

CAPE COD COMMERCIAL
**FISHERMEN'S
ALLIANCE**

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March 9, 2023

NOAA Fisheries

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Re: NOAA Fisheries Draft National Seafood Strategy

To whom it may concern:

Cape Cod Commercial Fishermen's Alliance submits the following comments in response to the February 14, 2023 [Notice](#) by NOAA Fisheries inviting the public to provide information and recommendations concerning NOAA Fisheries Draft National Seafood Strategy.

Cape Cod Commercial Fishermen's Alliance is a member-based nonprofit organization that works to build lasting solutions to protect our ecosystem and the future of our fisheries. Fishermen's Alliance represents 150 fishing businesses and more than 300 fishing families, making our organization the leading voice for commercial fishermen of Cape Cod. We represent a diverse group of commercial fishermen, seafood processors, and shoreside support businesses who depend on access to healthy fish stocks and the marine environment. While the species we target, the gear we use, and vessel sizes may differ, we all firmly believe in robust federal investments to ensure we continue to be both a global leader in ocean sustainability and provide consumers with sustainable local seafood.

We support a National Strategy that focuses on supporting the entire U.S. seafood sector, increasing U.S. wild capture production, supporting sustainable aquaculture production, and fostering access to domestic and global markets for the U.S. seafood industry. While we support the four goals of the Draft National Seafood Strategy, we would like to provide recommendations on specific actions, and partnerships that will ensure a thriving domestic U.S. seafood economy, and resilience of the seafood sector in response to a changing climate and other stressors. Below are comments regarding each goal:

1. Goal 1: Sustain or increase sustainable U.S. wild capture production.

We support building and maintaining strong partnerships with fishermen, regional councils, and research partners to ensure that wild-caught seafood is sustainable and managed appropriately. We recommend that funding be available to support fisheries science, and collaborative fisheries research projects. Adaptive fisheries management is important in the face of climate change and to protect and restore habitats important to our nation's fisheries to ensure resilient and sustainable coastal communities. Efforts should also be made to increase oceanographic sampling along our coast using fishing vessels as a platform for research. Existing data coverage often lacks spatial and temporal resolution to characterize key oceanographic processes in our region. By working

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closely with the fishing industry, we can collect improved spatial and temporal coverage, and provide data products that directly benefit fishing operations, marine resource management, coastal research, climate change mitigation and the Blue Economy.

2. Goal 2: Increase sustainable U.S. aquaculture production.

Expansion of aquaculture should only be done in a way that reflects the values of the local communities. We agree that aquaculture growth should be regionally appropriate and would recommend that growth be locally appropriate. We would recommend the following guidelines for how aquaculture is permitted:

- 1) Require communication among fishermen, local communities, and aquaculture startup companies, so they can openly discuss options, identify shared values for the ocean and working waterfronts, and create respectful relationships.
- 2) Aquaculture should collaborate with local fishermen to select mutually agreeable species and locations for their farms. Farms should be a location that does not take away important fishing grounds (or other culturally important areas). The species grown should complement and not compete with wild harvest. Commercial and recreational fishermen should be allowed to fish around the net pens, benefiting from the wild fish aggregations. There are other forms of assistance to be considered as well: co-marketing for domestic seafood, shared shoreside infrastructure, economies of scale for processing and distribution.
- 3) Mandate technology and farm designs that ensure aquaculture creates low to no environmental impact. This could be copper mesh that does not need chemicals to stay clean, controlled feeding to minimize food waste, using feed that is primarily waste from fish processing and plant oils, subsurface nets to avoid storm damage and escaped fish, wild broodstock or sterile babies so escaped fish won't impact the wild population, plenty of space and water circulation to keep fish healthy without antibiotics, and farm designs that prevent protected species interactions.
- 4) Model, Monitor and Management: Complete pre-permit modeling and pilot studies on farm design to ensure the proposed farm site can absorb effluent and function as designed. It is crucial to measure success or failure and shut it down if it is not functioning successfully. In addition, it is important to continue to monitor for environmental impacts, even after transitioning from pilot to a full-scale farm. Finally, practice responsible management with a commitment to values and a respect for the local community.

