



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Silver Spring, MD 20910

AUG 16 2010

MEMORANDUM FOR: Paul N. Doremus,
Acting Deputy Assistant Administrator &
Director of Strategic Planning, Office of Program Planning
and Integration

FROM: Tom Billy
Chair, Marine Fisheries Advisory Committee (MAFAC)

SUBJECT: Comments on the Draft *NOAA's Next Generation Strategic Plan*

This memo transmits NOAA's Marine Fisheries Advisory Committee (MAFAC) comments and recommendations (Attachment 1) on the Draft *NOAA's Next Generation Strategic Plan* (NGSP) to the Office of Program Planning and Integration (PPI).

MAFAC appreciates the opportunity to provide these comments and recommendations. MAFAC held a publicly noticed meeting by teleconference on Thursday, August 12, 2010, to discuss and consider recommendations from its Strategic Planning, Budget and Program Management Subcommittee on the NGSP. The comments build on recommendations previously submitted by MAFAC to PPI and NOAA leadership in MAFAC's *Vision 2020: The Future of U.S. Marine Fisheries* (Dec 2007).

Thank you for consideration of our recommendations. If there are any follow up questions, my contact information is TomBilly@comcast.net, or by phone: (202) 251-0218.

Attachment: MAFAC Comments and Recommendations on the Draft *NOAA's Next Generation Strategic Plan* (Version 4.0)

Cc: Jane Lubchenco
Monica Medina
Larry Robinson
Eric Schwaab
Sally Yozell



**MAFAC Comments and Recommendations on the Draft *NOAA's Next-Generation Strategic Plan (Version 4.0) (NGSP)* to the NOAA Office of Program Planning and Integration
August 12, 2010**

SUMMARY FINDING: The NGSP's basic premises, conclusions and recommendations of NOAA's *Next-Generation Strategic Plan (Version 4.0) (NGSP)* are generally consistent with those contained in *Vision 2020*, with several exceptions. Though both documents are limited in many respects to broad statements of intent and purpose, the NOAA NGSP uses generic statements that lack specificity but incorporate topics that *Vision 2020* addresses more specifically. MAFAC recognizes that greater detail would be beyond the scope of the NGSP. That said, MAFAC believes that many of *Vision 2020's* 25 specific recommendations are well suited as examples of how MAFAC expects NOAA to **implement** the goals and objectives laid out in NGSP. This is presented in more detail in Appendix I.

Regarding the exceptions, MAFAC presents several findings and recommendations, discussed below, for PPI and NOAA's consideration, to help improve the articulation and focus of NGSP.

FINDING 1: Though the Committee's *Vision 2020* focuses predominantly on specific fisheries issues, MAFAC strongly supports two specific long-term goals of the NGSP, (1) *Climate Adaptation and Mitigation: An informed society anticipating and responding to climate and its impacts* and (2) *Resilient Coastal Communities and Economies: Coastal and Great Lakes communities that are environmentally and economically sustainable*, and recognizes the important linkages between these goals and living marine resources. These linkages could be strengthened in the following ways:

(1) NGSP Long-term Goal: *Climate Adaptation and Mitigation (p. 4)*

The NGSP places considerable emphasis on climate issues and emphasizes NOAA's ability to provide climate services and document climate change trends nationwide. NOAA appropriately notes that climate is expected to exacerbate other impacts on fisheries and marine ecosystems, such as corals distribution and abundance, overfishing, habitat destruction, pollution, eutrophication of coastal waters, invasions of non-native species, and other trends of interest to MAFAC. MAFAC supports and encourages this emphasis and focus of NOAA, and supports NOAA's goal of improving its provision of climate services to help governments, businesses, and communities make scientifically-informed decisions.

Along these lines, within the third objective *Mitigation and adaptation efforts supported by sustained, reliable, and timely climate services (p. 6-7)*, MAFAC encourages more direct emphasis on the adaptation management needs that fisheries and protected resources (endangered species and marine mammals) will require. As sea levels rise and ocean temperatures change, stocks may shift spatially or temporally, stock abundance may shift, and predator-prey interactions or habitat availability may change. Fisheries management strategies will be required to adapt to help mitigate these changes, but how is still unknown.

