



SOUTH ATLANTIC FISHERY MANAGEMENT COUNCIL

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South Atlantic Fishery Management Council Comments NOAA Fisheries Draft National Seafood Strategy March 15, 2023

The South Atlantic Fishery Management Council (Council) appreciates the opportunity to comment on the NOAA Fisheries Draft National Seafood Strategy (Strategy). The Council has followed development of the Strategy through updates to the Council Coordination Committee and discussed the Strategy during its March 2023 meeting. The Council supports the vision statement and objectives and is committed to working with NOAA Fisheries to ensure a sustainable and viable US seafood sector.

Infrastructure emerged during Council discussion as a critical and necessary component to ensuring a thriving seafood economy. Without adequate infrastructure none of the strategy goals can be met. While the strategy addresses a vision to modernize infrastructure, within the South Atlantic there is an added need to preserve existing, and replace lost, infrastructure. The threats of climate change, increasing coastal populations, and waterfront development have combined in the South Atlantic to greatly reduce fishing related infrastructure. It is impossible to gain benefits to employment and communities or support thriving seafood markets and restaurants if there is no place in the community to land fish, berth, and service vessels. Access to fresh seafood is one reason so many South Atlantic locales make lists of top coastal tourist destinations, yet development to support increasing tourism often replaces the fishing industry infrastructure that is part of the appeal of these areas. Increasingly, this loss extends to the for-hire recreational industry as well as the seafood industry. In addition to working with federal agencies to modernize infrastructure as noted, the Council recommends that NOAA Fisheries use the Goals of the Strategy to promote partnerships with municipalities to support and expand infrastructure.

Many of the species managed by the Council are considered 'data poor' and are unassessed, and significant uncertainty buffers are applied to most assessed stocks due to gaps in data and shortcomings in our understanding of stock characteristics. Such buffers may help ensure stock sustainability in the face of uncertainty, but they pose a challenge to ensuring fishery sustainability as desired under Goal 1 and they impose a significant loss of revenue on the seafood economy in the South Atlantic. Additionally, chronic data deficiencies hinder our efforts to adapt to climate change. It is impossible to know how a stock is changing when there is inadequate baseline information on the stock historically. The Council considers increased fishery data, independent population monitoring, and stock assessment capabilities critical to improving management and maximizing opportunities and production as required to meet Goal 1.

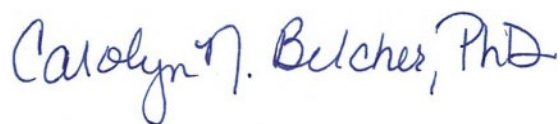
The Council agrees that there is a significant labor shortage in the seafood industry. Barriers to new entrants are also an issue, and include more than just permit limitations. Regulations are complex, challenging, and subject to change with little warning relative to business planning timelines. Some common regulations, such as trip limits, can reduce the potential for profitability

from each trip. The lack of clear pathways to fully joining the industry in the future can deter young fishermen from entering the industry as the deckhands of today. Fishing businesses can have difficulty securing the kinds of financial support and assistance that are available to more conventional businesses. The Council recommends that NOAA Fisheries develop and support fishing industry vocational education programs directed at fishing industry participants in communities that still have a fishing influence. Additionally, the Council recommends that NOAA Fisheries develop financial infrastructure or build relationships with financial institutions to increase the financial support available to seafood businesses, including facilitating loans or grants for new fishery entrants where permit or share costs are prohibitive.

The Council strongly supports efforts in Goal 3 to increase public awareness of the value of US seafood. Markets are under constant threat from imports and consumer opinion is too easily swayed by incorrect and inappropriate information about which stocks are sustainable. The Magnuson-Stevens Act is built upon the ideals of conservation and precaution and has resulted in US fish stocks being arguably the best managed in the world. NOAA Fisheries monitors the sustainability of all managed stocks and should work to ensure that consumers have access to fair and unbiased information about stock conditions. The Council recommends developing marketing approaches that promote factual information to educate consumers about the value of fresh, wild seafood and the highly regulated industry that exists to provide seafood products. Working with existing trade groups, such as the National Restaurant Association, could greatly expand the impact of such efforts. The Council also recommends that NOAA Fisheries be proactive in addressing false and misleading information about fishing practices and stock sustainability put forth by advocacy groups.

The Council supports the Goals of the Strategy and commends NOAA Fisheries on identifying the many significant threats to the seafood economy. We appreciate the opportunity to provide these comments, and look forward to continued collaboration as actions, timelines and milestones are developed. Please feel free to contact John Carmichael, Executive Director (john.carmichael@safmc.net) if you require any additional information.

Sincerely,

A handwritten signature in blue ink that reads "Carolyn N. Belcher, PhD". The signature is written in a cursive style with a large initial 'C'.

Carolyn N. Belcher, Ph.D.
Council Chair

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cc: SAFMC members and staff