



**Western
Pacific
Regional
Fishery
Management
Council**

June 3, 2022

Monica P. Medina
Assistant Secretary of State
Bureau of Oceans and International Environmental and Scientific Affairs
2201 C Street, NW
Washington, D.C. 20520

Dear Monica,

The Western Pacific Regional Fishery Management Council (Council) is concerned with a recent proposal by a Pacific Remote Islands Coalition on expanding fishing prohibitions across all the Pacific Remote Island Areas (PRIAs) by expanding the Pacific Remote Island Marine National Monument from 50 to 200 miles seaward of Palmyra Atoll and Howland/Baker Islands. The Council contends any possible or perceived conservation benefits of closing the remaining areas of the PRIAs to fishing will be tantamount to several unintended consequences, many of which counter US interests and may lead to other conservation issues.

More closures of US waters will send a message to Pacific Islands nations that the US is divesting in fisheries, while these nations see fisheries as the leading economic common denominator for their national development. While the US is brokering for influence across the Pacific, China is expanding its fishing operations in surrounding Kiribati waters. Chinese fisheries could be a beneficiary of more closures across the US EEZ around Palmyra Atoll and Howland/Baker Islands.

The use of the Antiquities Act to prohibit fishing around US Pacific Islands also poses a real Equity and Environmental Justice (EEJ) Issue. While the Biden Administration has an aspiration of conserving 30% of US waters by 2030, it also has promoted the applicability of EEJ principles to alleviate disproportionate burdens on underserved communities. Further restricting fishing access may make it seem that Pacific Islanders, their fishing access, and their own food security are carrying the brunt of the 30% conservation burden. A recent study published by Sullivan-Stake et al (2022) already demonstrates that the US Pacific Islands account for over 90% of US MPA areas that are at least 'highly protected' (enclosed).

Existential stressors to the Pacific Islands are related to climate change resulting from carbon emissions, overdevelopment of coastal habitats, and plastic pollution. Fishing does not occur in these areas at levels to be an existential threat and US fisheries are well-managed to minimize conservation threats to biodiversity in these areas. To achieve meaningful conservation benefits, the Council believes the existential stressors listed above, uneven foreign regulations, and harmful subsidies in global fisheries need to be mitigated as a priority.

The Council, its advisory bodies, and the US fishing industries are deeply concerned by the proposal. Please contact me soonest to discuss this issue, by having your staff email me at kitty.simonds@noaa.gov or call by telephone at (808) 522-8220 to set up a meeting with the Administration.

Sincerely,



Kitty M. Simonds

Executive Director

- Attached: (1) Map of US Regulated Areas and EEZs in the Western and Central Pacific Ocean
(2) Slides presented by Sullivan-Slack et al (2022) demonstrating MPA coverage and levels of protection by US region