Since changes may not be specifically linked to ocean acidification trends, we encourage expanding the wording of two metrics of progress as follows:

- Coastal and marine spatial planners **and marine resource managers** incorporate a greater understanding of the risks of sea level rise as they manage ocean and coastal resources;
- Coastal decision-makers and marine resource managers understand ocean acidification trends **and other climate impacts** and begin to adapt **management strategies** to changing conditions; and
- Additionally, related to our aquaculture comments below, the final bullet (p. 7) should include '**aquaculture**' after 'agriculture:' Decision-makers in the electricity, agriculture, **aquaculture**, and other industries have better information regarding climate extremes, including deviations in temperatures and precipitation patterns.

(2) NGSP Long-term Goal: *Resilient Coastal Communities and Economies* (p.15)

MAFAC discussions have often emphasized the importance of understanding the complex interdependence of healthy ecosystems and economies, and have supported working waterfronts and maintaining "cultural heritages" as noted in this goal. However, NOAA's proposed objectives in this section could benefit by more explicitly referencing the importance of fishing (commercial, recreational and subsistence) and aquaculture to healthy economies. This could not be demonstrated any more dramatically than from witnessing the impacts the Deepwater Horizon oil spill has had on Louisiana and the other Gulf states' coastal economies. For example, the second objective, *Comprehensive ocean and coastal planning and management* (p. 16) notes that "NOAA will promote sustainable resource use and stewardship by continuing to implement key NOAA mandates," but neglects to list the Magnuson-Stevens Act (MSA), as well as the Endangered Species Act (ESA) or Marine Mammal Protection Act (MMPA) alongside the "National Marine Sanctuaries Act and Coastal Zone Management Act." The sustainability of many coastal communities is dependent in large part on their natural resources, which are protected by these very laws. Since fishery interests have had concerns of being left out of coastal and marine spatial planning processes, NOAA should better foster and explain the importance of bridging these issues amongst complementary planning processes. Additionally, as MAFAC noted in *Vision 2020*, NOAA must work with states and coastal communities to ensure the infrastructure necessary to support viable seafood industry along our coasts is maintained or improved, as needed.

FINDING 2: In addition to Finding 5 below, several specific key themes of MAFAC could be better embraced within and throughout the NGSP. One is the importance of safe seafood as an important **food source** for the American public and worldwide, and the second is the importance of **aquaculture** for expanding seafood sources. Though the objective *Safe and Sustainable Seafood* (p. 14) under Long-term Goal *Healthy Oceans*, mentions both these topics, it does so in a limited way, discussing improved inspection services and ensuring sustainable aquaculture practices. It and no other objective address **promotion** and **expansion** of the aquaculture sector, an important theme in *Vision 2020* and a priority of NOAA which is working toward establishing a new National Aquaculture Policy. NGSP also does not discuss the importance of consuming seafood as part of a healthy diet. Thus, MAFAC recommends that this objective be clarified and expanded to include health benefits of seafood, that 'seafood' be added to other objectives that also touch upon food security, and that an independent objective on aquaculture is developed.

- Remove general discussion on aquaculture from the *Safe and Sustainable Seafood* objective (p. 14) and expand the objective to discuss health benefits of seafood. A safe and sustainable seafood supply is critical if the nation is to take advantage of the increasingly recognized public health benefits of higher seafood consumption. The adverse consequences of inadequate fish consumption during pregnancy are significant. According to research published since 2004, fish consumption during pregnancy can raise neurodevelopmental performance including IQ to as much as five points, depending on the amounts and types of fish consumed. It appears that maximizing this beneficial effect involves consumption beyond 12 ounces per week, as compared to much lower present rates (average per capita consumption is six (6) ounces per week). Current levels of fish consumption are reducing incidences of fatal coronary disease by 30,000 per year and incidences of fatal stroke by 20,000 per year.
- Expand the theme "long-term food security" to include seafood (wild and aquaculture) wherever it is mentioned. For example, there is one mention of "food security needs" under the Long-term Goal: *Weather-Ready Nation*, under the objective *Secure, reliable infrastructure for energy, communications, and agriculture through timely and accurate environmental information* (p.11). First, we recommend including in the objective title "including seafood from fishing and aquaculture" following 'agriculture.' Similarly under this same goal, under objective *Improved water resource management* (p. 9), NGSF notes services NOAA provides to agricultural and other sectors but fails to mention the importance and economic benefits of water resource forecasting and management to healthy estuaries, coastal ecosystems, fisheries and aquaculture (let alone its significance to certain endangered fish such as salmon). Both sections could easily include references to aquaculture and fisheries to help emphasize the importance of supporting healthy seafood sources.
- Establish a new objective that better embraces the *need to promote and expand the aquaculture sector in the U.S.* Proposed new objective (taken largely from *Vision 2020*) is as follows:

Objective: Expanded and sustainable aquaculture production of seafood to meet growing consumption demands.

Trends in seafood consumption in the U.S. on a per capita basis have steadily increased the past three decades. Americans are the **third largest consumer of seafood in the world**. Additionally, consumption, domestic and worldwide, is expected to continue to increase as the health benefits of a diet rich in seafood protein become increasingly recognized. However, even though domestic wild-catch fish stocks continue to improve and 80 percent of our nation's fish stocks are already at sustainable levels, domestic demand for safe seafood will far exceed domestic supply from wild stocks. Worldwide, production from capture fisheries has leveled off, and most of the main fishing areas have reached their maximum potential. By comparison, aquaculture is the fastest growing food-producing sector, accounts for nearly 50 percent of the world's food fish, and it has the potential to make a significant contribution to this increasing demand for aquatic food in most regions of the world. However, the United States lags far behind most countries -- today, our domestic aquaculture industry provides only 1.5 percent of the US seafood supply. An expanded U.S aquaculture industry can increase the production of fish and shellfish to meet increasing domestic and international demand, assist in fishery stock recovery via enhancement, and decrease the U.S. seafood trade deficit. Additionally, demands for production of safe and quality aquaculture products are helping to ensure that domestic

aquaculture production is managed sustainably and does not adversely impact the larger ecosystem.

To help promote and expand U.S. seafood production, NOAA will pursue science and policies that promote sustainable aquaculture practices. NOAA will continue to develop and finalize a National Aquaculture Policy; provide information and guidance to implement effective and ecologically-sustainable aquaculture; develop innovative land- and ocean-based feed technologies and evaluations of aquaculture production to improve best practices; and provide leadership and seek ways to integrate wild stock production with aquaculture production to maximize the value of domestic seafood production and support stable, year-round processing and related industries ensuring coastal community sustainability.

Over the next five years, evidence of progress toward this objective will include:

- Establishment and implementation of a National Aquaculture Policy;
- Economically and environmentally sustainable domestic marine aquaculture production is expanded;
- Increased proportion of U.S. consumed seafood products are produced domestically; and
- Continuous, comprehensive monitoring of offshore aquaculture sites is conducted to safeguard wild stocks and assure environmental sustainability of facilities.

FINDING 3: MAFAC supports requests for additional resources for NOAA's work in fisheries. The underpinnings of NOAA's strategy to achieve all of its responsibilities are of course the basic science and technology functions that generate research and development, models, and environmental observations; the distinct functions for engaging partners and customers; and the underlying administration and management functions that support all of NOAA's work. As the NGSP describes (not in great detail, however), this includes a holistic understanding of the earth system through research and accurate and reliable data from sustainable and integrated observing systems. As both the NGSP and *Vision 2020* discuss, more financial and personnel resources are needed.

FINDING 4: The NGSP states that it was developed as the result of a process of extensive consultations with NOAA's staff and the extended community of partners and collaborators in the public, private, and academic sectors. MAFAC notes the growing perception that NOAA management is not sincere in its efforts to seek public input to policy development; but rather cites support from selected stakeholders that share its preconceived policies. MAFAC strongly urges NOAA to plan more carefully in advance to engage with MAFAC and other groups at the national, regional, and local level to ensure NOAA's success in implementing the NGSP. NOAA should improve and strengthen strategic partnerships and communications with groups such as MAFAC. This is completely essential and critical to NOAA's success. As the NGSP states explicitly, "External collaboration and partnerships are and will continue to be central to every aspect of NOAA's work."

