



Mission Statement: To develop, expand, and enhance new and existing dive fisheries in Southeast Alaska.

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To: Kimberly Stryker
Alaska Department of Environmental Conservation

April 17, 2020

Dear Ms. Stryker,

The Southeast Alaska Regional Dive Fisheries Association (SARDFA) is writing in strong opposition to The Alaska Department of Environmental Conservation’s proposed fee increases for laboratory analysis and testing for paralytic shellfish poisoning (PSP) toxin and shellfish growing water. SARDFA represents the commercial geoduck clam fishery. This fishery faces the very real possibility of closure due to the proposed shifting of a state funded federally recognized shellfish authority (DEC) from a state funded model to an industry funded model.

All shellfish producing states in America have shellfish management authorities and not a single one charges what Alaska is proposing to charge for PSP testing. All shellfish management authorities across America fund the collection and shipment of both PSP and water quality samples for regulatory testing; Alaska industries spend over \$300,000 annually to supply regulatory samples. The attached spreadsheet is a draft summary of state programs in the US and illustrates how the proposed Alaska program would compare to other programs. In summary, the fee structure proposed is excessive and will put Alaska shellfish entering interstate or international markets at a significant economic disadvantage.

The geoduck fishery has been closed since mid-January 2020 with over half of the annual quota unfished due to Covid-19 market collapses. The geoduck fishery relies on annual landings and an assessment tax to fund next year’s PSP and water quality sampling costs. Due to Covid-19, we anticipate having a deficit to cover even sampling costs. Any new costs cannot be borne by this fishery.

An industry funded model, if pursued, will put Alaska products at a serious disadvantage in the marketplace and ultimately close Alaska shellfish industries. This is not in the best interest of Alaskans.

Sincerely,

Kate Sullivan
Co-Executive Director

Member of:
Southeast Conference
United Fishermen of Alaska
PACRIM Shellfish Sanitation Association
Interstate Shellfish Sanitation
Conference