

The Honorable Jared Huffman
Chairman
Subcommittee on Water, Oceans, and Wildlife
Committee on Natural Resources
United States House of Representatives
1324 Longworth House Office Building
Washington, D.C. 20515

The Honorable Don Young
Acting Ranking Member
Subcommittee on Water, Oceans, and Wildlife
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United States House of Representatives
1329 Longworth House Office Building
Washington, D.C. 20515

November 24, 2021

Dear Chairman Huffman and Acting Ranking Member Young:

Thank you for convening the Subcommittee's legislative hearing on November 16 to consider H.R. 59, H.R. 4690 and H.R. 5770. The Magnuson-Stevens Fishery Conservation and Management Act (MSA) has made the U.S. fishery management system the envy of the world. We welcome congressional review of its successes and the potential consequences of legislative changes.

During the hearing, Chairman Huffman made certain comments about trawl vessels operating in the Alaska pollock fishery. He also saw fit to enter into the record a "memorandum" authored by a group called "Accountable US". Both the comments made by the Chairman and the "memorandum" he entered into the record served to spread misinformation about the Alaska pollock fishery. I understand that Mr. Shannon Carroll from Trident Seafoods will be providing a written response to those comments and that "memorandum". I will not repeat all the points being made by Mr. Carroll, but I did want to provide some additional information that I hope will be helpful to the Subcommittee. I respectfully request that my response be made part of the hearing record.

By way of background, for more than 40 years I have lived in coastal Alaska, in communities that depend upon fisheries for their survival. My whole career has been spent advocating for sustainable fisheries—to help ensure that those communities have a future. I operated an air taxi from the Tom Madsen Airport in Unalaska with my late husband for nineteen years, and then worked for the shoreside processors that are central to the economy of coastal communities. I am now proud to work as Executive Director of the At-sea Processors Association, representing six companies that operate catcher processor vessels in the Bering Sea Alaska pollock fishery—the largest fishery in the United States and the largest seafood fishery in the world.

The Bering Sea Alaska pollock fishery has set the bar for fisheries management and sustainability for decades. It is certified sustainable by two independent certification bodies with some of the highest sustainability ratings of any fishery on Earth. Here are some facts that I believe Members of the Subcommittee should know about this fleet:

- **We are accountable.** All of the fishery's catcher processor vessels pay to carry two Federal observers who measure and report everything that comes aboard on every trip. Scales and multiple cameras are also used to ensure that everything caught in our nets is counted and

documented. There is no other fishing fleet, anywhere, that is more closely monitored and more accountable for their operations.

- **We are transparent.** Every April since 2000, we have reported to the public through the North Pacific Fishery Management Council the precise amount and type of species caught by each vessel. All of those reports are available on the [NPFMC website](#) (see Pollock Conservation Cooperative and High Sea Catchers' Cooperative). The catch data is also available to the public during the season on the [National Marine Fisheries Service website](#).
- **We follow the science.** The North Pacific has invested heavily in climate science and sophisticated models to address the changing climate. This includes local and traditional knowledge. The process to include LKTK is being improved, so that before any actions are taken we have all the available science. This region is known for having adopted precautionary principles early in the history of the Council, and we continue to improve on the ecosystem-based fishery management that has long been a hallmark of the region.
- **We work hard to minimize incidental catch.** All fisheries encounter non-target species. Our fleet goes to great lengths to target pollock and avoid other marine life. As a result of these efforts, more than 98 percent of what our vessels catch is pollock.
- **We have dramatically reduced incidental catch of Chinook salmon.** Since 2010, our fleet has operated under a Chinook salmon hard cap, which would shut the fishery down if exceeded. When the Western Alaska stocks are low our cap is lowered, which has been the case for the last several years. Our fleet has worked to not only stay under the cap, but also to further minimize incidental catch of salmon by investing in extensive gear and technological innovations, including underwater cameras, salmon lights, and salmon excluders. We also pay to access and share detailed historical and current spatially explicit catch data across the entire fleet, and we analyze these data in real time to help inform time and area fishing decisions to avoid salmon. As a result, incidental catch of Chinook salmon by our vessels has declined by 89 percent since its peak in 2007.
- **We support salmon science.** Salmon encountered by our vessels are counted and sampled so that ecosystem impacts can be understood. Every tenth Chinook salmon encountered is sampled to determine its genetic makeup. Every thirtieth chum salmon is also sampled. Those samples are processed by the National Marine Fisheries Service, and the stocks of origin of those salmon are publicly reported. The science shows us that a majority of chum salmon encountered in the Bering Sea pollock fishery come from hatcheries outside the United States.
- **We donate salmon to help those in need.** Regulations require all salmon to be retained and counted by the Federal observers. Our companies donate eligible salmon to regional foodbanks through our non-profit partners Sea Share, to serve those in need.
- **Incidental catch by trawl fisheries is not the cause of declining salmon runs in Western Alaska.** Declining salmon runs in Western Alaska are devastating to see, and the impact on Western Alaska communities is heartbreaking. We should do everything possible to understand the causes of these declines and address them through science-based policy

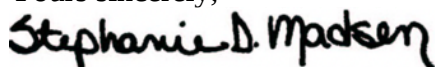
responses. Genetic sampling and adult equivalent (AEQ) modeling of incidental catch makes clear that trawl fisheries are not the cause. In the case of Chinook salmon, the best scientific information indicates that the current impacts of incidental catch on total run estimates for Western Alaska rivers has been less than three percent in every year since 2009. Incidental catch impacts to Upper Yukon Chinook runs average close to 1 percent.

- **Our fleet is inextricably linked to Western Alaska communities.** The companies operating these vessels partner or are owned in whole or in part by the Western Alaska Community Development Quota (CDQ) Groups. In fact, as envisioned by the late Senator Stevens, who helped establish the CDQ program, the ownership share of CDQ groups in this fishery continues to increase. Revenue from the Bering Sea pollock fishery provides critical resources to Western Alaska communities in need. Folks who characterize our fleet as “outsiders” are incorrect, and are pitting Alaskan against Alaskan.
- **We support habitat protections to ensure a healthy Bering Sea ecosystem for future generations.** Every five years, as required by the Magnuson-Stevens Act, the North Pacific Council looks at impacts to habitat by fisheries. If the science, including a fishing effects model, indicate that impacts are more than temporary and more than minimal, mitigation measures are developed.
- **We are providing low-cost, low-carbon protein that helps feed the world.** Alaska pollock is a low-cost, high-nutrition seafood. It feeds millions of Americans in need, through affordable retail and food-service offerings, and through the National School Lunch and food bank programs. It also serves consumers around the world, providing one of the most climate-friendly options of any widely-available protein. Its CO₂e per kg of protein is 3.77kg—compared to 12.5 for chicken, 19.65 for pork, 20.83 for plant-based meat, and 115.75 for beef. All food production has an environmental footprint. We are proud that ours is one of the most modest of any protein source on Earth.

Our industry welcomes debate about responsible management of our natural resources. It is critical that such a debate be grounded in science and proceed based on facts. Those who are spreading false information about trawl fisheries are doing nothing to help our communities or our environment. Rather, I urge those who care about these issues to join us in advancing solutions that are based in science and fact. We strongly support efforts to further study and address declining salmon runs in Western Alaska; we welcome science-based efforts to minimize incidental catch in all North Pacific fisheries; and we are committed to improving the resiliency of the precious Bering Sea ecosystem through management that responds to and incorporates climate change.

I look forward to working with Members of the Subcommittee to advance our shared priorities in these critical areas.

Yours sincerely,



Stephanie Madsen

Executive Director

At-sea Processors Association