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Dear Mr. Podesta and esteemed colleagues,

Members of the U.S. fishing and seafood industries appreciate the opportunity to comment on implementation of the Inflation Reduction Act, a landmark piece of legislation that represents a turning point in America's commitment to confront the major challenge of our lifetimes: climate change. Our industry forms the backbone of coastal America, providing healthy protein to our neighbors and the world. In the following statement, we outline key recommendations to ensure that implementation of this pivotal climate policy is as fishery friendly as possible.

President Biden's Executive Order on "Implementation of the Energy and Infrastructure Provisions of the Inflation Reduction Act of 2022" (issued September 12, 2022) creates a new White House Office on Clean Energy Innovation and Implementation to oversee the execution of the Inflation Reduction Act and directs federal agencies implementing the Act to adhere to nine specific priorities: investing public dollars efficiently and achieving demonstrable outcomes for the American people; driving progress towards a 50% reduction in greenhouse gas emissions below 2005 levels by 2030, a carbon pollution-free electricity sector by 2035, and attainment of

net-zero emissions by 2050; advancing environmental and climate justice; promoting construction of clean energy through community engagement; increasing economic competitiveness and investment in critical supply chains; increasing high-quality job opportunities; reducing energy costs; accelerating innovation and breakthrough technologies; and effectively coordinating with State, local, Tribal, and territorial governments, and with private-sector stakeholders and nongovernmental organizations.

**To this list of implementation priorities, the undersigned members of the U.S. fishing and seafood industry would like to add a priority of our own: ensuring that the Inflation Reduction Act is implemented in the most *fishery friendly* manner possible, by preferentially promoting climate-related investments and actions that avoid negative impacts and/or promote positive benefits to fishery ecosystems and economies.** We solicit the collaboration of all federal agencies tasked with implementing the Inflation Reduction Act, as well as the National Climate Task Force, the National Climate Advisor, and the newly created White House Office on Clean Energy Innovation and Implementation in working with the fishing and seafood industries to jointly advance this priority.

“Fishery friendly” climate solutions may be defined as those that:

- Reduce, sequester, or avoid greenhouse gas emissions;
- Avoid collateral impacts on the physical, chemical, and ecological properties and processes of ocean, coastal, estuarine, and watershed environments;
- Avoid interference with the harvest and provision of wild seafood;
- Wherever possible, contribute conservation co-benefits that enhance the resilience of ocean, coastal, estuarine, and watershed ecosystems;
- Help the fishing industry address its own carbon footprint by supporting transition to low-carbon fishing vessels; and
- Contribute to putting the U.S. on track to reduce its share of greenhouse gas emissions to a level that will hold warming well below 2°C while pursuing efforts to limit warming to 1.5°C.

Below, we present a set of recommendations for enhancing the fishery friendliness of the Inflation Reduction Act’s implementation.

**Energy.** To ensure that energy development supported by the Inflation Reduction Act is as fishery friendly as possible, we recommend:

- a) Minimizing the scale of deployment of energy infrastructure in fishery habitats by preferentially encouraging clean energy development in the built environment, brownfields, and working lands;
- b) Maximizing deployment of energy efficiency technologies and demand reduction practices in order to avert a need to expand energy generation beyond a level that is

compatible with minimizing impacts of energy infrastructure to fishery habitats and activities;

c) Minimizing the mining and manufacturing of energy inputs in critical fishery habitats by supporting efficiency in materials usage, recycling of spent materials, and environmentally sensitive siting; and

d) Minimizing the disposal of waste and debris in fishery habitats by supporting proper decommissioning of infrastructure components and storage/reuse/recycling of waste and spent materials.

In spite of these recommendations, we recognize the likelihood that energy development will continue to proceed in areas that are vital to fishery habitats and activities. In fact, the administration's goal of supporting development of 30 gigawatts of offshore wind generation by 2030 all but assures that such impacts will take place. Therefore, we encourage close collaboration with organizations led by members of the commercial fishing industry, such as the Responsible Offshore Development Alliance, who can provide guidance regarding the avoidance, minimization, and mitigation of negative impacts to fishery ecosystems and economies from such development.

