



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

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To: Alaska Senate Finance Subcommittee  
CC: Senator Bert Stedman  
Representative Dan Ortiz  
DEC Commissioner Jason Brune  
John Moller, Governor Dunleavey's office  
Bill Thomas, Governor Dunleavey's office  
SARDFA Board of Directors

March 6, 2020

Dear Alaska Senate DEC Finance Subcommittee,

The Southeast Alaska Regional Dive Fisheries (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. In the past few weeks I have been contacting and documenting the strategies that the 22 shellfish producing states in America use to fund the various aspects of their duties as a shellfish authority. I have attached a spreadsheet that shows how each state approaches this responsibility. The first sheet provides a breakdown of funding by key activity and the second sheet provides a breakdown of pre- and post-harvest industry fees, if any are charged.

I am also providing the following as a summary to key findings that I hope will help Alaska make an informed decision about the future of any shellfish industry in Alaska. Please note there are three industry sectors that will be impacted: commercial geoduck, shellfish farm, and commercial razor clam (this third group I was unable to collect information from).

1. Alaska is the only state that passes the cost and burden of both biotoxin and water quality sample collection and shipping onto the industry. This costs 2 Alaska industry sectors over \$300,000 annually. California requires industry to collect water samples and deliver to county labs. All other states routinely collect and pay for all aspects of sample collection.
2. Conservatively, all states, except Alaska, have shellfish programs that are 85% state general funded.
3. Several states have federal grants (EPA and FDA primarily), and with the exception of South Carolina, these are transient funds and are used for training and travel and equipment purchases for special projects. They are not available on a consistent basis.
4. Roughly 2/3 of the shellfish producing states charge some pre- and/or post-harvest fees. These are detailed on the second sheet. In general, Alaska's current fees are in line with other states, possibly on the low side for shucker/packer/shippers.

5. Not one state that I spoke with viewed state supported mandatory regulatory testing as a “subsidy;” but rather as a critical public health function and a highly appropriate use of government resources.

Clearly, the interest in moving the DEC shellfish program funding to an industry-pay model is out of line with the national thinking in relation to a State’s responsibility for shellfish safety. 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.

This document is a work in progress as I am still waiting for information from a few contacts. I have detailed information on where I got this information and am happy to provide further details or answer any questions anyone may have.

Sincerely

Kate Sullivan

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

**U.S. State Shellfish Authority Overview**

State	Classification	Water quality testing	Biotoxin testing	Collection/shipping	Licensing fees (2019 rates) see "Industry fees sheet"
Alaska	Industry fee: \$500 initial \$300 annual reclassification	CVECP funds	CVECP funds	\$180,000 commercial geoduck \$118,000 shellfish farms commercial razor clam Could not estimate	yes
Washington	State GF	State GF	state GF and annual fee based on size/production range 198 - 2412	State GF	yes
Oregon	State GF year 1 Annual recert \$200-800 per area	State GF	State GF	State GF	yes
California	State GF	Industry County PH labs 60-300 per month ave	State GF	State GF biotoxins and classif Industry collects water samples	fishing license fee % comes to program
Texas	State GF	State GF	State GF	State GF	\$0.33 tax per 100 pound sack of oysters landed
Louisiana	State GF	State GF	State GF	State GF	Yes
Mississippi	State GF	State GF	State GF	State GF	None
Mississippi has a Public Trust Tidelands Tax admin. In Sect of State's office. Tax collected on floating gaming facilities, docks and marinas that encroach on public trust lands. The shellfish program is funded from these taxes collected.					
Alabama	85% GF 15% grants	State GF	State GF	State GF	None
Grants cover travel to meetings/training and the cost of training. Also to purchase equipment. GF covers classification/other Authority costs					
Florida	State GF	State GF	State GF	State GF	yes
Georgia	did not respond				
South Carolina	Federal grant funds	Federal grant funds	State GF	State GF	Not for sanitation but for comm fish
North Carolina	State GF	State GF	State GF	State GF	not for sanitation but for commercial fisheries
Maryland	State GF	State GF	State GF	State GF	yes
Virginia	State GF	State GF	State GF	State GF	None
Hawaii	In process of developing program				
New York	State GF/fees	State GF/fees	State GF/fees	State GF/fees	yes
Massachusetts	State GF	State GF	State GF	State GF	yes
Rhode Island	State GF	Industry 50 per sample holding tank water and growing area	State GF	State GF	None
Connecticut	State GF FDA funds when available	State GF FDA funds when available	State GF FDA funds when avail	State GF	None
New Hampshire	State GF maybe 10% grant EPA for training	State GF	State GF	State GF	Yes Also 1.5 cent per oyster landing tax goes back to FG
Maine	State GF Some FDA grants - not annual	State GF	State GF* offshore quahogs fee different testing req'd	State GF/Municipality 60% state/40% town for WQ samples	Yes

