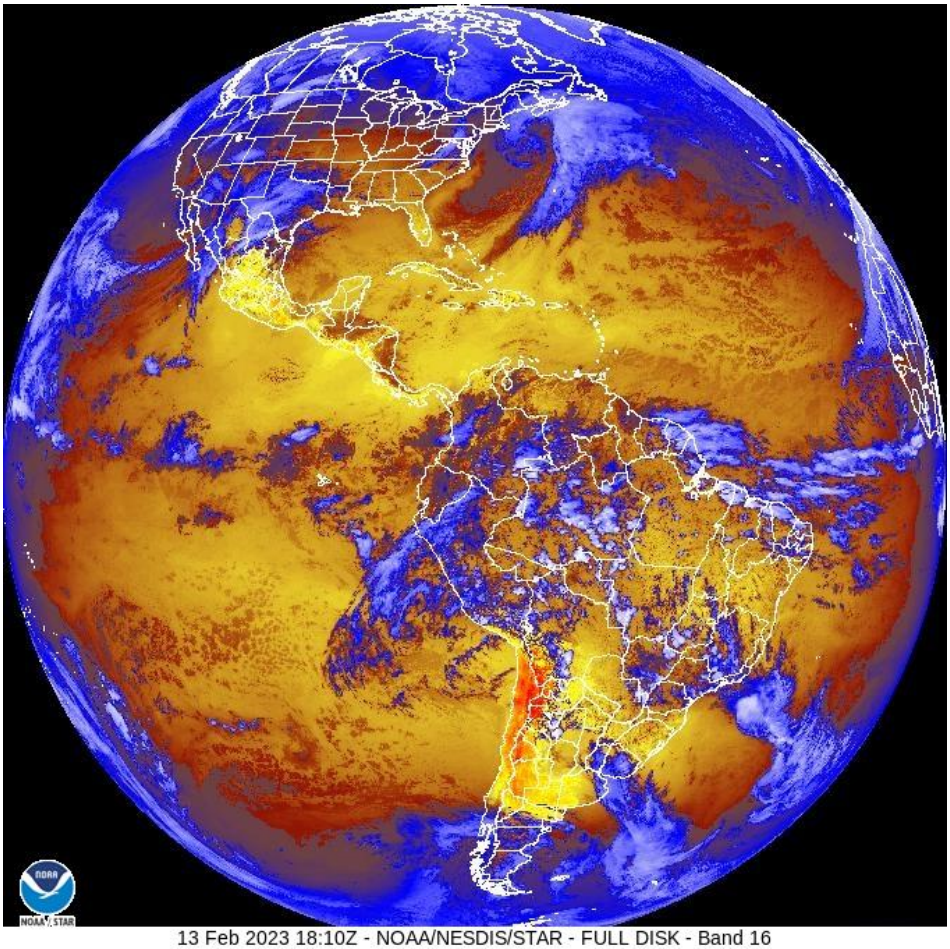
The following website tracks the steady rise of carbon dioxide in the Earth's Lower Atmosphere since 2005, and it is a useful website to show the public on a regular basis:

https://climate.nasa.gov/vital-signs/carbon-dioxide/

Land tends to heat quickly during the day and cool rapidly at night as earth rotates to the east. The Earth's surface absorbs the sun's radiation during the day and radiates the warm air back into the Lower Atmosphere as the sun disappears to the west. The absorbed radiation from the sun by the Earth's surface is radiated back into the Lower Atmosphere, mixes with the colder air above and creates air movement patterns that we experience on the Earth's surface as Weather.

The Sun is the heat source that causes Weather and Climate on Earth. Weather is a local or regional experience over a short period of time, such as a sunny day. Climate is a feature of the atmosphere that is experienced over a long period of time. When scientists say that the Earth's Climate is changing, they are talking about changes that are occurring over a long-period of time, not local or regional short-term weather conditions.

Climate and weather are affected by large concentrations of carbon dioxide, as shown in the NOAA February 13, 2023 satellite image of carbon dioxide GOES-East (Band 16) below:



"Since 1975, NOAA's Geostationary Operational Environmental Satellites (GOES) have provided continuous imagery and data on atmospheric conditions and solar activity (space weather) (NOAA, Satellite Information System. https://www.noaasis.noaa.gov/GOES/goes_overview.html).

Orange and yellow images paid for with tax dollars show the location of global warming gasses, (above). The public is unaware that these images are available for their use due to NOAA institutional bias. These satellite images need to be presented to the public (such as through the National Weather Service) so that the public can learn to see the global warming problem for themselves.

Here are the Eastern and Western NOAA Carbon Dioxide (CO2) Satellite images:
GOES-East
https://www.star.nesdis.noaa.gov/GOES/fulldisk_band.php?sat=G16&band=16&length=12&dim=0

GOES-West
https://www.star.nesdis.noaa.gov/GOES/fulldisk_band.php?sat=G17&band=16&length=12&dim=0

NOAA through the US Department of Commerce has violated the public trust by mismanaging the public's fishery resources and withholding critical imagery that can illustrate the magnitude of the Global Warming Problem to the American people. NOAA Fisheries should be abandoned as an agency that serves the American people, and replaced with an agency that cares more about America's national security than exploiting our vital marine fishery.

It is time to show the public the satellite images that illustrate global warming patterns so that the American people can visualize the problem for themselves. The American people are capable of responding to the challenge and work effectively with government to reduce the amount of carbon dioxide entering the atmosphere that could end our existence here on Earth.

Robert Rohde

Retired - USDA District Conservationist

Cc: Jared Huffman

Dianne Feinstein

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Dr Michael Tlusty
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Graduate Program Director

March 16, 2023

To NOAA Fisheries:

Thank you for the opportunity to comment on the NOAA Fisheries Draft National Seafood Strategy. I appreciate the effort you take to include the public in drafting this most important national strategy. My comments are listed below. I have copied each point as on the draft, and provide both a comment, as well as a suggested edit.

