

Alyeska Seafoods
Alaska Dragger Assoc.
Alaska Groundfish Data Bank
Alaska Pacific Seafoods
Aleutian Pribilof Island Community Development Assoc.
Akutan, Atka, False Pass, Nelson Lagoon, Nikolski, St. George
Mid-Water Trawlers Cooperative
At-sea Processors Assoc.
Bristol Bay Economic Development Corp.
Aleknagik, Clark's Point, Dillingham, Eggeik, Ekuk, Ekwook, King Salmon, Levelock, Manskotak, Nainok, Pilot Point, Port Heiden, Portage Creek, South Naknek, Toigak, Twin Hills, Ugashik
Central Bering Sea Fishermen's Assoc.
Saint Paul
City of Unalaska
Coastal Villages Region Fund
Chefomak, Chevak, Eek, Goodnews Bay, Hooper Bay, Kipnuk, Kongiganak, Kwigillingok, Melkoryuk, Napakiak, Napaskiak, Newtok, Nightmute, Oscarville, Platinum, Quinhagak, Scammon Bay, Toksook Bay, Tuntutuliak, Tununak
Groundfish Forum
High Seas Catchers Cooperative
Icicle Seafoods
Alaska Leader fisheries
North Pacific Fisheries Research Foundation
North Pacific Longline Association
North Pacific Scallop Cooperative
Norton Sound Economic Development Corp.
Brevig Mission, Diomedes, Elim, Gambell, Golovin, Koyuk, Nome, Saint Michael, Savoonga, Shaktolik, Stebbins, Teller, Unalakleet, Wales, White Mountain
Ounalashka Corp.
Prowler Fisheries
Trident Seafoods Corp.
Seafood Cold Storage Assoc.
Southwest Alaska Municipal Conference
United Catcher Boats
Akutan Catcher Vessel Assoc. Arctic Enterprise Assoc. Northern Victor Fleet Cooperative Peter Pan Fleet Cooperative Unalaska Co-op Unisea Fleet Cooperative Westward Fleet Cooperative
Mothership Group
PV Excellence PV Ocean Phoenix PV Golden Alaska
Western Alaska Fisheries, Inc.
Yukon Delta Fisheries Development Assoc.
Alakanuk, Emmonak, Grayling, Kotlik, Mountain Village, Nunam Iqua

October 24, 2002

James D. Watkins
Admiral, U.S. Navy (Retired)
Chairman
U.S. Commission on Ocean Policy
1120 20th Street, N.W.
Suite 200 North
Washington, DC 20036

Dear Admiral Watkins:

Thank you for your letter and the opportunity to further discuss the Marine Conservation Alliance's (MCA) origins, organization, and perspectives on important issues. I hope the following is helpful.

Origins of the MCA

Collectively, fishing interests -- especially coastal communities dependent on sustainable use of marine resources -- were concerned that, despite a long record of responsible, successful management of North Pacific marine resources, commercial fishing was under increasing attack. Some criticism was due to broad-brush treatment of all fisheries because of egregious practices elsewhere in the world. However, a growing public awareness of and involvement in marine resource management issues appeared increasingly oriented toward restriction or elimination of seafood harvest activities for no apparent scientifically justified reasons. This trend was especially disturbing in the North Pacific, where commercial fishing activities are a critical component of local, state, and regional economies.

MCA organizers were concerned public pressure on resource managers was being generated partially by statements or campaigns of questionable motivation. They were concerned scientific veracity was giving way to emotional statements seemingly directed more toward generating membership revenues than honestly addressing problems. They were concerned the positive story of proper management of North Pacific marine resources was overshadowed by irresponsible and poorly-founded but well-financed, widely-presented arguments. Repeating an inaccurate conclusion frequently enough does not render it true, but public pressure based on unreliable premises can indeed drive public policy.

Organizers were also concerned that even though fishing communities and the industry in general had long supported conservative management measures which have resulted in a healthy ecosystem and no overfished groundfish stocks, there was little public acknowledgement of this. Certainly, the MCA's goal is not public acclaim. However, because public opinion reflects public understanding, organizers were concerned the public component of fisheries management was apparently based largely on an incomplete view of the situation in the North Pacific.

The MCA began to take tangible form after a lawsuit against regulatory agencies over declines in Steller sea lion (SSL) populations threatened to shut down vast tracts of valuable fishing grounds. Trawl fisheries, especially those for walleye pollock, Atka mackerel, and Pacific cod were particularly threatened.

MCA organizers were concerned that increasingly prevalent lawsuits such as the SSL case 1) precluded or hindered science-based management decisions, 2) drove management in political rather than scientific directions, and 3) forced regulatory agencies to expend resources responding to legal challenges instead of attending to their real work. Legal disputes and public campaigns led to reduced fishing opportunities and ability to harvest seafood. Even if they played on inaccurate public perceptions of fisheries, the increasing influence of emotionally powerful but scientifically questionable arguments from activist groups threatened the future of the seafood industry. Frequently, those forwarding the emotional argument were well-financed public relations professionals, while the industry had only an inconsistent public presence.

