

Subject: In reference to The Bering Sea Cantons

From: Carl Salamone <carl.salamone@wegmans.com>

Date: 3/5/2015 12:46 PM

To: "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov

CC: Jeanne Colleluori < Jeanne. Colleluori@wegmans.com>



Please see Wegmans stance on the subject of The Bering Sea Canyons and protection of such. We recognize the very valuable resource the Bering Sea is and its importance of supplying some of the world's finest seafood.

As a retailer with 85 stores in the northeast and mid-Atlantic regions of the US, we support the North Pacific Fishery Management Council in protecting known coral and sponge habitat from the impacts of bottom contact. We also encourage the implementation of a network of benthic protected areas that includes a representative sample of habitats found on the shelf break. We are aware of the studies (past and future) conducted in this area by NOAA.

Furthermore, we support the planned development and implementation of the Fishery Ecosystem Plan for the Bering Sea.

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1 of 1 3/8/2015 1:42 PM



Giant Eagle, Inc.

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North Pacific Fishery Management Council 605 West 4th, Suite 306 Anchorage, Alaska 99501-2252

RE: MSC Bering Sea Canyons

Giant Eagle, Inc. is a multi-format food, fuel and pharmacy retailer serving customers for 84 years in communities across Western Pennsylvania, Ohio, West Virginia and Maryland. With approximately 36,000 Team Members working in 427 retail locations, Giant Eagle's focus is on delivering high quality food, convenience-based services and great overall value. As Giant Eagle's seafood leader, I am happy to report we have endeavored to ensure a sustainable supply source for more than a decade.

Giant Eagle is asking the North Pacific Fishery Management Council to help protect the Coral and Sponge habitat. We realize that the North Pacific Fishery Management Council is going through efforts to understand the current conditions of fishing in the Canyons and will be releasing recommendations on scientific study findings later this year. We also recognize that the Alaska Pollock fishery has achieved Marine Stewardship Certification for sustainability.

We recommend to Retailers & Supply Chain to support the North Pacific Fishery Management Council in protecting known coral and sponge habitat from the impacts of the bottom. We encourage North Pacific Council to implement a network of benthic protected areas that includes a representative sample of habitats found on the shelf break. We also support the development of a Fisheries Ecosystem Plan for the Eastern Bering Sea.

Regards,

Richard Castle
Director of Seafood



March 16, 2015

food services for a sustainable Suture *

Mr. Dan Hull Council Members North Pacific Fishery Management Council 605 West 4th Avenue, Suite 306 Anchorage, AK 99501-2252



RE: Bering Sea Canyons

Dear Chairman Olson and Council members:

I am writing to convey our interest in ensuring that Zhemchug and Pribilof canyons in the Bering Sea are adequately protected given their important role in the ecosystem that supports our valuable fisheries. As a leader in sustainable sourcing, we are serious about our commitment to support sustainable fishing practices and policy. This is an important opportunity for your company to help Bon Appétit continue providing high quality, sustainable seafood to our customers.

The Canyons are known to contain abundant and diverse corals and sponges that provide valuable habitat for commercially important fish and other marine species¹. Numerous fish and crab species depend upon Canyon terrain for spawning and nursery areas, making these habitats important for sustaining species populations. According to NOAA, commercially important species that utilize the Canyons for essential fish habitat include rockfish, Pacific cod, halibut, pollock and several species of crab.

In much of the Canyons, corals and sponges often provide the *only* three-dimensional habitat structure available to fish and other marine life. Unfortunately, corals and sponges are extremely vulnerable to impacts from bottom-tending fishing gear. They are long-lived and slow growing; some Alaskan corals are more than one thousand years old. When they are ripped from ocean substrate or crushed by fishing gear they are unlikely to recover, causing a habitat deficit that is difficult if not impossible to regenerate.

Sustainable fisheries maintain the diversity, structure and function of healthy ecosystems, which depends, in part, on minimizing fishing gear interactions with essential fish habitat. NOAA has stated "reducing bycatch and protecting habitat are two of the fundamental standards that drive the management of all fisheries." Indeed, commercial fisheries cannot be biologically and economically sustainable in the absence of a robust and healthy ecosystem, and we depend upon NOAA and the NPFMC to ensure that fisheries in Alaska do not jeopardize the ecosystems that produce our seafood supply.