1. The U.S. seafood industry is facing unprecedented challenges.

> **Comment:** This box is a passive approach to challenges and should be solutions focused.
>
> **Suggested edit:** The U.S. seafood industry can innovate solutions in the face of unprecedented challenges.

2. Climate change is rapidly altering species location, size, and composition. It is also intensifying storms and impacts on infrastructure.

> **Comment:** change this to focus on solutions.
>
> **Suggested edit:** Climate change and intensifying storms are rapidly altering both species biology and infrastructure challenges. Adaptive management and scenario modelling can predict best future opportunities.

3. The coronavirus pandemic disrupted markets and trade, decreasing the economic viability of the seafood industry and limiting access to some seafood.

> **Comment:** need to turn into an opportunity
>
> **Suggested edit:** The coronavirus pandemic greatly disrupted markets and trade, while future proofing links between domestic producers and markets can overcome this burden

4. New technologies and other ocean uses, such as offshore wind energy, will affect use of ocean space and potentially result in conflicts.

> **Comment:** these new uses do not have to automatically result in conflict.
>
> **Suggested edit:** New technologies and other ocean uses, such as offshore wind energy, will add to blue economic solutions, and adaptive siting and management can ensure needs of all users are met.

5. Significant labor shortages plus aging harvesting, processing, and distribution infrastructure affect production, safety, and cost effectiveness in the industry.

> **Comment:** This is a given,

Suggested edit: Significant labor shortages plus aging harvesting, processing, and distribution infrastructure limit production, safety, and cost effectiveness and can be overcome by a strong local innovation.

6. NOAA Fisheries' National Seafood Strategy supports the growing importance of seafood in meeting global needs

Comment: seafood is a known important component of food systems, and needs should be identified

Suggested edit: NOAA Fisheries' National Seafood Strategy supports the continued importance of seafood in meeting global nutritional and food security needs

7. It is also critical to providing food to a growing global population.

Comment: it does more than just provide food

Suggested edit: It is also critical to providing food security and sovereignty to a growing global population

8. To implement the Seafood Strategy, NOAA Fisheries will partner with state and other federal agencies, the National Sea Grant College Program, Tribes, non-government organizations, fishermen, seafood farmers, and other stakeholders to address the challenges facing the seafood sector, especially when resources are limited.

Comment: This is getting to be an extensive list, and the question should it be short and efficient or longer and inclusive. I have edited it to be longer and inclusive, as it seems it is only missing academia, consumers, and the broader public.

Suggested edit: To implement the Seafood Strategy, NOAA Fisheries will partner with state and other federal agencies, the National Sea Grant College Program, Tribes, academia, non-government organizations, fishermen, seafood farmers, consumers, and the broader public to address the challenges facing the seafood sector, especially when resources are limited.

9. GOAL 1: Sustain or increase sustainable U.S. wild capture production

Comment: "Sustain or increase" makes it seem that it is one or the other -it should be both. Also sustain sustainable is a bit awkward. Earlier seafood is referred to as resilient, that word works better here.

Suggested edit: GOAL 1: Sustain and increase resilient U.S. wild capture production

10. Fisheries Management. Maximize fishing opportunities and sustainable seafood

Comment: Maximization of opportunity leads to harvest overshoot down from the optimal level. Optimization is a better word use in this case.

Suggested edit: Fisheries Management. Optimize fishing opportunities and sustainable seafood

11. Supporting gradual, diverse, and regionally-appropriate growth of the domestic industry

Comment:. If regulations are sound, it does not preclude gradual growth. I would strike the term gradual.

Suggested edit: Supporting diverse, and regionally-appropriate growth of the domestic industry

12. GOAL 3: Foster access to domestic and global markets for the U.S. seafood industry

Comment: At SENA, US fisheries were discussing the lack of access to domestic markets, so they sold internationally. This section should be about prioritizing access to US markets. All down-stream issues (overfishing, IUU etc) stem largely from imports.

Suggested edit: GOAL 3: Prioritize domestic markets and foster access to global trade for the U.S. seafood industry

13. Fair Trade. Promote fair seafood trade by combating IUU fishing and related harmful fishing practices around the world and by expanding access to foreign markets for U.S. seafood.

Comment: Fair trade carries the connotation of a benefits to a community while IUU includes both a social and ecological aspect (indentured workers and overfishing).

Suggested edit: Legal Trade. Promote fair, responsible, and equitable seafood trade by combating IUU fishing and related harmful fishing practices around the world and by expanding access to foreign markets for U.S. seafood.

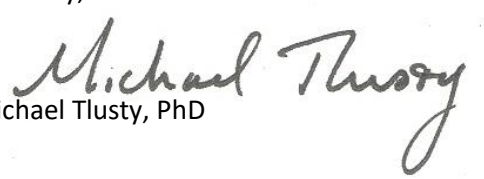
14. Seafood as a Vital Part of the Blue Economy. Support the U.S. commercial fishing, marine aquaculture, and seafood communities to adapt and thrive in a changing ocean economy and given new competing uses.

Comment: The “and given new competing uses” is awkward. Also need to include solutions-based language.

Suggested edit: Seafood as a Vital Part of the Blue Economy. Support the U.S. commercial fishing, marine aquaculture, and seafood communities to adapt and thrive in a changing ocean economy and integrate with new ocean economies.

If you have further questions or require additional clarification, please contact me at

Sincerely,



Michael Tlusty, PhD

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March 30, 2023

Janet Coit
Assistant Administrator
NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

Assistant Administrator Coit,

Please accept The Nature Conservancy's (TNC) comments on NOAA Fisheries' Draft National Seafood Strategy (Draft Strategy). TNC is a non-profit organization whose mission is to conserve the lands and waters on which all life depends. We are known for our science-based, collaborative approach to developing creative solutions to conservation challenges. Our on-the-ground and in-the-water conservation work is carried out across the states and territories of the United States and in 79 countries around the world. This work is supported by more than one million individual members. TNC shares many goals with NOAA Fisheries. Our organizations have partnered on many science and management initiatives through cooperative agreements and service on various agency advisory bodies. The cooperative efforts have designed and implemented new technologies to enhance fisheries management and quantified the ecosystem benefits of various habitats. While significant progress has been made, TNC recognizes the critical and increasing need to improve and enhance science and management capabilities in a changing climate.

