



July 31, 2020

Via email to: SeafoodTrade.Strategy@noaa.gov

Dear Seafood Trade Task Force Members:

On behalf of 140 federally permitted, Hawaii-based longline vessels, the Hawaii Longline Association (HLA) expresses its appreciation to President Trump for issuing Executive Order 13921 (May 7, 2020) “Promoting American Seafood Competitiveness and Economic Growth”. As signified in EO 13921, attention to the Nation’s fishing and seafood industries is important today and strategic for tomorrow. We are in full agreement with the purposes of EO 13921 as stated in Section 1.

The Hawaii longline fishery is the largest food producer in the State of Hawaii, annually landing over 30 million pounds of seafood worth around \$105 million in ex-vessel, dock-side sales. Because of the Hawaii longline fishery, Honolulu Harbor consistently ranks in the Nation’s top ten ports in terms of fisheries economic value (6th in 2018). Published estimates indicate that around 80% of fish landed by Hawaii vessels remain in state, with 18% to US mainland and 2% exported. The 2% estimate of exports is likely less now due the impacts of the Billfish Conservation Act, which prohibits sustainably caught billfish landed in Hawaii to be exported to foreign markets or sold to US mainland markets. Hawaii longline landings do not rely on export markets, nor do we view exports as a significant near-term market opportunity. Therefore, this letter focuses on issues generally unrelated to the questions posed in the July 10, 2020 Federal Register Notice, and instead identifies other priority areas related to seafood trade.

Seafood Trade Deficit: Task Force Should Address US Exports and Foreign Imports

HLA supports the formation of the Seafood Trade Task Force; however, we are concerned that Task Force is not directed to examine the role of foreign imports into the US seafood market. US fisheries only produce 15% seafood consumed nationally. Instead of finding export markets for US produced seafood, the Task Force should focus on ways to increase US seafood production and limit seafood imports that directly compete with US produced seafood. In many cases, seafood imported in the United States is derived from heavily subsidized, poorly monitored, environmentally unregulated foreign fleets. Alarming, a significant portion of imported seafood into the US is believed to be from IUU fisheries.

A better way to reduce the Nation's seafood trade imbalance, is to produce more and import less. However, if import regulation is a challenge for legal and/or political reasons, government programs are immediately needed to support marketing initiatives that distinguish US caught seafood over foreign imports. One example would be a US government affiliated certification system for US seafood similar to USDA beef labeling. As the fishing industry is facing immense economic impacts from the COVID-19 pandemic, now more than ever is the time to promote US products over foreign imports.

Combat IUU Fishing and Protect Ocean by Restricting Imports into the United States

The most effective tool available to the US government to combat IUU fishing is the power of the United States seafood market, which is among the largest globally. Foreign seafood imports that do not meet US or internationally accepted anti-IUU standards should be banned. A litany of reports has identified China, which is the world's largest producer of seafood, as having government subsidized fleets engaged in IUU fishing across the globe.

Taking strong measures tied to the US seafood market demand will also enhance ocean ecosystem conservation. Our fleet operates within the same high seas fishing grounds as foreign longline vessels and we know they follow zero environmental laws, unlike Hawaii vessels which are subject to a range laws and regulations focused on marine mammals, seabirds, sharks, endangered species and marine pollution. Foreign imports are often subject lower production costs due to subsidies and minimal regulations for foreign vessels. Existing legal frameworks exist to restrict imports not up to US environmental standards, including the Magnuson-Stevens Fisheries Conservation and Management Act, Endangered Species Act, and Marine Mammal Protection Act.

EO 13921 specifically calls out transshipment as an area of IUU focus, which we support. High seas transshipment of tuna is poorly monitored. According to a 2016 Pacific Islands Forum Fisheries Agency report, approximately 40% (56,000 mt) of the bigeye caught in the WCPO is from IUU fishing activity. A large percentage of that IUU bigeye tuna catch is from foreign longline high seas transshipments. Approximately 20% of yellowfin caught in the WCPO is estimated to be IUU. Tuna longline vessels that transship their catch at sea often stay on the fishing ground for 12-15 months per trip, durations that promote poor working conditions, slave labor, and human trafficking. High seas longline vessel transshipments are also the primary pathway of the IUU shark fin trade. Although federal regulations allow Hawaii longline vessels to transship at sea, Hawaii vessels do not engage in this activity.

Ensuring Safe Seafood for Consumers in the United States - Restrict "Tail-pipe Tuna"

Not only is the US seafood market wide open to foreign imports, which is detrimental to US seafood producers, foreign imports are not subject to the same seafood handling requirements as found in the US. One such product of significant seafood safety concern is carbon-monoxide treated tuna, which there has been reported food safety recalls involving salmonella, Hepatitis B, and scombroid toxicity. Treating fish with carbon monoxide does nothing for fish preservation and safety, but rather it masks freshness by artificially enhancing coloration. This practice has been banned in Japan, Canada, and the EU seafood markets and the US should consider a similar

prohibition due to associated health risks. Its our understanding that no US seafood production company applies carbon monoxide treatments of tuna within the United States, thus tuna in this product form are derived from foreign sources.

Summary

We again thank President Trump for issuing EO 13921 and the acknowledgment that “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.” This is a long overdue directive to federal agencies to work with the Nation’s seafood producers to promote this important industry. HLA looks forward to the opportunities EO 13921 presents in terms of leveling the playing field with foreign fisheries, restricting IUU imports, and lessening the competitive effects of foreign imports in the US seafood market.

Sincerely,

A handwritten signature in blue ink, appearing to read "E.K.K." followed by a stylized flourish.

Eric K. Kingma, Ph.D.
Executive Director