



Global High Seas Marine Preserve
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May 2, 2025

Howard Lutnik
Secretary of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Re: Public Comment on April 17, 2025, Executive Order
Restoring American Seafood Competitiveness by
Amending the Magnuson Stevens Fisheries Conservation Act
to save the global fisheries from collapse

Dear Secretary Lutnik:

I hope this letter finds you and your colleagues in good health. This is our public comment to President Trump's April 17, 2025, Executive Order, "Restoring American Seafood Competitiveness. Our non-profit is the Global High Seas Marine Preserve. We work on educating the global public on ocean wildlife issues. Our long-term goal is saving the ocean's wildlife by amending the Law of the Seas Treaty and protecting 100 percent of the oceans by creating a Global High Seas Marine Preserve. The oceans are 70 percent of the planet. Protecting the oceans will solve many of our environmental problems. The land problems can be solved by changing the diet. This Executive Order is not going to solve any of these massive environmental problems. In fact, opening up our fisheries to industrial commercial fishing and loosening our science based regulations will make everything worse.

There are several very serious problems with this Executive Order. The primary reason U.S. fisheries are the best in the world is they are carefully regulated using the best available science. This protection of our marine resources is a result of the bi-partisan legislation that created the Magnuson Stevens Fisheries Conservation Act and the subsequent amendments since its implementation. This change in our laws is one of the most important legal victories for the marine life in history. It is not because the oceans under American jurisdiction are overly regulated that has caused our nation to import so much seafood. Our trade policies and foreign government subsidies of their fishing industries have resulted in emptying the oceans. Other nations are reckless with their fisheries and protection of their marine life. Consequently, global fisheries are in huge trouble.

American fishermen follow our laws and regulations. Our fisheries are carefully monitored and regulations preventing overfishing are strictly enforced. That is not the case globally. The problem with the oceans is lack of international law and regulation. What is going to save the global fisheries is American leadership. **We need to completely close off our market to all foreign import of seafood and work on a five-year moratorium on global industrial fishing. The fisheries need a break.**

Closing off our market to foreign fisheries will vastly increase American fishermen's wages. Our seafood will have far greater value. The biggest violator of destruction of the ocean's wildlife is the People's Republic of China. The Chinese are not fishing. They are emptying the oceans. China is responsible for over 100,000 sharks being killed each day for shark fin soup. The sharks' fins are cut off while these magnificent animals are still alive. Then they are thrown into the oceans to suffer a horrible death. Their bodies are just wasted. Shark finning is destroying the ocean's top predator.

We are asking the Trump Administration to address these global environmental, conservation problems. Unless we act now and help save the global fisheries, the marine life of the planet will be gone by mid-century. The Trump Administration is in a unique position to stop the slaughter of the ocean's wildlife. Closing the oceans to industrial commercial fishing for five years to allow the global fisheries time to recover.

We recommend the following policy change. The United States should amend the Magnuson Stevens Fisheries Conservation Act and banning all foreign seafood from being sold in the US market for at least five years. We need to work with the United Nations to revive the fisheries. The US is the world's second largest market for seafood. Like the tariff program, we have leverage. We should help other nations to protect their fisheries and marine life. Our fishermen are hardworking, honest small businessmen who put America first. They put their lives on the line and should be paid more money for their dangerous work. This proposed ban on ALL foreign seafood from entering the U.S. market for five years should incorporate the following exceptions:

1. Foreign governments shall allow U.S. inspection of their fishing methods and shall monitor their fishing vessels in the same manner U.S. fishermen are monitored. The goal of reducing by-catch will be an essential part of this monitoring.
2. Foreign fisheries shall use the best available scientific data and agree to carefully regulate their fisheries to insure their survival and recovery. We have the educational resources at our great universities which can provide important jobs for our graduates in oceanography and environmental science.

3. Foreign vessels shall be subject to inspection at all American ports for compliance with international law on slavery and treatment of their crews in a humane manner. Not only do other countries subsidize their massive fishing fleets, the crews of some of these ships engage in violation of international law. At times some companies engage in slavery. This behavior must be stopped.

4. If their vessels are found to be importing illegally caught and unregulated fish products, they shall be seized, and the crew will be tried under American law. If found guilty, the entire crew should be imprisoned for five years or such time as our federal courts deem appropriate and their ship scrapped as a warning to others.

5. All governments shall work with the Food and Agricultural Organization of the United Nations to repair their fisheries with the goal of increasing the ocean's wildlife to 1970 levels.

6. All governments shall contribute money from their seafood sales to the United Nations Food and Agricultural Organization to help meet the UN's budgetary needs. The United States should not be the primary benefactor of the UN. Other nations should pay their share. The President has spoken about this problem many times.

7. Foreign governments navies shall work on enforcement of international law to ban illegally caught fish. U.S. fishermen comply with our regulations. It's time to level the playing field and other countries fishermen to compete with the same rules.

8. The Trump Administration shall work on an international ban on killing sharks for shark fin soup. There is simply no reason to ever cut off a shark's fins for a completely non-nitrous food. The United States needs to lead and pressure China to stop emptying the oceans and slaughtering the ocean's top predators for shark fin soup.

9. All governments shall work to stop garbage from entering the oceans. This is where our government and industry can help other nations. Rather than give corrupt governments foreign aid, our companies must be allowed to help other countries clean up their rivers, so garbage does not enter the oceans.

10. The United States should host an international conference on reviving the oceans' wildlife and cleaning up the planet. This international conference can be held here in Hawaii. We should invite all major fishing companies, governments, universities and major environmental organizations.

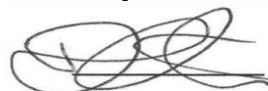
We understand that our laws and regulations will cause some economic difficulties for small nations and protectorates like American Samoa, Tahiti, Palou and others. These difficulties can be alleviated with direct foreign aid to their fishing industries and fishermen. We have helped our farmers who have been economically hurt by the unfair trade practices of other nations. We can help small nations who will be affected by this change in policy. But this change must be made. Our laws and regulations work because they are enforced. Rebuilding the global fisheries will help small nations.

If you think we have immigration difficulties now, allowing the global fisheries to collapse, will result in a humanitarian disaster of biblical proportions. Our children and the plants and animals depend on us to protect their future. If the global fisheries collapse, over one billion people will be without access to protein. Environmental refugees will cause global conflicts and social unrest in poor coastal nations who have lost their fisheries because of overfishing and pollution.

What a five-year ban on imports of foreign seafood will do is immediately start the process of rebuilding global fisheries. The need to clean up the planet will create hundreds of millions of new labor-intensive jobs and entire new industries. By focusing on cleaning up the mess humans have made over the last 300 years, we will solve many economic and environmental problems.

Our laws, regulations and enforcement have created the best fisheries in the world. The Trump Administration must lead the way to rebuild the global fisheries, clean up the planet and protect our children and grandchildren's future. Opening the Papahānaumokuākea Marine National Monument and marine protected areas to industrial commercial fishing will cause substantial harm to our pristine fisheries. The result will be a conservation disaster that can clearly be avoided. We are available to answer any questions and can provide experts to testify before Congress or provide advice to the Department of Commerce.

Sincerely,



Danny Quintana
President

Global High Seas Marine Preserve

CC: Environmental organizations

U.S. Congress, global governments

U.S. fishing industry, oceanography departments of major universities

Global foundations working on ocean wildlife conservation