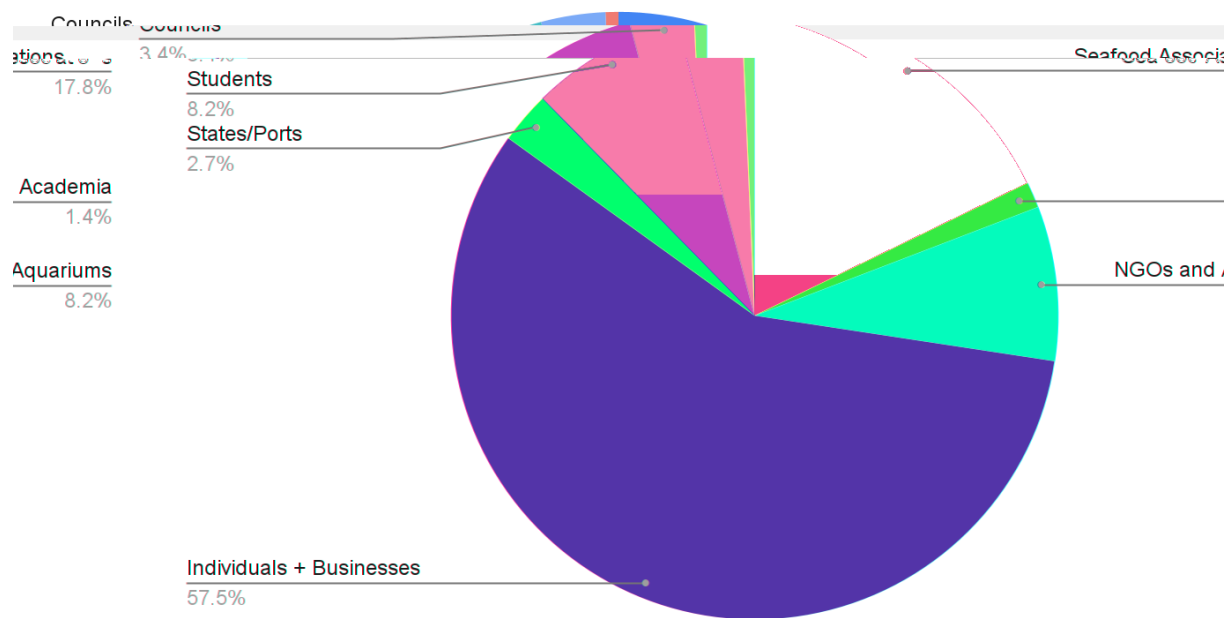


# Summary of Public Comments on the Draft National Seafood Strategy

## Overview

The Draft National Seafood Strategy was posted for public comment from February 14, 2023 to March 31, 2023. We received more than 150 separate comments, about a quarter of which were from organizations—fishing, aquaculture, and seafood associations, non-profits, NGOs, aquariums, and state agencies. In addition, five regional fishery management councils provided comment letters. We also received feedback during three virtual listening sessions, one in-person listening session, and four council meetings during the public comment period.

Number of Individual Letters and Sources



Among the individual comments were 12 seemingly from students in South Dakota as part of a class assignment, and 14 from individuals expressing a common concern about the makeup of Gulf of Mexico Fishery Management Council being imbalanced with too many recreational and not enough commercial fishing representatives. Other individual commenters included seafood-related businesses and private citizens. Seafood associations include commercial fishing and processing associations.

Below is a synthesis of public input on the draft strategy. Many of the comments were used to strengthen and improve the strategy. Others were beyond the scope of this strategy or more relevant to implementation actions for specific programs or regions. Those comments were shared with the

appropriate NOAA Fisheries offices and will be considered in the development of an implementation plan for the strategy.

## **Public comments were, by and large, positive.**

Most of the written and verbal comments received regarding the draft strategy supported its overall intent and objectives.

There was abundant appreciation for recognizing the importance and value of fish as food, aiming to put U.S. seafood on U.S. plates, and broadly supporting the U.S. seafood sector. Many comments expressed appreciation for the acknowledgement of the value of seafood-related jobs and coastal community livelihoods, market and trade issues, and the need to better communicate the sustainability of U.S. seafood. Numerous commenters agreed with the strategy drivers and the description of unprecedented challenges.

## **Science and Support**

Two messages were repeated in many comments. The first message was that science conducted by the agency to support wild capture fisheries and seafood farming is essential for the wellbeing of the U.S. seafood sector. The wild capture sector noted the critical importance of surveys and assessments to support the allocation process through the fisheries management councils. The marine aquaculture sector and others noted the importance of science to support an efficient regulatory process and the sustainable development of U.S. seafood farming.

The second message was that the seafood sector needs more support and attention from NOAA Fisheries and other federal agencies regarding:

- adaptation to climate change, changing markets, and new ocean uses
- new domestic sources of seafood supply (from wild capture and aquaculture)
- fair trade
- workforce development
- recapitalizing and modernizing seafood infrastructure

Commenters shared the challenges they face and how the strategy relates to them. Many made suggestions or recommendations for implementation actions under each goal, which will be considered in developing the implementation plan. Several called for an inclusive implementation plan development process and requested being able to review the implementation plan. Commenters also acknowledged that it is difficult to address all issues in one policy.

