

July 16, 2020



Interagency Seafood Trade Task Force
U.S. Department of Commerce

RE: RFI Response: Interagency Seafood Trade Task Force

Dear Members of the Interagency Seafood Trade Task Force:

Please accept the following comments on behalf of the Recreational Fishing Alliance (RFA) regarding the request for information issued by the Interagency Seafood Trade Task Force. RFA is a national organization with a mission statement to fight for the rights of saltwater anglers, protect marine and fishing tackle jobs and ensure the long-term sustainability of our Nation's marine resources. RFA recognizes the importance and traditional value of US commercial fishermen and what they provide to this council in terms of food production and jobs. RFA strives to maintain working relationships with individual commercial fishermen and commercial fishing organizations to work constructively through issues important to both our sectors.

RFA also recognizes the intent of Executive Order 13921 issued by President Trump on May 7, 2020. RFA is particularly supportive of the statement in section 1 to "get more Americans back to work and put healthy, safe food on our families table." The U.S. fisheries are the best managed in the world and RFA believes it is appropriate for the Administration to make investments for the benefit of U.S. fishermen.

Specific to key sections of Executive Order 13921, RFA supports Section 2 (a) that seeks to "identify and remove unnecessary regulatory barriers restricting American fishermen and aquaculture producers." While RFA agrees that U.S. fishermen are subjected to unnecessary regulatory barriers, RFA is cautious about advancing aquaculture producers too rapidly. Aquaculture development, particularly ocean-based facilities, hold potential negative impacts to important habitat and native fish stocks and these important issues should not be glossed over, but rather fully vetted. RFA supports NOAA remaining the lead federal agency and conducting the appropriate environmental impact statements under NEPA for all aquaculture facilities proposed in the marine area.

RFA supports Section 2 (b) to combat illegal, unreported, and unregulated fishing (IUU). RFA and the recreational fishing community have been at the forefront of requesting the U.S. government take a firm stance through international fishing treaties to curb IUU fisheries. The fairness aspect aside, which should be plainly apparent, there are serious conservation impacts

that result from IUU fishing that impact domestic commercial and recreational fishermen. The obvious impact is the reduction of available quota and fishing opportunities for U.S. fishermen.

RFA supports Section 2 (e) that seeks to safeguard our communities and maintain a healthy aquatic environment. Fishing communities are essential for both commercial and recreational fishermen to access our marine resources. Fishing communities include tackle shops; marinas that hold private, for-hire and head boats; piers; boat ramps; and water access points. All are essential in ensuring that the American public has adequate opportunities to access U.S. fisheries. It also goes without saying that a healthy aquatic environment is essential to many species of critical importance to both commercial and recreational fishermen. RFA is opposed to the roll back of any environmental laws, regulations, or review processes that would result in a net degradation of our nation's estuaries, rivers, bays, waterways, and oceans.

Where the RFA finds fault with Executive Order 13921 and recent notices to enact the mandates of EO 13921, is the conscious decision to exclude recreational fishing in achieving the goals of the order. In our review of multiple definitions of seafood, in no instance did it exclude fish harvested by recreational anglers. The most common definition of seafood includes some variant of the following definition, "any shellfish or finfish from the sea used for food." None of the definitions we have seen restrict the definition of seafood or shellfish to finfish caught by commercial fishermen or commercial fishing gear. Therefore, a summer flounder, blue crab, bluefin tuna, or Atlantic cod landed for consumption by a recreational angler is just as much seafood as those same species landed by commercial fishermen.

EO 13921 fails to define seafood for use in this executive order or for actions that will be taken to advance its objectives. Therefore, it can be assumed that any one of the myriad of definitions for seafood in popular use could be used with this executive order. RFA sees absolutely no reason that fish landed by recreational anglers for consumption should not be considered seafood. Based on every definition we have reviewed seafood is not a term that can be assigned exclusively to the commercial fishing industry. Furthermore, EO 13921 speaks about actions suggested to benefit U.S. fishermen. 'Fishermen' is a broad term that covers all individuals that catch or attempt to catch animals from the marine environment. The term fisherman is not sector specific, and the Administration should never suggest that the term 'fishermen' excludes anglers that fish for recreation or personal consumption. Thus, all benefits, goals and objectives outlined in EO 13921 aimed at benefiting fishermen must include both commercial and recreational fishermen.

RFA points this out because it is extremely disappointed that EO 13921 does not recognize the contributions that recreational fishing makes towards providing the U.S. public with fresh, domestic caught seafood. While not all recreational fisheries have a significant consumptive component such as marlin, sailfish and some other 'sport' fisheries, the primary motivation for

most anglers is to consume at least a portion of their catch. From an economic standpoint, recreational fishing generates income, supports jobs, and contributes to the gross domestic product in no less important a manner as commercial fishing. RFA can find no rationale to support why recreational fishing should be excluded from this effort by the Administration to “promote American seafood competitiveness and economic growth.” In fact, RFA feels it is insulting and disappointingly consistent with a long and unfortunate bias against the recreational fishing industry by NOAA Fisheries under previous Administrations. In the past, this modus operandi has been used to promote discord and divide recreational and commercial fishermen when we are natural allies in achieving conservation objectives and promoting the goal of achieving the greatest value from our shared public trust marine resources.

