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Margaret Henderson
Campaign Manager



Nov. 12, 2020

Chairman Raul M. Grijalva
House Committee on Natural Resources
1511 Longworth House Office Building
Washington, D.C. 20515

Ranking Member Rob Bishop
House Committee on Natural Resources
123 Cannon House Office Building
Washington, D.C. 20515

Dear Chairman Grijalva and Ranking Member Bishop,

We are writing to express concern with Sec. 409 of H.R. 8632, *the Ocean-Based Climate Solutions Act*. This section titled, "Restorative Aquaculture," establishes a research and policy program for offshore aquaculture which would be limited to seaweed and shellfish only. Unfortunately, this falls short of what is needed for the U.S. to leverage the many environmental, societal, and economic benefits of offshore aquaculture. Instead, what America needs now is a comprehensive plan for managing and permitting U.S. offshore aquaculture, including finfish, that preserves existing environmental safeguards and minimizes impacts to existing ocean-based industries, much like what is envisioned in the **Advancing the Quality and Understanding of American Aquaculture (AQUAA) Act**, H.R. 6191 and its bipartisan Senate companion, S. 4723.

Wild fish harvests are and always will be an important part of the seafood supply. There is, however, a significant environmental and social opportunity for aquaculture to supplement wild harvests in both domestic and international markets. Aquaculture is one of the fastest growing sustainable forms of food production and has the unique potential to improve food security and nutrition, enhance coastal resiliency, create quality jobs, help restore species and habitats, and ensure that seafood (both wild-caught and farmed) continues to be an important part of the global food supply.

The **environmental benefits** of offshore aquaculture include water conservation, lessened emissions and greater animal protein production using little space. Offshore aquaculture requires no land, minimal fresh water and a relatively small amount of space to provide abundant, healthful seafood. Since fish are cold blooded and grown in water where the effects of gravity are lessened, they can convert feed to edible protein much more efficiently than warm blooded animals produced on land. Plus, farming in the ocean is *three-dimensional*, allowing much more animal protein to be produced in the same areal footprintⁱ.

During the past 30 years, management practices and scientific innovation have reduced, eliminated, or minimized many of the environmental risks at responsibly managed farms.ⁱⁱ And, new coastal planning and siting tools are already available to assist managers, coastal planners and businesses in identifying suitable sites for marine aquaculture that avoid environmentally-sensitive habitats and reduce spatial conflicts with existing ocean uses like fishing, shipping and energy development.

Unfortunately, domestic aquaculture is currently constrained by disjointed federal leadership and numerous regulatory hurdles, including overlapping jurisdiction of federal, state and local governments, and the absence of an efficient and affordable permitting process, particularly in U.S. federal waters.

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To overcome these regulatory hurdles and lay the groundwork for strengthening the U.S. aquaculture industry, AQUAA authorizes NOAA to clarify a pathway for permitting offshore aquaculture operations which meet robust National Standards for Sustainable Offshore Aquaculture which, like the National Standards for commercial fishing outlined in the Magnuson Stevens Act, are guiding principles for growing coastal economies, protecting ecosystems, and avoiding conflict among stakeholders. AQUAA leverages modern siting and monitoring technologies to mitigate potential environmental impacts. It also provides for strict federal enforcement and includes a process for public input which ensures that coastal communities and states are considered prior to permitting new operations. In short, AQUAA provides much-needed regulatory certainty for U.S. marine farmers while also preserving the environment, local economies, and public health.

In addition to increasing our supply of healthful and sustainable American-raised seafood, growth of domestic aquaculture is an opportunity to revitalize the seafood industry which has been hard hit by the effects of COVID-19. As America begins to rebuild from the devastation of the COVID-19 pandemic, creating a new American seafood source will have rippling effects throughout many areas of the country. Increased aquaculture production will lead to increased demand for American-grown crops such as soybeans, corn and peas which can be used in plant-based fish feed, will open up new markets to heartland farmers and lessen dependence on the uncertainty of foreign trade relationships.

For these reasons, we encourage the Committee to support of the AQUAA Act instead of the limited Restorative Aquaculture program included in H.R. 8632. For the U.S. to responsibly expand the aquaculture industry and tap into the full potential that aquaculture can provide, the AQUAA Act is the better choice.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Margaret Henderson', is centered on the page.

Margaret Henderson
Campaign Manager

ⁱ [World Economic forum 18 Oct 2017 Robert Jones, Global Aquaculture Strategy Lead, The Nature Conservancy](https://www.weforum.org/agenda/2017/10/how-aquaculture-can-feed-the-world-and-save-the-planet-at-the-same-time)
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ⁱⁱ *Hall, S. J., A. Delaporte, M. J. Phillips, M. Beveridge, and M. O'Keefe. Blue Frontiers: Managing the Environmental Costs of Aquaculture. Penang, Malaysia: The World Fish Center (2011).*