Value of Vision

We appreciate NOAA Fisheries articulating its vision for a thriving domestic U.S. seafood economy and enhancing the resilience of the seafood sector in the face of climate change and other stressors. A public vision provides us all with a common understanding of what is driving the agency's actions and investments. Soliciting input from fisheries science and management partners helps to make that a common vision and shape future collaborative efforts. It also provides a basis for evaluating progress, assessing gaps, identifying resource needs, and shaping additional actions.

Connectivity Within the Strategy

The Draft Strategy lays out four important goals. Each is outlined at a high level and discussed separately. In reality, the rationales for the goals and work within each overlap. Directly recognizing these connections would strengthen the strategy and set the stage for an

implementation plan that better harnesses the strengths of NOAA Fisheries' talented staff and maximizes collaborative efforts. For example, Goal 4 notes how the COVID-19 market disruption highlighted systemic challenges. These disruptions and challenges are similar to those caused by damaging storms noted as a challenge affecting access to and production of seafood and subsistence fishing in Goal 1.

Connectivity Across Strategies and Policies

Similarly, the Draft Strategy makes no mention of how it fits within the ecosystem of other agency strategies and policies beyond acknowledging such other documents exist. We appreciate recent efforts by NOAA Fisheries to develop an Equity and Environmental Justice Strategy (EEJ Strategy) and to update the National Saltwater Recreational Fisheries Policy. They each provide useful visions to drive agency actions and collaborations. We also appreciate that the agency is drafting the NOAA Consultation Handbook to guide its implementation of the White House Guidance for Federal Departments and Agencies on Indigenous Knowledge as well as the White House Memorandum on Uniform Standards for Tribal Consultation. These documents underscore the importance of incorporating Indigenous knowledge and meaningfully addressing the United States' unique trust relationship with federally recognized Tribes uniformly across federal agencies. There are issues that overlap the strategies and policies and it is not clear when reading each individually how that overlap will be addressed. For example, Goal 1 seeks to "maximize fishing opportunities and sustainable seafood production while ensuring the sustainability of fisheries through effective and efficient management." How will this maximization goal be addressed in accordance with the equity goals of the draft EEJ Strategy to meet the differing needs of communities, respect Tribal rights, and provide for individual and community-based subsistence fisheries? How will it address the needs of both recreational and commercial sectors? How will it address the ecosystem interconnectedness of different fisheries within a region? How will Tribal consultation – and according feedback – be factored into this maximization goal?

Similarly, Goal 1 references challenges to subsistence and Tribal fishing but there is no reference to improving the incorporation of local and Indigenous knowledge into the agency's science enterprise. This was central to NOAA Fisheries' Draft Equity and Environmental Justice Strategy and its absence here is notable.

The issues within these strategies overlap. Articulating them separately without specifically addressing the relationship across strategies runs the risk of creating silos that fail to appropriately integrate science and management approaches. This could yield implementation plans that miss opportunities to address community needs, leverage expertise, and unnecessarily duplicate efforts.

Active Role

We appreciate that NOAA Fisheries values collaboration. The Draft Strategy would be improved by articulating NOAA Fisheries' active role in such collaborations and not using a framing that merely supports such work. For example, Goal 1 appropriately notes the need for fisheries management to adapt to climate change and thrive in a changing ocean economy. However,

the Draft Strategy positions NOAA Fisheries' role in that work as supportive. This does not reflect NOAA Fisheries' role in facilitating, encouraging, funding, and requiring action to address climate change. This is a regular and growing part of NOAA Fisheries' work. NOAA Fisheries agreed with recommendations for improvements on these issues made by the Government Accountability Office in its report *Opportunities Exist to Enhance Climate Resilience*. The charge to innovate and accelerate this work is often noted by agency officials at meetings including of the Council Coordination Committee and recent East Coast Scenario Planning sessions, and in budget proposals. Additionally, the recently released Ocean Climate Action Plan (OCAP) outlines a very active role for NOAA Fisheries to advance these efforts. The language in the new strategy should better reflect NOAA Fisheries' active role and responsibilities to advance this work.

Data Modernization

We appreciate that the Draft Strategy notes that advances in sampling technologies and data modernization call for an evolution in science and management frameworks. However, Goal 1 does not articulate a vision for fisheries science that fully embraces data modernization and could be read as expecting things to mostly continue as is. This runs counter to the discussions during the Next Generation Data Acquisition Plan process about the need to innovate what data is collected, how it is collected, and how it is managed.

The advancements in science to enhance management will not be fully successful without also modernizing NOAA Fisheries data collection and data management. This foundational work will enhance the quantity and quality of data used by communities to engage in fisheries management and habitat conservation and restoration by facilitating better integration, more timely utilization, and greater accessibility to the full suite of ecosystem data. Better, faster data will be critical to effective management in a changing climate.

Ocean Health

The OCAP emphasizes that "a healthy and resilient ocean is the foundation of climate action." We agree and we'd note that to have a healthy seafood sector we need to have a healthy ocean. However, the Draft Strategy does not reflect this important foundation or how it will be addressed. We recognize that the Draft Strategy was released before the OCAP and its commitment that related public-facing documents will emphasize it and that members of the Ocean Policy Committee will include a focus on ocean health and stewardship in all of their activities. We'd recommend that this be addressed as you finalize the Draft Strategy and be fully incorporated into the activities of the subsequent implementation plan.

Inclusive Implementation Plan Process

The Draft Strategy provides a very high-level vision to guide the agency's actions and investments. It is concise by design and meant to provide direction over time. An important complement to this will be the anticipated development of an a more detailed implementation plan. The Draft Strategy notes that it will be informed by public comment and advice from partners. Putting the Draft Strategy out for comment will undoubtedly provide valuable feedback for the agency about its high-level vision. We encourage you to provide for an

inclusive public process – including regular, meaningful, and robust consultation with federally-recognized Tribes and Alaska Native Corporations – as work on implementations plans proceeds.

