



TRIDENT SEAFOODS CORPORATION

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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
Committee on Natural Resources
United States House of Representatives
1329 Longworth House Office Building
Washington, D.C. 20515

November 24, 2021

Chairman Huffman, Ranking Member Benz, Dean of the House Congressman Young, and Members of the Committee:

Please accept this written follow up to statements made and a document added to the record by the Chairman during the November 16, 2021 Subcommittee on Water, Oceans, and Wildlife legislative hearing on H.R. 59, H.R. 4690, and H.R. 5770. Trident Seafoods appreciates the opportunity to provide a response given our commitment to science-based management and responsible fishing practices, and our sincere concern for the health of communities impacted by sharp declines in salmon abundance in two major Western Alaska river systems. I respectfully request that this response be entered into the hearing record.

I participated in the November 16 hearing in good faith to contribute to an important ongoing dialogue regarding fisheries conservation law in the United States. I am stunned to instead be reacting to use of the hearing as a platform to help advance a misinformation campaign against my employer and one of the most intensely monitored and responsibly managed fisheries in the world.

The Chairman alleged that pollock trawl vessels, including those owned and operated by Trident, “are far exceeding their bycatch limits of salmon and halibut, leaving small fisheries and Alaska Native fishing communities struggling.” As I noted in my oral testimony during the hearing, this is a false statement that contradicts NOAA Fisheries data and publicly available reports.¹

An authorless and error-laden memo² was also entered into the record in support of this statement included inaccurate and out of context information. We completely reject the unvetted document, which, together with the Chairman’s comments, accuse Trident of acting unlawfully and irresponsibly, and imply we have no regard for conservation or for the health of Western Alaska communities. Nothing could be further from the truth.

¹ NOAA Fisheries, Fisheries Catch and Landings Reports in Alaska,
<https://www.fisheries.noaa.gov/alaska/commercial-fishing/fisheries-catch-and-landings-reports-alaska>.

² See Attachment 1 for detailed response to the memo added by Chairman Huffman.

Bycatch is rigorously managed

Many companies operate in the Bering Sea pollock fishery, the nation's largest fishery. Neither Trident nor the pollock fleet have exceeded their salmon or halibut bycatch limits in either the Bering Sea or the Gulf of Alaska. **In fact, they are operating well below their limits in both regions.** Both the Bering Sea and Gulf of Alaska pollock sectors operate under hard caps for halibut and salmon, with an abundance-based trigger further reducing Chinook salmon hard caps in the Bering Sea fishery. Note that there is very little halibut bycatch in the pollock fishery, so the comments and record submission about halibut bycatch appear to conflate the pollock sector with the flatfish bottom trawl catcher-processor fishery³ in which Trident does not operate.

All hard caps are implemented by the National Marine Fisheries Service (NMFS). The agency closes fisheries when Prohibited Species Catch (PSC) bycatch limits are reached so they are not exceeded. PSC species in North Pacific groundfish fisheries include salmon, halibut, crab, and herring; none are allowed to be retained for sale. Bering Sea pollock fisheries all have one or two federally trained independent observers onboard to monitor all fishing activity. Every Chinook salmon is retained and counted under controlled oversight for accurate reporting and to support the strong vessel-level accountability measures in place in this fishery. This public information is tracked by NMFS in-season managers and reported weekly on the NMFS website.⁴

In addition to hard caps, Bering Sea pollock fisheries are required to operate under Incentive Plan Agreements (IPAs) to promote salmon bycatch avoidance (through contractual incentives) at times when hard caps are not at risk of being reached. The IPA contracts also all include agreement to impose and adhere to rolling hot spot area closures based on real-time data, and other reporting requirements. **These measures are among the most innovative globally and have been effective: Chinook bycatch in the Bering Sea pollock fishery has been reduced by around 89% since its peak in 2007. They come at great expense to our industry, but we understand the importance and are committed to their continuation.**

All Bering Sea pollock cooperatives submit reports to the North Pacific Fishery Management Council, annually.⁵ Likewise, the North Pacific Council receives updated genetic information on Chinook and chum salmon bycatch annually. This is critically important because not all bycaught Chinook or chum salmon is from the United States. Annual genetic and age sampling enables us to understand the impacts of salmon bycatch on salmon runs in specific regions of the United States, like villages in coastal western Alaska.

³ While Trident does not participate in the Bering Sea flatfish sector, it should be noted they are also managed under a hard cap, which cannot be exceeded.

⁴ See footnote 1.

⁵ Available here: <https://www.npfmc.org/cooperative-reporting/>.

