

August 24, 2022

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

Dear Ms. 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 with the report "[Improving Net Gains: Past, Present & Future](#)", we've funded over \$1m in projects to promote fisheries data modernization and we 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.

The 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. It is from this perspective that we comment on the draft NOAA Fisheries Equity and Environmental Justice (EEJ) Strategy.

Improved data and information systems will be essential for achieving the goals of the EEJ strategy. As the strategy notes:

"We have not fully identified the underserved communities that are impacted by our work. This oversight affects who are considered NOAA Fisheries stakeholders, who research and monitoring are tailored for, and who are aware of and receive services. Without recognition of underserved communities, their needs cannot be documented or addressed."

This points to two broad areas of information needs: data that can help identify and characterize underserved communities (e.g., demographic and economic data) and data on the impact of NOAA Fisheries activities in service of the EEJ Strategy goals. Since there is little of the first type of data now, and the Strategy has not yet launched, these are new data needs and NOAA Fisheries has an opportunity to be thoughtful and intentional about the design of the data systems to support them, from data collection to analysis and reporting. **Successful implementation will require dedicated staffing and funding.** While we discuss where we think the EEJ strategy can build off other data efforts in this letter, we want to emphasize that new resources are essential to achieve these goals. Human dimensions data has also emerged as a top priority in NOAA Fisheries' Next Generation Data Acquisition Plan process, indicating a broad consensus that NOAA Fisheries should invest in this knowledge area.

### Standardization & Interoperability

The first receiver of fisheries data is often states, via licensing and catch reporting programs. That data then flows to regional Fishery Information Networks, NOAA Fisheries Science Centers and Regions, and other partners such as academic researchers. If demographic or EEJ impact data will follow these same data pathways, there need to be shared standards and formats across all parties for consistent reporting. For catch and compliance data, this has often been coordinated by the Fishery Information networks, such as the Atlantic Coastal Cooperative Statistics Program and PacFIN, and that could be a model to consider for EEJ data. NOAA Fisheries also has many skilled social scientists whose prior one-time studies could be expanded into continuous data collection programs, and who could guide the design of new data schemas and management programs.

### Data Policy, Privacy & Access

While fishing activity data is often granted a high degree of confidentiality, it is not technically personally identifying information (PII), which is subject to a higher level of protection under federal and state laws. As NOAA Fisheries and its data partners expand their collection of demographic and economic data, they will need to ensure data policies consider PII and that data systems implement those policies, such as through role-based permissioning and access logs.

However, NOAA Fisheries needs to balance PII protections with allowing data access for research and reporting. Modern data science techniques can allow researchers to run analyses without ever storing data locally or accessing individual records. Staff at NOAA Fisheries, the Regional Fishery Management Councils, Fishery Information Networks, states and universities have been navigating these data accessibility challenges for years and can help identify challenges and elevate solutions.

One way that privacy issues around socioeconomic data have been addressed has been by recognizing communities and stakeholders as equal partners in data collection and placing data ownership with those communities. This is most clearly demonstrated in NOAA Fisheries' work with Tribes, who hold sovereign rights over their data, but can also occur when the agency or a Council asks associations to survey their members and share aggregate results.

### Defining Community & Spatial Linkages

Implementation of the EEJ Strategy requires considering the interconnection of people and place, with regard to geographically defined fishing communities as well as communities that are linked by occupation and other attributes and may be mobile or dispersed. "Communities" include those who catch fish as well as crew, processors, buyers, food service workers, and families, and also those who fish for subsistence. As part of identifying and gathering information about the underserved communities impacted by the agency's work it's important to adopt an inclusive definition of community. It's also important to document the spatial footprint of fishing activities to understand how fisheries management decisions – as well as climate change and other ocean activities such as wind development – impact underserved communities. This may require NOAA Fisheries to rethink its policies around location data to

allow for novel place-based analyses across datasets. The frameworks used by the National Center for Coastal Ocean Science in preparing the Aquaculture Opportunity Area Atlases may be a useful reference for thinking about this type of data infrastructure.

NGA fully supports NOAA Fisheries' efforts on EEJ as detailed in the draft strategy. In carrying out the strategy, NOAA Fisheries should incorporate best practices for data acquisition, storage, analysis, and reporting. 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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