## **Goal-Specific Feedback**

Of note, there were no comments on changing or adding to the Goals. Some asked for clarifications of meaning and context. In particular, there were questions about how the Seafood Strategy related to other NOAA Fisheries strategies and priorities. Thus the revised strategy includes only minor changes, most to clarify phrases or context. One exception is the addition of an Equity and Environmental Justice sub-goal in Goal 4. In addition, descriptions of other agency strategies/policies to provide context were included. Below are comment themes as well as examples of recommendations for implementation activities organized by the relevant Goal.

## Goal 1: Commercial Fishing

- Commercial fishing interests and Councils expressed support for maintaining, and in some cases expanding, **funding for surveys that support allocation work**. They noted a need for surveys for data poor stocks and that the lack of data leads to decreased quotas/increased need for buffers to prevent overfishing, and result in lost catch and economic opportunity. Climate change and offshore wind development also result in the need for additional survey work. There was also concern about offshore wind developments affecting surveys. There were recommendations to work more closely with the fishing industry on surveys, and to use fishermen for surveys, and increase the number of cooperative surveys. At the same time, commenters, by and large, recognized the agency's budget constraints.
- In addition to survey and allocation work, commenters with commercial fishing interests noted that in the face of climate change, COVID market disruptions, offshore wind, and other risks, additional work by NOAA Fisheries and other federal agencies is needed on increasing U.S. production, **industry support, and industry services**. For example, faster and more efficient distribution of **disaster relief funds**.
- There were requests for additional and **modernized data products and support services** that benefit fishing operations, which would help with climate change mitigation and development of the Blue Economy. Economic, market, and social data and data tools were of particular interest. There was also interest in making existing data (e.g. landings and prices) more available/accessible to support transparency.
- Some commenters noted that opportunities to **reduce discards**, increase utilization, and decrease waste were needed.
- **Gulf of Mexico** commercial fishing interests applauded the objectives of the strategy but expressed concern that expansion of recreational fishing quota is limiting potential for Gulf finfish harvest. They also expressed concern about the balance of interests on the Gulf Council.
- Several Alaska commenters expressed concern about the council not having a **Tribal representative**. Others expressed concern about the impact of the **pollock fishery's bycatch**.
- There was broad interest in expanding the **traceability** of seafood through new tools.
- **California salmon** fishermen expressed concern about the lack of salmon, season closures, and California water rights issues.
- A number of commenters expressed support for **restoring habitat** to increase fisheries recruitment.
- Commenters identified a need for increased **flexibility in management to adapt quickly**, given climate change.
- Many commenters expressed interest in **market economics** being included in management decisions.
- Some commercial fishing interests expressed **concern about consolidation** in the industry particularly due to catch shares/ITQs.

## Goal 2: Aquaculture

- Most commenters who provided feedback on this goal expressed support for U.S. aquaculture development as long as it was done in a **responsible, science-based way, with stakeholder engagement** in the process (e.g. coastal and marine spatial planning), and as long as projects are **regionally appropriate**. There were a small number of comments against any form of offshore finfish aquaculture.

- Many commercial fishing interests were supportive of aquaculture and the potential for **synergies with domestic wild capture** as long as the aquaculture ventures reflect the values of local/regional communities, complement wild harvest, allow for fishing around aquaculture facilities, and do not negatively affect commercial fishing (use of space, environmental effects, market effects). Additional entities also noted an interest in limiting the negative impacts of aquaculture on the environment.
- Aquaculture associations and several individuals indicated support for **expanding US aquaculture**. One recommended a **national seafood summit** to better understand what is required to build aquaculture farms, catch fish, and operate successful supporting businesses
- Many interests expressed a need for **improving regulatory efficiency and coordination** through streamlining the process and focusing on science developed during the past 20 years.
- Some expressed an interest in expanding **outreach** efforts during the development of aquaculture projects.
- Several Alaska interests expressed desire for states to have the **option to “opt out”** of aquaculture in Federal waters.
- A few commenters expressed concern about aquaculture benefitting only a few and that others would thereby lose **access to ocean resources**.