Science shows bycatch isn't the reason for declines

More broadly, I am concerned that the statement made furthers unreasonable expectations regarding the implications of reducing bycatch. Science demonstrates that bycatch is not in any way a significant contributing factor to declining salmon abundance in Western Alaska. Even if all bycatch could be stopped, there is no scientific reason to expect these salmon stocks would then rebound.

Using genetic tools and modeling, NMFS and Alaska Department of Fish and Game scientists have estimated how many of the incidentally caught salmon would have returned as adults to spawn. Based on this work, the latest assessment (2017) showed <2.5% impact on aggregate coastal Western Alaska Chinook runs and <1% on Middle/Upper Yukon Chinook runs. The 2019 genetic work demonstrated that out of the total number of chum bycatch in the Bering Sea pollock fleet, 57% was of Asian origin (predominately hatchery fish), 16% was from coastal western Alaska, and 0.3% was from Middle/Upper Yukon.⁶ The MSA requires that Councils use the best available scientific information to make decisions, and the comprehensive data provided on an annual basis to the public and the Council on these topics is staggering but necessary to ensure informed and scientifically based decisions are made consistent with the national standards. Trident urges use of scientific information and evidence in both decision-making for Federal fisheries and in discourse about changes to the MSA.

Drivers of salmon productivity declines may be due to several other factors that are the current focus of state salmon scientists and research organizations (like Arctic-Yukon-Kuskokwim Sustainable Salmon Initiative (AYK SSI)), warranting further analysis of system change and ecosystem dynamics. We need to put resources into this research specifically for Alaska salmon. We have seen unprecedented sea ice loss in recent years and temperatures are increasing both in-river and in the ocean, specifically in the nearshore environment. A better understanding of these drivers is critical to forecast runs and salmon health. Specifically, we need more research on the lifecycle of salmon species in the freshwater, nearshore, and marine environments, and the effects that environmental changes are having on salmon throughout their lifecycle. Trident has advocated for this work and funded significant salmon research through the Pollock Conservation Cooperative Research Center. We not only contribute financially to marine research but also support it through our operations platforms. Our future depends on detecting and appropriately responding to ecosystem changes.

I empathize with subsistence users in Western Alaska, and while I can never fully know the pain and sense of loss that they are feeling or their connection to the resource and culture, I appreciate what they are saying and am aware of the importance of continuing to further reduce incidental catch of Chinook and chum in the Bering Sea pollock fishery. However, the implication that the Council and industry have done nothing, and that the pollock fleet's bycatch is responsible for declining runs, is false. In addition to misleading Subcommittee Members and the public, it distracts from the efforts and research that are needed to determine factors driving lower salmon productivity in some regions.

⁶ See Bering Sea Salmon Bycatch Update North Pacific Fishery Management Council, September 2021, available here: <https://www.npfmc.org/wp-content/PDFdocuments/bycatch/BeringSeaSalmonBycatchFlyer.pdf>.

Actions are working – and need to support sustainable, healthy fisheries for all

The Chairman also made statements with respect to the regional councils “doing nothing” on bycatch. However, the facts and data do not support this. In the North Pacific, bycatch has been on the agenda at nearly every meeting since I began working in the Council process in 2015. Among other bycatch-related efforts, in 2015, the Council took actions that have reduced halibut bycatch in the flatfish sector by 25%, and it is poised to secure further reductions through an abundance-based approach at its upcoming meeting. As recently as last month, the Council took final action on a cooperative management structure for the Bering Sea/Aleutian Island Pacific cod trawl catcher vessel fishery, that will effectively reduce halibut incidental catch limits by 25% and Bristol Bay red king crab incidental catch by 80% when combined with the existing management measures that reduce limits when biomass is low.

More broadly, this sequence of events starkly illustrates why we believe fishery management plans should be developed in-region through a transparent and robust review process rather than through an outside, centralized body that simply cannot develop the depth of knowledge needed to distinguish valid from invalid information in making informed decisions on all fisheries management and conservation actions nation-wide.

As noted in my written and oral testimony, Trident is heavily invested in ensuring that the nation’s Regional Fishery Management Council process supports—to the extent that it has the authority—sustainable, healthy fisheries and ecosystems for all stakeholders, and that it is transparent and fair for all stakeholders. We have consistently supported management programs that reduce bycatch, increase accountability, and improve stability for coastal communities and independent harvesters. We have invested millions into filling gaps left by inadequate funding for science and research, including supporting efforts to conduct high seas salmon surveys, hatchery/wild salmon interaction studies, and gear modifications. These are issues upon which members of this Subcommittee should be aligned, and Trident welcomes the opportunity to work with you to achieve our shared objectives.

Thank you,

A handwritten signature in black ink, consisting of a stylized 'S' followed by a series of loops and a trailing line.

Shannon Carroll
Director Fisheries Development and Alaska Public Affairs
Trident Seafoods Corporation