



**Western
Pacific
Regional
Fishery
Management
Council**

May 8, 2020

President Donald J. Trump
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500
Via joseph.h.russo@who.eop.gov
christopher.l.chaffee@who.eop.gov

Dear Mr. President:

Subject: Executive Order to Promote American Seafood Competitiveness and Economic Growth

On behalf of the Western Pacific Regional Fishery Management Council, we applaud you and your Administration for supporting American fisheries through the issuance of your Executive Order Promoting American Seafood Competitiveness and Economic Growth. We also extend our appreciation to you and your staff for the opportunity to participate in the White House Conference Call to stakeholders on the executive order. The support of Dr. Peter Navarro, Director, Office of Trade and Manufacturing Policy; Chris Chaffee, Associate Director, Office of Public Liaison; Joseph Russo, Special Assistant to the President and Director of Business Outreach, White House Public Liaison Office; and Chris Oliver, NOAA Assistant Administrator for Fisheries, among others, is to be commended.

Pursuant to Dr. Navarro's invitation during the conference call for comments identifying burdensome, unnecessary barriers that are in need of removal, we note that the fishing restrictions in the Pacific marine national monuments are impeding America's three main tuna fisheries in the Pacific and the StarKist tuna cannery in American Samoa from operating at optimal levels and that these fishing restrictions are unnecessary as they have no proven conservation benefit.

- a) Hawai'i's longline fishery is the primary supplier of domestically caught bigeye tuna, yellowfin tuna and swordfish, making Honolulu one of the top 10 US ports in landed value of seafood, with landings of \$110 million ex-vessel.
- b) American Samoa's longline fishery supplies the local StarKist cannery with domestically landed albacore tuna needed to fulfill school lunch program and US military contracts.
- c) US tropical tuna purse-seine vessels in the Pacific provide the American Samoa cannery with skipjack and yellowfin tuna for shelf-stable canned and pouched products, which have been in exceptionally high retail demand during the COVID-19 pandemic.
- d) The cannery provides 25 percent of the territory's jobs and is the primary private employer. It accounts for one-third of the territory's gross domestic product and effectively subsidizes the cost of freight and fuel to American Samoa.
- e) 51 percent of the US exclusive economic zone (EEZ) in the Western Pacific Region has been proclaimed as marine national monument waters during the last 14 years (Attachment 1).
- f) Marine national monuments prohibit commercial fishing by American fishermen in the entire US EEZ surrounding the Northwestern Hawaiian Islands through Obama's expansion of the Papahānaumokuākea monument, Johnston Atoll, Wake Island and Jarvis Island and within 50 nautical miles of shore of Rose Atoll (American Samoa), Howland and Baker Islands, Palmyra Atoll and Kingman Reef, and the northernmost islands of the Commonwealth of the Northern Marina

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Islands. Because these are island areas, the fishing restrictions apply to swaths of water that are 400 miles wide and run up to 1,200 miles in the case of the Obama expanded monument.

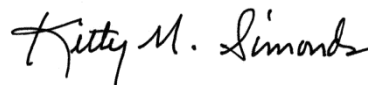
- g) Hawai'i longline vessels are faced with increased operational costs (fuel, ice, provisions, crew expenses, etc.) as they are forced out of the US EEZ to compete among foreign vessels on the high seas (Attachment 2). Only 17% of the US EEZ around Hawai'i is open to Hawai'i longline vessels.
- h) American Samoa longline vessels must operate within a small area that is further reduced by restricted fishing areas. The US EEZ around American Samoa extends less than 200 nautical miles because of the Territory's proximity to other Pacific Island countries. The adjacent foreign EEZs prevent the local fleet from reaching the high seas. Within the small US EEZ around American Samoa, the waters in which the local longline fleet can operate are further reduced by the Rose Atoll Marine National Monument and the Large Vessel Prohibited Area (LVPA), which extends 50 nautical miles from shore. The fleet has decreased from 60 to 16 active vessels in recent years. Opening a portion of the LVPA as well as the monument waters to local longline vessels (which average less than 79 feet in length) could prevent the total loss of this important US tuna fleet.
- i) The US tropical tuna purse-seine fleet is forced to pay burdensome fees to operate in the EEZs of other Pacific island countries when they are restricted from fishing in the US EEZ, due to monument restrictions and when the Effort Limit Area for Purse Seine (ELAPS), which includes both the US EEZ and the high seas, is closed. For example, US purse seine vessels, unable to access productive fishing grounds in the US EEZ must pay \$13,000 per day for access to the EEZs of Pacific Island States. The US tuna purse-seine fleet has dropped from a recent high of 39 vessels to currently 24 licensed vessels.
- j) American fisheries in the Western Pacific Region face an unfair playing field, with strict restrictions on protected species interactions, gear requirements, vessel size limits, fleet size limits, observer and vessel monitoring requirements, etc., that are not required of the fisheries of other nations. Harmonization of US regulation between the eastern and western Pacific regarding Fish Aggregation Devices (FADs) would be of immediate relief.
- k) American fisheries in the Western Pacific Region are in strong competition with the heavily subsidized Chinese fishing fleet that has grown at least fourfold in the past couple of decades and accounts for unprecedented levels of tuna harvests, e.g., nearly one half of the total South Pacific albacore catch by all nations in 2017, a record year for catches.

