October 19, 2007

Gulf of Mexico Fishery Management Council
Attn: Chairman Robin Riechers
2203 N. Lois Avenue, Suite 1100
Tampa, FL 33607

Re: Offshore Aquaculture

Dear Chairman Riechers and members of the Gulf of Mexico Fishery Management Council:

We, the thirty-three undersigned organizations, write to express our concerns about the Gulf Council’s plan to consider the proposed Generic Amendment to the Coral and Coral Reef FMP, Coastal Migratory Pelagics FMP, Red Drum FMP, Reef Fish FMP, Shrimp FMP, Spiny Lobster FMP, and Stone Crab FMP (Amendment). Because of our serious concerns about the impacts of offshore aquaculture in the Gulf and elsewhere, and because of the limited time that the public has had to review this plan, we ask that the Council delay the adoption of the Amendment until it can investigate and address a number of key issues.

We are very concerned about the impacts that offshore aquaculture will have on the environment, human health, and the economies of local fishing communities in the Gulf of Mexico and elsewhere. Water flowing out of fish farms can carry excessive nutrients, particulates, metals, antibiotics, pesticides, and other chemicals. For example, in more shallow sites, the feed and fecal matter from aquaculture facilities can accumulate in the sediments below the facilities, lowering oxygen levels in the water and sediments and causing a reduction in the biological diversity of the seabed.

Further, marine fish farms could also introduce into the ecosystem non-native or genetically modified fish if they are permitted for culture. These organisms can compete with wild fish for resources and habitat, threaten the genetic integrity of wild fish, and introduce disease and parasites. Even if open ocean aquaculture facilities are designed and built well, farmed fish are bound to escape into the ocean. The consequences could be widespread and devastating.
In addition, farmed carnivorous finfish consume large quantities of fishmeal and fish oil. This is an inefficient use of the available protein resource from the wild. Increased catches of forage fish for aquaculture fishmeal reduce the amount of fish available for larger fish, marine mammals, and seabirds.

Finally, aquaculture off the U.S. coasts could harm the existing U.S. fishing industry by lowering prices for wild fish caught by U.S. fishermen. Since the 1990s, increased imports of low-cost farmed salmon contributed to financial instability of fishing communities along the Pacific Coast of the United States.

Some of these problems could be partially addressed by changing the Gulf Council’s Amendment. For example, the Amendment should be changed to create allowable aquaculture zones to protect existing uses and fragile areas. It should ban the raising of genetically modified and non-native fish (as the Amendment currently states as one of its preferred alternatives), as well as ban endangered or threatened species and species of concern. It should require protections against hyper-domestication and detail strict feed-management methods. These are but some of the many problems with aquaculture. During the comment period in July 2007, a number of the undersigned organizations submitted comprehensive comments asking that significant changes be made to the Amendment.

We understand that the Council made significant changes to the plan over the summer. Despite this fact, it is our understanding that the Council is planning to take up the issue at its Oct. 29 – Nov. 2, 2007 meeting, without another public comment period or additional public hearings.

Given the recent changes made to the Amendment, we strongly recommend that the Council schedule an additional comment period and public hearings. Allowing the public more time to evaluate and work with the Council on the proposed Amendment could help minimize the negative impacts of offshore aquaculture in the Gulf. This is especially true given that the most recent draft of the Amendment was only available for public comment for a brief period during the summer, while many other important issues were also in process, like the effects of the proposed individual fishing grouper quota amendment.

In order to ensure that the Amendment protects ocean ecosystems, public health, and fishing communities, the Gulf Council should postpone any decision-making about offshore aquaculture until more information is gathered and the public is given adequate time to comment. We urge the Council to allow the public to comment on its most recent draft of the Amendment and to host additional, better publicized public hearings so that the Council can investigate and address the key issues involving offshore aquaculture.

Sincerely,

Jason Mackenzie
North Gulfport Community Land Trust

Susan Vuillemot
Louisiana Environmental Action Network

Michael Roberts
Association of Family Fishermen

A.J. Fabre
Louisiana Shrimp Association

Tracy Kuhns
Louisiana Bayoukeeper, Inc

Cyn Sarthou
Gulf Restoration Network

Terese Collins
Gulf Islands Conservancy Inc.

Charlie Smith
Louisiana Charter Boat Association
George Barisich  
United Commercial Fisherman’s Association  

John Wathen  
Hurricane Creekkeeper  

Mary Troupe  
Mississippi Coalition for Citizens with Disabilities  

Richard Richardson, Jr  
Houston Big Game Fishing Club  

Pete Gerica  
Lake Pontchartrain Fishermen's Association  

Vivian Newman  
Sierra Club  

Marianne Cufone  
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Wenonah Hauter  
Food & Water Watch  

David Harsila,  
AIFMA (Alaska Independent Fishermen’s Marketing Association)  

L.M. "Butch" Allen  
Alaska Center for the Environment  

Dale Kelley  
Alaska Trollers Association  

Paula Terrel  
Alaska Marine Conservation Council  

Kenneth Duckett  
United Southeast Alaska Gillnetters  

Peter Knutsen  
Puget Sound Harvesters Association  

Alfredo Quarto  
Mangrove Action Project  

Niaz Dorry  
Clean Catch  

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Mitchell Shapson  
Institute for Fisheries Resources  

W.F. “Zeke” Grader  
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Peter Huhtala  
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The Center for Food Safety  

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Half Moon Bay Fishermens Marketing Association