



Subject: Executive Order 14276

December 15th, 2025

Dear National Marine Fisheries Service (NMFS),

We are writing to oppose the extension of commercial fishing to within 12 miles of Muliava or Rose Atoll. We argue that this action is justified by a faulty economic reasoning, namely, the oversimplified belief that increasing fishing grounds might solve the trenchant issues facing the American Samoan commercial fishing and canning industry. It will not. That belief is incorrect: increasing fishing grounds will not solve the challenges facing industry. In fact, exposing Muliava to commercial fishing cannot save our local firms. Yet, as other commenters can attest, the cultural and ecological destruction will be substantial.

The American Samoan longliner fleet and the Starkist Tuna Cannery in American Samoa are important pillars of the territorial economy, but face a variety of headwinds. These challenges range from: the threat of deep seabed mining which substantially reduces pelagic species like tuna; declining global demand for processed tuna, and rising competition from global suppliers who have restructured production around flexible supply chains. None of these serious threats can be solved by expanding commercial fishing to within 12 miles of Muliava.

The Starkist tuna cannery is a pillar of the American Samoan economy, providing employment, the vast majority of territorial exports, as well as stabilizing import shipping costs. The major threats to the local tuna cannery come from slowed demand: “a declining market generally for processed tuna products, down 40 percent in the three decades ending in 2017” [1] as well as “increased competition” [2]. This competition comes from a global tuna canning industry that has embraced a supply-chain production process. International canneries globally source fish based on price, then outsource cleaning, cooking, and canning to locations with the lowest labor costs.

Like global competitors, the American Samoan canning industry also relies on globally sourced tuna. But unlike global competitors, the StarKist plant employs a fully U.S. based manufacturing process. The Starkist cannery remains competitive despite higher production costs due to US demand subsidies: qualification for federal contracts and “duty-free access to the U.S. canned tuna market” [2]; as well as supply factors: lower wages compared to those in the U.S. mainland, and access to territorial tax credits.

The relative importance of these market and institutional factors, rather than local fisheries, is evidenced by analyses of two canneries that left American Samoa. Chicken of the Sea, a cannery that relocated to Georgia, USA in 2009, attributed the relocation to the need for flexible access to global suppliers for tuna. This access outweighed proximity to American Samoan tuna fisheries. Similarly, Tri-Marine closed their cannery in 2016, citing high utility costs and price competition from the global tuna industry. Both firms relocated due to factors like, “logistics, and utility costs,” not the volume of the American Samoan tuna catch.



The American Samoan fishing fleet is another important pillar of the American Samoan economy, and delivers their entire catch to the cannery and local markets. This fleet has also been harmed by structural economic factors and is struggling to survive. The structural economic factors include low fish prices and the rising cost of operations, and competition with global operators who do not adhere to fair labor practices [4]. Over the years, Tautai-O-Samoa and the American Samoan longline fishing association have expressed a need for flaked ice; to diversify their fleet by expanding into jig fishing; an extension of the Malaloa Marina dock; continued access to finance through the cannery. They have also requested support for value-added and sustainable fishing practices, including an incubator program to develop an *alia tele*, which resulted in the recent launch of the Tautai Mua; and support for programs to restore the bottomfish complex [3]. None of these challenges are solved by encroaching on a marine sanctuary as currently, there is insufficient evidence to suggest that expanding commercial fishing to within 12 miles of Muliava would substantially improve the fleet's viability.

Our organization recognizes the economic importance of commercial fishing and the StarKist cannery to the economy of American Samoa. However, tuna fishing and canning is a complex global industry. Threats like deep seabed mining and structural economic challenges cannot be solved with oversimplistic proposals to expand commercial fishing into a sacred site and designated marine sanctuary.

Indeed, exposing this pristine site to commercial fishing may also contribute to overfishing and the declining catch for both commercial and coastal fishers. In American Samoa, “coastal fishers said their catches are already shrinking and warn that more exploitation could push a fragile ecosystem beyond recovery” [1]. Indeed, “scientific studies have shown that [establishing] marine protected areas increases the amount of fish available to commercial fishers in waters outside the protected areas” [5]. Commercial fishing of this sacred place and ecological treasure will not provide sustainable economic benefits, but will still inflict substantial cultural and ecological harms. These harms violate both statutory protections and the deeds-based fiduciary obligations that structure the U.S. relationship with American Samoa. Federal agencies are bound to safeguard culturally significant marine spaces such as Muliava, not convert them into sites of commercial extraction.

A comprehensive solution to the challenges facing the American Samoan fishing and canning industry requires deeper insights which can only be obtained through proper community consultation with all parties involved. Our organization is concerned by reports that the required WestPac community consultations in Manu'a were structured to deliver information but not to receive feedback; that matai of Manu'a were not in attendance; that considerable consternation and dissent expressed by the audience was not reflected in the summary of those meetings; and that attendees were misinformed that a consent form was an attendance sheet which they should sign.

Other Pacific islands have transitioned towards high-value add, zero waste, sustainable fishing by working closely with indigenous communities. True deliberative communication and insights from the community are required to address the challenges facing American Samoa's economy. Moreover, federal



actions affecting monument boundaries, fishing access, or enforcement must conduct true community consultations to comply with both statutory protections and deeds-based obligations.

Regards,

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References:

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