



July 5, 2018

The Honorable Paul Ryan
Speaker of the House
United States House of Representatives
H-232 The Capitol
Washington, DC 20515

The Honorable Nancy Pelosi
Democratic Leader
United States House of Representatives
H-204 The Capitol
Washington, DC 20515

Dear Speaker Ryan and Democratic Leader Pelosi,

On behalf of the Gulf of Mexico Reef Fish Shareholders' Alliance (Shareholders' Alliance), I write to you today to express our continued strong opposition to H.R. 200, the "*Strengthening Fishing Communities and Increasing Flexibility in Fisheries Management Act of 2017.*"

The Shareholders' Alliance is the largest organization of commercial snapper and grouper fishermen in the Gulf of Mexico, with membership in every Gulf state. We work hard to ensure that our fisheries are sustainably managed so our fishing businesses can thrive and our fishing communities can exist for future generations. We are the harvesters that provide much of the American public with a reliable source of domestically-caught wild Gulf seafood, and we do this through a philosophy that sustainable seafood and profitable fishing businesses depend on healthy fish populations.

It has come to our attention that the House plans to vote on H.R. 200 after Congress resumes from its July 4th recess. We must express our continued concerns with this harmful bill and we strongly encourage you to vote against it. It would significantly harm our nation's fishermen and women, seafood suppliers, and seafood consumers through punitive restrictions and requirements that would not improve recreational fishing. H.R.200 would make several damaging changes to the bedrock principles of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act):

H.R.200 would unnecessarily make it more difficult for the Gulf of Mexico Fishery Management Council (Gulf Council) to use limited access privilege programs (LAPPs) and catch shares as management tools. We believe that the decision-makers on the ground in the region should be able to make an informed decision as to whether LAPPs or catch shares may be appropriate for a fishery or not. Congress shouldn't tie the hands of the Gulf Council and preemptively remove these fishery management tools from the toolbox. Using these tools for commercial and charter fishing sectors has no impact on how recreational fishing is managed.

Also, H.R.200 would promote new limitations and exemptions to annual catch limits (ACLs). ACLs allow fishing at sustainable levels to maximize access while minimizing the risk of overfishing our shared fishery resources. Inherent in this management tool is the acknowledgement that exceeding science-based catch limits reduces future opportunities, and that this should be avoided. The existing generation of fishermen has already sacrificed to rebuild these fisheries – let's not burden the next generation with having to rebuild them again.

Additionally, proponents of H.R.200 claim that the Magnuson-Stevens Act does not provide adequate flexibility and rigidly imposes a 10-year rebuilding timeframe for overfished fisheries. However, the Magnuson-Stevens Act already allows fishery managers to approve fishery rebuilding timelines greater than 10 years in length due to a range of biological, economic, or social factors. In fact, Gulf of Mexico red snapper – the resource that many of us have built our small businesses on – is already experiencing that flexibility as it is in Year 13 of the current 27 year rebuilding plan. If the red snapper stock rebuilds by 2032 as intended, the stock will have been under a rebuilding program for over 40 years.

Finally, H.R.200 would overload the Gulf of Mexico Fishery Management Council with allocation review requirements that would leave little time or funding to perform its primary function of managing Gulf fisheries (e.g., setting catch limits and fishing seasons, conducting stock assessments, habitat management, etc.).

Furthermore, some Amendments to H.R.200 would simply make a bad bill even worse. Specifically, Amendment 26 would open the door to levying additional taxes on commercial fishermen, over and above the maximum amount they are legally required to pay today. We question why this punitive measure is directed only at two regions of the United States – the Gulf of Mexico and the South Atlantic. Why are the other six regional fishery management councils exempted from this measure? Furthermore, Amendment 26 would initiate a process that could lead to eliminating the participation of commercial fishing, seafood industry, and charter fishing businessmen and women in regional fishery management councils. These purported “conflicts of interest” are a non-issue, as all regional fishery management councils already enact standard operating procedures to address this concern. Simply put, Amendment 26 is a direct assault on commercial fishermen in these two regions and would only serve to eliminate fishing expertise from regional fishery management councils in order to further the interests of recreational fishing organizations. This would be a disservice to the millions of Americans who only access American seafood through restaurants, fish markets, and grocery stores.

Our nation has set the gold standard for sustainable fisheries because of our commitment to science-based management under the 2007 Magnuson-Stevens Act reauthorization. The science-based conservation requirements of the Magnuson-Stevens Act helped support the development of the commercial individual fishing quota programs in the Gulf of Mexico have played crucial roles in *nearly tripling* the red snapper quota for *all* fishermen in the Gulf of Mexico over the last 10 years, from 5 million pounds to nearly 14 million pounds. Clearly, the Magnuson-Stevens Act is working.

The nation’s fishermen, seafood suppliers, consumers, and Congressional leaders must protect the gains we have made under the last 40 years of the Magnuson-Stevens Act. It is in everyone’s best interests to pass vibrant national fishery resources on to the next generation. H.R. 200 would put that in jeopardy. H.R. 200 is widely opposed by the commercial fishing industry throughout the United States (especially in the state of Florida), as well as by the seafood industry, the restaurant industry, the charter fishing industry, and others who depend on healthy fisheries to support strong businesses. Once again, we ask that you oppose H.R. 200 to ensure Americans have access to sustainable seafood today and for years to come.

Thank you for your consideration on this important matter.

Sincerely,



Eric Brazer, Deputy Director
Gulf of Mexico Reef Fish Shareholders’ Alliance

Stewardship Through Leadership

www.shareholdersalliance.org