3. Goal 3: Foster access to domestic and global markets for the U.S. Seafood industry

Efforts need to be made on a federal level to identify and develop U.S. seafood markets that provide more local, and abundant seafood onto plates at universities, school systems, hospitals, and food banks. Education to consumers should focus on an approach that shrinks the geographical distance from port to plate and encourages individuals to choose a wide variety of seafood from their local ecosystems, thereby supporting a reduced carbon footprint. When consumers eat a diversity of local seafood, they increase market demand for other non-traditional species fishermen harvest, thereby supporting local fishermen and their communities. In addition, climate change is altering our ecosystems, and as waters warm, fishermen encounter new species that are traditionally found elsewhere. Therefore, we should encourage federal and state management and seafood markets to adapt to a changing ecosystem. Finally, it is important to form a relationship with the fishermen in your area, and know where your seafood comes from, and where it was caught. When you buy local, you support the entire seafood supply chain that includes fishermen on the water, seafood processors and dealers, and those in support businesses. Domestic seafood has a lower carbon footprint than imported seafood, and there should be efforts to support a market-based system that would create incentives for the seafood sector to reduce their emissions.

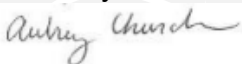
4. Goal 4: Strengthen the entire U.S. seafood sector.

In 2020, our nation and commercial fishermen faced unprecedented challenges in the face of the COVID-19 pandemic such as closures of local businesses, government stay-at-home orders, and international market disruptions. Retail sales of fresh and frozen seafood spiked as individuals cooked more at home. In addition, many consumers if they were able to, and lived near the coast, were able to go to the fishing docks and buy species such as lobsters and crabs off the boats. Seafood is a vital part of the Blue Economy, and purchasing local seafood is the best way to ensure that the seafood on our plates is both fresh, ecologically sustainable, and a socially responsible choice. Recently, there have been efforts in place to support a program for low and zero emissions technology in the commercial fishing industry through the Energy Efficient Fisheries (EEF) program in Massachusetts. This program, can allow commercial fishermen to save on their fuel bill, reduce emissions, and develop ways to lower their carbon footprint.

Another way to strengthen the seafood sector is to make sure local communities protect and support infrastructure like fishing docks and waterfront access, so coastal communities can adapt to new species that may migrate into our waters and invest in increasing seafood wastewater processing capacity. Federal money needs to be allocated to invest in new emerging fisheries that allow fishermen to diversify their harvester portfolio and decrease fishing pressure on species in rebuilding or low stock status. Finally, we need to address the “graying of the fleet” and attract young fishermen and seafood farmers to the sector by fully funding and expanding the Young Fishermen’s Development program. Currently, farmers and ranchers are eligible to participate in hundreds of workforce development programs compared to the seafood industry. The Young Fishermen’s Development Act (YFDA) allows funds to provide training, education, outreach, and technical assistance to the U.S. seafood sector. Priorities of the Young Fishermen’s Development Act are seamanship, navigation, vessel and engine care, innovative conservation, and fishing gear engineering, sustainable fishing practices, good business practices, direct marketing, and financial/risk management including vessel, permit and quota purchasing. At the Fishermen’s Alliance we place emphasis on recruitment, training, and retention through a program that is comprehensive of a diversity of local fisheries participants could work in, as well as rigorous safety training. Our program’s mission is to ensure that those individuals who attend the program stay local and find a future for themselves in the industry.

In conclusion, the fishing sector faces unique challenges that include complex fisheries management, gear restrictions and area closures, uncertain markets, changing ocean conditions, rising expenses, availability of permits and allocations, and a lack of understanding by the public. Despite these challenges, there are many opportunities to improve and grow this vital sector of our nation’s economy. Demand for local seafood is high and there is an important realization from COVID-19, that depending more on locally produced and harvested seafood is an important aspect of food security and a vital part of ensuring a sustainable Blue Economy. Cape Cod Commercial Fishermen’s Alliance greatly appreciates the opportunity to provide these comments to NOAA. We respectfully request that you take these comments into full consideration.

Sincerely,



Aubrey Ellertson Church
Policy Manager
Cape Cod Commercial Fishermen’s Alliance