Conclusion

Thank you for consideration of these comments on the NOAA Fisheries draft strategy. We look forward to working with you as the agency continues to refine the draft strategy and develop the implementation plan.

Sincerely,

Stephanie Bailenson
Water Policy Team Lead
The Nature Conservancy

NOAA Fisheries
Re: NOAA Fisheries Draft National Seafood Strategy
Submitted online via - NOAA Fisheries Draft National Seafood Strategy

The West Coast Pelagic Conservation Group (WCP) appreciates the opportunity to submit the following comments on the NOAA Fisheries Draft National Seafood Strategy (Draft Strategy). WCP is composed of commercial fishermen and processors. Presently, WCP's primary focus is a collaborative survey with the Southwest Fisheries Science Center (SWFSC) utilizing a commercial vessel paired with the NOAA research vessel FSV *Reuben Lasker*. Our members harvest, process, and market all major species of seafood on the west coast and Alaska. Our processors service over one thousand fishermen and our fishermen and processors employ over 3500 people. Our members have the five largest fish processing plants from San Francisco to the Canadian Border and sell and distribute fresh and frozen seafood from every major west coast fishery across the U.S. and worldwide.

WCP hereby supports and incorporates by reference those written comments submitted to NOAA Fisheries on the Draft Strategy, contributed by the Responsible Ocean Development Alliance (RODA) and the Washington Dungeness Crab Fishermen's Association (WDCFA) and additionally reference general data in the "*NOAA technical memorandum NMFS-NE: 291* source document; "*Synthesis of the Science Report*"[1].

WCP is excited to see a draft NOAA Fisheries "draft for the National Seafood Strategy Plan[2]. (NOAA Plan) We believe the timing to unveil this plan could not have been better. The US commercial fishing industry is facing what a long-time Washington State Pacific Fishery Management Council member (PFMC) publicly stated, in a PFMC meeting, to be the "biggest threat to commercial fishing I have seen in my career." This statement was issued regarding Offshore Wind (OSW) development. As happy as we are to see the NOAA Plan, we are as equally distressed to be in a pitched battle to preserve our legally authorized and purchased privileges under the Magnuson-Steven Conservation Plan, and other federal and state fishery sustainable management plans. These are ranked as the best in the world.

We are in strong agreement with some of the strategic constructs of the NOAA Plan and quote several examples to emphasize the argument to promote U.S. seafood and fishing.

Purpose:

[1] Fisheries and Offshore Wind Interactions: Synthesis of Science (noaa.gov)
[2] Natl-Seafood-Strategy-Final-Draft-Public-Comment.pdf (noaa.gov)

The National Seafood Strategy outlines our direction for supporting a thriving domestic U.S. seafood economy and enhancing the resilience of the seafood sector in the face of climate change and other stressors.

- U.S. seafood continues to be produced sustainably.
- The U.S. seafood sector contributes to the nation's climate-ready food production and to meeting critical domestic nutritional needs
- U.S. seafood production increases to support jobs, the economy, and the competitiveness of the U.S. seafood sector.

Strategy Framework:

"The National Seafood Strategy focuses on NOAA Fisheries' work to sustainably manage marine fisheries and produce seafood responsibly, based on sound science."

- GOAL 1: Sustain or increase sustainable U.S. wild capture production.
- GOAL 4: Strengthen the entire U.S. seafood sector.

WCP believes the above are laudable objectives and purposed as such could help promote U.S. Wild Capture seafood. However, the following statement in the NOAA Plan is not worked out as forecast.

Seafood as a Vital Part of the Blue Economy. *Support the U.S. commercial fishing, marine aquaculture, and seafood communities to adapt and thrive in a changing ocean economy and* ***given new competing uses.***

The above underlined language governed by the Bureau of Wind Energy Management (BOEM) guidelines simply cannot work. Actually, none of the stated laudable NOAA Plan objectives and goals that are in the NOAA Plan will be realized without changes to the planned development of OSW. OSW plans have begun the destruction of all major commercial fishing, fishing industry infrastructure, and the fishing industry supply chain. The speed and extent of that destruction depends on the total number and locale of all wind farms. What will be the OSW cumulative impacts to our fisheries? There are no plans through the BOEM NEPA process to study cumulative impacts either to fishing or the California Current Ecosystem (CCE). The CCE is one of the four most productive[3] Eastern Boundary Upwelling Systems (EBUS) in the world.

The destructive results to fisheries which we believe will reduce US commercial fishing to buy direct small-scale operations may pale in comparison to the impacts the removal of a portion of the wind-driven energy that creates upwelling and promotes the hydrological dynamics for CCE ecosystem services. Perhaps the largest impact will be phytoplankton and algae generation which is the foundation for the entire CCE food-web. The CCE is one of the greatest carbon sequestration mechanisms[4] on the planet. One only has to think of the outcomes to salmon on the Columbia River system after the dams were constructed. CCE ecosystem functionality loss could make the Columbia River results appear to be of minor consequence.

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[3] The four major EBUS include the California Current off the west coast of North America, the Humboldt Current off western South America, the Iberian/Canary Current off northwest Africa, and the Benguela Current off southwest Africa (Garcia-Reyes et al., 2015). These ecosystems are extraordinarily productive when wind-driven upwelling infuses nutrients toward surface waters that fuel phytoplankton bloom.
Frontiers | State of the California Current Ecosystem in 2021: Winter is coming? (frontiersin.org)

[4] The Ocean Is Still Sucking Up Carbon—Maybe More Than We Think
The Ocean Is Still Sucking Up Carbon—Maybe More Than We Think - Eos

It is said BOEM is allowing some BOEM designed Programmatic Environmental Impact Statements (PEISs) in the New York Bight and the Gulf of Mexico. BOEM has refused to do any on the West Coast. Nor are they willing to construct some experimental a small scale wind turbine farm to study the physical impacts of the turbines and the reduction of wind-driven energy to ecosystem systems. It should be noted that the PFMC and some E-NGO groups have recommended PEISs.

