



**Western
Pacific
Regional
Fishery
Management
Council**

July 10, 2020

The Honorable Wilbur L. Ross
Secretary of Commerce
US Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Dear Secretary Ross,

At the 182nd Meeting of the Western Pacific Regional Fishery Management Council held June 22-25, 2020 via WebEx, the Council discussed fishery issues in the Western Pacific, including the impacts of foreign competition. The Council manages the largest US fishery that operates in international waters as US fisheries formulate the largest economic footprint in the Pacific Islands.

The Seafood Trade Task Force, for which you established per Presidential Executive Order on May 7, 2020, was created to develop a strategy that includes supporting "fair market access for United States seafood products". The Council requested that the Seafood Trade Task Force evaluate all impacts of foreign-sourced fishery products on domestic fisheries and markets. The evaluation should focus on foreign-sourced fishery products into Hawaii and Guam with known seafood safety concerns such as carbon-monoxide gassed tuna. The Task Force should consider the potential suspension of such products during the COVID-19 pandemic. As a matter of food security in potential crises such as the COVID-19 pandemic, local US fisheries (such as the Hawaii longline tuna fishery) need to be in full operation to ensure the US market is supplied with ample safe seafood without economic impediment from foreign competition that may not be supplying the market with a beneficial and safe food source. The issue is even more critical for US Pacific Islands, such as Hawaii or Guam, where 'cheaper' tuna and tuna-like products are harvested by fisheries that do not meet typical US fishery standards and often preserve the product by gassing the product with carbon monoxide. This process creates an illusion of product freshness and can create deleterious health risks to the unsuspecting general public.

The Council also requested that the Seafood Trade Task Force include representatives of the Council Coordinating Committee (CCC) in its activities. The CCC will be meeting in September 2020 and consultation with the Seafood Trade Task Force would be appreciated. Moreover, attached to this letter is a list of other relevant matters that the Seafood Trade Task Force should consider. With your assistance, we can continue to ensure that we are able to "fish forever." Thank you for your attention to these matters and if you have any questions, please call me at (808) 522-8220.

Sincerely,

Taotasi Archie Soliai
Council Chairman

Kitty M. Simonds
Executive Director

CC: Chris Oliver, Assistant Administrator, NOAA Fisheries
Robert Blair, Director of Policy and Strategic Planning, US Department of Commerce

Attachment: *Notable Needs for Seafood Trade Task Force*



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Notable Needs for Seafood Trade Task Force

Executive Order on Promoting American Seafood Competitiveness and Economic Growth

1 – Improved Seafood Traceability and Country of Origin Labeling on Restaurant Menus and in Retail Markets Nationwide

The American public is becoming more and more aware of the virtues of wild-caught US domestic seafood, particularly those that are sustainably harvested. There is no shortage of outreach and education on domestic wild caught seafood so that informed consumers are educated enough to know domestic products are ideal for them to purchase at the marketplace. Unfortunately we don't have a mandate that will require restaurants to tell consumers where their seafood is sourced from. Labeling of product origin needs to improve so American consumers can make informed decisions on where the bulk of seafood consumption takes place – which is typically in restaurants. Tracing product origins in any case allows consumer prerogative to drive the US seafood market based on informed decisions which can be based on factors such as sustainability, food safety, or even human rights.

2 – Improve Public Outreach: NOAA FishWatch Should Serve as Equivalent to Third-Party Certification of Fishery Sustainability

Many imported seafood products may be subjected to 'green-washing' by fee-for-service assessments and resultant certification from third-party organizations. This may mislead consumers to believe the certified products are more sustainable than equivalent US fishery products which are managed under the auspices of the Magnuson-Stevens Act (MSA). The NOAA FishWatch program should act as the highest standard for sustainability certification when fishery products are deemed sustainable under science-based management criteria in the MSA. This initiative will require public outreach for NOAA FishWatch 'brand recognition' and allow the use of NOAA FishWatch on product labeling. Furthermore, large US retailers have adopted third-party seafood sustainability certification and/or rating systems to support the continued domination of the US market by imported seafood. This ignores the performance of NOAA Fisheries and the Regional Councils as the competent authorities on the sustainability of federally-managed US domestic fisheries. "Buy American" initiatives should include NOAA Fisheries outreach efforts directed to retailers to explain the source of sustainability of wild-caught US seafood products, NOAA Fisheries, the Regional Councils, and the MSA. As a result, the unnecessary cost of third party certifications would be eliminated for US fisheries and help make domestic seafood more competitive in the US market.

3 - Increased Testing of Imported Seafood to Ensure the Imports Meet FDA Standards

The use of chemical additives is prevalent in imported seafood (especially shrimp and other shellfish) to embellish product quality. Many of these additives may contain banned chemical

substances or substances that could cause health concerns. Chemically-treated products are often cheaper than domestic products and can often supplant US products in restaurants and markets. Origins of products with a propensity to use chemical treatments in seafood should be noted.

4 – Do Not Close Any More Areas to Fishing and Consider Re-Opening Closed Areas

The US has closed millions of nautical miles of fishing grounds in its sovereign economic exclusive zones which precludes production of seafood to compete with foreign harvested products. Many of these closures were done under the auspices of the Antiquities Act and not through instruments that require scientific justification, objectives, and evaluation (such as the MSA). Such closures create an undue burden on domestic seafood production while foreign sources are not subjected to the same management vigor as US fisheries.

5 – Accountability for Illegal, Unreported, and Unregulated Fisheries, Reduce Transshipped Products Entering in US Markets

Illegal, Unreported, and Unregulated Fisheries (IUU) are often synonymous with the most egregious at-sea violations on human rights and transgressions against international regulations for conservation. Products from many of these fisheries still find their way into the US seafood markets. The US needs to halt any supply of IUU fishery products and hold suspected flag states accountable through any means necessary. Furthermore, transshipment is another means for which internationally non-compliant fishing vessels can move fishery products into markets while offloading at-sea and ‘mask’ any deficiencies in sustainable practices. US longline fisheries do not transship any tuna or tuna-like products. There is a need to reduce transshipped products from entering US markets that may be unfairly competing with domestic products.

5 – Capacity-Building and Support of Young Fishermen Development Programs

The average age of participants in US domestic fisheries is increasing while the ability to supply domestic labor in domestic fisheries for the future is waning. This is not only creating a loss of cultural identity for many coastal areas, but also creates labor issues in supplying domestic seafood to the US market. Like with trade/vocational programs for young people in the US promoting industrial skills or agriculture, fisheries should be included as an encouraged career path. Lack of US participation in international or HMS fisheries will reduce the US footprint providing reliable data for HMS management and will diminish the US role in international fisheries management.

6 - Put Domestic Seafood on Lunch Menus in Public Schools and Prohibit Foreign-Caught Seafood on Lunch Menus in Public Schools

US domestic seafood products are more inclined to have a lesser economic footprint than land-based protein sources. Seafood also tends to have balanced levels of macronutrients and are naturally fortified with vitamins and minerals essential for growth and development. Seafood products are often cheaper than land-sourced meat products. Balanced diets consisting of seafood not only promote healthy lifestyles for generations, but they also increase the demand of domestic seafood over foreign products and less healthy land-sourced meat.