

**Institute for Fisheries Resources \* Ocean Conservancy \* Environmental Defense  
Alaska Independent Fishermen's Marketing Association \* Alaska Marine  
Conservation Council \* Alaska Troller's Association \* Cape Cod Commercial Hook  
Fishermen's Association \* Center For Food Safety \* Clean Catch \* Columbia River  
Crab Fishermen's Association \* Environment Matters \* Fishing Vessel Owners  
Association \* Food and Water Watch \* Go Wild Campaign \* Gulf Restoration  
Network \* Kenai Peninsula Fishermen's Association \* Mangrove Action Project \*  
Monterey Bay Aquarium \* National Coalition for Marine Conservation \* National  
Farmers Union \* Northcoast Environmental Center \* Oceana \* Pacific Coast  
Federation of Fishermen's Associations \* Pacific Marine Conservation Council \*  
Puget Sound Harvester's Association \* Sierra Club \* Small Boat Commercial  
Salmon Fishermen's Association \* Southeast Alaska Regional Dive Fisheries  
Association \* Southern Shrimp Alliance \* United Fishermen of Alaska**

April 24, 2007

The Honorable Madeline Z. Bordallo, Chairwoman  
Subcommittee on Fisheries, Wildlife and Oceans  
Committee on Natural Resources  
U.S. House of Representatives  
Washington, DC 20515

Dear Chairwoman Bordallo:

Conservation, food safety, and fishing organizations from across the nation urge you to oppose legislation proposed and transmitted to Congress by NOAA on March 12, 2007, concerning offshore aquaculture in U.S. ocean waters. The bill, "The National Offshore Aquaculture Act of 2007," will be introduced today by House Natural Resources Committee Chairman Nick Rahall (D-WV) at the request of the Administration. While a slight improvement over legislation introduced in 2005, we strongly oppose the bill because it appears to promote aquaculture, in particular ocean fish farming, at the expense of marine ecosystems and fishing communities. We believe that strong standards to eliminate or minimize the significant environmental and socioeconomic impacts of ocean fish farming must be provided in statutory criteria for issuing permits, and not merely addressed in a subsequent rulemaking process.

NOAA's proposed legislation does not contain adequate standards to eliminate or minimize diseases and parasites transmitted from farmed to wild finfish species; pollution of the marine environment with fish wastes and excess feed; contamination of humans and wildlife from feeds, drugs and chemicals; harm to marine mammals and other wildlife from predator controls; and the decimation of populations of important forage fish such as menhaden, herring and anchovies used to feed carnivorous farmed species. The proposed legislation also fails to develop a precautionary and transparent permitting and regulatory program, provide an adequate role for states and Fishery Management Councils, or protect essential fish habitat and other sensitive ocean sites.

Some of these issues have been addressed in legislation enacted in California in 2006 (the Sustainable Oceans Act) and in the recommendations of the Woods Hole Oceanographic Institution's Marine Aquaculture Task Force in 2007 (*Sustainable Marine Aquaculture: Fulfilling the Promise; Managing the Risks*).

Based on the bill's inadequacies, and the considerable harm that promoting an unsustainable fish farming industry would have on fishing communities and marine ecosystems, we urge you to oppose NOAA's aquaculture legislation as currently written.

Thank you for considering our views, and please feel free to contact any of the groups listed below for more information.

Sincerely,

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