FINDING 5: Although the *Vision 2020* recommendations can be seen generally in the NOAA NGSP, MAFAC requests that the 25 recommendations each be better included and recognized in the formal record of consideration of the NGSP, including as examples of how MAFAC expects NOAA to *implement* its Plan. In some cases the specific *Vision 2020* recommendations lend themselves well as "evidence of progress" under appropriate objectives.

Appendix I

Excerpts from the NOAA Next Generation Strategic Plan are in *italics*.

Vision 2020 Section 3: Summary Recommendations

Demand, Supply and Safety of Seafood Products

(NGSP objectives):

- *Increased numbers of seafood monitoring programs for human health; and*
- *Increased proportion of inspected seafood.*
- *“...strengthening the enforcement of regulations concerning international imports and exports; ... increasing the inspection of seafood and the development of health warning systems; ...supporting the use of eco-marketing and branding tools to promote sustainable seafood industries and raise public awareness of ocean sustainability.”*
- *“NOAA will ensure, for present and future generations, that seafood is a safe, reliable, and affordable food source...”*

The NGSP did **not** specifically address the following Vision 2020 recommendation; however, incorporation of MAFAC’s comments above captures many of these issues:

1. The safety and public health benefits of seafood should continue to be researched, understood and communicated. NOAA should help educate consumers domestically and world-wide about the wide array of health benefits from aquatic foods. The goal is to empower the public to tailor their consumption decisions to individual health needs while reflecting accurate and informed conservation concerns.
2. NOAA should seek both industry and government commitments worldwide to strengthen seafood safety programs, including the impacts of changing ocean environmental conditions and cooperative efforts through the United Nations/World Health Organization’s Codex Alimentarius (food safety and policy standards).
3. NOAA should support the federal government’s continuation of free trade policies for seafood, and pursue elimination of tariff and non-tariff trade barriers through the World Trade Organization, bilateral and multilateral agreements.
4. Seafood safety and associated human health should be enhanced through improved NOAA enforcement, research, outreach and education, and NOAA should establish itself as an unequivocal source of unbiased peer-reviewed scientific information. [NGSP notes *increased monitoring but not the outreach and education aspect of this recommendation*]

Commercial Fisheries

(From NGSP, related to Vision 2020 (5)):

- *Increased abundance of species and stocks that are currently depleted, threatened, endangered, overfished or subject to overfishing;*
- *Fewer fish stocks classified as overfished or subject to overfishing;*
- *Increased allowable catch levels as fish stocks reach rebuilt status;*
- *“NOAA will eliminate overfishing... and improve the long-term economic stability of fisheries harvests through such practices as catch share programs.”*

(Vision 2020):

“NOAA must achieve and maintain sustainable levels of stocks important to commercial fisheries.”

*The NGSP did **not** specifically discuss the following topics (in draft revised Vision 2020):*

6. NOAA must match fleet capacity with available, sustainable harvest. Limited access privilege programs (LAPPs) should be thoroughly analyzed for applicability in all fishery management plans for participants in the commercial and recreational sectors, with the goal of significantly increasing their use by 2020. Resource users and regulators need definitions and guidelines on the LAPP (or catch share) provisions in the MSRA, including time series chosen for the qualifying period, excessive shares, allocations, cost recovery, Regional Fishery Associations and Community Associations. Also, additional resources are needed for increased observer coverage and enforcement in relation to LAPPs. *[Analysis of LAPPs being thoroughly analyzed for applicability in all fishery management plans is an appropriate metric of progress.]*
7. Commercial fishermen, processing businesses, trade associations and state and local government representatives working with NOAA Fisheries should seek ways to integrate wild stock production with aquaculture production to maximize the value of domestic seafood production and related industries, including, but not limited to efforts to develop “niche” markets for value added products and wild products. Integration of wild and farmed production can contribute to the development of a stable, year-round processing industry ensuring coastal community sustainability. *[Integrated into new Aquaculture objective.]*
8. NOAA must work with states and coastal communities to ensure continued infrastructure necessary to support viable seafood industry along our coasts. *[This is important economically to fishery sectors and resilient coasts.]*

Recreational Fisheries

(From NGSP): “NOAA will ensure, for present and future generations, that seafood harvests, recreational fishing opportunities, and non-consumptive uses of living marine resources continue to support vibrant coastal communities and economies.”

