



Southern Shrimp Alliance

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April 9, 2020

Chris Oliver
Assistant Administrator for Fisheries
National Oceanic and Atmospheric Administration Fisheries
U.S. Department of Commerce
1315 East-West Highway
Silver Spring, MD 20910

Re: Reporting of Gulf Coast Shrimp Landings Through Fishery Market News

Dear Assistant Administrator Oliver,

On behalf of the Southern Shrimp Alliance, I am writing to emphasize the importance of the monthly compilation and publication of Gulf shrimp landings by the Fisheries Statistics Division, Southeast Fisheries Science Center, National Marine Fisheries Service ("NOAA Fisheries") and to request that the agency continue, and expand, this reporting in the future. This monthly report, published since 1995, is made available to the public through e-mail distribution and at NOAA Fisheries' website page for Fishery Market News.¹

NOAA Fisheries began developing and distributing Fishery Market News over eighty-two years ago in New York city. As the agency explains, "[t]his joint federal/industry program seeks to provide accurate, unbiased reports on conditions affecting the trade in fish and fishery products." However, with the passage of time, the information reported to the public through Fishery Market News has been severely curtailed.

At present, NOAA Fisheries obtains and publishes information through Fishery Market News regarding trade in seafood that is originally compiled and published by another bureau within the U.S. Department of Commerce (the U.S. Census Bureau);² as well as data originally

¹ See <https://www.fisheries.noaa.gov/national/sustainable-fisheries/fishery-market-news>.

² "Monthly imports of shrimp"; "Monthly imports of frozen fish blocks"; "Monthly imports of selected fishery products"; "Monthly exports of selected fishery products"; "FOREIGN TRADE IN INDUSTRIAL PRODUCTS" reported as part of the "Quarterly fish meal and oil production" report; and "U.S. shrimp imports by type of preparation" reported as part of the "Monthly Gulf Coast shrimp statistics."

compiled and published by foreign government entities, including the Government of Japan's Ministry of Finance,³ the Japan Fisheries Agency,⁴ and the city of Tokyo's metropolitan government.⁵ In contrast, NOAA Fisheries only compiles and publishes an extremely limited range of information reported to the agency for commercial fisheries regulated by the agency through Fishery Market News.⁶

In total, through NOAA Fisheries' Fishery Market News, the public is currently provided timely updates regarding (1) domestic fish meal and oil production; (2) U.S. menhaden purse-seine landings; and (3) U.S. shrimp landings in the Gulf of Mexico. Although NOAA Fisheries used to compile and publish market news and fish prices (auction prices and quantities) for the Northeast region, this report was discontinued at the end of 2018.

Since November 2013, the Southern Shrimp Alliance has, in turn, taken the information reported through Fishery Market News regarding U.S. shrimp landings in the Gulf of Mexico and distributed these data directly to industry participants and the public at-large. We obtained archival information for U.S. shrimp landings in the Gulf of Mexico with data reaching back as far as the year 2000 and developed a series of standardized charts that present NOAA Fisheries' monthly data reporting in historical context, with a time period that is significantly longer than that reported through Fishery Market News. For over six years, the Southern Shrimp Alliance has broadly distributed this information on the same day or within a day of its release by NOAA Fisheries. These data are reviewed and relied upon by industry participants and are further distributed by seafood industry press publications.

The Southern Shrimp Alliance initially began this exercise as a way to track and monitor shrimp landings in the wake of the April 2010 Deepwater Horizon oil spill. Many in and outside the commercial shrimp industry feared that there would be substantial long-term adverse effects on shrimp populations in the Gulf of Mexico as the result of the oil spill. The monthly data compiled and published by the Fisheries Statistics Division of the Southeast Fisheries Science Center demonstrated that, in fact, shrimp stocks quickly recovered. This information encouraged industry participants to remain in the business and continue to work towards the improvement of our commercial fishery.

Since its initial use, these data compilations have become an important reference tool in evaluating the potential impact of different events on the commercial shrimp industry operating in the Gulf of Mexico. The effect of large-scale freshwater diversions through the opening on spillways, hurricanes and severe weather events, massive expansions in hypoxic areas of the Gulf of Mexico, *et cetera* on commercial shrimp harvests may be evaluated on a near real-time basis. Where significant harmful impacts can be documented, the landings data published by NOAA

³ "Japanese shrimp imports"; "Japanese fishery exports"; and "Japanese fishery imports."

⁴ "Japanese cold storage holdings"; and "Fish Landings and Average Ex-Vessel Prices."

⁵ "Tokyo Wholesale Prices."