MCA organizers were especially troubled by the effects of injunctions and other punitive actions. Increasingly, fishing activities were being curtailed not because of substantive science-based management decisions as mandated by the Magnuson-Stevens Fishery Conservation and Management Act (MSA), but in deference to the National Environmental Policy Act (NEPA), the Administrative Procedures Act (APA), or other procedural and administrative requirements. While the group supports proper notice to stakeholders and an open, transparent public process, it remains convinced scientific arguments should retain primacy in management decisions.

The embryonic MCA contracted with expert scientists and attorneys familiar with the various federal Acts governing fisheries, and in July of 2001, filed extensive comments on the Draft Programmatic Supplemental Environmental Impact Statement for the Gulf of Alaska and Bering Sea/Aleutian Islands groundfish fisheries. It has since followed a similar process of bringing outside expertise to bear on issues as diverse as defining Essential Fish Habitat (EFH) and advocating for the use of the best available science in setting Total Allowable Catch (TAC) levels.

The group also concluded that to survive, the seafood industry could no longer simply conduct its activities so as to insure continued fishing by this and future generations. It would have to operate more effectively in the public relations field as well.

The MCA was created to promote the conservation and sustainable use of fishery resources in the North Pacific for present and future generations, including efforts to improve science, educate the public, and support science-based policies that protect the marine environment and the North Pacific fishing community. Specifically, those efforts include 1) advocating for sensible, sustainable management, including protecting fish habitat, preserving clean waters, and better understanding the marine environment, 2) uniting harvesters, processors, communities, associations, support businesses, and others in addressing mutual concerns, 3) developing a credible public voice in management discussions, 4) instilling

public confidence in industry contributions to research and information used by resource managers, and 5) engaging in collaborative efforts with other conservation groups on issues of mutual concern.

Central to a positive, credible public profile is the public perception of the industry as responsible stewards of valuable natural resources. Participants in the fisheries are the people most directly concerned with the long-term health of marine resources. MCA organizers agreed the best way to foster that public impression is not only to continue to conduct fishing operations in a sustainable, science-based manner, but to take steps to make the public aware of that fact.

From the outset, MCA organizers recognized modern life renders public perception as influential as the facts of any given situation. For every resource management question, it is essential to be aware of both public appearance and the truth as best it can be established by scientific research.

So, the MCA was keen to base its actions on publicly-available, proven, peer-reviewed science. Organizers wanted to avoid a “tobacco institute” practice of presenting in-house investigations and analyses, relying instead on widely-accepted, credible scientific research. Because the public already perceived the seafood industry as having a proprietary interest in a continued ability to harvest seafood, the MCA, as an industry-sponsored group, would be immediately suspect. An industry-sponsored group could not simply produce scientific data which, unsurprisingly, supported the industry’s desired conclusions. Credible science is open, testable, and replicable, and organizers were adamant the MCA associate itself only with information able to withstand the most intense public scrutiny.

The public also needed to understand the industry was deeply concerned with all the attendant issues that render fisheries sustainable and profitable in the long term, including basing sustainable management schemes on sound scientific information, protecting fish habitat, and maintaining cleanliness of oceans and watersheds.

Our mission is to promote sustainable fisheries based on sound science, prudent management, and an open, transparent public process, which sounds remarkably similar to the mission statements of other environmental organizations. However, unlike some of those groups, we do not object to continued harvest, as long as the preponderance of evidence suggests such activity does not threaten the biological stability of fish stocks. We favor careful, conservative management, but reject the so-called precautionary principle – the concept of disallowing an activity until it can be proven there will be no negative effects. In most situations, even hundreds of years of data collection could not satisfy that test.

MCA Structure

The MCA is not a membership organization in the usual sense. Instead of regular dues, contributions from participant groups, including harvesters, processors, and fishing

associations, fund the MCA's operations. Specifically, eight "Founding Sponsors" assessed themselves a fixed rate per ton of pollock, cod and mackerel harvested and processed, making up the bulk of MCA revenues. The executive directors of each of the eight groups serve as Directors of the MCA.

In addition, "Community Sponsors" contribute a minimum annual amount set by the Board and collectively elect one of their number to serve as an MCA Director. Similarly, "Associate Sponsors" contribute at a prescribed minimum level and elect one MCA Director.

At least four times per year, the MCA Board holds regular meetings; one annual meeting is held in the first quarter of the year. The Board elects a President, Vice President, and a Secretary/Treasurer; the Board hires an Executive Director, who hires such staff as he/she deems appropriate.

Marine Protected Areas (MPA)

In our view, MPAs are areas where human activity is restricted for any duration in order to achieve a specific management objective, including exclusion of certain types of fishing gear and seasonal closures. While we recognize President Clinton's Executive Order defines MPAs as places where human activity is excluded in perpetuity, the MCA believes that form of MPA is better termed a "marine reserve" or "marine park." In any event, a standardized set of definitions encompassing the different degrees of restriction would help reduce confusion and facilitate future discussions.

Graphic Representation of North Pacific MPAs

The maps you requested are attached as a PowerPoint program.

Thank you for the opportunity to comment. I hope this information is helpful. Please don't hesitate to contact me if we may be of further assistance.

Sincerely yours,

Ronald G. Clarke
Executive Director