**Carbon removal.** To maximize co-benefits resulting from land-based carbon removal practices, we recommend advancement of the Act's provisions related to farmlands (e.g., Section 21001, "Additional Agricultural Conservation Investments," and Section 21002, "Conservation Technical Assistance") and forestry (e.g., Section 23002, "Competitive Grants for Non-Federal Forest Landowners," and Section 23002, "State and Private Forestry Conservation"), with consideration of the benefits that such practices provide to fisheries. Soil and forest conservation not only benefit fisheries by reducing greenhouse gas emissions but also by reducing runoff of fertilizers, pesticides, and sediments, while improving upstream habitat and water quality. Due to these multiple co-benefits, such investments should be a major national focus, including but not limited to executing provisions of the Inflation Reduction Act.

**Greener fishing fleets and seaports.** To support practical, cost-effective, and autonomous emissions reductions within the fishing industry itself, we recommend leveraging provisions of the Act such as the "green ports" program (Section 60102, "Grants to Reduce Air Pollution in Ports") and the "green banks" program (Section 60103, "Greenhouse Gas Reduction Fund") to provide dedicated funding and technical support for bottom-up planning and innovation within our nation's fishing fleet. In so doing, we highlight several distinctive features of the fishing industry that must be taken into account:

a) The fishing industry's carbon footprint is already among the lowest of all protein production methods. Coupling emissions reductions with other objectives broadly shared by fishing businesses, such as cost savings and performance enhancement, may

make investments in fuel efficiency and alternative fuels more attractive to participants than a focus on emissions reductions alone.

b) Availability of financing for capital upgrades in fisheries tends to be scarce. Funding streams for energy efficiency and alternative fuels can fill a niche gap and increase industry resilience through upgrades that not only reduce vessel emissions but also achieve cost savings, safety improvements, and fleet modernization.

c) As a result of wide variation in fishing patterns and vessel size and configuration, there is no “one size fits all” solution to reducing greenhouse gas emissions in the U.S. fishing fleet. Solutions must be as diverse as the vessels that make up our nation’s fishing fleet.

d) Solutions for the fleet must be designed and led by those who best understand the unique needs of this sector: fishing vessel owners and operators themselves.

e) In some cases, energy efficiency may be more effective and affordable than switching to alternative fuels. *Both* pathways can contribute to reducing emissions, and it is important to have many options available for vessel owners and operators to choose from as their unique needs and interests dictate.

In conclusion, the Inflation Reduction Act will spur unprecedented transformation in the energy sector and beyond, resulting in a significant reduction in greenhouse gas emissions that is long overdue and vitally needed to spare the nation’s fish stocks from the worst effects of global climate change. However, if undertaken without regard for the fishery ecosystems and economies, the Act could end up putting our nation’s fisheries at greater risk. Fortunately, there are ways to reduce greenhouse gas emissions while *also* supporting fisheries, and these are the solutions that the White House and implementing agencies must prioritize.

**U.S. fishing communities and seafood businesses stand ready to collaborate with implementing agencies and the White House to ensure that implementation of the Inflation Reduction Act sustains the vital role that our nation’s fisheries play in supporting jobs, coastal communities, and national food security.** We encourage agencies and White House staff to communicate and coordinate with the Fishery Friendly Climate Action campaign, a national network that convenes fishing businesses, fishermen, and seafood-related businesses to promote fishery friendly climate action at all levels through coordination, information sharing, and communications support. More information is available at [fisheryfriendlyclimateaction.org](https://fisheryfriendlyclimateaction.org).

Additionally, a growing number of state and regional working groups around the U.S. are working to convene and empower commercial fishing and seafood businesses to advance climate-related priorities of their members. These include the Seattle-based Working Group on Seafood and Energy and the Alaska Fishing Communities Climate Change Work Group. As groups like these expand and multiply, they too can be a resource to federal agencies and the White House with regard to fishery friendly climate action.

We thank you for the opportunity to comment, and we welcome your collaboration.

Sincerely,

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