

“RESTORING AMERICAN SEAFOOD COMPETITIVENESS”

Dear President Trump,

As we review this more than welcome order, and these long overdue executive thoughts and directions, the following comments on various sections of the titled EO are all relative to the authority and purpose of the American Fisheries Advisory Committee (AFAC) (Committee) and the funding that is dedicated by the Saltonstall/Kennedy Act of 1954 to the US Seafood Industry and which is actively directed by the Committee for the purpose of:

“...to aid the American commercial fishing industry by promoting the free flow of domestically produced products in commerce and developing and increasing markets for those products.”

Furthermore, “The Act authorizes the use of the SK funds, which are statutorily and specifically directed by the AFAC, to provide an educational service and a market development program and to conduct research in the fields of technology, biology, and related activities.”

These specific purposes may also include “workforce development” and the formal training of fishermen. (In the American Fisheries Advisory Committee meeting on Oct 17, 1964, the minutes in the meeting record that “The advisory group also suggested that a training program be started for commercial fishermen as a means of encouraging young people to enter the industry.”

The US Seafood industry of 2025, is in horrible shape, as it is awash in regulation from every direction, extreme costs of energy, shipping and labor and the US market is overrun by imported seafood of every kind. This EO is very welcome, and we see only potential in its detail!

Sec. 3. Policy. It is the policy of the United States to promote the productive harvest of our seafood resources;

The word “productive” must include not only the act of harvesting or “producing” more fish, but must include in its definition, “value”. Without value, new and/or expanded “production” will not be “productive”.

To be productive, a trained and competent workforce must also be available....both at the harvesting and the processing phases.

The processing of US seafood in the US is minimal and is not competitive with the rest of the world, where regulation and labor is so much less than the US. Similarly, the cost of new product development and the common potential of failure in the marketplace for most new products makes US manufacturing that

much more of a challenge that few are willing to gamble on. AFAC and the SK fund are specifically and uniquely developed and positioned to help address these needs.

Sec.4. Sec. 4. A New Era of Seafood Policy. (a) The Secretary of Commerce, in consultation with the Secretary of Health and Human Services and with input from the United States fishing industry, shall immediately consider suspending, revising, or rescinding regulations that overly burden America's commercial fishing, aquaculture, and fish processing industries at the fishery-specific level.

There are agency (NOAA and NMFS) regulations in the SK grant program that are not needed for the "Committee" to do the job that the AFAC Act requires of them. Some of these interpretations and internal regulations that are clearly meant to maintain agency control, actually inhibit the Committee in ways that are not logical or needed for the Committee to make the most of the program. Like much legislation, the NOAA was able to also include wording in the Act that would let them retain much of the control over AFAC that they were used to and that the AFAC Act took new responsibility for. Those inclusions are difficult to address here, but the unneeded and overreaching regulations are not. Consulting the Committee directly for an accurate list and a practical explanation of, would make it quite clear what regulatory modifications are best addressed.

Sec. 4(i) The Secretary of Commerce shall request that each Regional Fishery Management Council, within 180 days of the date of this order, provide the Secretary of Commerce with updates to their recommendations submitted pursuant to Executive Order 13921, to reduce burdens on domestic fishing and to increase production. Building upon the earlier goals, identified actions should stabilize markets, improve access, enhance economic profitability, and prevent closures. The Regional Fishery Management Councils will commit to a work plan and a schedule for implementation to ensure these actions are prioritized.

The tasking above in Sec.4(i), includes "stabilize markets, improve access, enhance economic profitability". "Enhancing economic profitability" will happen with stabilized and expanded markets, which is one of the specific tasks delegated to the AFAC and the SK Act under their Congressional authority.

Sec 4(d) The Secretary of Commerce, in consultation with the Secretary of Agriculture, shall develop and implement an America First Seafood Strategy to promote production, marketing, sale, and export of United States fishery and aquaculture products and strengthen domestic processing capacity. This program shall accelerate the Department of Agriculture's efforts to educate American consumers about the health benefits of seafood and increase seafood purchases in nutrition programs.

Encouraging USDA to increase their purchasing of seafood would be of great assistance to the Seafood industry! It is not just the sale of seafood products, but by supplying our millions of food insecure consumers, with wild US Seafood, it is

actually a great way to introduce more people to Seafood and is in effect, a great market development tool. Of all of the food that USDA purchases for nutrition programs and to supply the food banks of America, seafood is an extremely small part of those purchases!....only about 7% on a big year. The industry also has shelf stable foods that should be used in the international food aid programs. Having been responsible for \$1.2B of Alaska seafood sales and product development to USDA for the last 20 years, I can tell you that seafood is not treated as fairly as the rest of the other Agriculture products

It is in the specific Congressional tasking of the AFAC to increase the marketing and development of our seafood products and their associated markets. This will clearly and surely increase consumption of our domestically seafood products. The SK fund that is transferred to NOAA from USDA is specifically created and sufficiently funded to:

- 1) Sustain a “national seafood marketing campaign” to address the American public for their best understanding of the nutritional benefits and broad usage of our US produced seafood. Competing with the 90% imported seafood in the US, as well as every other type of protein (organic, genetically modified or fake) that is available in the marketplace has developed a place in the market for US seafood that is unsustainable.
 - 2) Fund a (Young) Fisherman’s training program in a manner that will make the Program realistic and effective with the specific goal and intent to train and develop a workforce that is able to keep the US Seafood industry working and viable in relation to labor.
 - 3) Fund the Competitive SK grant program that will address:
 - A) marketing, market development and market expansion
 - B) product development
 - C) applied fisheries research
 - D) ... and the specific needs of the US seafood industry as realized and determined through the Committee’s outreach to the greater US seafood industry that is required in the AFAC Act. (2022)
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The following are specific recommendations relative to the above policy recommendations, that may NOT need Congressional action

The Saltonstall Kennedy Fund was created in 1954, “...for the purpose of aiding the American commercial fishing industry by promoting the free flow of domestically produced fishery products in commerce and developing and increasing markets for these products.”