In consideration of these facts, Mr. President, please consider lifting the fishing restrictions in the Pacific marine national monuments and allowing America's fishermen to fish again in the US EEZ under the regulations promulgated through the Magnuson-Stevens Fishery Conservation and Management Act. Quick action is urgently needed to support our Hawai'i and American Samoa longline fisheries, the US tropical tuna purse-seine fishery and the tuna cannery in American Samoa.



Archie Taotasi Soliai
Chair

Sincerely,





Kitty M. Simonds
Executive Director

Attachments: Large, regulated commercial fishing areas of the US EEZ, Western Pacific Region
Fishing effort in the Pacific Ocean




Cc: Dr. Peter Navarro, Director, White House Office of Trade and Manufacturing Policy
Chris Chaffee, Associate Director, Office of Public Liaison
Joseph Russo, President Special Assistant/Business Outreach Director, WH Public Liaison Office
Chris Oliver, NOAA Assistant Administrator for Fisheries

Large, Regulated Commercial Fishing Areas of the US EEZ, Western Pacific Region




Marine National Monument

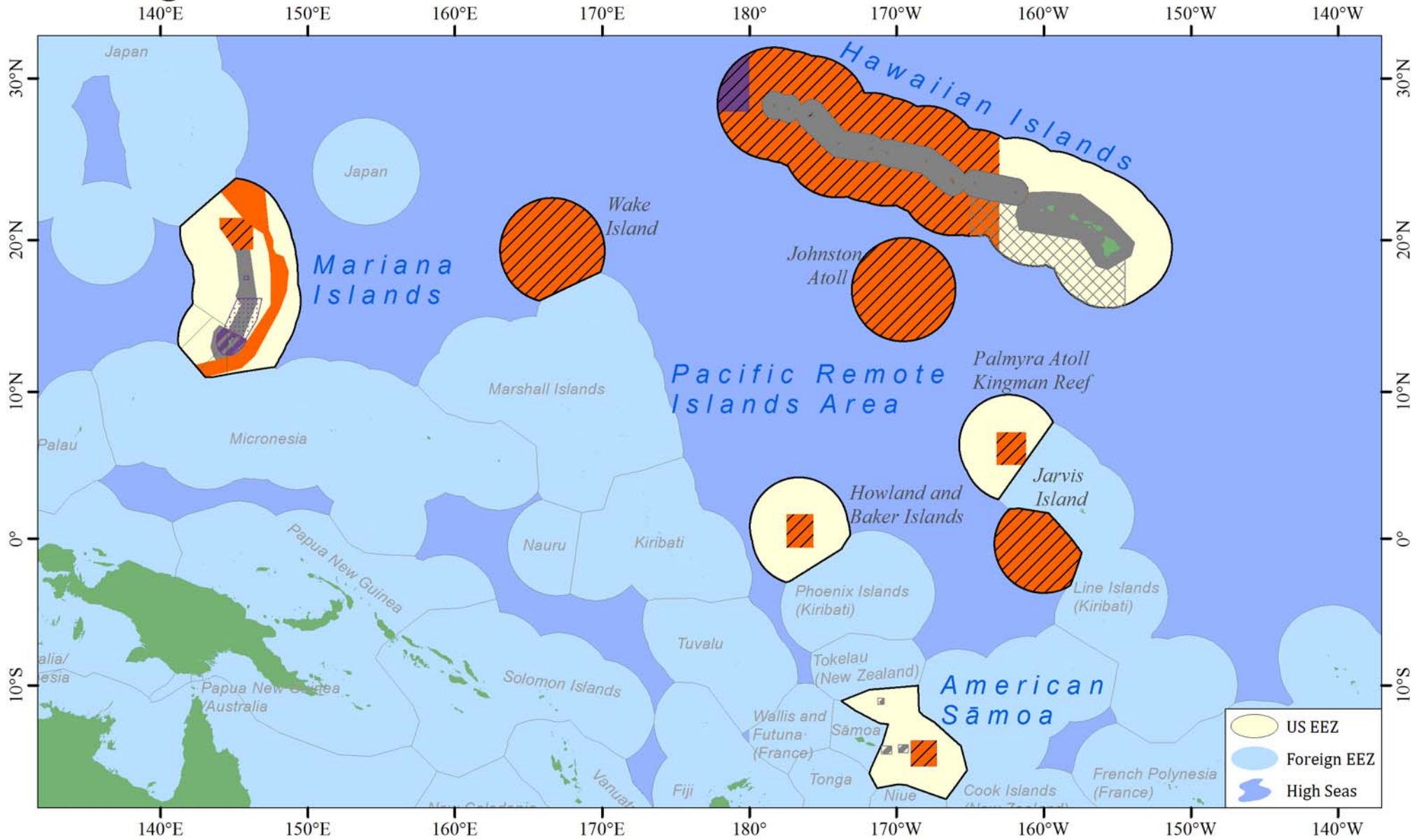
-  Marine National Monument
-  Closed to all commercial fishing