Recently a staff person for BOEM stated BOEM was not tasked to avoid fishery conflicts. Maybe they were not tasked but people in the fishing industry have heard time and again from BOEM and developers how they wish to work with the fishing industry to mitigate losses. After multiple discussions with developers and BOEM is difficult to comprehend how mitigation could occur.

There can be no continuation of fisheries when important fishing areas are occupied by mammoth turbines and suspended cables. Any reduction of harvest or loss of a fishery sector will be a threat to continuance of the processing plants. These plants have invested in multi-species portfolios for economic and employment stability. Loss of processors or processing capacity would impact the entire supply chain including fishermen and markets.

Industrialization of the ocean will have multiple-dimensional impacts; in the atmosphere, on the ocean surface, in the water column, and on the seafloor. There is little credible ecosystem services or socioeconomic research and no planned EIS's until the construction is ready to begin. Leases are sold at full value early in the BOEM development process and the money is not refundable. Not doing an EIS after leasing and money exchange is thought by the fishing industry to be business allowance of a predetermined outcome. No leases have been rescinded to date, and the EISs we have seen sidestep meaningful study of both socioeconomic and ecosystem impacts. In short, the BOEM environmental review process is a travesty with a "lease first, ask limited questions later" mandate.

Nothing in the BOEM or OSW process measures the world need for food or US food security, and the role seafood can play in staving off a dearth of sufficient food supply and inadequate nutritional intake. Covid demonstrated that food supply chains are not inviolate. UN estimates predict a much greater food shortage in the near future. OSW will eliminate a sustainable, highly nutritious, low-carbon food supply if we allow OSW to continue the present path it is on.

In addition to the above we will also state that there does not seem to be a plan or analysis as to the transmission of OSW or the cost of the electricity at the point of sale.

We believe what we have stated is within the boundaries of what most of the fishing community has experienced and believes true. We can't successfully run fishing businesses if it is impossible to harvest the resources.
Solution:

1. Experimental windfarms backed by more on-the-water research.
2. Extensive computer modeling of OSW impacts to ecosystem services and the entire food web including ESA listed and MMPA protected species.
3. Cement these together with clinical analytic study s be a mandate before we go any farther in OSW development.

What we have instead is stone age, witch doctor medicine. The OSW “cure” for climate change may be worse than the “disease”. We know if this convoluted process it isn’t restructured before we go farther we are likely to go through another Columbia River experience.

This has been a short comment of The NOAA Seafood Strategy. We hope NOAA Fisheries can bring some of our concerns forward at a high level and we can begin the dialogue to reshape this process rather have it dictated to our fishing communities. The price to get this wrong is too high and the present data too sketchy not to reevaluate the present path we have been forced to go down.

Thank you,
Sincerely.

Mike Okoniewski, Fisheries Consultant & Secretary West Coast Pelagic Conservation Group

C.c. Greg Shaughnessy, COO Ocean Gold Seafood and VP West Coast Pelagic Conservation Group

-

West Coast Seafood Processors Association
P.O. Box 1127
Astoria, OR 97103
(503) 227-5076

March 31, 2023

NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910
Submitted online via – NOAA Fisheries Draft National Seafood Strategy

RE: Draft National Seafood Strategy – WCSPA Comments

To Whom It May Concern:

On behalf of the West Coast Seafood Processors Association (WCSPA), I submit the following comments on NOAA's Draft National Seafood Strategy. WCSPA represents shoreside seafood processing companies and related businesses located in California, Oregon, Washington, and Alaska. Our member companies also have plants and seafood distribution facilities in Texas, Hawaii, Nevada, Utah, Arizona, and Florida. WCSPA members process the majority of Pacific hake (whiting) and non-whiting groundfish (rockfish, sole, sablefish) landed on the U.S. West Coast, in addition to Dungeness crab, pink shrimp, salmon, albacore tuna, and other important commercial species. WCSPA processing companies range from "mom and pop" operations to some of the largest seafood companies in the United States, employing thousands of workers in harvesting, processing, transporting, and distributing seafood across the country and throughout the world. We are essential workers, we are food producers, and we contribute greatly to our Nation's food security.

WCSPA appreciates the opportunity to submit comments on NOAA's Draft National Seafood Strategy. In addition to the comments provided below, WCSPA signed a letter written by the Responsible Offshore Development Alliance (RODA) and submitted as part of the record of comments on the Draft National Seafood Strategy. The comments and recommendations provided herein are intended to supplement the comments submitted in the RODA letter and offer perspectives more unique to U.S. seafood processors.

General Comments

U.S. wild capture commercial fisheries are managed to ensure sustainability and adhere to all National Standards set forth in the Magnuson-Stevens Fisheries Conservation and Management Act (MSA). Fisheries management follows strict laws for sustaining stocks, conserving biodiversity (protecting habitat, marine mammals, and endangered species), and protecting the Nation's living marine resources. Moreover, robust U.S. laws mandate that fisheries and seafood production follow workplace safety and protection rules, that seafood is safe for consumers to eat, and that associated environmental impacts are minimized and mitigated (such as with clean water). Companies utilize internal controls and audits, backed by third-party verification, to maintain product traceability and integrity of their supply chains. For all of these reasons, **successfully implementing the National Seafood Strategy will require NOAA Fisheries to explicitly**

acknowledge the outstanding merits of the U.S. fishing and seafood industry and defend our industry against unwarranted threats.

