



## **Southern Shrimp Alliance**

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**Testimony before the U.S. International Trade Commission**

***Inv. No. 332-575: Seafood Obtained via Illegal, Unreported, and Unregulated Fishing: U.S. Imports and Economic Impact on U.S. Commercial Fisheries***

**September 3, 2020**

**Washington, DC**

Good morning Commissioners, good morning to the Commission staff, and good morning to everyone else who is participating or watching this hearing today. I am John Williams, the Executive Director of the Southern Shrimp Alliance.

The Southern Shrimp Alliance formed in 2002 to address unfairly-traded shrimp imports and the Commission may know us from our work on international trade. But since the Southern Shrimp Alliance was created, one of the most important things we do is work with the federal regulatory agencies that manage our industry.

I have been a commercial fisherman for over thirty-five years and the Executive Director of the Southern Shrimp Alliance for the past fifteen years. I worked as a deckhand, captained boats and owned and managed my shrimp trawlers. I built a career in commercial fishing and took care of my family through working in one of the most heavily-regulated industries in America.

This regulation of our industry is why I asked to appear at this hearing regarding illegal, unreported, and unregulated fishing. In your investigation, the Commission is to report on the impact of imports of IUU seafood on commercial fishermen. As you do so, you should understand how commercial fishing industries in this country are regulated. This may help to explain the frustration and anger that commercial fishermen feel when they are asked to compete in the U.S. market with seafood that has been harvested outside of the United States without

similar regulations. This book I have here with me today is what our industry calls the “Commercial Fishing Bible.” It is the Magnuson–Stevens Fishery Conservation and Management Act. It contains 170 pages of what the commercial industries can and cannot do while working in a domestic seafood industry. Nowhere in this book does it say that IUU fishing is acceptable.

Currently, anyone who wants to run a shrimp boat in federal waters in the Gulf of Mexico, as I once did, has to hold a federal shrimp permit. A permit requirement was imposed in 2003 and we are currently under a ten-year moratorium that limits the number of permits that are allowed to exist. These limits were not imposed because we were overfishing shrimp. As an annual species, brown and white shrimp caught off the coast of the South Atlantic and the Gulf of Mexico are plentiful and their population has never been under threat.

Limits imposed on how we shrimp are the result of concerns regarding the impact of our fishing on non-targeted species, including migratory species such as sea turtles and marine mammals. Because of those limits, a shrimper has to report his landings, report where he trawled, and make his vessel available for fishery observers. His boat will be boarded by the U S Coast Guard and NOAA Fisheries Special Agents of OLE, who will check the equipment that was designed to mitigate these concerns. They will check the angle and size of the Turtle Excluder Devices in his nets. They will check the Bycatch Reduction Devices in those same nets to ensure compliance. And if anything is outside of allowable parameters, the Coast Guard will issue a violation ticket, possibly terminate his trip, potentially fine him, and attribute any violation to the entire industry for further regulations.

The Southern Shrimp Alliance has members in south Texas that get boarded so frequently by the Coast Guard that they have jokingly suggested that we should create a “punch card” for their frequent visitors.

As you can hear, we are a heavily regulated industry. None of us are happy about it. But none of our members can afford to pretend that we might be able to operate in a system without intense and invasive regulatory oversight. We cannot realistically tell the industry that we are going to get the federal government off our backs and return to a time where shrimpers could do what they wanted whenever they wanted.

We cannot make regulations go away, but we can listen to the concerns that regulators have and we can work with them to find ways to address those concerns so that our industry can keep operating. It is shrimpers from within our industry that are continually developing and refining new technology and methods that lessen our impact on the environment and overall ecosystem. It is shrimpers that are creating systems so that federal agencies can track where we fish, how long we fish, and how many of us fish at any given time. We must also produce and submit trip tickets that show how much shrimp we catch and what size they are. We have taken on those obligations because we have no other choice if we want to work. All of this is just a partial list of regulations we have to meet in order to get our product into the market.

I tell you this because I hope you will understand why it is so upsetting whenever I hear a seafood importer complain about possible regulations that might make their suppliers have to do

one-tenth of what we have to do. I am angry at the implication that it is ok to demand things from fishermen who work in the U.S. waters, but not ok to require anything from fishermen who work outside of U.S. waters. I am confused that the enforcement of our existing laws demonstrates that this country cares deeply about the health and safety of sea turtles and marine mammals while they are in U.S. waters, but shows nowhere near the same concern once those same animals leave our territorial waters.

And our industry gets really annoyed whenever a seafood importer disingenuously tells commercial fishermen that the real solution is to roll back all regulations. Our industry cares about the environment and ecosystem.

Seafood harvested through illegal, unreported, and unregulated fishing is imported into our market because the federal government has, historically, done little to prevent it from entering the United States. That seafood is illegal. It should not be here. Shrimp produced from IUU fishing touches a number of other foreign activities such as slave labor forced to work on unsafe vessels. The seafood from IUU fishing is turned into fish meal for feed in the aquaculture farms that are already breaking numerous U.S. laws with regard to illegal chemicals being added. And the shrimp taken out of those ponds is processed by child labor in “peeling sheds” – which has now been renamed to “pre-processing.” It goes on and on.

Commercial fishermen are hopeful that the Seafood Import Monitoring Program will cut back the extent to which we have to compete for sales with IUU seafood. But the program has to be strengthened and enforcement has to be just as serious as it is with U.S. commercial fishermen. We cannot continue to operate parallel systems through which we have heavy enforcement mechanisms to prevent illegally caught domestic seafood from reaching American consumers, but minimal oversight of imported illegal seafood. The circumstances in which we have been made to compete for sales cannot be rationally defended and it is far past time for a level playing field. Please remember that regardless of and in addition to the tremendous negative impacts on our domestic industry and others like us, the first word in IUU defines it all. **Illegal.**

Thank you.