

# Proposed Federal Ocean and Great Lakes Management Policy Ignores \$125 Billion Sportfishing Industry

The Interagency Ocean Policy Task Force, created by President Barack Obama this June, released its interim report on Sept. 17 with a 30-day public review and comment period. The task force, led by the chair of the Council on Environmental Quality (CEQ), was created to develop a draft national policy and implementation strategy for conserving and managing the oceans, Great Lakes and coasts of the United States.

The draft policy, the [Interim Report of the Interagency Ocean Policy Task Force](#), would govern federal Pacific and Atlantic Ocean waters and Great Lakes resource conservation and management and assist in the coordination of these efforts among federal, state and local agencies.

What the report failed to do, however, was include specific issues of concern to the recreational fishing and boating communities.

## Sportfishing Community Meets with Task Force

In a July stakeholder meeting with the task force, the American Sportfishing Association (ASA), the Congressional Sportsman's Foundation and other recreational fishing groups discussed issues of interest to the recreational fishing community. On July 15, the group followed up with a written submission to Nancy Sutley, CEQ chair, detailing recommendations to the task force and emphasizing the recognition and promotion of recreational angling in any federal policy.

Key points ASA and the other organizations made included the following:

- Commercial and recreational fishing must be differentiated in any strategy dealing with oceans and Great Lakes conservation.
  - A new national ocean policy should recognize the unique contributions of the recreational fishing community and re-affirm President Bill Clinton's Executive Order (EO) 12962, which President George W. Bush amended with EO 13474, on recreational fishing, which requires that it be managed as a sustainable activity in federal waters.
  - A successful national ocean policy would promote a balanced multiple-use approach to ocean resource management that focuses on compatible uses. It would recognize the beneficial economic and societal roles of sustainable fisheries, as well as other uses, and deem them just as important as conservation—not any less.
  - Responsibly regulated recreational fishing is a compatible activity with most, if not all, potential ocean uses (with appropriate safeguards for national security).
  - Efforts should be made to attain all necessary scientific information (biological, statistical and socio-economic) prior to making management decisions that impact coastal economies. This scientific information then should be used as part of an adaptive management model.
- Disappointingly, many of the contributions of the sportfishing community were not in the interim report. References to our concerns, including the need for



differentiation between commercial and recreational fishing and the critical role that recreational angling contributes to fisheries conservation in the United States,

were omitted from the September report.

“ASA has concerns regarding the direction the administration is taking regarding how to manage our nation's marine and freshwater public resources, choosing a tone of preservation over conservation,” said ASA Vice President Gordon Robertson. “We are disappointed that the task force failed to recognize recreational fishing's conservation, economic and social contributions and include recreational fishing as a key policy component. The sportfishing community supports healthy and abundant ocean and coastal and fishery resources that impact local coastal communities. Outdoor recreation, especially recreational fishing, is an integral part of coastal economies throughout this nation. Therefore, it should be included as a priority in any national ocean policy.”

“In regards to recreational fishing, it is a long-standing policy of the federal government to allow public access to public lands and waters for recreational purposes consistent with sound conservation, including the nation's wildlife refuges, national forests and national parks. This strategy should be reflected in a national policy for the oceans and Great Lakes. In fact, the use of public resources by recreational anglers is essential to

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the conservation model used in this country for fish and wildlife management,” said ASA Ocean Resource Policy Director Patty Doerr.

Doerr further said, “As with any good federal policy decision, discussions about measures that may restrict public access to public resources must involve an open public process, have a solid scientific basis and incorporate specific guidelines on implementation and follow-up. We are concerned about the abbreviated 90-day timeline that forced the task force to issue this policy document prematurely. The implications of such a policy are vast and nationwide. Therefore, the review process should be deliberate and extend beyond the 30-day public review and comment period that started on Sept. 17.”

Since 1950, with the passage of the [Sport Fish Restoration Act](#), anglers and the sportfishing industry have provided the bulk of funding for fisheries conservation and management in the United States through fishing license fees and the federal manufacturers excise tax on recreational fishing equipment. According to the National Oceanic and Atmospheric Administration’s National Marine Fisheries Service, saltwater anglers contribute more than \$82 billion annually to the economy. Despite taking only 3 percent of the saltwater fish harvested each year, the recreational sector creates nearly half the jobs coming from domestic saltwater fisheries.

Robertson said, “The sportfishing community believes that recreational activities, such as responsibly managed and regulated recreational fishing, deserve full consideration and incorporation in the administration’s ocean and Great Lakes policy. Providing the angling public with access to public resources is no less important than conserving those resources. Therefore, we urge the task force to include recreational fishing as a separate and distinct ocean and Great Lakes priority.”

For more information, contact ASA Ocean Resource Policy Director [Patty Doerr](#), 703-519-9691 x244. ■

## ASA Outlines Its Concerns in Task Force Response

ASA has a variety of concerns with the interim report and the national ocean and Great Lakes policy that were submitted to CEQ Chair Sutley.

- **No distinction between recreational and commercial fishing.** As stated in the written comments sent to the task force in July, there is an inherent distinction between recreational and commercial fishing and their respective impact on the ocean environment. Recreational fishing accounts for only 3 percent of the national saltwater harvest. Members of the public who spend leisure time on the water fishing with family and friends are fundamentally different than commercial fishermen who pursue a public resource for the purpose of selling it.

- **Reliance on the use of precautionary principle.** The precautionary principle is a complicated standard with a variety of facets that should not be mandated by law or executive order. It is another example of the draft policy failing to recognize the sustainable use of natural resources. Too often the precautionary principle is used as justification to ban such activities as recreational fishing, when the very definition of a sustainable activity argues against the use of the principle. Recreational fishing only should be banned when there is clear scientific evidence that it is the cause of depleted fish stocks or poor ocean habitat and only after traditional fishery-management measures have failed.

- **Mandating ecosystem-based management.** ASA recognizes the potential benefits of ecosystem-based management as one of many tools for natural resource management. Its use, however, should not be mandated.

Such a management philosophy requires an abundance of scientific information and data that resources managers simply do not have. Mandating the use of ecosystem-based management could have a variety of unintended consequences and only should be employed when enough data is present to make an educated determination.

- **No affirmation of states’ rights.** State agencies always have had the right to manage state fish and wildlife resources within state lands and waters. It is reflected through the American Model of Fish and Wildlife Management and its user-pay/user-benefit system. This governance structure is greatly supported by ASA and others within the recreational fishing community. A national ocean policy should reaffirm the rights of states to retain this jurisdiction, as well as all other jurisdictions. This belief also applies to the recommended U.S. ratification of the U.N. Law of the Sea Treaty and its potential impact on the rights of individual states.

- **Lack of public comment in coordination framework.** ASA supports increased coordination between the federal, state and regional authorities that govern ocean, coastal and Great Lakes management. As part of any new coordination structure, these authorities must retain all current jurisdictions. The coordination framework outlined in the interim report, however, calls for seemingly countless reports and strategies, none of which will be open for public review and comment. Users of public resources must be provided the opportunity to comment on their management.