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NOAA's NATIONAL SEAFOOD STRATEGY

The Port of New Bedford is the most economically valuable fishing port in the country. Commercial fishing is a $5.5 billion dollar industry in the United States and the Northeast alone is responsible for 30% of landings. New Bedford ex-vessel landings alone are almost half a billion dollars ($451m in 2020) with over $300 million from the scallop industry alone.

That number does not consider the countless jobs and shoreside economy supporting the industry. A 2019 economic impact study of the Port of New Bedford and Fairhaven Harbor conducted by Martin Associates and Foth-CLE Engineering Group calculated that 6,808 direct jobs and $3.8 billion in business revenue are provided by our local seafood and commercial fishing industry. A total of $162.8 million of direct, induced, and indirect state and local tax revenue was generated by processing activity at the Port of New Bedford with another $391.1 million of federal taxes. In addition, $228.3 million of state and local taxes and $608.2 million federal taxes were supported due to economic activity of the related users utilizing the Port of New Bedford.

The seafood industry is facing unprecedented challenges, as laid out in the seafood strategy document, it is therefore imperative that there is a significant investment in new technologies, research development, and mitigation from new industries that will share our waters. Fishermen and the industry as whole have been dealing with varying degrees of federal regulations over the years and have a deep concern that the government may not always be doing what is best to maintain a thriving and profitable fishing industry now and in the future. NOAA's National Seafood Strategy will have a positive effect on our domestic U.S. seafood economy; however any strategy cannot lose site of the factors impeding industry growth.

Goal #1 Sustain or increase sustainable U.S. wild capture production

While it is important to establish protected areas to help preserve fish stocks and protect fragile habitats from overfishing and pollution, as the emergence of offshore wind development is generating many more questions than answers when it comes to sustainability. Therefore, proper, and extensive monitoring and data collection funded by the offshore wind industry will assist in identifying areas of concern and assessing the true impact of the offshore wind industry on commercial fishing and fisheries. An increased effort is needed to identify potential new "open areas" for fishermen especially if new industries will add to current, often burdensome, regulations in place or projected. There must be a more flexible approach to restrictive fishing regulations to allow for adaptations in real time that address fisheries impacts as they are

occurring. This is particularly the case when multiple wind lease areas are constructed in a confined area, thereby compounding the impact on commercial fishing.

There are ways to sustain or increase seafood sustainability and production in place of just limiting days at sea or extended closed areas. Some approaches may include:

- Encourage sustainable fishing practices by providing incentives to fishermen who use environmentally friendly methods.
- Invest in research initiatives that monitor the health of fisheries resources and identify trends in population and habitat health.
- Develop targeted programs to reduce bycatch, or accidental catch of non-targeted species, which can have an impact on marine ecosystems.
- Establish incentives to promote responsible fishing practices such as gear restrictions and modernization.

Goal #2 Increase sustainable U.S. aquaculture production

Countries around the world are implementing regulations and best practices to ensure that aquaculture operations are carried out in a sustainable manner, taking into account environmental, social, and economic considerations. U.S. aquaculture offers Americans safe, affordable, and healthy food choices produced with minimal impacts on the environment. Expanding U.S. aquaculture will diversify and complement our well-managed fisheries and terrestrial food production systems by adding an important underdeveloped sector to enhance the resiliency of the overall US food supply.

The goal of increasing sustainable U.S. aquaculture production and economic growth through aquaculture should focus on regional and local aquaculture projects to reduce dependence on imported seafood products while creating jobs in coastal communities. A recent report prepared by The National Science and Technology Council Subcommittee on Aquaculture titled *"A NATIONAL STRATEGIC PLAN FOR AQUACULTURE RESEARCH"* laid out critical objectives and goals to increase sustainability in aquaculture production. These include, but are not limited to:

- Identifying market opportunities for U.S. aquaculture products.
- Educating and training a skilled aquaculture workforce.
- Developing production technologies that minimize environmental impacts.
- Promoting the safety and nutritional value of U.S. aquaculture products.

https://www.ars.usda.gov/sca/Documents/2022%20NSTC%20Subcomittee%20on%20Aquaculture%20Research%20Plan_Final%20508%20compliant.pdf

NOAA has been a key partner in identifying the strategic expansion of US aquaculture. This foundational support is critical and should continue to expand by working with our state and local partners. Investments of time and resources by NOAA is much needed in the development

of this new and promising industry as communities and companies alike will continue to need guidance and support.

