

California Pelagic Fisheries Association

Grantville Station
P.O. Box 601124
San Diego, CA 92160



February 22, 2025

The Honorable Harriet Hageman
Chair, Subcommittee on Water, Wildlife and Fisheries
Washington DC Office
1227 Longworth House Office Building
Washington, DC 20515

Re: Evaluating the Implementation of the Marine Mammal Protection Act and the Endangered Species Act.

Dear Ms. Hageman and subcommittee members,

The California Pelagic Fisheries Association (CPFA) is a San Diego-based organization representing U.S. fishermen targeting wild, highly migratory fish species (HMS) from the offshore waters of California. We are using this opportunity to express our views on the regulatory aspects of the Marine Mammal Protection Act (MMPA) and the Endangered Species Act (ESA).

Over the years, our members have become further restricted in their ability to harvest the healthy, HMS stocks such as the swordfish, bigeye tuna, and Pacific bluefin tuna found between the U.S. West Coast and Hawaii. These restrictions result from regulations imposed by the Department of Interior's Fish and Wildlife Service and the Department of Commerce's National Marine Fisheries Service under both the MMPA and the ESA. We argue that the regulatory interpretations of the two agencies fail to consider indirect effects created elsewhere from their actions. Consequently, unaccountable regulations severely hamper our members' ability to provide fresh seafood to U.S. consumers and contribute to U.S. food security.

The regulations adopted by the agencies overlook that the Nation consumes mostly imported seafood. Based on the source used, the USA imports somewhere between 62-68¹ to 90 percent² of the seafood it consumes. The ability to close that gap and reduce dependence on foreign fishing sources will require policymakers understanding that excessive restrictions on U.S. fishermen only transfer these impacts to foreign fisheries operating under less stringent conservation requirements than those imposed on U.S. harvesters. In other words, the unintended displacement of ecosystem impacts curtailed by shortsighted regulations results in reduced supply to the USA, shifts production to other less regulated areas, and adds another factor affecting the Nation's seafood trade deficit.

¹ Gephart, J.A., Froehlich, H.E. and Branch, T.A. 2019. *Opinion: To create sustainable seafood industries, the United States needs a better accounting of imports and exports*. Proceedings of the National Academy of Sciences, 116: 9142-9146.

² Helvey, M., Pomeroy, C., Pradhan, N.C., Squires, D. and Stohs, S. 2017. *Can the United States have its fish and eat it too?* Marine Policy, 75: 62-67.

We urge the subcommittee to consider our comments in its deliberations and to revisit the intentions of both statutes in the light of U.S. food security. Protections for living marine resources need to shift from a unilateral marine conservation perspective to one that recognizes and accounts for distant ecological consequences.

Sincerely,

A handwritten signature in blue ink that reads "Dave Rudie". The signature is written in a cursive, flowing style.

Dave Rudie
President, California Pelagic Fisheries Association