



July 24, 2023

Mr. Matthew Lee-Ashley  
Chief of Staff  
Council on Environmental Quality  
730 Jackson Place, NW  
Washington, DC 20503

Submitted electronically via <https://www.regulations.gov/commenton/CEQ-2023-0004-0001>

RE: Request for Information on Ocean Justice Strategy

Dear Mr. Lee-Ashley:

Thank you for the opportunity to provide comments on the Request for Information on the development of an Ocean Justice Strategy by the Ocean Policy Committee.

NOIA represents and advances a dynamic and growing offshore energy industry, providing solutions that support communities and protect our workers, the public, and our environment. For 50 years, NOIA has been committed to ensuring a strong, viable U.S. offshore energy industry capable of meeting the energy needs of our nation in an efficient and environmentally responsible manner. NOIA member companies are engaged in all facets of offshore energy development, including offshore wind, offshore oil and natural gas, and offshore carbon sequestration. Further, NOIA's members include energy developers and, just as importantly, the businesses - large and small - who do the work of building, supplying, and servicing these projects.

As stated in our ESG principles, NOIA member companies provide the energy that is essential for our everyday lives and raises the quality of life of our communities, reducing poverty and hunger while promoting good health and well-being. We operate in coastal and ocean environments with safety, health, environmental protection and sustainability as core values. We share a commitment to a high standard of corporate citizenship and continuous improvement in environmental, social and governance performance. We recognize the risks of climate change and, as innovators, we strive to contribute solutions and best practices to optimally balance societal and environmental needs.

**Addressing the threshold question: "What is ocean justice?"**

The Request for Information raises the threshold question of "What is ocean justice?" Our comments will focus on the need for ocean justice to include the vast economic benefits that accrue to coastal communities, coastal states, and the American public from commercial activities in U.S. offshore waters, and specifically as result of energy producing activities on the U.S. outer continental shelf.



The National Oceanic and Atmospheric Administration (NOAA) highlighted the importance of the U.S. offshore economy to our communities in a June 8, 2023 press release entitled, “Marine economy bolsters American prosperity: U.S. Marine economy contributed \$432 billion to overall economy in 2021.”<sup>1</sup> NOAA officials emphasized the overall impact of marine activities in the everyday lives of Americans. According to NOAA Administrator Rick Spinrad, Ph.D., “Our ocean and Great Lakes are vital to the overall American economy — it is virtually impossible to go a day without consuming items that come from or through our nation's coastal and Great Lakes waters. These economic data are critical to appreciate how the blue economy is essential to American economic prosperity.”

According to NOAA, the growth in the marine economy actually outpaced the growth in the U.S. economy from 2020 to 2021: “From 2020 to 2021, the marine economy bounced back strongly from declines associated with the COVID-19 pandemic, with a 7.4% growth in GDP and a 10.5% growth in sales. The growth in the marine economy outpaced U.S. economic growth, which had a 5.9% growth in GDP and 6.2% growth in sales.” NOAA’s Chief Economist, Monica Grasso, Ph.D., underscored this point, “These statistics show the marine economy's resilience, with higher growth than the overall U.S. economy. By investing in sustainable practices and working collaboratively with stakeholders, we can continue to build a thriving and resilient marine economy that supports our communities, protects the environment and drives our country’s economy forward.”

U.S. law that governs energy development in federal offshore waters is unambiguous in its directive for the development of offshore energy resources. The Outer Continental Shelf Lands Act (OCSLA) states that “the outer Continental Shelf is a vital national resource reserve held by the Federal Government for the public, which should be made available for expeditious and orderly development, subject to environmental safeguards, in a manner which is consistent with the maintenance of competition and other national needs.” As such, the OCSLA establishes a framework for the development of energy resources in the offshore region that provides for a balancing of energy, economic, social, and environmental factors, and it includes processes for the consideration of input from public stakeholders and coastal state governments.

## **Conclusion**

The U.S. system of laws and promulgating regulations that govern commercial activities in the U.S. offshore region provide our nation with a distinct advantage over other regions of the world in that it provides an established framework for the management and oversight of the nation’s ocean economy. As it relates to offshore energy development, the U.S. statutory and regulatory system is designed to consider and balance energy, economic, social, and environmental factors. When considering the U.S. offshore energy economy, our country has spent several decades building an efficient energy system that includes billions of dollars in infrastructure assets, thousands of companies with hundreds of thousands of employees, and

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<sup>1</sup> <https://www.noaa.gov/news-release/marine-economy-bolsters-american-prosperity>



unparalleled engineering expertise that is now being deployed for development of next generation energy technologies. In considering and defining ocean justice, it is especially important to acknowledge the significance and value of such an energy system. It is also important to recognize that failing to sustain this energy system would likely shift investment and energy production to foreign regions with much less efficiency and far greater emissions profiles. This could also be accompanied by a loss in companies with the talent, expertise, and resources required for decarbonization efforts. In other words, the benefits that flow from the U.S. blue economy are vast and the definition of ocean justice should specifically include consideration of the economic benefits that flow to Americans offshore commercial activities.

Thank you for your consideration of these comments.

Very respectfully,

A handwritten signature in black ink, appearing to read "Erik Milito". The signature is fluid and cursive, with a prominent initial "E" and a long, sweeping tail.

Erik Milito  
President  
National Ocean Industries Association