Fishermen and seafood processors not only face changing environments, global supply chain vulnerabilities, and potential loss of access to fisheries, but they must also contend with increasing regulatory costs and burdens that threaten their viability and competitiveness with other nations. **NOAA Fisheries should include action items to address and counter these threats and stressors when implementing the National Seafood Strategy.**

We support NOAA's vision outlined in the Draft Seafood Strategy and NOAA's intent to enhance the resilience of the seafood sector in the face of climate change and other stressors. The fishing industry is on the front lines of the climate change crisis, and U.S. reliance on imported seafood has come at a climate cost. However, it is clear that the most significant threat the fishing and seafood industry faces is offshore wind development and its potential to produce devastating impacts on fisheries, fishing communities, and fisheries ecosystems. **We feel strongly that NOAA must more explicitly identify and address the threat of offshore wind development to the fishing/seafood industry in its National Seafood Strategy.**

The Draft Seafood Strategy is incorrect when it suggests that offshore wind will "potentially result in conflicts." Offshore wind, and other potential new ocean uses, *will result in significant conflicts for the U.S. seafood industry*. NOAA's Seafood Strategy must acknowledge this reality and establish clear action items to protect the U.S. fishing/seafood industry and strengthen our ability to provide nutritious food for the Nation. The Seafood Strategy should also strive to ensure that our science-driven fisheries management process is not compromised. We acknowledge and appreciate the work being conducted by NOAA's National Centers for Coastal Ocean Science (NCCOS) in developing a spatial modeling tool that can help in identifying areas on the outer continental shelf potentially suitable for offshore renewable energy developments. However, in determining suitable sea space for offshore wind development, **areas which are important to our commercial, recreational, tribal and subsistence fisheries should be deemed unsuitable for offshore wind development**. *NOAA Fisheries should adopt and advance this position in the National Seafood Strategy.*

Moreover, given some recent, significant marine mammal mortality events on the East Coast, we remain extremely concerned that the impacts of offshore wind development on protected species could become a major problem on the West Coast. Any negative impacts to West Coast humpback distinct population segments (DPSs) will wreak havoc on West Coast fisheries. By way of example, in May of 2022, NOAA sent a letter to the Bureau of Offshore Energy Management (BOEM) expressing concerns about offshore wind siting on the East Coast and recommending that offshore wind sites should be moved further offshore to protect migratory North Atlantic Right Whales, one of the most endangered large cetaceans and the focus of coastwide conservation efforts. To our knowledge, BOEM never responded to NOAA's letter.

Under Federal law, every ocean stakeholder group must work to protect conserve and protect marine mammals, in some cases losing economic opportunities to do so, yet BOEM appears to have free reign to build wind fields despite no clear understanding of the impacts of survey and construction activities on the marine environment. Once these large areas of our oceans are industrialized and developed for offshore wind, it will be too late to remedy the damage.

Concerns about the impacts of offshore wind development must be addressed as NOAA's top priority, and certainly to ensure any possibility of advancing the goals and objectives laid out in the Draft Seafood Strategy.

Comments on the Seafood Strategy Framework

Goal 1: Sustain or Increase Sustainable U.S. Wild Capture Production

Fisheries Science. Federal fisheries surveys and resulting long-running datasets are integral to our understanding of the marine environment (including impacts of climate change) and the foundation for stock assessments which are the cornerstones of our fisheries management processes. Disruptions to those surveys, or long-running datasets, result in less certainty for stock assessments and other tools utilized in setting harvest guidelines for our fisheries. We strongly support NOAA's formal recognition of fisheries science as a top priority, given the need to increase and expand surveys in a changing climate while facing increasing costs to do so.

NOAA's National Seafood Strategy should identify and require specific commitments and actions the Agency will undertake to better deliver this core function, including steps to ensure that Federal fisheries surveys are conducted regularly and sustained. NOAA should explicitly include a commitment in the Seafood Strategy to increase scientific surveys to meet growing needs for ecosystem and climate resilience.

Fisheries science must be a cornerstone of the National Seafood Strategy, and actions must be identified to ensure its longevity and integrity. We are extremely concerned that the siting and location of offshore wind projects will interfere with NOAA's scientific and research surveys, one of the most critical elements of our fisheries management system. BOEM has not conducted any sort of Environmental Impact Statement (EIS) to examine the impacts of offshore wind development on the West Coast marine environment, our critical upwelling ecosystems, and the migration of fish and marine mammals. The U.S. fishing and seafood industry is counting on NOAA to protect the environment as well as our access to healthy marine resources for U.S. consumers throughout the offshore wind development process.

Fisheries Management. In the Seafood Strategy, we urge NOAA Fisheries to state how the Agency will provide resources to support efforts to uphold the National Standards in the MSA, defend use of the best available science, and assist Regional Fishery Management Councils in the development of more flexible management actions to adapt to changing conditions.

The role of NOAA and impacts on industry and the marine environment from offshore wind development are major concerns for the fishing/seafood industry on both coasts. NOAA is the lead Agency for managing marine resources, and the impacts of offshore wind activities on those resources and on the stakeholders that depend on them are not well understood. Difficult as it may be under the current regulatory and political framework, **NOAA must firmly inject science and common sense into the currently-rushed approach to offshore wind energy development**.

Goal 2: Increase Sustainable U.S. Aquaculture Production

WCSPA recommends that the National Seafood Strategy: 1) clarify how NOAA will work with other Agencies, the seafood industry, and other stakeholders to identify aquaculture's impacts on marine life and habitats and how negative impacts will be avoided; 2) address challenges created by new ocean space allocation issues and changing environmental conditions; and 3) identify the impacts of aquaculture development on existing seafood markets and include measures to proactively address any conflicting interests of market sectors.

Goal 3: Foster Access to Domestic and Global Markets for the U.S. Seafood Industry

West Coast seafood producers face extraordinary challenges in the domestic and global marketplace, including – among other things – tremendous trade uncertainty in recent years, the strength of the dollar against most foreign currencies, and competition from low-cost seafood producers from nations that are not subject to environmental safeguards and labor protections like U.S. fisheries. In addition, joining these challenges is the sharp uphill battle recently created by the COVID-19 global pandemic, including the near worldwide shutdown of the foodservice industry, which generally accounts for a majority of seafood consumption, on top of the logistical difficulties we currently face throughout the global supply chain.

