December 5, 2019

Chairman Roger Wicker  
Chairman Peter DeFazio  
Chairman Peter DeFazio  
Chairman Peter DeFazio
Senate Commerce, Science and Transportation Committee  
House Transportation and Infrastructure Committee  
House Transportation and Infrastructure Committee
512 Dirksen Senate Office Building  
2165 Rayburn House Office Building  
2165 Rayburn House Office Building
Washington, DC 20510  
Washington, DC 20515  
Washington, DC 20515

Ranking Member Maria Cantwell  
Ranking Member Sam Graves  
Ranking Member Sam Graves
Senate Commerce, Science and Transportation Committee  
House Transportation and Infrastructure Committee  
House Transportation and Infrastructure Committee
512 Dirksen Senate Office Building  
2165 Rayburn House Office Building  
2165 Rayburn House Office Building
Washington, DC 2051  
Washington, DC 20515  
Washington, DC 20515

Dear Chairman Wicker, Ranking Member Cantwell, Chairman DeFazio, and Ranking Member Sam Graves

The Seafood Harvesters of America is a broad-based organization that represents commercial fishermen around the country. Our members reflect the diversity of America’s coastal communities, the complexity of our marine environments, and the enormous potential of our commercial fisheries. As domestic harvesters of an American public resource, we recognize and embrace our stewardship responsibility and we advocate for strong accountability across all sectors.

We understand that the 2019 House and Senate Coast Guard Reauthorization bills, which contain provisions important to the commercial fishing industry, are soon to be conferenced. We urge the conference committee to accept the common sense measures found in both the House and Senate bills, and the FISH SAFE Act (HR 4719), that improve fishing vessel safety:

1) **Exemptions from Alternate Safety Compliance Programs (ASCP) for fishing vessels less than 79’ in length (S. 2297, Section 303)**

   This section removes the burden of developing an ASCP specific to smaller fishing vessels but maintains safety standards by requiring dockside examines every two years instead of five. We are concerned that the U.S. Coast Guard does not have adequate resources to develop appropriately tailored ASCPs as demonstrated by the failure to develop an ASCP in 2016. However, the U.S. Coast Guard already conducts dockside exams and has the staff qualified to conduct these important dockside exams. We appreciate the need for strict safety standards and believe those required by the Commercial Fishing Vessel Safety Act for dockside exams are sufficient to protect life at sea.
2) **Maintaining current practice for the Global Maritime Distress and Safety System (GMDSS) for fishing vessels 300GT+ (S. 2297, Section 423)**

This section simply codifies an existing exemption for specific GMDSS requirements that have been in place since 1999 for the commercial fishing vessels operating in Alaskan waters. This section, while removing the requirement for vessel to carry redundant and costly equipment that requires an additional licensed GMDSS operator onboard vessels, mandates that vessels still carry a suite of GMDSS equipment to ensure crew safety and maintain the ability to communicate with shoreside emergency response including: EPIRBS, wheelhouse transponders, and survival craft devices.

3) **Use of AIS devices to mark fishing gear (S. 2297, Section 417)**

The use of AIS to mark fishing gear has become an increasingly attractive way for Alaskan fishermen to reduce gear conflicts and on-the-water accidents. The practice of using AIS to mark fishing gear is currently prohibited by the FCC and this language directs the U.S. Coast Guard to work with the FCC to consider regulations that would allow for this practice.

4) **Restoring the federal share of the Fishing Safety Training Grants Program (S. 2297, Section 103; HR 4719)**

We appreciate the bicameral efforts to restore the federal share of the Fishing Safety Training Grants to 75 percent. This grant program is a critical source of funding to educate captains and crew on safety procedures that reduce fishing fatalities and injuries. Including this language in the conferenced Coast Guard bill would reduce the financial burdens on communities and organizations providing this valuable training and ensure their ability to continue providing it.

We applaud the strong bipartisan, bicameral work that has gone into crafting this bill. The result of this hard work is a bill that ensures the safety of our fishermen at sea while also enacting common sense laws. We support the provisions listed above and urge the conference committee to include them in the final bill.

On behalf of our 17 member groups and the thousands of fishermen we represent, I am deeply grateful to all the Senators and Representatives who have devoted their time and energy to this bill and look forward to it passing both chambers in short order.

Sincerely,

Leigh Habegger
Executive Director
Seafood Harvesters of America

**Member Organizations**