

June 4, 2025

The Honorable Harriet Hageman Chair Subcommittee of Water, Wildlife and Fisheries Committee on Natural Resources United States House of Representatives Washington, D.C. 20515

Dear Chair Hageman:

On behalf of the approximately 300 member companies of the National Fisheries Institute (NFI), I write to share our views on several topics impacting the seafood industry in connection with your Subcommittee's June 4, 2025 "*Restoring American Seafood Competitiveness*" oversight hearing. NFI offers these comments not only to highlight current successes, but also to offer recommendations for strengthening and supporting a thriving domestic U.S. seafood economy.

For almost 80 years NFI has been the leading voice for the fish and seafood industry and America's largest seafood trade association. Our members span the entire seafood value chain—from East Coast lobster, clam and scallop harvesters, Alaska vessel owners, Pacific processors, Midwest importers, and Southern shellfish producers, to aquaculture providers, distributors, cold storage providers, retailers, and seafood restaurants. Collectively, these companies supply American families with tens of millions of delicious, healthy, sustainable seafood meals every year, and directly support almost 1.6 million American jobs and more than \$183 billion in economic value to the U.S. economy.

First and foremost, seafood is widely regarded as one of the healthiest proteins available. At a time when Americans are told to limit the consumption of many foods, Americans are encouraged to enjoy seafood more frequently to improve their health. It is not difficult to see why. Seafood is low in total fat, high in protein, and rich in vitamins and minerals, such as selenium, vitamin D, omega-3 fatty acids, and B vitamins. However, seafood is one of the most under-consumed foods in American diets. The 2020 Dietary Guidelines for Americans (DGAs) recommends that all individuals eat 2-3 seafood servings per week, but, according to USDA, over 90% of Americans fall short of this recommendation.

Although increasing seafood consumption is not the focus of this hearing, seafood's unique nutritional profile should not be forgotten when discussing the sustainability, regulatory, and competitiveness issues that are.

Federal Fisheries Management System

NFI and its member companies recognize the importance of sustaining healthy fisheries and marine ecosystems for the benefit of American families and future generations. For almost 50 years, the U.S. fisheries management system under the Magnuson-Stevens Fishery Conservation Act (MSA) under the National Marine Fisheries Service (NMFS) has been recognized as one of the world's best. That system has put the United States at the global forefront of science-based fishery management. Through its eight regional councils, the system recognizes regional differences to responsibly but nimbly manage a huge variety of stocks through the individual Fishery Management Plans (FMPs).

These FMPs are developed using ten fundamental National Standards that provide a framework for Council actions. The system works because it balances regional autonomy with science and emphasizes transparency and fairness for all stakeholders. The result? The vast majority of American fisheries are sustainably fished.

Unfortunately, in the last few years there have been attempts to go around MSA to implement extraneous policy measures that threaten the successful path NMFS has carved out. For instance, rather than recognizing that seafood sustainability under the MSA framework augments ocean conservation, opponents of this approach have sought to wall off large swaths of the U.S. EEZ from commercial fishing. A recent attempt to change the National Standards, if successful, would have subjected American seafood harvesters to unworkable and unrealistic requirements regarding, for instances, bycatch, in order to satisfy a fringe agenda. These proposals, especially when carried out without public input, undercut confidence in U.S. fishery management, weakening NOAA's position as a global fishery management leader and sowing uncertainty in industry as to the reliability of access to domestic fisheries.

NFI believes NMFS must do more to communicate its achievements and promote its science-driven fishery management approach—not only to the American public but also to international markets. A key part of this outreach should be an enhanced promotion of *FishWatch*, NMFS's consumer-facing resource, as the definitive source of information on the availability and sustainability of U.S. seafood.

Looking ahead, continued dialogue is needed on how to enhance the MSA framework and expand opportunities within it. NFI strongly urges NOAA to prioritize essential functions that support the seafood industry, including timely stock assessments, streamlined permitting and regulatory processes, and consistent fisheries management support for regional councils.

