



Western  
Pacific  
Regional  
Fishery  
Management  
Council

December 14, 2023

Michael Rubino, Ph.D.  
Senior Advisor for Seafood Strategy  
NOAA Fisheries  
1315 East-West Highway  
14th Floor  
Silver Spring MD 20910

Dear Dr. Rubino:

The Western Pacific Regional Fishery Management Council (Council) and its Fishing Industry Advisory Committee (FIAC) reviewed the National Seafood Strategy leading up to its 197<sup>th</sup> Council Meeting, held December 12 and 13, 2023. The FIAC makes several recommendations for implementation of the National Seafood Strategy in this letter that specifically addresses three of the Strategy's four goals. In addition, we seek clarification on some overarching issues. First, we ask that any implementation plan provide guidance on the roles of the Councils. We also ask that the implementation plan clearly define 'climate-ready fisheries.' The Strategy and its implementation plan should also provide a definition of what the 'seafood sector' entails – whether it includes all parts of the supply chain, including seafood buyers and importers. The FIAC and the Council note that while the Strategy is appreciated, most of the actions of NMFS towards U.S. fisheries seem to overregulate fisheries, which is counter to the Strategy's goals. The FIAC notes that many of the tasks outlined in the National Seafood Strategy seem to be the existing responsibility of NMFS and should not be considered a novelty in accomplishing the goals of the Strategy.

The FIAC and the Council provide suggestions for the implementation plan of the National Seafood Strategy for: Goal 1 - Maintain or increase sustainable U.S. wild capture production; 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.

*Goal 1 - Maintain or increase sustainable U.S. wild capture production*

The agency needs to invest in fishery development. As U.S. fisheries experience impacts of climate change, there will be opportunities lost and some gained. Being able to develop new fisheries or enhance existing fisheries that may become more productive, or are underutilized, are a shared responsibility of optimizing yields and opportunities. In the Western Pacific, we have Marine Conservation Plans (MCPs), which are a compendium of projects designed to ensure thriving U.S. Pacific Island fisheries and their development. At present, the only

benefactor towards these plans is the Hawaii longline fishery, which contributes to territorial MCPs through specified fishing agreements. These MCPs need federal support. Attached to this letter is an information paper on this matter

NMFS needs to consider relaxing closures to U.S. fisheries, including Marine National Monuments and other fishing prohibitions. In the Western Pacific, more than half of U.S. waters are closed to fishing through establishment of Monuments. In an attached letter, dated October 6, 2023, the Council outlines its concerns over the perceived federal approach of managing fisheries through the Antiquities Act and the National Marine Sanctuaries Act, rather through the MSA. Restricting access without demonstrable benefits to production or conservation is completely counter to this goal.

Access to labor is a major production bottleneck and an efficiency barrier for our region. The implementation of the National Seafood Strategy needs to make sure that there are coordinated inter-agency efforts to streamline mechanisms to get foreign labor on fishing vessels in an efficient manner. This is the benefit for the crew as well as the operators. At present, getting crew for the Hawaii longline fishery requires expensive, highly inefficient trips to pick up foreign crew in a foreign port (e.g. 2500 nm to Mexico one direction) than through Honolulu by air. Access to crew and processing sector labor is a major impediment to USA seafood production and needs to remedy similar to what is afforded the USA agricultural sector.

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

In addition to relaxing unnecessary closures to fisheries, the agency needs to scale back unnecessary regulatory barriers and reconsider the utility of regulations that may not have an conservation or management value. For example, prohibition of the sale of billfish from U.S. Pacific Islands to the continental U.S. unfairly targets U.S. Pacific Islander fishermen in addition to being Unconstitutional with respect to interstate commerce. This prohibition under the 2018 addendum to the Billfish Conservation Act was formulated by recreational fishing special interests on the east coast, with no ties to the Pacific.

### *Goal 4- Strengthen the entire U.S. seafood sector*

U.S. fisheries and their products in the supply chain need recognition and promotion. U.S. fisheries are the world leaders in terms of conservation and management. Often they rely on third party certifications for market or retail access, which come with exorbitant fees. The standards of these certifications are not even stronger than those of the MSA and other applicable U.S. laws. Rather, these fisheries, like agricultural products, need market promotion that is federally supported. FishWatch could potentially be used as a tool to do so.

The Strategy needs to address workforce development much stronger. A salient concern in this region is the ‘greying of the fleet’ as participants are retiring or leaving the sector and not being replaced by younger participants. The Young Fishermen’s Development Act was conceived in 2021 to address this issue. While an important first step, the level of funding has been inadequate for our region this far. Other programs like the U.S. Department of Agriculture grants and Saltonstall-Kennedy Research and Development Program need to be enhanced to include workforce development.

Contact Kitty Simonds, Executive Director, at +1 (808) 522-8220 or via email [kitty.simonds@noaa.gov](mailto:kitty.simonds@noaa.gov) to discuss the Council's suggestions for the implementation of the National Seafood Strategy.

Sincerely,

William A. Sword  
Council Chairman

Kitty M. Simonds  
Executive Director

Encl: Map of US Pacific Island EEZ, Monuments and Sanctuaries  
*Fishery Development of U.S. Pacific Islands*

CC: Fishing Industry Advisory Committee Members