



100 Davisville Pier
North Kingstown, R.I. 02852 U.S.A.
Tel: (401)295-2585

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Testimony of Meghan Lapp on Behalf of Seafreeze Ltd. and Seafreeze Shoreside Re Northeast Marine Monument:

My name is Meghan Lapp and I am the General Manager of Seafreeze Shoreside, a fish plant in Point Judith, Rhode Island, that unloads fresh seafood from commercial fishing vessels. I also serve as the Fisheries Liaison for both Seafreeze Shoreside and Seafreeze Ltd., a sister facility in North Kingstown, Rhode Island. Our companies own and operate three commercial fishing vessels that harvest sustainably managed U.S. seafood in the Monument area. In fact, our two freezer vessels have sustainably fished the Monument area since the 1980s, including for Atlantic butterfish and squid, which are both projected to be climate change winners according to the Northeast Fisheries Science Center.¹ For decades, the Monument area has been an extremely important fishing ground for our vessels. In certain seasons it can be one of our most important harvest areas.

In my role as Fisheries Liaison, I serve on two Advisory panels for the New England Fisheries Management Council, two Advisory Panels for the Mid Atlantic Fishery Management Council, and one Advisory Panel for the Atlantic States Marine Fisheries Commission. I continually participate in what is a public, transparent and science-based process of U.S. fisheries management federally established under the Magnuson Stevens Act. Due to this process and strict federal standards, U.S. commercial fisheries are the most sustainable fisheries on the planet. According to a George Mason University study, U.S. fisheries are the 7th most regulated industry in the United States, more so than oil and gas extraction and more so than pharmaceutical manufacturing.²

Many of these fisheries regulations are, in fact, spatial as well as biological. We do not have the opportunity to relocate our vessels to just anywhere; we are highly spatially regulated. When one area closes, we do not simply have the ability to relocate due to existing closures and regulations established by the regional Fishery Management Councils. Arbitrary executive closures such as the Marine Monument with no analysis of impacts to affected users have huge economic impacts on our vessels, their future viability, and therefore our land-based facilities. Loss of opportunity is not just a loss of opportunity in that area. The cumulative effects of new and existing closures, combined with the basic reality of fisheries that fish are migratory and are not found evenly dispersed in time and space, means that you can create a situation where you have fully removed all fishing opportunity for a species, time or season.

To do that arbitrarily and behind closed doors with no analysis of impacts to fishing communities puts the survivability of those affected businesses and communities in danger. Our vessels

¹ See https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/572d00f2c2ea51215901defa/1462567158802/2_ClimateVulnReport_journal.pone.0146756.pdf.

² See <https://www.mercatus.org/publications/regulation/mclaughlin-sherouse-list-10-most-regulated-industries-2014>.

support a lot of American working families. Our land-based facilities do the same. Our land-based facilities provide good paying and steady jobs to a lot of environmental justice communities- those people from minority demographics with little education or resources other than their work ethic. We provide them the opportunity to make a living and support a family. Without fish coming through the doors of our plants, those people have no jobs, and they don't have the same opportunity as more highly educated or skilled workers to just simply find work elsewhere. As I said, Seafreeze vessels have sustainably harvested fish in the Monument area for decades. Because we do harvest sustainably and responsibly, that area remains pristine and productive. Our fishermen should be commended and rewarded, not punished, as a result.

Both the Mid Atlantic Fishery Management Council and the New England Fishery Management Council have, through the federal fishery management process, approved sweeping conservation measures in their Coral Amendments, one of which actually covers the vast majority of the Monument area.³ These habitat protection measures were developed over years of scientific analysis, deliberation and public participation from a wide spectrum of stakeholders. The Antiquities Act was never developed or intended for use in managing fisheries. While it is certainly appropriate in some applications, it is not a sustainable way to manage our fisheries resources, whether fish or people. The Magnuson Act was developed specifically to manage these resources, in a scientifically based manner, and that science includes social science and economic science. The Antiquities Act contains no such standards.

We support the continuance of federal fisheries management under the Magnuson Act, rather than the Antiquities Act. To move from a transparent and science-based process to a closed-door executive process with no scientific deliberation would be a move backwards rather than forwards for our nation's fisheries resources. I know that the Biden Administration has stated that it will manage by science. I hope this includes the fisheries science and social sciences of the Magnuson Act over the non-scientific edicts of the Antiquities Act. The Monument area has supported healthy, productive and well-managed fisheries for decades, providing pure, organic food for the American people and supporting jobs up and down our East Coast. We hope that it will continue to do so for many decades to come and that the Administration will value our nation's hard working fishing industry, value our jobs, value domestic food production and value the federal fisheries process that sustains it. We respectfully request that the Biden Administration continue to allow our fisheries to be managed under the Magnuson Act rather than the Antiquities Act. Thank you for the opportunity to comment.

³ See <https://www.nefmc.org/library/omnibus-deep-sea-coral-amendment> and <https://www.mafmc.org/actions/msb-am16>.