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

Locally generated, or even U.S. produced, product consumption is far more attractive than the global importing of often questionable seafood products. Increased regulation on domestic fisheries increases prices and incentivizes purchase of cheaper products from other foreign sources. Communicating and promoting a responsible seafood supply chain by labeling who, what, where and how fish are caught will allow consumers to make informed decisions about their seafood purchases.

Other ways to foster access to markets could include:

- An increase in the availability of fresh, locally sourced seafood through farmers markets and grocery stores.
- The creation of materials and videos showcasing companies with the trademarked message of "American Seafood is Sustainable Seafood."
- More direct and simple supply chains to help maximize value to the fishermen and consumer. Traceable and simple supply chains promote trust and a more direct relationship between fishermen, the public, consumers, retailers, and wholesalers.
- Taking the lead on tackling illegal fishing operations worldwide by strengthening international cooperation between countries' law enforcement agencies and adopting sanctions against vessels caught engaging in illegal activities.
- Raising awareness with the American public of the negative environmental and species impacts from the foreign illegal fishing methods, to help them better appreciate the contrasts and importance of supporting domestic wild caught seafood.

NOAA and our other federal partners should collaborate with academic institutions, economic development agencies, local ocean clusters, and organizations such as the Local Catch Network (LCN) which was established in 2011 and is a hub for knowledge exchange and innovation to support and catalyze local and community-based seafood systems. Today, the network is made up of more than 500 members, including 200 seafood businesses from across North America. In doing so, we can collaboratively support fisheries initiatives that provide economic opportunities for coastal communities while also promoting sustainable fisheries management practices.

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

It is imperative that NOAA works with Congress to identify the challenges our current fishing industry is facing. In doing so, legislative action will be needed in the areas of amending the Magnuson-Stevens Act with extensive input from the industry, re-opening the Northeast Canyons and Seamounts Marine National Monument area to sustainable commercial fishing, and the mitigation and compensation to the entire fishing industry from the potential negative effects of offshore wind development.

To date, the Bureau of Ocean Energy Management ("BOEM") has auctioned over 24.7 million acres for offshore wind in the Atlantic. With these leases comes significant revenue for the federal government. This lease revenue, or a portion thereof, should be used to support scientific survey mitigation work and activities to avoid, minimize and mitigate the environmental and economic impacts of offshore wind.

We, and the fishing industry as whole, also have deep concerns with Administration's "30 by 30" order committing 30 percent of our lands and oceans to conservation by 2030. Fisheries in all Federal waters are already conserved under the Magnuson-Stevens Act, which has been praised for its success by nearly every major environmental organization. Numerous global studies have found U.S. fisheries to be among the most sustainably managed fisheries in the world. We therefore believe that fisheries in all Federal waters outside formal properly-created marine *sanctuaries*, including fisheries in marine monuments, should be managed sustainably under the Magnuson-Stevens Act. There is no scientific justification for the 30% number, and no likelihood of increasing our national food security to be derived from closing 30% of U.S. waters to sustainable commercial fishing.

Between offshore wind and the stated conservation goals, the potential impact in the commercial fishing industry is daunting. There must be a concerted effort to use the offshore lease funds to research and encourage new technologies, new areas and lessen barriers to entry into fisheries before it is too late. As aforementioned, fisheries management must be nimble and adaptable and based on sound scientific data especially due to climate change and the new development of offshore wind. We would not want to see a shift in demand to less sustainable seafood sources abroad, creating disadvantages for our domestic industry stakeholders.

Seafood supply chains and policies should foster and strengthen community-based fisheries. Fisheries access should be kept available to future generations and must be balanced against the needs and limits of the ocean as well as fishermen's ability to sustain a livelihood with pride. Building a better seafood system requires creativity and innovation. It also requires that forward-thinking ideas are not isolated but rather spread through a network of diverse stakeholders working together, aligning around shared values. Creativity and networking fosters knowledge sharing and collective understanding to have a truly sustainable and successful seafood trade on a local, national and global level.

Sincerely,



Gordon M. Carr
Executive Director
New Bedford Port Authority