

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

RE: **Coalition Opposes Fish Farms Via Energy Bill**

November 14, 2006

Dear Senator:

We, the undersigned consumer health, fishing and conservation organizations urge you to reject language in section 19 of H.R. 4761, or any similar provisions, which could authorize the conversion of unused oil and gas platforms into fish farms. This “rigs to fish farms” provision could jeopardize consumer health and wild fish populations and it represents a give-away to oil and gas companies by allowing them to escape liability, removal and restoration costs associated with expired oil platforms.

We commend the Senate for rejecting the “rigs to fish farms” provision thus far, and urge you to oppose similar provisions in any conference on S. 3711 (The Gulf of Mexico Energy Security Act) and H.R. 4761 (the Deep Ocean Energy Resources Act). Energy legislation, particularly if passed during the lame duck congressional session, is not the proper venue to authorize industrial fish farming in federal waters.

Section 19 of H.R. 4761, which has been approved by the House of Representatives, would allow the Minerals Management Service (MMS) to authorize use of decommissioned offshore oil and gas platforms for “an artificial reef, scientific research, or any other use authorized under section 8(p) [of the Outer Continental Shelf Lands Act] or any other applicable Federal law.” This provision – particularly the “other use” clause – could allow MMS to authorize fish farms in federal waters and could allow oil companies to evade liability and platform removal responsibilities. Unfortunately, this provision does not adequately address the potential impacts of ocean fish farming on human health, wild fish populations and the fishing industry. These impacts include:

Human Health: To increase growth rates of farmed fish and prevent deaths, many fish farms use hormones, algacides, pesticides and other chemicals that can pose serious health risks to consumers. Moreover, PCBs and other contaminants found in wild fish can concentrate in farmed carnivorous fish. High levels of mercury are also known to exist in both the soils and fish caught near oil rigs due in part to the use of mercury-laden drilling solutions. The health impacts associated with these various contaminants range from cancer to neurological disorders and learning disabilities.

Depletion of Wild Fish to Feed Farmed Fish: Several pounds of wild fish in the form of fish feed can be required to produce one pound of farmed marine finfish. This represents a net loss in fishery resources.

Escaped Farmed Fish Jeopardize Wild Fish Populations: Large numbers of fish escape from ocean fish farms. Escaped fish – particularly if they are non-native or genetically distinct from wild populations – could threaten wild fish populations by competing with them for food and habitat and interbreeding with them leading to a genetically inferior wild population. If Section 19 were to be adopted, several wild fish species could be impacted. In fact, the risk of escapes could be significant because fish farms could be placed farther from shore where weather conditions are more severe.

Pollution of Water and Local Ecosystem: The concentration of fish waste, uneaten fish feed, pesticides and antibiotics can overload local ecosystems with chemicals and nutrients.

Parasites & Disease: Pathogens and parasites that occur at low levels in the wild, can multiply rapidly in the crowded conditions of fish farming facilities and can transfer to wild fish populations.

We urge you to maintain your opposition to the harmful “rigs to fish farm” provision during this lame duck session.

Sincerely,

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The Center for Food Safety

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United Commercial Fisherman's Association

David Harsila, President
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CC: Senate Committee on Energy and Natural Resources