### **Goal 3: Market Development and Trade**

- Commenters were supportive of **communication** efforts and recommended they **celebrate U.S. seafood** and be **proactive in addressing misinformation**. They also noted a need to increase communication about the sustainability and scientific management of US fisheries and aquaculture. There were several comments in support of **FishWatch**.
- Commenters were generally supportive of NOAA Fisheries engaging in **domestic and international market development**, and expanded communications about the **sustainability of U.S. seafood**.
- There were recommendations to develop U.S. and export **markets for underfished/underquota species**. At the same time, some were concerned about expanding access to foreign markets when domestic seafood needs are not met.
- There was much support for development of **U.S. seafood markets for U.S. seafood** that provide more local/regional seafood to universities, schools, hospitals, food banks, and U.S. consumers generally. They noted that buying local seafood supports the entire seafood value chain.
- Some commenters noted the need for science and monitoring to document whether **local needs** are being met and evaluate **changing local markets** due to climate change.
- Several commenters noted that U.S. seafood is not competing on a **level playing field given illegal, unreported, and unregulated (IUU)** fishing practices. In some parts of the world, the lack of enforcement of environmental or social requirements equivalent to those in the United States contributes to the low cost of some imported seafood. Some commented that the agency’s work on fair trade is insufficient and that restrictions on IUU imports need to be increased.
- Several comments noted significant impacts to their businesses due to **tariffs** and called for tariff relief. There were several recommendations for the agency to work closely with the U.S. Trade Representative.
- Some commenters noted the generally high cost of U.S. seafood limits access to it. They recommended working with other countries to improve environmental and social performance in their seafood production. This would allow U.S. consumers, including food banks, to have more **access to affordable, safe, and sustainable seafood**.

#### **Goal 4: Strengthen the Seafood Sector**

- Public comments generally **encouraged** the agency and other federal agencies to broadly enhance their support of the seafood sector.
- Commenters noted that investments are needed to modernize or maintain vessels, **infrastructure** (port, processing, cold storage, ice, custom processors, other), and working waterfronts, especially in smaller coastal communities and for small businesses. Expansion of production (wild and farmed) will depend upon having sufficient working waterfronts and commenters noted the decline in access. Competition with foreign processing will depend on increasing **domestic processing, cold storage, and other working waterfront infrastructure**.
- Commenters expressed the need for commercial harvesters to have **access to working waterfronts** and the decline.
- There were many comments about the need for **workforce training** and development (in wild-capture and aquaculture) and expanded opportunities for new entrants to the fishing industry.
- There were comments about the commercial fishing sector's need for **capital and low interest loans**, especially for young harvesters. Commenters recommended the development of the financial infrastructure to increase financial support of the wild-capture sector.
- Commenters recommended working closely with **USDA** to leverage their resources, especially increasing the amount of seafood in the USDA's commodity purchase programs. Many commenters recommended expanding or extending **USDA programs** that support farmers (and aquaculture) to wild capture fisheries.
- Opinions on funding **seafood marketing** were mixed—some called for, some called against, and others called to include only U.S. harvested seafood in the efforts.
- One comment indicated the strategy needs additional emphasis on “**innovation adoption**” to improve data collection and use, reduce carbon emissions, improve seafood quality, and reduce environmental impacts of processing and packaging. Other comments also expressed interest in transitioning vessels to energy options that reduce their carbon footprint.
- Commenters suggested that addressing **access issues** (consumers' access to seafood and commercial fisheries' access to harvest opportunities) would enhance the resilience of the sector.

#### **Additional Feedback**

- There were several Equity and Environmental Justice-related comments about the importance of understanding or supporting underserved communities, Tribal and subsistence fishing, processing labor, access, and nutrition and the non-market/cultural significance of seafood. There were related suggestions to include actions like the following in the strategy:
  - maintain opportunity for small and medium sized fishing interests
  - elevate voices of historically under-represented, and to increase diversity in seafood sector
  - better understand demographics of fishing communities and labor, as well as who has access and who doesn't to seafood or fishing opportunities
  - better understand the impacts of industry consolidation
- Several commenters acknowledged the agency would have to work with partners to accomplish strategy goals.
- Several commenters expressed concerns about environmental effects of fishing, aquaculture, offshore wind (OSW), overfishing, destruction of ecosystems, catch and consumption of forage fish, as well as potential impacts of OSW and aquaculture on the commercial fishing industry.

- Some commenters noted that the lack of access to coastal waters and working waterfronts (NIMBYism, conflicting uses, viewscape and recreational conflict issues) limits opportunities to maintain or sustain wild capture production and increase aquaculture production.
- Recommendations by one or a few commenters:
  - Align strategy with the White House National Strategy on Hunger and Nutrition.
  - Take a holistic approach by integrating commercial fishing and aquaculture goals in the strategy.
  - Make the strategy more action oriented.
  - Acknowledge the overlap in the strategy's goals.
  - Include Great Lakes fisheries.
  - Include recreational fishing in the strategy.
  - Minimize the carbon footprint of fisheries/seafood production in some way, including by adopting low and zero emission technologies, reducing the greenhouse gas footprint of fishing/processing, improving packaging to reduce waste (state and federal programs to subsidize transition to efficient motors) and implementing fishery friendly climate action.
- There were a few concerns expressed about the seeming conflict between increasing access to foreign markets and putting more U.S. seafood on U.S. plates (and the related hunger and nutrition priorities in the United States).
- Concern was noted that the seafood strategy does not address the effects of policies such as Marine Protected Areas (MPAs and 30x30) on reducing fishing and aquaculture opportunities.
- A few commenters indicated that better coordination/consultation with Tribes and states was needed.
- A few commenters expressed concern that the strategy didn't address climate change.