

Wageningen, 12 July 2016

**Subject:** Response to your letter dated 14 March 2016

Dear Nancy Hillstrand,

Many thanks for taking the time to participate in the GSSI public consultation for the Alaska Responsible Fisheries Management (RFM) Certification Program.

GSSI is a global platform and partnership of seafood companies, NGOs, experts, governmental and intergovernmental organizations working towards more sustainable seafood for everyone.

The recent public consultation relates specifically to the GSSI Benchmark Report for the Alaska RFM Program. While GSSI appreciates the concerns raised by Pioneer Alaskan Fisheries Inc., these concerns are outside the scope of this public consultation.

The GSSI benchmark process verifies alignment of a certification scheme, including its governance, operational management and fisheries certification standard, with the FAO Code of Conduct for Responsible Fisheries and the FAO Guidelines. GSSI neither reviews the management nor the certification of specific fisheries.

These concerns would benefit from being raised during the public consultation period addressing them to the certification bodies responsible for the certification of the respective fisheries in this case the Alaska salmon fishery.

For more information on GSSI and the Global Benchmark Tool and Process please visit [www.ourgssi.org](http://www.ourgssi.org).

Many thanks again for participating in the public consultation and we do hope that the above response has been helpful.



---

Herman Wisse  
GSSI Program Director

---

**From:** Nancy Hillstrand [halibuts@gmail.com]

**Sent:** Monday, March 14, 2016 4:52 PM

**To:** secretariat GSSI

**Subject:** Aquaculture in Alaska

Pioneer Alaskan Fisheries Inc.

P.O. Box 674

Homer, Alaska 99603

907-235-9772

March 14<sup>th</sup> 2016

Greetings,

Our Corporation has been in the Fisheries business for 52 years. We have fished most fisheries and gear types as well as participated in rehabilitation efforts of the State Fisheries Rehabilitation and Enhancement operations of ADFG. We are seafood processors and retail presently.

We are extremely concerned about the 1,700,000,000 Billion low value factory hatchery pink salmon being released into Alaskan waters that compete with our more lucrative sustainable wild fisheries.

The hatchery Act of 1974 purpose States: *“For the rehabilitation of the states depleted and depressed salmon fishery. The program shall be operated without adversely affecting natural stocks of fish.”*

Are pink salmon fisheries depleted? No. What are the adverse affects? Who pays to assure no adverse affects?

There are grave concerns about the wisdom of releasing massive numbers of feeding fish into near shore ecosystems that are nursery grounds for so many other species of fish. They are similar to an invasive species and benefit very few Alaskan fishermen or the State of Alaska.

ASMI is made up of major processors who make profit over these hatcheries as they are using Alaskan ecosystems for a business plan to ship these pinks overseas. This use of the resource and our ecosystems is not sustainable and requires stringent comprehensive review.

With the jury so very far out on these contentious issues with even the American Fisheries Society showing grave concerns, Factory hatcheries in Alaska using the North Pacific pastures of our wild fish populations must cease being glossed over as a sustainable activity. The controversy pointing toward adverse affects is too high to accept this as benign or sustainable.

Mono culture of pink salmon hatcheries deliberately floods the nearshore shellfish, herring, and wild salmon nurseries with hundreds of millions of aggressively feeding invasive fish that do not benefit our true wild spawning Alaskan seafood.

Hatchery fish are heavily subsidized, Hatchery fish benefit a small number of corporations. Hatchery fish glut the market and glut processing plants with low quality unwanted seafood. The subsidies are often hidden from view and need to be brought to the surface in an all-encompassing cost benefit analysis. Our "*Wild Alaskan Seafood*" Market is getting damaged.

ASMI itself is subsidized by the state of Alaska. 2014 was the fourth largest export year of Alaskan Seafood. This does not benefit Alaska or Alaskans. Alaska is in debt 4 Billion dollars and these corporations refuse to pay a higher tax? So who benefits? Who loses on this activity. The sockeye fisherman who lose a pound on each fish they catch costing them 10's of millions of dollars? The local fisherman who are not allowed to fish because the Aquaculture Associations cost recovery is the priority? How does mixed stock management affect the fisherman or the significant stocks of wild spawning salmon populations. Who has money to monitor this accurately? The State of Alaska does not have the revenue. Lip service is cheap.

The Processors benefit, the processors who make up the Alaska Seafood Marketing Institute.

Do we continue this charade of big numbers of fish and exports at the expense of our wild spawning fish? When the stakes for healthy wild spawning fish is so high. Who has to pay for all the science to prove adverse affects. Are the hatcheries paying for this? No this is another subsidy.

Hatcheries at this magnitude are a business plan gone wrong. They are unsustainable and misdirected to benefit big corporations and have become a self-feeding Aquaculture Association Empire subsidized by the unwitting State of Alaska and the fisherman themselves. Every action has a reaction. Consequences and repercussions.

Those who dare to speak out against these monopolies are ostracized or degraded into submission. This in itself is a red flag of something very wrong when truth and science is disallowed and prohibited from discussion.

The Global Sustainable Seafood GSSI needs to get an in-depth cost analysis of this boondoggle of low value mass produced factory export. It needs to look at all the available science.

High Quality wild fish not mass factory quantity is sustainable. Mass Quantity has adverse affects on our wild sustainable fish produced by the free ecosystem services. Less is more.

Alaska has the rare benefit of relatively unspoiled coasts and pristine waters. Unleashing this invasive massive biomass of simple to raise pink salmon with the explicit purpose to out compete the natural wild populations by sheer numbers is not sustainable and needs comprehensive evaluation instead of the continued denial.