

March 15, 2023

Ms. Janet Coit
Assistant Administrator for Fisheries
NOAA Fisheries
1315 East West Highway
Silver Spring, MD 20910



Dear Asst. Administrator Coit,

Thank you for this opportunity to provide feedback on the Draft National Seafood Strategy announced by NOAA Fisheries on February 14th, 2023. We are excited to see an open conversation taking place that considers how we can build out our national seafood systems in a way that is good for the people and the planet while also being economically viable. NAMA is led by fishermen and coastal community members across the country who share this sentiment and work to ensure these systems remain beneficial for the coastal communities associated with them.

Purpose

The purpose laid out for this seafood strategy aligns with NAMA's mission and the work we support through our active and engaged network of fishing folks. Wherever possible, NAMA seeks to highlight stand-out seafood operations to raise the collective skillset of our network, build deeper relationships among small- and medium-scale producers of sustainable seafood, and learn directly from those with on-the-water knowledge in how values-driven seafood systems can be built and moved forward. We rely on these relationships to have a good pulse on the health of the oceans and coastal communities.

As the concept of 'sustainability' has gained prominence in mainstream food production and among policymakers, the term itself has, in some cases, lost its grounding in small-scale, localized production. Discussions around sustainability are often difficult in these spaces because the sustainability of any two fisheries can require extremely different tools, people, knowledge, etc. NAMA strongly believes that a broad network of communities who are intimately familiar with and dependent on any given fishery is required for impactful environmental restoration and protection. Any strategy aiming to sustainably grow our fishing communities must be as wide-reaching and diverse as the fisheries themselves.

Strategy

This strategy is driven by the truth that seafood is good for people, the planet, and the economy is great, but as with anything healthy, the mismanagement of it can cause it to not only lose its health benefits, but become something harmful altogether. Fortunately, we have many historical parallels to draw from. If we look at the growth of agriculture, we can see that a shift away from community-based and regional food systems created troves of problems to our domestic agriculture. We want to ensure that any strategy moving forward is supportive of a seafood system that will be good for all people, good for the planet in the long-term, and creating an economy that supports a living wage for everyone in the supply chain, not just record profits at the top of the chain.

Currently the strategy fails to acknowledge that there are active policies in place driving our seafood to not meet the very goals that are named. It is one thing to build and promote seafood operations that

meet these goals and foster the healthy future we all want. Equally important is to address policies that have been a detriment to our communities, environment, and economy. Offshore aquaculture is proven by many different entities globally to be incredibly harmful to the ocean and operates at a scale that only benefits massive corporations who are far from needing any extra economic support.¹ Additionally, the commodification of permits under the catch share system is continuing threaten the livelihoods of small-boat fisherman while allowing international private equity firms to consolidate these permits as a form of long-term investment. This is making it nearly impossible for coastal communities to access fishing rights and it is taking massive amounts of wealth away from them and the country altogether.² Attempts to challenge this consolidation at Regional Fishery Management Councils are often thwarted due to the reality that the companies with the most resources can most easily maneuver through these council meetings and heavily skew decision-making in their favor.³

A Community-Informed Just Strategy

Ultimately, what will truly strengthen our seafood sector is a seafood strategy that is grounded in finding key allies across the country who can speak to their community's issues and advocate for the people who will be the most impacted. Currently there needs to be acknowledgement of systems and policies that are not working for small- and medium-scale fishermen and coastal communities. Once that has been named, steps should be taken to meaningfully connect with the people who can represent the communities most impacted and bring them in to help shape the core of any strategy moving forward.

Conclusion and Gratitude

We have a lot of appreciation for the opportunity to provide feedback to this seafood strategy. There are many people in fishing communities who are excited and determined to ensure our seafood is sustainable, both environmentally and economically, and we hope that is heard loudly through all the comments.

Sincerely,
North American Marine Alliance

1: "The Foodprint of Farmed Seafood." *FoodPrint*, GRACE Communications, 19 Oct. 2020, https://foodprint.org/reports/the-foodprint-of-farmed-seafood/#section_4.

2: Sennott, Will. "How Foreign Private Equity Hooked New England's Fishing Industry." *ProPublica*, 6 July 2022, <https://www.propublica.org/article/fishing-new-bedford-private-equity>.

3: Touchstone Consulting Group. 2011. A Review of the New England Fishery Management Process. Report to NMFS April 2011