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April 22, 2021

President Joseph R. Biden  
The White House  
1600 Pennsylvania Avenue, N.W.  
Washington, DC 20500



Dear President Biden:

On behalf of the Northwest Atlantic Marine Alliance (NAMA) and our network of nearly 400,000 fishing families around the United States, as well as in Canada, Latin America, and Europe, we were glad to see the inclusion of seafood in the recent American Rescue Plan. Thank you for the steps the Biden-Harris administration has already taken to support the food supply chain both on land and at sea. As we build back better, it's essential that we support seafood harvesters and businesses, and protect the health of the ocean and marine ecosystems.

NAMA is a fishermen-led organization building a broad movement toward healthy fisheries and fishing communities. We build deep and trusting relationships with community-based fishermen, crew, fish workers and allies to create effective policy and market strategies. NAMA provides backbone support to the Fish Locally Collaborative (FLC), a network that connects fishermen and fishing businesses across multiple continents.

We earnestly believe that small and medium-scale community-based fishermen must be the leading voice in finding solutions and new approaches to ensuring healthy ocean ecosystems, managing fisheries, and transforming seafood markets. Existing policies and markets threaten the marine environment, survival of community-based fishermen, and equitable access to the seafood they harvest. The pandemic has worsened the crisis, battering fishing communities that were already struggling to stay afloat.

The vision of the network of fishing communities who lead our work is a seafood system where marine ecosystems are protected from industrialization, consolidation, and privatization; seafood harvesters are in control of the price they are paid; those facing food insecurity have access to food from the ocean; and, everyone in the seafood value chain is paid fair wages, and afforded lives with dignity.

We look forward to working with you, the Secretary of Commerce, Gina Raimondo, and other executive branch staff, to advance ocean, fisheries and seafood policies that embody these values, and build a better seafood system together. We invite your administration to engage with us on the following priorities and welcome the opportunity to provide more in-depth detail.

### **Ensure that Small and Medium-Scale Fishing and Seafood Businesses Receive COVID-19 Relief**

Since the early days of the pandemic, NAMA has worked alongside a collective of fishermen, commercial fishing trade associations, seafood businesses, food and agriculture groups, environmental organizations, social justice advocates and concerned citizens to alert the federal government about the impacts of the crisis on small and medium-scale fishing and seafood businesses. Both the disruption in international markets and the eventual closure of restaurants in the US, where around 70% of consumer spending on seafood occurs, caused significant decreases in demand and in the ex-vessel price of catch.

The federal government has so far allocated \$600 million in direct payments to fishery participants. As the National Oceanic and Atmospheric Administration (NOAA) works with state governments to distribute the funds, we urge federal and state agencies to expedite the process and ensure that at least 50% of the relief goes to the small and medium-scale fishery participants who need it the most.

We commend the Biden-Harris administration for extending further support to food providers and families in need through the American Rescue Plan, including funds to purchase seafood, and grants and loans to small and mid-sized seafood processing facilities and processing vessels. We encourage the U.S. Department of Agriculture (USDA) to expand more of its programs (in particular the Farmers Market Promotion Program, Local Food Promotion Program and Beginner Farmer and Rancher Development Program) to fully include fishing and seafood, which historically have been largely or entirely left out.

### **Address Privatization of the Public Commons and Consolidation of Corporate Power in the Seafood Industry**

The Catch Share system of fisheries management, instituted by the Magnuson Stevens Act over a decade ago, enables individuals and entities to buy and sell the rights to fish. The inevitable result of converting fisheries access into a tradeable commodity is that the price of fishing quota has skyrocketed, and those with the most capital have the greatest leverage. As outside investors and big corporations gain increasing control of fishing quota, permits and other fishing privileges under the Catch Share system, independent fishermen across the country are being pushed out of the industry.

Without proper statutory and regulatory safeguards, corporate control over our fisheries is growing and becoming concentrated among fewer companies through vertical and horizontal

integration. We highly recommend setting strong guidelines at the national level to change this dynamic and preserve the way of life of fishing communities. These guidelines should include:

- Stricter consolidation caps (to reasonably restrict the amount of fishing quota that a single individual or entity can control)
- Owner-operator incentives (to prevent outside investors from accessing quota)
- Reserved allocations of fishing privileges for boats of various sizes (to ensure that fleets are diversified), and
- Fleet separation (to prevent seafood dealers from gaining access to fishing privileges).

### **Support Community-Based Fisheries Management**

Community-based fisheries management is an approach to managing fisheries that is bottom-up, ecosystem-based, and fosters collaboration between fishermen, scientists, policymakers, and the broader public. Community-based fishermen live and work in the communities where they fish. They are typically independent, owner-operators and the bulk of their earned income circulates within close range of the community. They are part of the social fabric that builds identity and culture within their communities. Community-based fishermen operate small to mid-sized boats that match the scale of the ecosystems where they fish. They are ecological experts attuned to the nuances of ocean rhythms, fish migration patterns, and spawning habitat. This is in contrast to fishing operations that extract money and resources from coastal communities and circulate them elsewhere, often carried out by large corporations or investors without community ties.

NOAA Fisheries' five-year strategic plan includes researching and implementing human-integrated ecosystem-based fisheries management because of NOAA's recognition that "managing ecosystems is about managing people." People on the water have the keenest insights, informed by daily experience, on how fisheries should be managed. The shift to a more integrated form of fisheries management should give community-based fishermen a participatory role in shaping the fisheries management process that goes beyond including them as subjects in studies on the human dimension of fisheries.