Bottomfish Restrictions

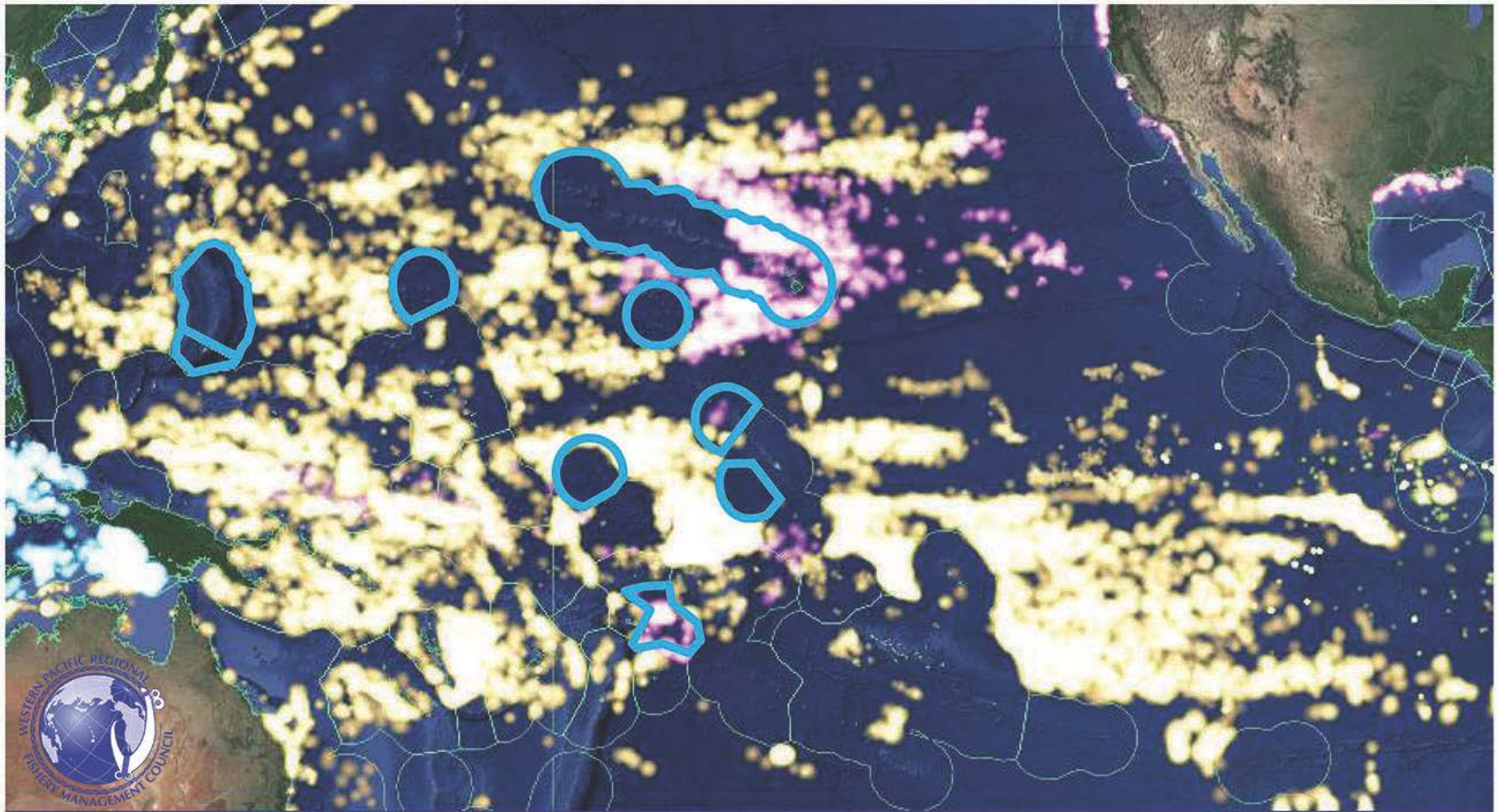
-  Bottomfish/Groundfish fishing prohibited
-  Vessels ≥ 40 ft (opening pending)
-  Vessels ≥ 50 ft

Pelagic Restrictions

-  Longline fishing prohibited
-  Vessels ≥ 50 ft
-  FKW Southern Exclusion Zone



Fishing Effort in the Pacific Ocean



Three months fishing effort (November 9, 2018–February 9, 2019)

Data source: Global Fishing Watch

● Foreign fishing vessels ● U.S. fishing vessels ● U.S. exclusive economic zone

Vessels are predominately purse seine, longline, and pole and line vessels targeting tuna and swordfish.