Communication and Promotion. NOAA is well-positioned as an authoritative source of science-based and factual public outreach about the availability, sustainability, and nutritional value of seafood harvested in the United States. **The Seafood Strategy should include specific actions for NOAA and NMFS to take to accomplish this goal**, **including investing in public outreach to bolster consumer confidence in U.S. seafood** and communicating the 2020-2025 U.S. Department of Agriculture (USDA) Dietary Guidelines for Americans that support eating more seafood.

In the Seafood Strategy, NOAA should increase public and inter-Agency outreach on seafood's role in meeting U.S. dietary needs. Towards this end, the Seafood Strategy should clearly articulate how NOAA will improve upon existing government market support programs. NOAA should actively partner with the USDA to provide more effective and timely support for its domestic food marketing and seafood purchase programs.

U.S. Market Development. As noted above, **NOAA's National Seafood Strategy must articulate how NOAA will work effectively with the USDA and the seafood industry to communicate the outstanding merits of seafood** to U.S. consumers so domestic markets will further develop and provide vital outlets for seafood producers. Toward this end, more seafood should be included in the USDA's National School Lunch Program (NSLP). The Seafood Strategy should also incorporate regular input from domestic seafood producers so NOAA can better understand the domestic market and related access challenges.

Fair Trade. While the volume of U.S. seafood produced from waters the West Coast and Pacific Northwest are large, it is a relatively small part of a global supply chain that encompasses large volumes of competing wild and farmed species, many of which see comparatively small production costs due to less stringent management and production efforts. The success of America's fisheries and seafood production systems, therefore, depends on the success of U.S. trade officials in facilitating fair global seafood market access.

Similar to the National Seafood Strategy, NOAA Fisheries should advance a National Trade Policy for the seafood industry, through which NOAA Fisheries could work with the International Trade Administration (ITA) and the Office of the United States Trade Representative (USTR) in designing and implementing a targeted plan for pursuing free and fair trade.

Illegal, Unreported and Unregulated (IUU) fishing degrades marine ecosystems, and forced labor is an affront to human decency. These practices in any part of global seafood production hurt American producers by undercutting U.S.-harvested seafood in U.S. and global markets. Our companies are held to high sustainability and other standards. Those standards should be more broadly applied to fisheries around the world in ways that directly target bad actors and do not impose undue burdens on lawful U.S. seafood trade.

WCSPA supports the National Seafood Strategy objective to combat IUU fishing. The Strategy should include items that make full use of current authorities and programs to fight IUU fishing and exploitative labor practices worldwide, and in particular to leverage the cross-sector collaboration and governmental coordination functions called for in the Maritime SAFE Act. Current authorities also allow agencies to address cases of domestic seafood fraud, and the Plan should ensure these foreign IUU fishing and fraud enforcement programs are fully resourced. WCSPA recognizes that NOAA Fisheries faces pressure to do more domestically to combat foreign IUU fishing, such as expanding the Seafood Import Monitoring Program (SIMP). If the National Seafood Strategy addresses SIMP, WCSPA strongly recommends that it remain focused on only a few of the highest-risk categories. Given its administrative complexity, high costs, risks to lawful seafood trade, and lack of effectiveness in identifying IUU fish, *we strongly oppose expanding SIMP*.

Goal 4: Strengthen the Entire U.S. Seafood Sector

WCSPA supports this goal and emphasizes the need to integrate the National Seafood Strategy with the Federal government's strategy for enhancing food security and creating resilient food supply chains.

Seafood as a Vital Part of the Blue Economy. NOAA's Seafood Strategy must explain, in detail, how NOAA will invest in and help fishing and seafood-dependent communities "thrive" as competing uses for ocean space increase and erode access to sustainable fisheries. Specifically, the Seafood Strategy must explain how NOAA will bolster fishing community support and promote access to sustainable fishing, based on fully articulated values of seafood-based economies, while other Federal Agencies like BOEM seek to develop offshore industries with little to no assessment and consideration of impacts to fisheries and marine ecosystems.

The Seafood Strategy should state that before actions are taken to displace fisheries from ocean space, NOAA and other agencies managing the action (i.e., BOEM) must proactively identify the full range of economic impacts (e.g., losses to jobs, income, reinvestment, tax revenue, etc.) and commit to avoid and mitigate those impacts.

In addition, the Seafood Strategy should state how NOAA can help drive government investment to Blue Economy communities in the form of technologies, infrastructure, and market access, thereby increasing their long-term ability to compete in seafood markets.

Seafood Infrastructure. WCSPA supports the objective of modernizing U.S. seafood infrastructure and supply chain components to advance the resilience of fishing and seafood communities and regional food economies. In the Seafood Strategy, **NOAA should identify every opportunity to better understand the U.S. seafood supply chain** – from harvest to consumer – and work with the fishing/seafood industry to identify infrastructure needs at the local level. NOAA can then best understand how to use its authorities and/or work with states and partner agencies to increase technical assistance and direct grant programs for vessel modernization and recapitalization, port facilities, processing and storage facilities, and programs for modernizing seafood storage and shipment.

To support resilient coastal communities, **WCSPA urges NOAA to include specific items in the Seafood Strategy advancing partnerships with coastal communities to improve resilience and fortification for coasts and coastal infrastructure**. In addition, we recommend NOAA focus on the infrastructure capacity and modernization needs of seafood-dependent communities, particularly those in rural locations. We recommend close consultation with local fishermen, seafood processors, and community leadership to identify priority community resilience and infrastructure projects.

Workforce Development. WCSPA strongly supports this objective. The best way to attract commercial fishermen and seafood producers is to clearly facilitate economic success and further signal to the national economy that domestic seafood is a national priority.

The Seafood Strategy should state how NOAA Fisheries will help minimize industry cost, burden, risk, and uncertainty – and how it will help ensure that seafood jobs are in demand, pay well, and attract investments. It should explain how NOAA will work collaboratively with other agencies, educators, and seafood employers to expand workforce development, training, and extension programs, which are needed to instill valuable and unique fishing and seafood processing skillsets.