In terms of staff, research dollars, and management funding, the U.S. Department of Commerce and its subordinate agencies, particularly NOAA Fisheries, have historically prioritized commercial fishing interests over that of the recreational fishing industry. RFA and many in the recreational fishing industry had hoped this Administration would undo this institutional bias that has placed the interests of the commercial fishing industry over that of the recreational fishing industry. We were hopeful that the current Administration would put both sectors on equal standing and acknowledge the important role that each play in providing the United States public with domestic seafood. It is our expectation that these comments will spur the Administration to reflect on this oversight and provide equal interest and consideration.

Perhaps the White House and the newly created Interagency Seafood Trade Task Force are not aware of the magnitude of the benefits to the nation derives in terms of jobs, landings and economic output from the US recreational fishing industry. According to the National Oceanic and Atmospheric Administration, the most recent economic estimates of recreational saltwater fishing include 472,000 jobs, \$68 billion in sales and \$39 billion in total contributions to gross domestic product. When compared to similar categories attributed to the commercial fishing industry, the recreational values represent over one third of the combined US fishing output. This is no small contribution and should not be overlooked in the creation of something as important as the Interagency Seafood Task Force.

In terms of landings, recreational anglers are estimated to have harvested 334,907,475 pounds of seafood in 2019. In the same year, the recreational sector is estimated to have released over 609,000,000 pounds of fish. Released fish, the overwhelming number of which return unharmed to the biomass, can be classified in several ways including regulatory discards (below or above a minimum/maximum size limit, above a bag limit, out of season), or a personal decision made by the angler to release the fish. Based on the data alone, it would be frivolous for recreational fishing to be considered insignificant or even worse, excluded when crafting domestic seafood policy.

As to the RFI, RFA offers the following response to question 1. The remaining 6 questions are not relevant to the recreational sector and again demonstrates the inherent bias towards the commercial sector. These questions also demonstrate a very narrow focus put forward by the Administration to address this issue solely by increasing the export of more domestically caught seafood. RFA believes it is not the ideal solution for a whole host of reasons and in fact, this approach may exacerbate pressure on certain species and have broad ecological consequences. If the United States is already the largest importer of foreign-caught or farmed seafood, wouldn't a more prudent approach be to promote domestic-caught seafood to the domestic market and reduce our reliance on imports, thereby reducing our trade deficit in much the same way the Administration has promoted increased domestic energy production to reduce imported energy.

1) Recreational anglers do not export fish they land. Thus, every pound of fish harvested by recreational angler remains and is consumed by U.S. citizens. These landings estimates should be applied toward the total domestic seafood production on an annual basis. As explained above, recreationally landed fish fall under every definition of seafood and this acknowledgment alone will help in closing the seafood deficit.

Given that the questions put forward in the RFI are primarily focused at commercial fisheries, RFA would like to offer additional comments for the Task Force to consider as it works towards the development of a Comprehensive Interagency Seafood Trade Strategy.

1) The harvest attributed to recreational anglers on an annual basis is significant. What is unique about these landings is that they result from low impact hook and line gear. The magnitude of landings is only possible when the number of recreational participants is high. Appropriate regulatory frameworks for popular, healthy fisheries can help spur interest in these fisheries and drive more participation. This would help close the seafood gap and consequently increase the overall economic benefits to the nation derived from recreational fishing.

2) International management and compliance ~~has~~ imposes a significant impact on U.S. recreational fishermen and the businesses and jobs supported by recreational fishing. RFA suggests the U.S. State Department and Commerce Department take more aggressive action through international fisheries treaties where U.S. fishermen are regularly disadvantaged due to IUU, noncompliance, misreporting, while lacking enforcement by other contracting parties. These actions often result in lower overall quotas for the U.S., which in turn result in fewer opportunities for recreational anglers, lower recreational harvest and reduced economic output.

3) Explore ways to reduce regulatory discards in the recreational sector and convert mortality associated with discards to harvest. The idea is to find conservation neutral solutions that will increase the potential for recreational harvest without resulting in a net increase of overall mortality.

4) Review all federal laws that hold jurisdiction over the management of recreational saltwater fisheries and make suggestions for changes that would allow greater recreational access to U.S. marine resources while ensuring long term sustainability.

5) Explore ways to increase recreational participation. Increasing recreational participation, in concert with some of the above-mentioned suggestions, will allow for increased recreational harvest without the unwanted consequences of highly efficient or destructive fishing gear.

In closing, RFA believes it is paramount that the Administration acknowledges that fish and shellfish harvested by recreational anglers is indeed seafood. Perhaps this acknowledgement will help end the decades long institutional bias against the recreational fishing industry and help achieve the Administration's goal of closing the U.S. seafood gap which the RFA supports under certain scenarios. Now more than ever as our Nation deals with COVID 19, it has been demonstrated that recreational fishing in all forms of fresh and saltwater fishing and recreational shellfish harvesting helps provide food to the public. Grocery stores had either low inventory or were limiting the amount of protein a customer could purchase. The inventory at food banks and other food assistance programs remains low. Because of this, the public actively sort out recreational fishing opportunities to supplement their diet. Recreational gives the public an opportunity to put fresh food, seafood, on the plate.

RFA strongly encourages the Administration to include the interests of the recreational fishing industry and the important role it can play in the goals and objectives of the Interagency Seafood Trade Task Force and the forthcoming Comprehensive Interagency Seafood Trade Strategy.

Thank you for your consideration. Our industry looks forward to providing constructive input for this important work.

Sincerely,

A handwritten signature in black ink, appearing to read "James Donofrio". The signature is fluid and cursive, with a large initial "J" and "D".

James Donofrio
Executive Director