



August 1, 2020

RFI Response: Interagency Seafood Trade Task Force

RTID 0648–XQ012

Recommendations for a Comprehensive Interagency Seafood Trade Strategy

Background on the American Albacore Fishing Association

The American Albacore Fishing Association (“AAFA”) is a non-profit organization based in Bonita, CA representing commercial pole & line vessels fishing for Albacore off the coasts of California, Oregon, and Washington. AAFA consists of 61 vessels and vessel members representing the majority of the total catch of Pole and Line caught Albacore on the West Coast. From 2015 to 2019, AAFA members have averaged landings per year of more than 7.7 million pounds.

AAFA seeks to ensure responsible fishery management practices and the participation of vital coastal fishing communities. It supports education regarding responsible fishing methods and promotes the health benefits of Albacore tuna consumption along with environmental benefits of sustainable fishery practices. AAFA strives to ensure the economic viability of pole & line fisheries now and into the future. Many AAFA member families have been involved in the fishing industry for multiple generations. Our families have helped to create a better future for the U.S. Pole & Line Albacore Fisherman, encouraging the next generation of fishermen to follow in the footsteps of their fathers, grandfathers, and great-grandfathers.

We are actively involved at the Pacific Fishery Management Council, with the implementation of the US-Canada Albacore Treaty, and with efforts to promote domestic and foreign consumption of Albacore tuna harvested by U.S. fishing vessels. According to the most recent stock assessment, the North Pacific stock of albacore tuna is not overfished and is not subject to overfishing, and there are no bycatch issues in the line and pole fishery.

AAFA Comments

AAFA believes strongly in one of the main stated *Purposes* of the White House Executive Order on Promoting U.S. Seafood.

America needs a vibrant and competitive seafood industry to create and sustain American jobs, put safe and healthy food on American tables, and contribute to the American economy.

To achieve this goal, AAFA and its members encourage the Seafood Trade Task Force to take all practicable actions to address the following issues.

1. Enhance U.S. domestic processing capacity
2. Address adverse tariff impacts
3. Improve marketing for U.S. harvested Albacore products
4. Increase market and value for Albacore harvested by U.S. fishermen

AAFA believes the Task Force must take a comprehensive approach to achieving the overarching goal of creating American seafood jobs and increasing U.S. and international demand for U.S. harvested seafood. While it may not happen overnight, the Task Force should begin now to take steps to support the development of increased seafood processing capacity on American soil. Currently, so much seafood harvested in the U.S. is shipped overseas for primary and secondary processing. This is a direct loss of U.S. jobs, and further contributes to trade imbalances other negative impacts to U.S. seafood companies. There are many regions in the U.S. that could excel in the seafood processing sector if the commitment is there to build the infrastructure and facilitate the growth of a U.S. processing work force. It works in other protein sectors, and it is a viable path for the seafood industry in this country that merits federal interest and support.

Recognizing that boosting U.S. seafood processing capacity will take some time, AAFA requests that the Task Force reduce punitive tariffs on Albacore tuna that currently must be shipped overseas for processing and reimported into the U.S. for American consumers. This dynamic contributes to marginal business models and undercuts the ability of U.S. harvested seafood to compete in domestic markets. The Task force also should support regional and national seafood marketing initiatives that highlight U.S. harvested and produced seafood products. With the trade imbalance skewed so far in favor of foreign seafood imports, every gain made in reduction of punitive tariffs and in the increase in U.S. marketing efforts will make a real difference.

Responses to Seafood Trade Task Force Questions

1. Which seafood products (to include fish, shellfish, and processed fish and seafood products) are you currently exporting? Please provide the Harmonized Tariff System (HTS) codes for these products.

AAFA Products – *Canned Albacore tuna*

HTS codes

1604.14.1091

1604.14.2259

1604.14.3059

1604.14.3051

2. To which countries or other trading partners are you currently exporting?

Costa Rica, France, Spain, Thailand, and Vietnam

3. Are there countries or other trading partners to which you are planning to export, or to which you would like to export? Please specify.

No

4. Are there issues in the markets you currently export to that limit your exports or unnecessarily increase the costs for your exports? Please specify.

No

5. Are there issues in other markets that have prevented you from exporting? Please specify.

General tariff issues with European markets

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7. Are there barriers that prevent the export of your product to certain markets? Please specify.

No