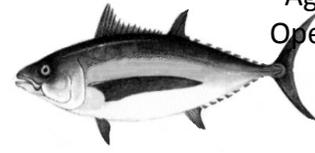


WESTERN FISHBOAT OWNERS ASSOCIATION



Agenda Item B.1
Open Comment 2
June 2013

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May 3, 2013

Dr. Don Mclsaac - Executive Director
Pacific Fisheries Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384
Via Email: pfmc.comments@noaa.gov

Re: June 2013- Item B.1 Open Comment - Alternative to Marine Stewardship Council Certification

Dear Dr. Mclsaac:

Western Fishboat Owners Association went through Marine Stewardship Council Certification (MSC) in 2009 at considerable expense and time. The process although well-recognized worldwide as a legitimate seafood certification system based on FAO guidelines for sustainable harvest, is probably not what is best for US fishermen. This is especially true for the albacore tuna harvesters, who are striving to build more domestic market in the US for our local product.

It is ironic that while the US imports nearly 90% of its fish products we export over 80% of ours.

WFOA has always supported a concept of certifying well managed and sustainable U.S. fisheries by the U.S. government ie: NOAA/NMFS. Until now there has not been any initiative to start such a program. MSC has served some fisheries well and is very recognizable, but it still amounts to a foreign third party certifier giving their stamp of approval at a high costs to the U.S. fishermen for fish that are already well managed and in effect certified under the Magnuson Stevens Act.

The Mid-Atlantic Fisheries Management Council recently passed an important Magnuson amendment proposal below that we are very supportive of.

"That the Mid-Atlantic Fishery Management Council recommend to the organizers of the Managing our Nations Fisheries 3 (MONF3) conference that an important amendment to the MSA would authorize the National Marine Fisheries Service to provide the U.S. industry with a Sustainability Certification Program and Certification Mark, which would provide the industry with the ability to promote and sell its seafood products, in both domestic and export markets, as sustainable based upon the requirements of the Act."

It is important that NOAA/NMFS understand how significant this issue is to harvesters, processors, and marketers of our well-managed, and sustainably harvested domestic seafood resource. More and more corporations and countries will be looking for some form of seafood certification now and

in the near future. Because there is not only MSC but also dozens of other certifications by various bodies out there, a U.S. sustainable label is something that should be supported since we are legally required to harvest to sustainable specifications.

The PFMC should be rightfully proud of its own history in fisheries management. This issue presents a great opportunity to support well managed and sustainable U.S. fisheries. The PFMC by supporting and encouraging the USG to set up a system to do that, would go a long way in establishing a nationally based seafood certification system that supports all the management efforts over the past 30 years.

NOAA/NMFS already maintains Fishwatch which WFOA has been promoting as an example as starting point for a domestic certification program. For the U.S. to set up a program using FAO guidelines, with consistent science based scoring throughout, based on its own management systems would be a great benefit to the U.S. fishing industry and consumer alike.

MSC has its good points and it will remain a certification system for many countries. It is also very costly to those that seek it, and time consuming. Small fisheries have a very difficult time raising the funds to get the certification. We also have found the certifiers are generally not familiar with the U.S. fisheries and need to be educated about the fishery before the certification begins.

The U.S. has the most well managed and sustainable fisheries in the world and it is time for the councils to request that NOAA/NMFS help promote it as such. WFOA supports this concept very strongly and encourages the Council to do the same.

Sincerely,



Wayne Heikkila
Executive Director

cc: Mark Helvey - NMFS SW Region