



Western Fishboat Owners Association (WFOA)

October 13, 2025

RE: Public Comment on Executive Order 14276: Restoring American Seafood Competitiveness

The Western Fishboat Owners Association (WFOA), established in 1967, represents over 200 family-owned and operated vessels participating in the North Pacific albacore troll and pole-and-line fishery. Our membership spans California, Oregon, Washington, and beyond — including vessels, processors, buyers, and shore-based businesses. The fleet has a proud legacy of low-impact, highly selective fishing practices that support sustainable harvest and vibrant coastal economies. For nearly 60 years, WFOA has engaged with state, federal, and international partners to promote sound science, sustainable management, and fair market access. Today, the albacore fishery continues to support thousands of American small businesses and contributes to domestic seafood security.

We appreciate the opportunity to comment on Executive Order 14276: Restoring American Seafood Competitiveness. The WFOA supports the goals of implementing an America First Seafood Strategy to promote production, marketing, sale, and export of United States wild caught fishery products and strengthen domestic processing capacity. Our ongoing efforts to educate American consumers about the health benefits of seafood has been a priority for our organization since the 1970s. We believe that US caught pole and troll caught albacore is an excellent option for nutrition programs. Additionally, addressing the egregious unfair trade practices of major seafood-producing nations, including illegal, unreported, and unregulated (IUU) fishing, is a top concern for many of our members. Eliminating use of IUU practices and the use of highly destructive gear types will provide a tremendous benefit for our US fleets and our partners around the globe.

Review of regulations is an important step in expanding the opportunity for our US fishermen. Maintaining compliance and navigating complex regulatory requirements can be an economic burden on independent vessel owners and create unintended consequences that limit opportunity. However, achieving the stated goals of restoring American seafood competitiveness requires a broader approach. As an organization dedicated to advocating for the future of the fleet, we hope that the following recommendations will be considered when addressing how to help ensure that American fisherman can stay competitive internationally. These recommendations will help drive economic prosperity in local coastal communities, ensure food independence for the US, and keep a critical, multi-generational trade a part of the future of food.

Expand U.S. Seafood Marketing and Government Utilization

Expanding domestic markets and government utilization will strengthen working waterfronts, stabilize prices, and enhance food security.

We support:

- Public-private partnerships for marketing and consumer education, emphasizing traceable, wild-caught, sustainable seafood.
- Inclusion of US caught albacore tuna in federal nutrition programs, including school lunches, emergency food assistance, and correctional facilities.
- Coordination between NOAA, USDA, and USTR to reduce export barriers and strengthen international recognition of U.S. troll caught albacore tuna.
- Federal funding for a National Seafood Marketing and Promotion Program.

Advance U.S. Seafood Labeling and Traceability

Consumers increasingly value sustainability, traceability, and domestic origin.

We support:

- Federal development of a U.S. caught seafood labeling system akin to USDA beef grades.
- Voluntary participation for small fleets without requiring third-party certifications.
- Differentiated market access for traceable wild-caught U.S. tuna products.

Protect Access to Productive Fishing Grounds

As offshore wind, deep sea mining, marine aquaculture, and conservation zones expand, it's critical that productive high seas and EEZ waters remain accessible to existing fisheries.

We support:

- Early consultation with fishermen on marine spatial planning.
- Explicit inclusion of commercial operators in energy and aquaculture siting decisions.
- Transparent evaluation of proposed Marine Protected Areas (MPAs) that may restrict access.

Prioritize U.S. Participation in International Fishery Bodies (RFMOs)

Our fishery is co-managed through Regional Fisheries Management Organizations (RFMOs), primarily the Western and Central Pacific Fisheries Commission (WCPFC) and the Inter-American Tropical Tuna Commission (IATTC). These forums determine conservation and management measures for North Pacific albacore and other tuna stocks.

We support:

- Ensure full staffing of U.S. delegations, including from NOAA, the State Department, and fund travel for industry representatives.
- Protect equitable fishing opportunities for U.S. vessels in future harvest strategy negotiations.
- Elevate RFMO engagement as a top diplomatic and seafood competitiveness priority.

Reduce Regulations and Eliminate Redundancies for Multi-Fishery Vessels

Many vessels in the WFOA fleet also participate in salmon, Dungeness crab, or other groundfish fisheries — each with distinct rules, permits, and reporting burdens.

We support:

- Harmonized logbook and e-reporting tools across fisheries and regions.
- Streamlined safety and compliance measures.
- Continued improvements to centralized permit management platforms to ease administrative burden.
- Create compliance alternatives for legacy vessels structurally sound but disqualified under modern inspection rules.

Invest in Port Infrastructure & Harbor Access

Our vessels operate in smaller working ports in California, Oregon, and Washington, many of which face deferred maintenance and restricted access due to siltation, tidal constraints, and lack of funding.

We support:

- Prioritized dredging for small harbors to ensure operational access.
- Funding for fuel dock, hoist, cold storage upgrades and general dockside maintenance.
- Simplified permitting for fishery-dependent waterfront development.

Develop Crew Training and Workforce Entry Programs

Access to skilled deckhands is a growing challenge. The seasonal nature of albacore and the economic variability of the fishing industry can make crew recruitment difficult.

We support:

- Expansion of NOAA Sea Grant workforce training and state-level maritime programs.
- Programs and tax incentives that support vessels owners that bring young fishermen into the fishing industry.
- Seed funding for cooperatives that mentor new entrants into the fishery and provide support for startup costs associated with the industry.

Boost HMS Science Investment

While groundfish and salmon programs receive stable assessment funding, Highly Migratory Species (HMS) science lags behind. Albacore assessments are complex, requiring international coordination and high seas data.

We support:

- Dedicated NOAA funding for HMS science equivalent to domestic stocks.
- Support for Pacific-wide tagging and oceanographic data collection.
- Inclusion and compensation for fishermen participation in data collection efforts.

Support Access to Financial Risk Management Tools

Fishing is one of the few working lands sectors without federally supported safety nets.

We urge exploration of:

- Fishery-specific insurance models, similar to USDA crop insurance, to mitigate fuel price volatility or environmental disruption.
- Expanded access to low-interest loans under the Fisheries Finance Program.
- NOAA collaboration with USDA to pilot regionally targeted financial tools without distorting market incentives.

WFOA supports the overarching goals of EO 14276 and encourages the Administration to build a seafood competitiveness strategy that reflects the strengths, and challenges, of wild-caught, HMS-dependent, small-vessel fleets like ours. We also support the recommendations offered by the Pacific Fisheries Management Council and the overall sentiments of numerous commercial fishing advocacy groups that have emphasized the importance of prioritizing US wild caught seafoods.

The U.S. albacore fishery is resilient, efficient, and built on generations of ocean stewardship. With targeted support and streamlined governance, our fleet can continue to supply healthy, sustainable seafood to American and global markets while upholding our leadership in international fisheries management. Our communities are worth fighting for and the importance of America's working waterfront cannot be overstated. Thank you for keeping this industry an important part of America's future.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Clayton Wraith". The signature is stylized with a large, looped "C" and a long, sweeping "W".

Clayton Wraith, Esq.
Executive Director
Western Fishboat Owners Association