



UNITED FISHERMEN OF ALASKA

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March 4, 2016

Honorable Lisa Murkowski
U.S. Senate
709 Hart Senate Building
Washington, D.C. 20515

RE: Support for Strengthening Seafood Country of Origin Labeling

Dear Senator Murkowski,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 34 commercial fishing organizations participating in fisheries throughout the State and its offshore Federal waters. As you know, seafood from Alaska is second to none. We proudly stand by the products we bring to market and want nothing more than a level playing field when competing for market share with imported seafood. The work that you have done in advancing legislation and international treaties to combat Illegal, Unregulated, and Unreported (IUU) fishing over the past several years has been instrumental in helping to level the playing field for the domestic industry. However, we feel there is still more work to be done and we ask for your help in this endeavor.

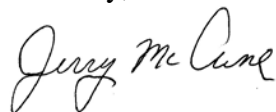
As you know, most seafood products imported into the United States are subject to Country of Origin Labeling (COOL) laws. However, loopholes in existing law allow a significant amount of seafood to enter the US market exempt from COOL. Specifically, as outlined in 7 CFR 60.119, "*...a retail item derived from fish or shellfish that has undergone specific processing resulting in a change in the character of the covered commodity*" is exempt from COOL. Examples of "*specific processing*" include frying, broiling, grilling, boiling, smoking, steaming, baking, and roasting. As such, products such as canned salmon and cooked crab sections from Russia are able to enter the US retail market with no requirement that they be labeled with the country of origin. As you know from your work on the IUU issue, a significant portion of the crab exported from Russia is estimated to be of illegal origin. Given these facts, it is quite likely that American consumers are unwittingly supporting the activities of illegal fishermen by purchasing their products in retail outlets. As a first step in closing this loophole, we would request that COOL be expanded to include all seafood, regardless of specific changes that may occur to the character of the product during processing.

While closing the loophole that allows processed seafood to enter the US retail trade exempt from COOL is a good first step, we feel that more can be done. 32% of all seafood consumed in the United States is done so in restaurants and other food service outlets. However, COOL is applicable to the retail trade only. As such, we would also request that consideration be given to expanding COOL to the food service sector.

Consumers are demanding more information than ever about the foods they eat and the products they buy. Whether the issue is GMO-free crops, lead-free paint, BPA-free water bottles, or soccer balls made with child labor, the US consumer wants the opportunity to make informed purchasing decisions. This trend is nowhere more pronounced than when it comes to seafood. In recent decades the US consumer has said no to tuna caught by encircling dolphins. The consumer has said no to artificial dyes and other chemicals used in certain types of aquaculture operations. Most recently the consumer has said no to seafood produced with forced labor. And Congress heeded that call by passing bi-partisan legislation aimed at ending this disgraceful practice.

Now it is time for Congress to act once again by removing the loopholes that allow processed seafood to be exempt from COOL at the retail level and to expand COOL to the food service sector. As mentioned at the start of this letter, Alaska's commercial fishermen want nothing more than a level playing field when bringing products to market. Recent success in fighting the issue of IUU fishing has been a tremendous first step in helping to level the field. We feel that the expansion of COOL is the logical next step. We thank you in advance for your consideration in this matter and welcome the opportunity to work with your staff to find a path forward.

Sincerely,



Jerry McCune
President



Mark Vinsel
Executive Administrator

CC:

Senator Dan Sullivan
Representative Don Young
Senator Maria Cantwell
Senator Patty Murray
Representative Rick Larsen
Representative Jaime Herrera Beutler
Representative Cathy McMorris-Rogers
Representative Jim McDermott
Representative Dave Reichert
Representative Adam Smith
Representative Denny Heck
Representative Suzan DelBene
Representative Dan Newhouse
Representative Derek Kilmer

MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Independent Fishermen's Marketing Association
Alaska Independent Tendermen's Association • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Trollers Association
Alaska Whitefish Trawlers Association • Armstrong Keta • At-sea Processors Association • Bristol Bay Reserve • Cape Barnabas Inc.
Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United • Douglas Island Pink and Chum
Freezer Longline Coalition • Golden King Crab Coalition • Groundfish Forum • Kenai Peninsula Fishermen's Association
Kodiak Regional Aquaculture Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association
Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel Owner Association
Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska Fisherman's Alliance
Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners • Southern Southeast Regional Aquaculture Association
United Cook Inlet Drift Association • United Southeast Alaska Gillnetters • Valdez Fisheries Development Association