These funds are not US taxpayer dollars, but are a portion of US Customs duties on “fishery products, (including fish, shellfish,

mollusks. Crustacea, aquatic plants...including processed and manufactured products)”

The 1983 amendment to the SK Act, requires “...60% of the SK transfer from USDA to be used for direct industry grant(s) (the SK competitive and national grant programs) to develop US fisheries and to expand domestic and foreign markets for US Fishery products.” The other 40% is directed to NOAA for their discretionary use and is deposited into their Operations, Research and Facilities acct. (ORF)

The SK Act provides for 2 separate grant programs under this rule.

- A) The Fisheries Research and Development projects, better known as the Competitive Grant Program which has a very specific and public application and award process.
- B) The National Fisheries Research and Development Program which has no public process associated with it.

The yearly Congressional appropriations process is extremely flawed when we look to the actual SK Act! Despite specific direction from the Act (60% for the Grant program) or from Congressional intent language that may provide varying percentages of the fund transfer from year to year for the competitive grants, NOAA has used nearly all the money for their operations and has, in recent years, allocated only about 1% - 2% for the program, even as their budget grows each year. NOAA, visible by their actions, has completely abandoned the industry’s needs by not supporting the market, product and development requirements for a health industry!

To date, in 2025, under the current CR, NOAA has allocated zero dollars for the SK Competitive Grant Program that is needed to focus on all of the industry’s needs on the “dry side of the dock” where the money is made.

- 1). To realistically fund the SK Grant program as intended by the Act, Congressional Appropriations MUST direct to NOAA, that “...30% of the total SK Transfer from USDA, shall be retained in the Promote and Develop Seafood Products Account” (P&D), which is the first account to which the “SK transfer from USDA” arrives, and it is the same account within which the SK Competitive Grant Program operates. If Congressional Appropriations will not make this, written decision/allocation clear, then Secretary of Commerce

can direct NOAA Staff to do so, even if 100% of the “Transfer” is moved into the ORF account.

The total “transfer from USDA” from 2024, was about \$375+M. This suggested 30%, designated by Congress in the budget, would be about \$100+M. By statute, these funds that would remain in the P&D account, are directed by the AFAC and will likely be directed in two primary ways....

- 1) an expanded and robust grant program focusing on the needs of the entire US seafood industry, both wild capture and the ever expanding aquaculture industry (“growing” seafood).
- 2) a sustained, national seafood promotion program (“Got Fish?”) focusing on the health, use, and cultural and other positive attributes of US seafood products in the (primarily) domestic marketplace.

While the “Farm Bill” contains many chapters, with many provisions for many sectors of Americans, a very significant portion equaling hundreds of millions of dollars per year are for the exclusive use of US Agriculture industry addressing technology, marketing, infrastructure, research, education, training, price supports of various kinds and active, generous support for the “Young Farmers and Ranchers Program” that will carry on this critical industry.

The US seafood industry has no such support program although it is not for lack of trying to be included with the other “food producers” of America in the Farm Bill. The SK Grant funds, as proposed above, are the closest thing that the Seafood Industry has to the development sections of the Farm Bill and they will allow for some help to the US Seafood Industry (including US Aquaculture) to be more competitive in the market, which is so needed in the face of increasing, foreign, imported seafood that now amounts to approximately 90% of all seafood consumed in America.

There is no question that a program such as the Young Fisherman’s Development Act is critical to the future of the US Seafood Industry. The Act however, should have the best funding and access by the young and beginning fishermen as well as the potential variety of training needed for the program to be a national success and the best help to all sectors of the industry.

As it is today, the current Young Fisherman's Act should be much better funded to be at all effective.

In an original American Fisheries Advisory Committee (AFAC) meeting on Oct 17, 1964, the AFAC made a specifically recorded statement that a portion of the SK funds should be used for the training and development of young fishermen. I would suggest that half of the "National Grant Program" be directed to fund the Young Fisherman's Act and be administrated under the SK National Grant Program (NGP) by NMFS or possibly USDA.

40% to ORF. (Operations, Research and Facilities)
30% for SK Competitive Grant Program
15% for the National Grant Program.
15% for the Young Fisherman's Program.
100%

The SK fund was realized and directed for the exclusive use of the US Seafood Industry. The group of industry experts from across America that makes up the American Fisheries Advisory Committee (AFAC), will direct the funding to address the needs of all sectors of the US seafood industry as directed by the SK Act.

NOAA will continue to administer the AFAC's directed funding decisions and continue to use 55% (15% (national grant program) and 40% (ORF) of the SK Transfer funds for their needs as they see fit and as directed by the Act.

These few suggested modifications will be of huge benefit to the ailing US seafood industry, and are merely trying to actively and officially from your office, firmly activate what is in statute. These changes will not negatively affect any piece of America and should not be of particular controversy, except for maybe NOAA, wanting to keep the funds and maintain their 50 years of control of the funds and the programs.

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