

March 13, 2023

Ms. Janet Coit, Assistant Administrator  
National Marine Fisheries Service  
1315 East-West Highway, Room 14636  
Silver Spring, MD 20610

Dear Director Coit:

The Net Gains Alliance (NGA) is a non-partisan, independent initiative that works to improve the collection, management, and use of data and information to enhance the benefits obtained from sustainable management of fisheries and marine ecosystems. Since our launch in 2017, we've [funded over \\$1m in projects](#) to promote fisheries data modernization, issued [multiple reports and recommendations](#), and continuously engage a community of more than 1,000 fishermen, advocates, academics, ocean innovators, managers, and agency staff in conversations and programming around digital transformation in the fisheries sector. NGA believes that data management by NOAA Fisheries should be executed in a systematic, coordinated, modern, and transparent manner to ensure the highest and best current and future use of all data.

We generally support the goals and strategies contained in the draft National Seafood Strategy. Much of NGA's work over the past five years has emphasized the value of data modernization for core fisheries science and management in support of [our vision](#) for a data-driven future, such as simplifying electronic catch reporting to enable better in-season management and creating unique trip identifiers to link multiple records. We are seeing the agency invest in these areas and we expect that work will support Goal 1 of the Strategy. In these comments, we focus on additional areas where data modernization is needed to advance the Strategy, and the interconnected portfolio of NOAA and NMFS goals.

Working toward and achieving these goals and strategies will require timely, data-informed actions by NOAA Fisheries staff and partners throughout the seafood supply and value chains, including both wild-caught fish and aquacultured products. Modern, interoperable data systems will benefit science, management, and business operations and will require a robust data system that incorporates the following attributes:

- Interoperability, including increased findability and reusability of datasets across program silos
- Transparency, including revision of data confidentiality restrictions on data access
- Procurement and programs based on data and performance standards, not hardware or software requirements, to allow technologies to keep pace with innovation

Further, integration of the multiple aspects of fisheries science and management, businesses and supply chains, and economic and social justice issues will require NOAA Fisheries to commit to improvements and investments in staffing in the following areas:

### **1. Improve data resolution**

In order to support the commercial fishing industry and fishing communities in “their efforts to adapt to climate change and thrive in a changing ocean economy ... given new competing uses” (Goals 1 & 4), NMFS needs to know much more about who is fishing and where, and the social and economic characteristics of those communities and locations. As we’ve seen in efforts to provide disaster relief to fishing communities, it can be difficult to identify captains, crew, and business owners, much less their demographics and economic dependencies or those of the broader, connected coastal communities. More and better data are needed to inform workforce development and seafood infrastructure investments, understand skills gaps and support equitable outcomes across places and communities.

### **2. Invest in – and share – human dimensions data**

Human dimensions data has emerged as a top priority in NOAA Fisheries’ Next Generation Data Acquisition Plan process, indicating a broad consensus that NOAA Fisheries should invest in infrastructure and expertise to support this work. The Strategy rightly recognizes under Goal 4 that strengthening the U.S. seafood sector depends on supporting resilient communities, infrastructure, and employment. A successful National Seafood Strategy should also connect to the goals set out in NOAA Fisheries’ 2022 Equity and Environmental Justice strategy.

Improved economic and social science data will support more effective decision-making in the face of a changing climate. Seafood policies can be better tailored to specific contexts if local, regional, and national economic data are robust. High quality “asset class” data is also in demand by investors, insurers, and third-party certification programs, such as the Marine and Aquaculture Stewardship Councils and the Task Force on Nature Related Financial Disclosures. To be competitive and well-positioned for the future, tomorrow’s U.S. domestic seafood businesses will need to demonstrate they meet safety, sustainability, and social impact standards. NOAA should be a data partner in helping businesses do so.

### **3. Rethinking data sharing, within and outside NOAA Fisheries**

One of the most common complaints NGA hears from stakeholders is the difficulty accessing their own data from NOAA Fisheries and the limited ability to integrate NOAA reporting data with third-party software. Fisheries and aquaculture businesses should be able to prepare a report and submit it to all necessary recipients - buyers, exporters, sustainability certifiers, and government agencies - and that report should become a verified record for all partners. That would mean an importer can double check the location of a catch (or farm, in the case of aquaculture) by viewing the certified landing receipt, rather than calling the captain or business owner. To do this, NOAA Fisheries needs to rethink its data sharing and interoperability policies, setting up more role-based access permissions and allowing cross checking between outside vendor systems and regulatory reporting systems.

To find success with the Strategy and more broadly, the agency needs to prioritize investing in these upgrades through staffing, training, and data infrastructure. The overlapping responsibilities of multiple government agencies overseeing these issues and the potential for environmental, economic, and social impacts on vulnerable coastal communities renders the work complex and difficult. However, investing in modernized data systems and protocols now will bolster the entire effort and assists in identifying and managing the local, regional, and national impacts of human induced climate change, a crowding ocean space with diverse participants, and a rapidly expanding aquaculture sector.

We congratulate you and your team for this important, timely work and stand ready to leverage our expertise and position as a respected and neutral convener to assist NOAA Fisheries in implementing this effort.

Sincerely,



on behalf of the Net Gains Alliance Leadership Team:

George Chmael II  
George Lapointe  
Katie Latanich  
Jill Stevenson  
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