



Southern Shrimp Alliance

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TO: John Carmichael,
Executive Director
South Atlantic Fishery Management Council

Christina Wiegand,
Fishery Social Scientist
South Atlantic Fishery Management Council

FROM: John Williams,
Executive Director
Southern Shrimp Alliance

RE: Recommendations for Implementing President Trump's Executive Order 14276:
"Restoring American Seafood Competitiveness"

Thank you for the opportunity to provide these recommendations on behalf of the American shrimp industry which are presented in no specific order of priority.

- 1) Restore access by American commercial rock shrimp fishermen operating from the Gulf and South Atlantic to a small section of historic and valuable fishing grounds that are subject to an erroneous, unnecessary and overburdensome regulatory closure by approving and implementing the Shrimp Fishery Access Area set forth in the South Atlantic Council's joint Coral Amendment 11/Shrimp Amendment 12, Preferred Alternative 2.
- 2) Fully transition all fishery regulatory activities of the National Ocean Service associated with National Marine Sanctuaries to the National Marine Fisheries Service pursuant to its authorities under the Magnuson-Stevens Act (MSA). Rescind the unnecessary and burdensome regulatory restrictions on shrimp fishery access to the Florida Keys National Marine Sanctuary.

- 3) Suspend the ongoing NOAA Endangered Species Act (ESA) Section 7 Consultations and any ensuing regulations regarding shrimp fisheries interacting with Smalltooth Sawfish and Giant Manta Rays in the South Atlantic and Gulf of America for a period of no less than 5 years. During the 5-year regulatory pause, conduct such research, including cooperative research with the shrimp industry, as is necessary to –
 - correctly assess the status of these species,
 - correctly assess the impacts of the shrimp fishery on these species, and
 - correctly assess the impacts of any fishery management regulations deemed necessary to mitigate those impacts on the species.
- 4) Work with the U.S. Coast Guard and the U.S. fishing industry to modernize and increase the efficiency, competitiveness, and safety of the ageing U.S. commercial fishing fleet by removing current overburdensome and costly regulatory impediments to the construction of new U.S. flag fishing vessels including but not limited to those cost-prohibitive regulations requiring newly constructed U.S. fishing vessels to meet certain vessel classification requirements.
- 5) Work with the USDA to establish a position and office in the Office of the Secretary solely responsible for the effective expansion and coordination of seafood policies and activities within the Department that will provide support for domestically harvested and processed seafood and domestic seafood producers.
- 6) Work with the Department of Treasury to increase its understanding of the perverse and profound economic impacts on the domestic shrimp industry of IFI financing of foreign shrimp aquaculture production with the objective of permanently terminating any such financing in the future.
- 7) Work with Congress to substantially increase the allocation of funds deposited into the S-K fund for grants that support the original and current statutory purposes of the S-K Grant Program to *“develop the United States fisheries and to expand domestic and foreign markets for United States fishery products.”*
- 8) Establish a long-term marketing program for domestic seafood with the goals to increase US consumption of domestic seafood based on the nutritional health benefits which domestic seafood provides (brain health, heart health, maternal and infant health, etc.), and to educate consumers that they help sustain commercial fishing as an artisanal way of life when they choose to eat domestic seafood. This marketing program must focus on the marketing of domestic seafood as there is ample literature documenting the contamination of imported farm raised seafood with chemicals that are detrimental to human health. The

aim of this program must be to promote domestic seafood and the US industry which produces it.

- 9) Working with USTR and other federal agencies, as necessary, consider a section 301 action or other trade action to prohibit all shrimp imports from countries that have proven to produce shrimp consistently contaminated with banned chemicals and/or through the use of forced labor from importation into the US market
- 10) Work with Congress and other federal agencies as necessary to require labeling of seafood as imported or domestic in all restaurants nationwide.
- 11) Provide authority for NOAA Office of Law Enforcement, including authority to work with other federal agencies as may be necessary, to carryout genetic of testing shrimp at restaurants which advertise they serve domestic shrimp in an effort to uphold and enforce domestic consumer protection regulations, while at the same time curbing illegal advertising that is harming the domestic shrimp industry.
- 12) Consistent with the Young Fishermen's Development Act, develop and fund a program to address recruitment and retirement challenges in the ageing commercial shrimp fishing industry by providing targeted career development opportunities for young shrimp fishermen including recruitment, training and mentoring.
- 13) Substantially increase the effectiveness of NOAA's enforcement of the Moratorium Protection Act to level the playing field for American fishermen including American shrimpers by leveraging access to the U.S. seafood market. Ensure that the President is fully and timely notified of any negative certifications of Nations NOAA has issued pursuant to this statutory authority for IUU fishing, including the use of forced labor, and for failure to apply bycatch conservation measures to their fisheries that are comparable to that required of American fisheries. Pursuant to 16 U.S.C. § 1826a(b)(3), work with the White House and Department of the Treasury to prohibit the imports of fish and fish products from Nations receiving a negative certification, including imports from Mexico which has twice been negatively certified for IUU fishing for red snapper.
- 14) Achieve the timely completion of the ongoing reform of the Seafood Import Monitoring Program (SIMP) to substantially increase the efficiency and effectiveness of NOAA's enforcement of this program to target high risk seafood imports such as shrimp in order to combat IUU fishing, seafood fraud, and to level the playing field for American fishermen including American shrimpers by leveraging access to the U.S. seafood market. Coordinate and collaborate these activities with other federal agencies including CBP, and with the FDA

to prevent the importation of farm-raised seafood including shrimp that is contaminated with illegal antibiotics and other contaminants harmful to U.S. seafood consumers.

15) Substantially increase the effectiveness of NOAA's enforcement of statutory mandate, known as the "Section 609 program", to prohibit the importation of shrimp from nations that have not been certified by the U.S. as having sea turtle conservation measures in place that are comparable in effect to that which the U.S. requires of U.S. shrimp fishermen including the required use of NOAA-approved Turtle Excluder Devices (TEDs).

16) Substantially increase the effectiveness of NOAA's enforcement of the Marine Mammal Protection Act to level the playing field for American fishermen including American shrimpers by leveraging access to the U.S. seafood market. Fully implement and aggressively enforce the MMPA Final Rule to prohibit the importation of fish and fish products that do not have marine mammal conservation measures comparable to those applied to U.S. fisheries pursuant to MMPA section 101(a)(2). This to include full compliance with the 2024 Settlement Agreement requiring NOAA to issue final "comparability findings for all harvesting nations" by September 1, 2025, and for NOAA to implement the prohibition of importation of non-compliant seafood on January 1, 2026.

17) Use NOAA's authorities to prevent any adverse impacts of offshore wind energy and offshore aquaculture development in the Gulf on the South Atlantic and Gulf shrimp fisheries, resources and habitats.