*The NGSP did **not** specifically discuss the following topics, other than #9 (which is captured generally by the objective “Recovered, rebuilt, and sustained living marine resources’):*

9. NOAA must achieve and maintain sustainable levels of stocks important to recreational fisheries.
10. Sale of recreationally-caught fish is a form of commerce and should be prohibited at state and federal levels.
11. Improved recreational harvest data are essential and a recreational registry must be implemented and used.
12. Fishery management plans should include analyses of quota transfer between recreational and commercial sectors, and should incorporate market mechanisms where appropriate.
13. Efforts should be directed to enhance a conservation ethic and pride of a national resource amongst all fishery user groups.

Aquaculture

(From NGSP): "NOAA will pursue science and policies that promote sustainable aquaculture practices...

- *An aquaculture research program*
- *Sustainable aquaculture facilities that do not adversely impact the larger ecosystem"*

The NGSP did not specifically discuss the following Vision 2020 topics; however, incorporation of MAFAC's comments above captures many of these issues:

14. The development of a significant domestic, environmentally sound aquaculture industry is essential for the production of safe and healthy seafood, assisting in the rebuilding of depleted stocks, and providing employment opportunities in coastal communities.
15. National offshore aquaculture legislation providing a coordinated, cohesive and efficient regulatory process should be passed by Congress and implemented immediately.
16. The domestic aquaculture industry should receive financial and technical support similar to that available to the American agricultural industry.
17. Continuous, comprehensive monitoring of offshore aquaculture sites must be included to safeguard wild stocks and assure environmental impacts of facilities are insignificant.

Management

With the exception of Vision 2020 recommendation #23 (subsistence fishing), the NGSP covers Vision 2020 recommendations well:

18. Coastal and ocean habitat protection must be a primary concern of fishery managers as a basic requirement for robust and sustainable fish stocks.

NGSP: *"Increased habitat quantity and quality achieved through strengthened habitat conservation policies, restoration programs, partnerships and on-the-ground habitat conservation; Habitat conservation targets set and priority areas identified for habitat protection and restoration;*

Increased use of ecosystem-based approaches, such as integrated ecosystem assessments, that incorporate climate considerations in fishery and protected resource decisions and in coastal and marine spatial planning processes;"

19. Ecosystem-based management, including assessments that integrate both habitat protection and multi-species interactions, should be the norm and not the exception for U.S. fisheries management.
20. Cooperative management efforts among states, regional management authorities and federal managers should be maintained and enhanced as a basis for sound domestic fisheries management.

NGSP: *"NOAA will work to enhance cooperation and cooperation between scientists, policy-makers and stakeholders to ensure that (assessments and science work) is well understood and incorporated in management practices ... will assist partners in the development of management plans ... will ensure that this information is used in transparent regulatory and policy-making process and is well-communicated to a wide range of stakeholder communities." (also applies to # 21).*

21. Marine spatial planning is an important tool to support sound policy decision-making for balancing the needs of multiple ocean uses, including fishery conservation and management.
NGSP: *“Increased use of ecosystem-based approaches ... that incorporate climate considerations in fishery and protected resource decisions and in coastal and marine spatial planning processes ... NOAA will promote sustainable resource use and stewardship by continuing to implement key NOAA mandates ... and further its programmatic efforts to support coastal and marine spatial planning.”*
22. Stock status and catch data must be accessible to all stakeholders and provide the information needed to make informed management decisions.
23. Subsistence fishing is recognized as an important source of protein for rural and native communities. However it needs to be included in the calculation of total catch with an efficient, comprehensive, and uniform data collection method. **Not discussed.**
24. The United States should exert strong leadership in the international forums that manage fish stocks beyond countries’ Exclusive Economic Zones.
(NGSP): *“Full implementation of the provisions of the Magnuson-Stevens Fishery Conservation and Management Act to combat Illegal Unregulated and Unreported fishing and bycatch of protected living marine resources in international fisheries;”*
25. The U.S. government must exert every influence possible aimed at maintaining healthy highly migratory species stocks and barring IUU fish from entering the global market place.