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National Marine Fisheries Service  
National Oceanic and Atmospheric Administration  
U.S. Department of Commerce

*Disclaimer: The opinions expressed herein are our own and do not necessarily reflect the views of The Johns Hopkins University.*

**RE: E.O. 14276 Notice Response – Recommendations for Restoring American Seafood Competitiveness**

Dear National Marine Fisheries Service,

We are scientists and researchers at the Johns Hopkins Center for a Livable Future, based within the Department of Environmental Health and Engineering at the Johns Hopkins Bloomberg School of Public Health at Johns Hopkins University. The Center engages in a portfolio of research, education, and public policy analysis on the complex systems influencing diet, food production, public health, and the environment.

We are pleased to submit this comment on “Recommendations for Restoring American Seafood Competitiveness, E.O. 14276 Notice Response”. We appreciate the work of the National Marine Fisheries Service (NMFS) in undertaking this public comment period. Our recommendations are briefly summarized here, with expanded explanations, reasoning, and supporting references provided in the sections that follow.

**Summary of Recommendations:**

1. We strongly recommend that the NMFS apply, enforce, monitor, and fund the numerous successful tools at their disposal to continue and expand U.S. fisheries management.
2. We strongly recommend embracing and cultivating an industry-wide conservation ethic to protect U.S. fisheries for generations to come.
3. We strongly recommend investing in and supporting small- and medium-scale fishers, along with the working waterfront communities and infrastructure that backstop them.
4. We strongly support the initiative for NMFS to “modernize data collection and analytical practices to improve the responsiveness of fisheries management to real-time ocean conditions”.
5. We strongly recommend against widespread deregulation of U.S. fisheries.
6. We strongly recommend against cuts to the Seafood Import Monitoring Program (SIMP).
7. We strongly recommend against widespread cuts to staff, research, and data collection and sharing at NOAA and other relevant federal agencies.

8. We strongly recommend against cuts to Marine Protected Areas (MPAs) due to their role in supporting healthy fisheries.

The U.S. commercial fishing industry generated \$183 billion and supported 1.6 million jobs in 2022.<sup>1</sup> Domestic seafood also supports nutrition and health for millions of Americans through retail and food service sales, free and reduced-price meals served to children in the National School Lunch Program, and seafood distribution at food banks, and other outlets. These economic, workforce, and health gains are made possible by effective fisheries management which makes sure that sustainable fish stocks exist for fishers today, and into the future.

**Regarding regulations that govern fishing activities that may be suspended, revised, or rescinded, and ways to improve fisheries management and science:**

We recommend proceeding with caution when considering any fisheries regulations for suspension, revision, or rescinding. U.S. fisheries have averted collapse and rebounded because of carefully designed fisheries regulations, not in spite of them.<sup>2,3</sup> Similarly, the passage of landmark legislation like the Magnuson-Stevens Fishery Conservation and Management Act — a key U.S. fisheries regulatory vehicle — has resulted in numerous successes, including significant increases in fisheries landings since its enactment in 1976.<sup>2</sup>

U.S. fisheries rely on predictable, thoughtful regulations to successfully function. What's critically needed is sufficient support for fisheries management, enforcement, monitoring, and the corresponding funding to carry these out. Without regulations, the result is overfishing, collapsed fisheries, decimated working waterfront communities, loss of economic stability for fishers, risks to supply chain stability, and higher prices for consumers.<sup>4</sup>

There may very well be opportunities for low-cost, rapid innovations, but this is the exception not the rule. U.S. fisheries are part of an incredibly complex system that requires constant management in perpetuity. Instead, we recommend that NMFS take a holistic, systems-thinking approach that balances human, animal, and environmental health.

Many of the tools needed for continued, successful fisheries management are in place, but they need to be consistently applied, enforced, monitored, and funded. For example, provisions within the Magnuson-Stevens Act, regulations to fight illegal, unreported, and unregulated (IUU) fishing, as well as working waterfront protections, all have critical roles in the successful management of U.S. fisheries. Similarly, tools like the Seafood Import Monitoring Program (SIMP) are critical to fighting IUU and protecting U.S. fisheries for generations to come. However, cutting parts of SIMP will only serve to undermine successful fisheries management and we strongly advise against any such cuts.

To utilize the many existing tools at the U.S. government's disposal, there must also be adequate resources dedicated to staffing, data collection and reporting, and research. Maintaining critical staff at NOAA and other relevant agencies that have carried out these roles, is essential to the continued and successful management of U.S. fisheries.<sup>2,5</sup> Data, expertise, science, and research are all critically needed to understand and manage this system. Without these components, fisheries collapses will become more frequent and last longer.<sup>2</sup>

Similarly, there must be a continued and expanded cultivation of an industry-wide conservation ethic to sustain fisheries, livelihoods, and U.S. seafood production.<sup>4</sup> Healthy fisheries cannot exist without healthy habitats. Without careful management of fishing effort and other competing industry interests, fisheries

habitats suffer damage that can cause shockwaves throughout the larger system of U.S. fisheries. Similarly, changes in water temperatures and pH levels, as well as water contamination from runoff and atmospheric pollution are damaging fisheries habitats and the overall health of U.S. fisheries. However, with adequate use of existing tools that control for overfishing, harmful gear types, protections against pollution, and numerous other tools, these harms can be mitigated and prevented. In addition, critical protections like Marine Protected Areas (MPAs) have been proven to buffer, restore, and maintain the health of fisheries.<sup>2,6,7</sup> We strongly recommend that conservation protections be upheld and strengthened in U.S. fisheries management, not cut.

Lastly, the human dimension of healthy U.S. fisheries cannot be overlooked. Small-and-medium scale fishers — which make up a large segment of the workforce — along with the working waterfront communities that backstop them, are deeply in need of support. Throughout the U.S. these communities need investments in critical infrastructure, protection from climate change and gentrification, funding for gear and other equipment upgrades that support healthy fisheries, business protections, workforce development, worker health and safety training, protected public access to fishing grounds, and interagency collaboration. Moreover, these communities also need to be included in fisheries management as key stakeholders that have valuable knowledge and need to share in the co-management of fisheries.<sup>8</sup> When fisheries management is designed with community input there is better understanding of the necessary regulations, as well as increased compliance, enforcement, and conservation in support of healthy, sustainable fisheries.<sup>9,10</sup>

**Regarding “How can NMFS modernize data collection and analytical practices to improve the responsiveness of fisheries management to real-time ocean conditions?”:**

This initiative is deeply needed but will require significant initial investment and resources to execute before cost-savings can be realized. We recommend undertaking a careful and informed process that includes input from industry, fishers, working waterfront communities, scientists, policy makers, NGOs, and other key stakeholders. For example, a series of listening sessions throughout key fisheries regions in the U.S. could gather additional details on what’s needed and how data collection and analysis could be modernized.

**Conclusion**

While the administration’s attention to U.S. fisheries is important, great caution must be taken to not introduce harmful risks to the economy, fishers and fishing communities, and our food supply if hasty policy actions are taken. Said another way — if you mischaracterize the problem, you get the wrong solution. As such, we encourage the NMFS to act with patience, trust the tools in place while making thoughtful improvements where needed, and not discard valuable and functioning programs in pursuit of quick wins.

Sincerely,

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