



June 22, 2019

To Whom It May Concern:

Today's American Shrimp Processors Association was chartered in 1964 as the American Shrimp and Oyster Cannery Association. As such, it is one of the Gulf and South Atlantic's oldest fishery trade organizations. Our members today process more than 70% of all shrimp harvested in the Gulf and South Atlantic.

Our members' businesses are family-owned, privately-held firms. These businesses, along with docks and fishermen have a great deal at stake in the health of all Gulf and South Atlantic fishery resources. No one has more to lose than those who have invested millions into the health and wise utilization of resources like shrimp.

We have in the past voiced our concerns over efforts in North Carolina to restrict net fishing in North Carolina state waters. Our members from Texas to North Carolina are again concerned about apparent attempts to significantly change fishery regulations in state waters. The domestic shrimp industry today produces only 6% of total U.S. shrimp consumption, not because of declining shrimp resources, but because of the availability of pond-raised shrimp from countries around the world, predominantly southeast Asia. Domestic production, combined with 1.4 billion pounds of shrimp imports has substantially increased shrimp consumption in the U.S., which now is a record 4.4 pounds per person per year.

While all domestically produced products are wholesome and safe, the same cannot be guaranteed for imported products. Most imported shrimp today is safe, however the frequency of product rejection because of the use of banned veterinary drugs is alarmingly high, especially for some exporting countries. Most restaurants serve shrimp and other seafood products without informing patrons of the source of their product. One of our concerns about the proposed changes, as we know them, to North Carolina fishery policy could lead to a substantial reduction in the supply of local, wild-caught shrimp. We believe this could result in a potential increase in exposure of North Carolina citizens to products containing these banned veterinary drugs. We suspect that North Carolina restaurant patrons are like those elsewhere and assume that the shrimp they are eating is domestic, locally-caught product.

We have been unable to locate any definitive analysis of the impacts of these proposed regulatory changes, particularly the impact of increased consumption of imported product and a related potential increase in exposure to banned veterinary drugs. Likewise, we have been unable to find a definite analysis of the impact of these proposed regulatory changes on the economies of and social well-being in North Carolina's rural coastal communities.

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Until a thorough analysis of the potential risks and benefits, including economics, health, sociological, environmental, and natural resource health is conducted and is publicly available, we would encourage a delay in further discussions of these regulatory changes. Simple changes to the natural resource's regulatory process can have a significant and unintended negative impact on the economic and social well-being of small rural communities already struggling with change in today's societies.

While our discussions have only looked at the shrimp industry, we believe these arguments are also valid for other commercially-harvested marine species. We ask that North Carolina regulatory agencies delay any action on pending fishery legislation and/or regulation which might curtail commercial fisheries until a thorough analysis is completed. The American Shrimp Processors Association will certainly be anxious to participate in any such thorough analysis if asked and given the opportunity. Thank you for the opportunity to provide input.

Sincerely,

A handwritten signature in black ink that reads "C. David Veal". The signature is written in a cursive style with a large, stylized "C" at the beginning.

C. David Veal  
Executive Director,  
American Shrimp Processors Association