⁶ The "Quarterly fish meal and oil production" report; the "Monthly Gulf Coast shrimp statistics" report; the "Monthly Menhaden purse-seine landings" report; and the annual forecast for the Gulf and Atlantic Menhaden purse-seine fisheries/review of the past fishing season.

Fisheries, in turn, provides an objective basis through which to discuss appropriate responses to the particular challenge presented with local, state, and federal policymakers.

At this very moment, families across the southern United States that depend on the commercial shrimp industry for their livelihoods are anxious about their economic well-being as the country implements extensive public health measures to counter the COVID-19 pandemic. The collapse of demand in the food service sector of our economy caused by the shuttering of restaurants is anticipated to have a severe impact on the market for U.S. wild-caught shrimp. Access to timely data regarding landings and ex-vessel prices paid for shrimp at the dock will be an essential element in the Southern Shrimp Alliance's ability to monitor and accurately describe the condition of the commercial shrimp industry.

According to the *Fisheries of the United States 2018*, commercial shrimpers landed nearly 300 million pounds of shrimp in 2018 (the seventh highest total of any seafood species group landed in the United States) worth nearly half a billion dollars (the fifth highest total of any seafood species group in the United States). There are over one thousand boats operating in federal waters pursuant to Gulf of Mexico Shrimp Commercial Fishing Permits (Limited Access). Hundreds of more vessels operate in federal waters in the South Atlantic pursuant to South Atlantic Penaeid Shrimp Commercial Fishing Permits (Open Access). Additional thousands of commercial fishermen operate in state waters across the eight states spanning from Texas to North Carolina. The size and breadth of our industry means that data regarding shrimp landings are not otherwise readily publicly available and that it is beyond the means and capacity of the domestic industry to establish, on its own, a parallel system of reporting and compilation that would accurately capture the information that is already reported by individual fishermen to state and federal authorities.

Because it would be a practical impossibility for the industry to build its own reporting system, in the absence of its compilation and publication through Fishery Market News, information regarding production and landings of these products is only obtainable through the agency's publication of annual commercial landing statistics. The most recent information available for annual commercial landings is for calendar year 2018 and was released in February of this year. Should this schedule for the release of annual commercial landing statistics be maintained, data regarding landings over the next few months will first become available to the public, including the U.S. shrimp industry, in February 2022. This would be far too late to be useful in crafting any response to harm befalling the industry because of the COVID-19 pandemic.

By the publication of our monthly reports based on the data released by NOAA Fisheries through Fishery Market News, the Southern Shrimp Alliance has provided a concrete demonstration of the importance of this information to the commercial shrimp industry. The fact that these reports are subsequently picked up and further disseminated by members and seafood industry trade press publications establishes that the agency's Monthly Gulf Coast shrimp statistics are of significant importance to the public at large.

For all of these reasons, the Southern Shrimp Alliance believes that is vitally important that NOAA Fisheries continue to compile and publish Monthly Gulf Coast shrimp statistics through Fishery Market News. Moreover, the Southern Shrimp Alliance requests that NOAA Fisheries

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take steps to address any potential deficiencies in its current data collection process to enhance and augment the reliability of its monthly data reports. Further, the Southern Shrimp Alliance also requests that NOAA Fisheries begin to compile and report monthly data for shrimp landings in the South Atlantic. The inability to access reasonably contemporary data regarding shrimp landings in the South Atlantic has substantially impeded the ability of the Southern Shrimp Alliance and other industry organizations to evaluate the impact, as just one example, of the recurrence of black gill disease on shrimp populations in this region. Indeed, the most recent annual commercial landings data published by NOAA Fisheries shows that the volume of shrimp landed in the South Atlantic declined by roughly one-third between 2017 and 2018, with a loss of over \$21 million in the value of landed shrimp year-to-year. Anecdotal reports from fishermen in the region at the time indicated that landings had fallen, but the full extent of the decline did not become completely apparent until the release of these data in February of this year.

Thank you for any consideration you are able to give to these requests. I am available to address any questions you might have regarding this correspondence.

Sincerely,

A handwritten signature in black ink, appearing to read "John Williams", written in a cursive style.

John Williams
Executive Director

cc: Dr. Paul Doremus, Deputy Administrator for Operations
David Detlor, Acting Director, Office of Science and Technology
Dr. Alan Lowther, Branch Chief, Commercial Fisheries Statistics
Dr. Clay Porch, Director, Southeast Fisheries Science Center
Dr. David Gloeckner, Division Director, Fisheries Statistics Division, Southeast Fisheries Science Center