

Senate Committee on Commerce, Science and Transportation  
Dirksen Building Room 508  
Washington, DC 20510

April 4, 2006

Dear Senator:

In light of the upcoming Senate National Ocean Policy Study (NOPS) subcommittee hearing on offshore aquaculture, the undersigned organizations, representing consumer and conservation organizations, recreational and commercial fishing groups and business interests, would like to share our concerns about legislation to allow permitting of commercial offshore aquaculture in federal waters without adequate safeguards for protecting marine ecosystems, wild-fish populations, consumer health and the economic livelihood of fishing businesses and communities. We therefore ask that you oppose the National Offshore Aquaculture Act (S.1195) - introduced on June 8, 2005 at the request of the National Oceanic and Atmospheric Administration (NOAA) - and any similar future proposal until pertinent questions are answered.

We recognize that some types of aquaculture offer potential benefits; however, independent reports from two recent blue ribbon commissions, the U.S. Commission on Ocean Policy and the Pew Oceans Commission, highlight the threats that farming carnivorous finfish, such as cod, halibut and red snapper, can pose to the environment and native fish populations. The U.S. Commission on Ocean Policy's report cites numerous concerns, including the spread of disease and parasites; genetic "contamination" and competition between wild- and farmed-fish populations; degradation of water quality; harm to marine mammals; increased pressure on already-exploited fisheries from an increased demand for fishmeal and oil; and the possible introduction of non-native or genetically-modified species. The Pew Oceans Commission recommended a moratorium on offshore fish farming until such concerns are addressed.

The issues raised by offshore aquaculture development are not just environmental, but also include the impacts on fishermen and women. In the 1990s, increased imports of low-cost farmed salmon substantially depressed commercial salmon prices, contributing to financial instability for many fishing families and fisheries dependent businesses. Yet NOAA appears to be promoting offshore aquaculture without consideration of such impacts. To our knowledge, NOAA has not analyzed the potential socioeconomic impacts of offshore aquaculture development, nor has the agency articulated a strategy to minimize or balance the impacts offshore aquaculture will have on the livelihoods of US commercial fishermen and women.

S. 1195 gives NOAA the authority to issue permits for the construction of private fish farms, or marine aquaculture operations, in federal waters from three to 200 miles from shore. Unfortunately, this bill does not address the problems with offshore aquaculture and instead allows the Secretary of Commerce, in consultation with other federal agencies, to fast-track the permitting of large commercial fish farms with little protection for the marine environment, consumers or fishing businesses and communities. For example, the bill fails to require the Secretary to conduct appropriate mapping, planning or zoning to minimize conflicting uses or protect sensitive areas and ecosystems. The bill gives the Secretary nearly unlimited discretion to determine the siting- and operating-permit conditions, including the environmental criteria, if any, that apply to facilities. It provides no requirements for tagging, tracking or monitoring of fish farms to assess their impacts on wild fisheries or on consumer health. Contrary to the laws of several states, the bill fails to prohibit the raising of genetically modified and non-native fish species, and it provides for little or no oversight from the public, states or fishery management councils.

Moreover, NOAA has refused repeated requests from a number of the organizations below to conduct a

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Legislative Environmental Impact Statement on the bill, as required by the National Environmental Policy Act, so that Congress can begin to assess the effects of offshore fish farming before voting on this major change to the management of our ocean resources.

In short, S.1195 is an example of a bill that lacks safeguards necessary to protect marine ecosystems, including marine fisheries. We therefore urge you to oppose S. 1195. We would be happy to discuss our concerns further and to work with you to protect our oceans and America's fisheries. For more information, please contact Zach Corrigan at Food and Water Watch at 202-797-6549.

Sincerely,

*Organizations/Associations*

George A. Kimbrell  
Center for Food Safety

Beth Fitzgerald  
Greenpeace USA

Wenonah Hauter  
Food and Water Watch

Gerry Leape  
National Environmental Trust

Kate Wing  
National Resource Defense Council

Tim Eichenberg  
The Ocean Conservancy

Caroline Gibson  
Pacific Marine Conservation Council

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Dorothy Childers  
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Peter Baker  
Cape Cod Commercial Hook Fishermen's  
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Marine and Fish Conservation Program  
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Bill Schultz  
Raritan Riverkeeper, NJ

Ken Hinman  
National Coalition for Marine Conservation, VA

Alaska Independent Fishermen's Marketing  
Association, WA

Anne Mosness  
Go Wild Campaign, WA

Stephen Taufen  
Groundswell Fisheries Movement, WA

Alfredo Quarto  
Mangrove Action Project, WA

Chuck Owens  
Peninsula Citizens for the Protection of Whales,  
WA

*Businesses*

William T. Black  
F/V Carol M, AK

Gulkana Seafoods-Direct, AK

Tom Waterer  
Nautilus Marine, Inc., AK

Norman Van Vector, Bristol Bay Manager  
Peter Pan Seafoods, AK

William (Bill) Webber  
Webber Marine & Mfg., Inc., AK

Robert A. Bonanno  
F/V Night Train II, CA

Chris White  
F/V Vulcan, ID

Peter Girvan  
F/V Karma, UT

Paul Gilliland, Managing Director  
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Bristol Bay Wild 'N Red Salmon, WA

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Jay Follman  
F/V Erika Lynn, WA

Fisher's Choice Wild Salmon, WA

Buck Meloy  
Flopping Fresh Fish Company, WA

John Jovanovich  
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Justin Marx  
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