### **Increase Transparency and Accountability of Fishery Management Councils**

Our fisheries are a public resource and, as such, all data on fisheries access should be public information. Yet, Regional Fishery Management Council members and the public are not privy to data identifying the individuals and entities that hold fishing quota, and how much fishing quota each one controls, because it is considered "proprietary information." This dangerous trend has enabled greater corporate control of U.S. fisheries. We highly recommend making information on quota ownership and leasing available to the public.

Another flaw in the Regional Council system is that the fisheries management process is easily infiltrated by the same corporate players who control large amounts of fishing quota. We are, therefore, calling for regulations that lock the revolving door which allows representatives of big

corporations to lobby for policies that favor them, then join the Regional Councils to ensure that those policies are adopted and implemented.

### **Advance Racial Equity in the Seafood Sector and Expand Access to Seafood in Underserved Communities**

The Executive Order on Advancing Racial Equity and Support for Underserved Communities is a welcome step towards building a more just economy. Tribal fishermen and fishermen of color, both of which have been historically marginalized, are not adequately represented in the seafood sector. In addition, young aspiring fishermen, regardless of ethnicity, are encountering multiple barriers to entry in the fishing industry, including the high price of fisheries access and the substantial costs and governmental fees associated with boat ownership. As a result, the average age of independent fishermen is well over 50 years old. We encourage your administration to invest in a younger, more diverse generation of fishermen to sustain fishing as a way of life and to revitalize communities that have been denied access to fisheries for subsistence or commercial purposes.

Similarly, the demographics of seafood eaters are largely lacking in diversity. This trend is strongly tied to economic inequality, as seafood is often considered a luxury item that people with higher incomes can enjoy at restaurants. However, dietary guidelines suggest that everyone eat seafood at least twice a week because of its essential nutritional benefits. Addressing the root cause of this disparity by ensuring that all workers earn a living wage is paramount. We also recommend short and medium-term measures to determine where seafood is least available and support USDA and nongovernmental programs that are able to help fill that gap.

### **Restrict Industrial Activities that Adversely Impact Marine Ecosystems and Coastal Communities**

Our ocean and fisheries face pressures from industries ranging from fishing and aquaculture, to industrial agriculture, plastic manufacturing, oil and gas exploration, and offshore wind (to name a few). The U.S. fisheries management system must evaluate the impacts of all these activities on fisheries in a holistic way, instead of attempting to assess and regulate the effects of fish harvesting on fish populations in isolation.

It is particularly concerning that under the Trump administration, NOAA – the agency responsible for managing and protecting the nation’s fisheries – worked in tandem with the aquaculture industry to promote offshore finfish aquaculture in the United States. We oppose the introduction of factory fish farming facilities in federal waters for a host of reasons. First, by granting commercial permits to corporations for offshore operations, the government would be essentially converting the public commons into private enclosures, denying access for all other uses. Industrial fish farming also presents clear dangers to ocean ecosystems and coastal communities, such as toxic pollution, the potential spread of diseases and pathogens, and the risk of farmed fish escapes. Finally, flooding the seafood market with farmed fish is likely to displace wild-caught seafood along with people who fish for a living. We respectfully urge you to

reverse the previous administration's hasty and damaging policies supporting factory fish farming in the ocean, and instead, focus on measures that support responsible wild-caught fishing and more ecologically sound approaches to farming seafood.

### **Invest in Local Seafood Processing Facilities**

The impact of the COVID-19 pandemic on global seafood supply chains has been a painful reminder of the importance of investing in domestic food security. Despite the significant challenges that the seafood sector faces, direct producer-to-eater sales of seafood have increased dramatically, with community supported fisheries across the US reporting record-high sales. To meet the demand for local seafood, community-based fishing businesses need access to better infrastructure, including local seafood processing facilities. This would not only benefit coastal economies and seafood eaters across the country, it would help to lower the carbon footprint of seafood trade.

We applaud the immediate measures that the Biden-Harris administration has taken to address the climate crisis. Notably, the Executive Order on Tackling the Climate Crisis at Home and Abroad required NOAA to collect input from fishermen, regional ocean councils, fishery management councils, scientists, and other stakeholders on how to make fisheries and protected resources more resilient to climate change.

We must emphasize that one of the most carbon-intensive practices in the industry is exporting locally caught seafood for processing overseas and reimporting it to the United States. It is economically cheaper to process seafood overseas because current trade policies make it possible to externalize the true costs of processing seafood onto the environment and overseas workers. This is untenable. According to the latest climate models, there are less than 200 gigatons of carbon dioxide left in the budget for a 66% chance of staying below 1.5 degrees Celsius of global warming above pre-industrial levels (which the world is on track to use up within six years). We are therefore calling on your administration to eliminate wasteful carbon emissions by changing the economic incentives of seafood trade both to enhance U.S. food security and for the sake of a livable planet.

Thank you for considering these recommendations. We look forward to working with you, the Secretary of Commerce, and other executive branch staff on these and many other critical issues facing independent fishermen and small to medium-scale seafood businesses.

Sincerely,

Rosanna Marie Neil, Esq.  
Policy Counsel  
Northwest Atlantic Marine Alliance  
[rosanna@namanet.org](mailto:rosanna@namanet.org)

Jason Jarvis  
Board President  
Northwest Atlantic Marine Alliance  
[buddhajay108@yahoo.com](mailto:buddhajay108@yahoo.com)