NFI welcomed President Trump's April 17, 2025, Executive Order (EO) titled "Restoring American Seafood Competitiveness." This EO builds on his 2020 EO 13921, "Promoting American Seafood Competitiveness and Economic Growth," and recognizes the challenges faced by the industry. The new EO directs the Secretary of Commerce and other agencies to "immediately consider suspending, revising, or rescinding regulations that overly burden America's commercial fishing, aquaculture, and fish processing industries." It also calls for collaboration with regional councils to identify recommendations that will reduce burdens, boost production, and improve management and science.

NFI believes that this EO will help maintain a stable and predictable fisheries management system that supports growth, investment, and long-term planning. Preserving the structure of the MSA, while ensuring it evolves to meet today's realities, is essential to keeping the American seafood supply chain strong, reliable, and economically viable.

Aquaculture

President Trump's April EO also focuses on increasing domestic aquaculture production, which NFI supports. Given that aquaculture continues to be fastest growing form of food production in the world, prioritizing development of American aquaculture only makes sense. Farmed and wild-capture products are both essential if seafood is to play a role in feeding a growing global population. Yet the U.S. lags behind, ranking 16th globally in aquaculture production. Although multiple factors contribute to this performance, the nation's complex and burdensome regulatory framework is a primary culprit.

NFI therefore applauds efforts to advance an efficient, predictable, timely, and sciencebased aquaculture regulatory framework that reduces red tape and increases transparency and predictability. Such a framework is essential in order to increase investor confidence and drive customer interest in the development of a mature U.S. farmed seafood sector. As plans and proposals are introduced, NMFS should clearly establish how the agency will work with other regulators (such as USDA), industry, and additional stakeholders to help grow this sector of seafood.

The Seafood Import Monitoring Program (SIMP):

President Trump in the April 17, 2025 EO asked that the Commerce Secretary "immediately consider revising or rescinding recent expansions of the Seafood Import Monitoring Program to unnecessary species and further improve the program to more effectively target high-risk shipments from nations that routinely violate international fishery regulations" as a way to highlight the need to combat illegal, unreported, and unregulated (IUU) fishing.

NFI and its members strongly support efforts to combat IUU fishing. That includes support for the many federal initiatives underway to ensure that the United States leads the way in promoting sustainable fisheries management and identifying measures—such as the Agreement on Port State Measures (PSMA)—that can genuinely address illegal fishing where it occurs.

However, NFI believes we need to go a step further, and eliminate the SIMP program, which is deeply flawed and fails to effectively detect and deter IUU. In April 2021, NOAA Fisheries published a report on SIMP implementation, concluding that "SIMP does not prevent or stop IUU fish and fish products from entering U.S. commerce." Given that the program has not achieved its intended purpose, it is reasonable to question its continued relevance. Illegal fishing is a complex challenge to address. SIMP is a very limited tool for addressing the IUU challenge. It is a unilateral program aimed at a global problem; yet requires seafood companies to stop IUU fishing after the fact at the U.S. ports of entry long after harvest activity has occurred—and requiring mountains of paperwork.

The United States instead should prioritize stronger government-to-government efforts, such as bilateral and multilateral diplomacy, fishery management capacity building, coordinated law enforcement against bad actors (instead of species of fish), and full utilization of international Regional Fishery Management Organization (RFMOs).

One legislative proposal the Committee should review is S.283, *The Illegal Red Snapper and Tuna Enforcement Act* which builds upon existing effective efforts stopping IUU and help give NOAA Fisheries technical assistance from the Coast Guard and several tools and partnerships necessary to help and produce concrete results. NFI supports the bill in its current form, as long as it replaces SIMP.

Conclusion

NFI appreciates the Committee's attention to the critical issues impacting the seafood industry and the opportunity to provide input during the "Restoring American Seafood Competitiveness" oversight hearing. From modernizing fisheries management and improving aquaculture permitting to advancing more effective approaches to combat IUU fishing, there are clear opportunities to strengthen the competitiveness and resilience of the U.S. seafood sector. With clear direction, consistent engagement, and a firm commitment to practical, science-based policymaking, the federal government can be a vital partner in helping this essential American industry grow—supporting jobs, driving economic value, and delivering high-quality seafood to millions of consumers at home and abroad. NFI applauds the Committee's leadership looks forward to continued collaboration in the months ahead.

Sincerely,

Lise Warlenda Ricard

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