

November 11, 2021

The Honorable Jenniffer González-Colón
2338 Rayburn HOB
Washington, DC 20515

Dear Representative González-Colón,

Thank you for the opportunity to provide comments on the H.R. 4690, the Sustaining America's Fisheries for the Future Act which provides potential updates to the Magnus-Stevens Fisheries Conservation and Management Act (MSA). As mandated by our overarching comments herewith focus on the impacts of the proposed legislation specific to the U.S. Caribbean.

In general, the current MSA, through the actions of the Caribbean Management Council, have worked for fisheries in the U.S. Caribbean by balancing the need to benefit both the nation's fisheries and local island communities. Transparency and the public involvement are foundational elements of MSA for carrying forward fisheries management decision making. Retaining these elements along with increasing the current adaptability mechanisms is crucial for the effectively managing the fisheries of our diverse region. The U.S. Caribbean archipelago is unique, made up of several distinct rural coastal communities and traditions that are dependent on the ocean for food security, recreation, and cultural identity. Our fisheries are considered strictly artisanal since they provide only for a small percent of local fish and shellfish consumption while our communities are underserved and experiencing disproportionate levels of poverty and lack of food resources in comparison to the rest of the continental U.S. National level definitions and provisions that afford regional flexibility safeguard these regional differences and avoid unnecessary implementation challenges. Essential fish habitat, forage fish, bycatch reporting, and subsistence fishing are examples of key provisions that would benefit from flexible implementation approach nationwide.

The proposal includes additional reporting and planning requirements intended to monitor fisheries performance and the effects of management measures in relation to climate change. These requirements could pose a significant challenge for the less developed, culturally based fisheries in the U.S. Caribbean. By nature of our artisanal subsistence fisheries, there is a limited capacity to satisfy these requirements, and also potential impacts regarding how the reporting and planning would be used as part of the management decision making process. U.S. Caribbean data collection systems have not evolved to support the sophisticated stock assessments to support and implement ACL management. The consequences of a management decision based upon faulty science, or an incomplete picture, can be significant for subsistence-based communities, which cannot simply reconfigure for other fisheries. In addition, merging environmental climate data with highly variable, data-limited fishery dependent data could amplify the already existing large uncertainties and impact the management obligations.

A continued investment in the research and monitoring infrastructure coupled with management and enforcement capacity within our region is essential for the existing management agencies to fully realize the responsibilities under MSA. Thank you for taking our comments into consideration as part of your participation in the upcoming public hearing.

Sincerely,

A handwritten signature in blue ink, appearing to read 'René Esteves', with a stylized, cursive script.

René Esteves
Marine Outreach Director
Research Coordinator
Puerto Rico Sea Grant