

SARDFFA

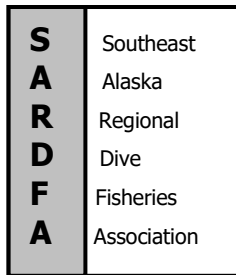
Hi Kimberly,

Please find attached SARDFFA's letter opposing proposed PSP and WQ fee increases as well as a summary of US state programs (draft format) that illustrates how the proposed fee increases would treat the Alaska shellfish industries significantly differently than other shellfish producing states.

Please feel free to contact us if you have questions or would like more information.

Best regards,

Kate



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

Phil Doherty – Co-Executive Director
Kate Sullivan – Co-Executive Director
PO Box 5417
Ketchikan, Alaska 99901
1-907-225-2853
ksullivan@sardfa.org
www.sardfa.org

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

State	Classification	Water quality testing	Biotoxin testing
Alaska	Industry fee: \$500 initial \$300 annual reclassification	CVECP funds	CVECP funds
Washington	State GF	State GF	state GF and annual fee based on size/production range 198 - 2412
Oregon	State GF year 1 Annual recert \$200-800 per area	State GF	State GF
California	State GF	Industry County PH labs 60-300 per month ave	State GF
Texas	State GF	State GF	State GF
Louisiana	State GF	State GF	State GF
Mississippi	State GF	State GF	State GF
Mississippi has a Public Trust Tidelands Tax admin. In Sect of State's office. Tax collected on floating gaming facilities, docks and n			
Alabama	85% GF 15% grants	State GF	State GF
Grants cover travel to meetings/training and the cost of training. Also to purchase equipment. GF covers classification/other Authi			
Florida	State GF	State GF	State GF
Georgia	did not respond		
South Carolina	Federal grant funds	Federal grant funds	State GF
North Carolina	State GF	State GF	State GF
Maryland	State GF	State GF	State GF
Virginia	State GF	State GF	State GF

Hawaii	In process of developing program		
New York	State GF/fees	State GF/fees	State GF/fees
Massachusetts	State GF	State GF	State GF
Rhode Island	State GF	Industry 50 per sample holding tank water and growing area	State GF
Connecticut	State GF FDA funds when available	State GF FDA funds when available	State GF FDA funds when avail
New Hampshire	State GF maybe 10% grant EPA for training	State GF	State GF
Maine	State GF Some FDA grants - not annual	State GF	State GF* offshore quahogs fee different testing req'd

Collection/shipping		Licensing fees (2019 rates) see "Industry fees sheet"
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	\$180,000	commercial geoduck	yes
	\$118,000	shellfish farms	
Could not estimate		commercial razor clam	
State GF			yes
State GF			yes
State GF			State GF biotoxins and classification
State GF			Industry collects water samples
State GF			fishing license fee % comes to program
State GF			\$0.33 tax per 100 pound sack of oysters landed
State GF			Yes
State GF			None
varinas that encroach on public trust lands. The shellfish program is funded from these taxes collected.			
State GF			None
State GF			Priority costs
State GF			yes
State GF			Not for sanitation but for comm fish
State GF			not for sanitation but for commercial fisheries
State GF			yes
State GF			None

State GF/fees

yes

State GF

yes

State GF

None

State GF

None

State GF

Yes

Also 1.5 cent per oyster landing tax
goes back to FG

State GF/Municipality

Yes

60% state/40% town for
WQ samples