



October 19, 2009

Interagency Ocean Policy Task Force
Council for Environmental Quality
Executive Office of the President
c/o The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

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Dear Task Force Members:

These comments were submitted electronically on October 17, but they have not yet shown up on the "submitted comments" list, so we are sending them by mail to make sure you receive them.

We submit the following comments on the Interim Report of the Interagency Ocean Policy Task Force on behalf of NAMA (the Northwest Atlantic Marine Alliance), working with fishing communities in New England.

1. **Place appropriate conditions on strategy objectives.** The nine priority objectives for implementing a national ocean policy are only as good as their implementation. For example, Ecosystem Based Management is a laudable goal but very difficult to do, and it requires guidance on defining areas and key parameters. And, marine spatial planning can provide a means for planning truly sustainable uses and vibrant ocean systems, or it can turn into a mercenary sea and seafloor grab that devastates living marine ecosystems.
2. **Include a provision for saying "no."** The Interim Report is generally a good statement of objectives, policies and principles. However, we believe there must be a clear mandate to say "no" to proposed activities that would compromise a national ocean policy "that ensures the protection, maintenance, and restoration of the health of ocean, coastal, and Great Lakes ecosystems." We are concerned that principle number 3 implicitly condones all uses of marine ecosystems and resources as long as they are balanced to achieve the policy objectives. For some activities that won't be possible.

3. **Facilitate timely, coordinated plans of action.** The NOC should begin coordinating with ongoing state and regional efforts quickly, even while plans of action are being developed, to facilitate compatibility between national ocean policy and ongoing marine spatial planning. Action plans must be flexible, nimble and well integrated. We are happy to see the federal government regaining a leadership role on environmentally protective ocean policy and look forward to federal coordination with similar state, regional, tribal, and local programs.
4. **Make coastal communities an integral part of the decision-making.** The management structure needs to indicate intention and methods of incorporating into management strategies for marine resources those local people who are part of the coastal ecosystem and who are directly affected by changes in the ecosystem. The recent Nobel Prize award to Elinor Ostrom is important validation of the perceived need for consequential involvement of local coastal communities in the management of marine resources and marine ecosystems. People who are part of these ecosystems suffer the consequences of mismanagement and must also be part of the solutions.
5. **Recognize the unique position of those people, such as fishermen, who have direct interaction with marine ecosystems.** Fishermen and fishing communities should be recognized as important sources of information about the status of marine ecosystems. Their information should be evaluated and appropriately used just as scientists' information is. Fishing methods, catch size, density, location, and timing and the nature, distance and size of commercial markets are all important aspects of marine policy. Ocean policy and management should recognize the tight interdependence the health and vitality of coastal fishing communities have with the health and vitality of marine ecosystems.
6. **Management should be consistent with multiple ecosystem scales.** The Interim report does not address the importance of matching the scale of ocean activities and specific ocean management actions with the scales of relevant marine habitats and ecosystem processes. This will be critical to marine spatial planning and should be immediately inserted into current management decision-making procedures. Among other activities, fishing operations, management, and markets should conform to this scale-matching principle.
7. **Be more explicit about coordination and conflict resolution.** The interim report acknowledges the need to coordinate among federal, state, local and tribal authorities and regional governance structures, but it does not address how each of these can be structured to effectively incorporate public participation. It is essential that coordination include a commitment by all to be guided by the national policy objectives and principles. We agree with using the precautionary approach as a guiding principle, but how to apply it needs some guidance in itself. We recommend you turn to the 1998 Wingspread statement on the Precautionary Principle (from the Science and Environmental Health Network's conference on the Precautionary Principle):

When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically.

The numerous local initiatives that have arisen from the agreement are worthy of your attention. The statement is also reminiscent of precautionary words in numerous international agreements. Clear guidance on implementing this principle in managing the use of marine resources should be included in the final report.

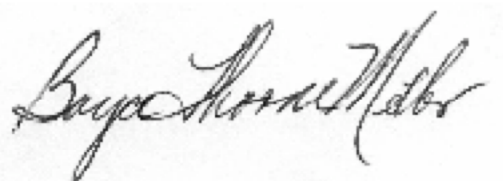
8. **Incorporate diverse sources of information into management process.** In several places it is mentioned that there is a need for stronger linkage between science and management. Where the linkages are indeed weak, we would agree that strengthening them is desirable. However, we hope more attention will be given to utilizing a broader body of verifiable scientific information. To be used, science must often be narrowly formatted and funneled first through governmental science institutions and then through more politically motivated offices. Furthermore there is little use of critical information from sociology, socio-economics, history, natural history and reliable non-conventional sources of field observation. Integrating all this will require unprecedented collaboration among diverse sources of information.

We congratulate you on a thoughtful and inclusive document outlining the new national ocean policy and guidance for its implementation. We thank you for the opportunity to provide our input into the process and the thinking, and we look forward to your success in bringing this policy to life.

Yours truly,



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Coordinating Director



Boyce Thorne Miller
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