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,

Mitchell Shapson  
Institute for Fisheries Resources  
Dale Beasley  
Columbia River Crab Fishermen’s Association

Tim Eichenberg  
Ocean Conservancy  
Marianne Cufone  
Environment Matters

Rebecca Goldburg  
Environmental Defense  
Robert D. Alverson  
Fishing Vessel Owners Association

David Harsila  
Alaska Independent Fishermen’s Marketing Association  
Andrianna Natsoulas  
Food & Water Watch

Paula Terrell  
Alaska Marine Conservation Council  
Anne Mosness  
Go Wild Campaign

Dale Kelley  
Alaska Troller’s Association  
Cynthia Sarthou  
Gulf Restoration Network

Paul Parker  
Cape Cod Commercial Hook Fishermen’s Association  
Brent Johnson  
Kenai Peninsula Fishermen’s Association

George A. Kimbrell  
Center for Food Safety  
Alfredo Quarto  
Mangrove Action Project

Niaz Dorry  
Clean Catch  
George H. Leonard  
Monterey Bay Aquarium
Pam Lyons Gromen
National Coalition for Marine Conservation

Tom Buis
National Farmers Union

Greg King
Northcoast Environmental Center

Jim Ayers
Oceana

William “Zeke” Grader
Pacific Coast Federation of Fisherman’s Associations

Matt Van Ess
Pacific Marine Conservation Council

Peter Knutson
Puget Sound Harvesters Association

Vivian Newman
Sierra Club

Mike Hudson
Small Boat Commercial Salmon Fishermen’s Association

Kathy Hansen
Southeast Alaska Fishermen’s Alliance

Phil Doherty
Southeast Alaska Regional Dive Fisheries Association

John Williams
Southern Shrimp Alliance

Mark Vinsel
United Fishermen of Alaska