Toward this end, **we recommend NOAA Fisheries work with the USDA to enhance supply chains for seafood production**. By way of example, the USDA Rural Development administers a Meat and Poultry Processing Expansion Program (MPPEP) to provide grants to help eligible processors expand their capacity. USDA Rural Development designed the MPPEP to encourage competition and sustainable growth in the U.S. meat processing sector, and to help improve supply chain resiliency. A similar grant program for seafood processors would help strengthen the entire U.S. seafood sector and enhance opportunities for coastal seafood communities and regional food economies.

As lack of workforce continues to be one of the major issues plaguing the seafood processing industry, automated fish processing machinery is needed to supplement lack of hand filleters while increasing throughput, but often requires multimillion dollar investments that are often unattainable. Funds to support seafood processors could be used to offset significant capital expenditures on cutting edge fish processing machinery.

Thank you for the opportunity to provide comments on the Draft National Seafood Strategy. Ultimately, it remains incumbent on NOAA Fisheries to lead and effectively partner with many other agencies to implement this Strategy through an interagency approach, with NOAA Fisheries at the helm. We look forward to the opportunity to work with NOAA Fisheries to implement the National Seafood Strategy.

Sincerely,

Lori Steele
Executive Director

WASHINGTON DUNGENESS CRAB FISHERMEN'S ASSOCIATION

P.O. Box 2678, Westport, WA 98595

March 31, 2023

RE: NOAA Fisheries Draft National Seafood Strategy

My name is Larry Thevik I am the President of the Washington Dungeness Crab Fishermen's Association, (WDCFA), headquartered in Westport, Washington. The Dungeness crab fishery is sustainable and is the most valuable single species fishery on the West Coast. The Dungeness crab fishery is the lifeblood of coastal fishing communities coast wide.

WDCFA incorporates by reference the comments of RODA (Responsible Offshore Development Alliance) in a letter dated March 31, 2023 on NOAA Fisheries Draft Seafood Strategy. The RODA letter is thoughtful, thorough and the subject matter discussions and policy statements are applauded and echoed by WDCFA.

The subject matter discussion on new technologies and potential industrialized alternative use of ocean space in the RODA letter, and more broadly, is especially concerning to WDCFA. Alternative use of Ocean Space that would carry broad negative impacts on fisheries displacement, ocean health and resources is a foundational constraint to a successful and robust seafood strategy.

Beyond displacement of fisheries and consequent negative socio economic impacts by proposed Floating Off Shore Wind projects (FOSW), off of the West Coast the potential for cumulative negative impacts on marine species, resources, ocean hydrology, ecosystem effects, especially on the dynamics of ocean health and productivity, are barely understood or been seriously examined and/or studied by BOEM. There is no question that use conflicts and cumulative ecosystem effects and impacts will be consequences of FOSW projects and will carry even greater impact from multiple FOSW projects developed along the entire west coast. What is less known is how large and how far reaching those impacts will be? A seafood

strategy to strengthen the seafood industry that does not include a thorough analysis of those potential impacts is bound to fall far short of professed goal..

It is now known and partially modeled that large turbine arrays will have effects on ocean hydrodynamics. It is not known what ecosystem effects may follow. There are no existing FOSW projects or experience with projects of scales proposed and potential impacts anywhere off of America's coasts or worldwide. Unintended negative consequences of human endeavors not well thought are numerous and we need look no further than the long-term unforeseen negative impacts from Colombia River hydroelectric projects on iconic Pacific Northwest Salmon populations for proof of that.

Specific to the Dungeness crab fishery, in addition to socio-economic effects of potential displacement of the fishery from FOSW, there are several other concerns. The potential effects of EMF (Electro Magnetic Field) from transmission cables on benthic species including shellfish behavior is not well known. There are conflicting reports on effects. Some reports indicate significant behavior modification to adult male Brown crab off of Scotland. Other species and forage may be affected by suspended cables. A better understanding of EMF effects seems an obvious need before industrializing and crisscrossing ocean and benthic space with power transmission cables at scales proposed. If Marine mammal migration is altered by individual or repeated projects, migrating mammals including ESA listed populations may alter course and lead to increased cooccurance with crab gear, potential increased entanglements and consequent added spatial and time constraints on the crab fishery. Of a more foundational concern: What will the cumulative effects of multiple FOSW build outs be on ocean currents and the dependence on shoreward movement from ocean currents for the pelagic larval and megalope stage of the Dungeness Crab life cycle? Crabs at this stage depend on current transport to shallower waters to survive in the early stages of Dungeness crab development.

There is a complex crossover between effects and response to climate change, warming waters, harvest access, marketability, resource viability and increasing Harmful Algal Blooms (HABs) and consequent biotoxin events and impacts from hypoxia. There is an increasing need to understand the dynamics and provide response to interruptions to fisheries seasonality and activity from these events. Under Goal 4 in the strategy "Strengthen the entire US seafood sector" the strategy must recognize the potential vulnerability of many domestic fisheries to the impacts from these episodic but significant sector destabilizing natural events. Within the strategy a deeper dive into effective support protocols and support

resources to respond to these events and "Strengthen" ability to survive these events should be recognized as a need in the Strategy. Additionally a re-examination of NOAA's definition of fishery failures, policies, and processes to provide more immediate and effective fishery disaster relief would help "Strengthen" the strategy and help fishers survive such events to "fish another day".

Similarly the impacts, and potential impacts from invasive species such as Green crab warrant mention as vulnerabilities to a successful fisheries strategy and warrant additional scrutiny and resources to prevent "weakening" seafood industry resilience strategies for affected fishing sectors.

WDCFA appreciates the opportunity to comment on the Draft National Seafood Strategy and asks that our comments be reviewed and considered along with RODA's expressed concerns in additional refinements to the Strategy.

Respectfully,
Larry Thevik
Washington Dungeness Crab Fishermen's Association WDCFA