



# UNITED FISHERMEN OF ALASKA

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February 19, 2021

Benjamin Friedman  
Deputy Under Secretary for Operations and  
Acting Administrator  
National Oceanic and Atmospheric Administration  
**Via Email:** [benjamin.friedman@noaa.gov](mailto:benjamin.friedman@noaa.gov)

Dear Acting Administrator Friedman:

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association, representing 36 commercial fishing organizations participating in fisheries throughout the state and the federal fisheries off Alaska's coast. We look forward to working with the Biden Administration to help ensure that our nation's fisheries management system remains the envy of the world.

Nowhere are coastal communities more reliant on healthy oceans than in Alaska. For decades, this reliance has inspired a broad cross-section of stakeholders to support science-based decision-making in the management of our fisheries—to ensure that they provide for us in perpetuity. The 1.7 million jobs in the national fishing and seafood industry are, in many respects, among the original “green jobs”. We are proud to work every day to help conserve the marine environment and ensure that those jobs continue to be available to future generations given the profound threat posed by climate change.

We read with interest the January 27<sup>th</sup> “Executive Order on Tackling the Climate Crisis at Home and Abroad”, and in particular the provisions of Section 216. The Alaska fishing industry is on the front lines of climate change; and the North Pacific Fishery Management Council is at the forefront of efforts to ensure fisheries management is anticipating and adapting to rapid changes in the marine environment. We therefore welcome the process established under Section 216(c) of the Executive Order and look forward to working with your office to implement its provisions.

Similarly, we look forward to working with you on implementation of Section 216(a), which directs establishment of a process “to achieve the goal of conserving at least 30 percent of our lands and waters by 2030”. The implementation of Candidate Biden's 30x30 campaign promise has been a matter of intense interest to our industry, and we are pleased that Section 216(a) puts emphasis on stakeholder participation and identifies fishermen as a key stakeholder group.

As the process moves forward, it will be critical to ensure that such consultation is genuine and sustained, and that it is used as an opportunity to learn more about the myriad science-based protections established by the regional Fishery Management Councils to safeguard the long-

term health of marine ecosystems. To that end, the report being prepared by the Secretary of Interior within 90 days of the Executive Order must lay out a consultative process that is wide-ranging and includes detailed input from all eight regional Fishery Management Councils and fisheries stakeholders in each region.

UFA recognizes that what constitutes “conservation” under the terms of Section 216(a) will be a matter for debate. We are proud to participate in a fishery management system that aims to conserve 100% our region’s marine environment. On the other hand, we have noted the position adopted by some advocates attempting to equate “conserving” designated marine areas with eliminating all productive human activity in those areas. The Alaska seafood sector is unanimous in the view that such an interpretation would be deeply misguided, and contrary to the international consensus regarding area-based protections established under the United Nations Convention on Biological Diversity. As parties to the Convention consider a bold new 2030 target of conserving 30 percent of the world’s land and water, no one is seriously suggesting that human use of 30 percent of the planet should end. Rather, the Convention’s concern is for the protection of marine and terrestrial ecosystems, and measures to appropriately safeguard the world’s biodiversity. We anticipate that the Biden Administration will implement a domestic 30x30 agenda in a fashion that is consistent with that international approach. Indeed, leading U.S. marine scientists [have been clear](#) that to do otherwise would actually weaken marine biodiversity outcomes.

In that context, as implementation of the January 27<sup>th</sup> Executive Order proceeds, we urge NOAA to enhance the sophistication of its thinking regarding area-based protections. **Specifically, we recommend (i) the initiation of a high-level review of how the IUCN protected area management categories are applied to existing area-based closures; and (ii) the establishment of a new framework for the designation of Other Effective Area-Based Conservation Measures (OECMs).**

The IUCN recognizes categories of protection ranging from strict nature reserves (Category 1a) to protected areas with sustainable use of natural resources (Category 6). NOAA’s application of these categories to existing area-based protections of the marine environment has never been thoroughly vetted or subject to broad stakeholder scrutiny. As a result, expansive area-based protections implemented by regional Fishery Management Councils are at risk of mis-categorization. In the North Pacific, for example, the MPA Center alleged in [a 2020 report](#) that just 0.6 percent of the region’s waters met the IUCN definition of protection. In reality, regional stakeholders estimate that as much as 65 percent of the region’s marine waters are protected. The failure to recognize and appropriately account for science-based protections implemented through the Council process must be carefully scrutinized by agency leadership at the outset of any 30x30 implementation effort.

Similarly, NOAA is yet to make any serious effort to provide a framework for establishment and categorization of Other Effective Area-Based Conservation Measures (OECMs). OECMs are a key tool utilized by parties to the United Nations Convention on Biological Diversity to achieve goals relating to ecosystem conservation. In accounting for progress against the Aichi 2020 Biodiversity Targets, it has been agreed by the parties that OECMs should be credited [in addition](#) to protected areas, and some countries have developed frameworks for their designation. The United States cannot initiate a serious effort to contribute to a 30x30 global target without developing a more sophisticated approach to the use of OECMs.

United States fisheries management provides a remarkable model for sustainable use—one that safeguards ecosystem health and biodiversity outcomes while providing profound benefits to humanity. In addition to sustaining coastal communities and their traditional way of life, Alaska fishermen are helping to feed the human population of this planet and producing food with one of the lowest carbon footprints of any protein on Earth. As the Biden Administration seeks to implement its bold sustainability agenda, we hope to work with you to build on, and where possible scale up, this remarkable example of sustainability success.

Thank you for considering our perspectives on this critical matter.

Yours sincerely,



Matt Alward  
President



Frances H. Leach  
Executive Director

#### **UFA MEMBER ORGANIZATIONS**

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Trollers Association  
Alaska Whitefish Trawlers Association • Area M Seiners Association • At-sea Processors Association • Bristol Bay Fishermen's Association  
Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen  
Cook Inlet Aquaculture Association • Cordova District Fishermen United • Douglas Island Pink and Chum • Freezer Longline Coalition • Fishing Vessel  
Owners Assn Groundfish Forum • Kenai Peninsula Fishermen's Association • Kodiak Crab Alliance Cooperative • Kodiak Regional Aquaculture  
Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association • Northwest  
Setnetters Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel Owner  
Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska Fisherman's Alliance • Southeast  
Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners  
Southern Southeast Regional Aquaculture Association • United Catcher Boats • United Southeast Alaska Gillnetters  
Valdez Fisheries Development Association