Zhemchug and Pribilof Canyons are carved into the Bering Sea shelf break, a unique ecoregion known as the Green Belt due to its extraordinary productivity. The economic and ecological importance of the Green Belt warrants a precautionary approach to management. Setting aside representative portions of the Green Belt habitat as conservation closures to protect and support ecosystem functions will provide benefits for fisheries, communities, and consumers and demonstrate. We urge you to take this opportunity to demonstrate progressive leadership in ecosystem management, and provide all stakeholders with an insurance policy that can help preserve biodiversity as well as ensure the sustainability of fisheries and seafood supply.

The motions adopted by the Council in June 2013 were an important step towards realizing NOAA's number one stated objective for deep-sea coral and sponge conservation and management: protect areas containing known deep-sea coral or sponge communities from impacts of bottom-tending fishing gear.³ The available data and analysis provided by NOAA and independent scientists provides the Council with sufficient guidance to act. As noted in the discussion paper on fishing

¹ Miller RJ, Hocevar J, Stone RP, Fedorov DV (2012) Structure-Forming Corals and Sponges and their Use as Fish Habitat in Bering Sea Submarine Canyons. PLoS One 7(3): e33885. doi:10.1371/journal.pone.0033885

² NOAA, Fishwatch U.S. Seafood Facts, http://www.fishwatch.gov/wild_seafood/what_is_a_fishery.htm

³ National Oceanic and Atmospheric Administration, Coral Reef Conservation Program. 2010. NOAA Strategic Plan for Deep-Sea Coral and Sponge Ecosystems: Research, Management, and International Cooperation. Silver Spring, MD: NOAA Coral Reef Conservation Program. NOAA Technical Memorandum CRCP 11. 67 pp.

activity produced by Council staff,⁴ the amount of catch occurring in the Canyons is typically quite low, so the economic benefits of setting these areas aside are likely to exceed the costs.

As a foodservice company that is committed to building a market for sustainable seafood, we have a strong interest in ensuring the health of ecosystems that harbor and nurture that seafood. We entrust you to make choices that will produce sustainable seafood for this and future generations. We urge you to move swiftly to protect America's Grand Canyons of the sea and ensure the long-term sustainability of the vital fisheries of the Bering Sea.

Sincerely,

Maisie Ganzler

Vice President, Strategy

⁴ Pribilof and Zhemchug canyons: fishing activity, protection measures and process for future action. 2013. Council staff discussion paper. 56 pp.

http://www.npfmc.org/wp-content/PDFdocuments/conservation_issues/BSHC/BScanyonsDiscPaper513.pdf

Subject: Bering Sea Canyons

From: "Carrie Brownstein (CE REM)" < Carrie. Brownstein@wholefoods.com>

Date: 3/20/2015 12:14 PM

To: "dan.hull@noaa.gov" <dan.hull@noaa.gov>, "npfmc.comments@noaa.gov" <npfmc.comments@noaa.gov>, "danhullak@gmail.com" <danhullak@gmail.com>

CC: "steve.maclean@noaa.gov" <steve.maclean@noaa.gov>

Dan Hull, Chairman North Pacific Fishery Management Council 605 West 4th, Suite 306 Anchorage, Alaska 99501-2252

Dear Mr. Hull,

March

20, 2015

As buyers of seafood from Alaska, Whole Foods Market is invested in the long term viability of Alaskan fisheries and the ecosystems that support these important fisheries. In recent months we have followed the controversy and discussions surrounding the Bering Sea Canyons and specifically whether certain areas of the canyons should be protected.

We understand that the Council expects to release a final report in June 2015, which will show the results of the NOAA surveys on deep water corals in the Bering Sea and will determine whether or not the Council will develop alternatives for implementing protections in the Bering Sea. Our team looks forward to reviewing this report and the Council's decision as part of our work to fully evaluate the issue. Therefore, we encourage the Council to do its due diligence in evaluating all relevant scientific publications on the Bering Sea as part of the decision making process.

Sincerely,

Carrie Brownstein, Global Seafood Quality Standards Coordinator & David Pilat, Executive Global Seafood Coordinator, Purchasing

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