



August 30, 2022

The Honorable Martha Williams, Director
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, VA 22041-3803

Dear Director Williams:

On behalf of the National Restaurant Association, we thank you for the opportunity to share our views regarding the seafood supply chain and protecting aquaculture development for both commercial markets and conservation. It is especially critical for the agency to recognize sturgeon aquaculture as a well-established, sustainable industry as it considers extending the Endangered Species Act under its proposed rule.

Founded in 1919, the National Restaurant Association (“The Association”) is the leading business association for the restaurant and foodservice industry, representing national and small restaurant businesses. Still recovering from the economic effects of COVID-19, restaurants have not recreated 635,000 jobs lost in the shutdowns early in the pandemic. Inflation has added to the industry’s headwinds, as wholesale food prices have increased 16.3% in the past 12 months. In the same time period, menu prices have only risen 7.6%. Consequently, 85% of operators say their restaurant is less profitable than it was in 2019.

The commercial seafood supply chain includes harvesters, exporters, importers, distributors, retailers, and restaurants that collectively employ 1.25 million people. These restaurants are generally independently-owned, full-service establishments. Restaurants are concerned about how seafood products, such as sturgeon, are affected by new federal regulations that may reduce access and lead to subsequent price spikes.

We urge the agency to consider the effect of any proposed rule regarding the seafood supply chain on the restaurant industry and their customers. Restaurants are strong advocates for sustainable seafood and responsible aquaculture development, and would welcome an opportunity to engage directly with the agency on this issue.

Now is the time to advance sustainable ideas to advance the seafood supply chain rather than burden it. Earlier this year, Congress recognized this need when it declined to add and implement expansive, unnecessary provisions regarding the Seafood Import Monitoring Program (SIMP). We thank your agency for taking a thoughtful approach on this effort in order to both promote aquaculture that supplies the foodservice industry, and ensure any new rule will not harm restaurants and global supply chains. Restaurants managing inflationary trends, economic uncertainty, and supply shortages should not have seafood products limited by new a federal rule.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Laura Abshire".

Laura Abshire
Director of Food and Sustainability Policy
National Restaurant Association