



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE  
Silver Spring, MD 20910  
**MARINE FISHERIES ADVISORY COMMITTEE**

April 7, 2011

Ms. Susan Bunsick  
NOAA Aquaculture Program  
1315 East-West Highway  
SSMC#3-13th Floor Rm. 13152  
Silver Spring, MD 20910

Re: Comments on NOAA Draft Aquaculture Policy

Dear Ms. Bunsick:

The following comments on the NOAA draft aquaculture policy are submitted on behalf of NOAA's Marine Fisheries Advisory Committee (MAFAC). A separate comment letter is being provided on the Department of Commerce draft aquaculture policy. As you are aware, MAFAC advises the Secretary of Commerce on all living marine resource matters. Specifically, the Committee evaluates and recommends priorities and needed changes in national program direction.

For several years MAFAC has been urging Commerce and NOAA to expand domestic aquaculture production. We have documented this interest through our December 2007 strategic report titled "Vision 2020: The Future of U.S. Marine Fisheries"<sup>1</sup> and our contributions to NOAA's development of a 10-year plan for marine aquaculture.<sup>2</sup> As noted in Vision 2020, "An expanded U.S. aquaculture industry can increase the production of fish and shellfish to meet increasing domestic and international demand, assist in fishery stock recovery via enhancement, and decrease the U.S. seafood trade deficit". While encouraging the growth of aquaculture MAFAC underscores the importance of doing so in a manner that protects wild stocks.

**General comments:**

In general, MAFAC is pleased with the draft NOAA policy. Similar to the agency's existing aquaculture policy, it is supportive of expanding U.S. aquaculture production. However, we are very concerned with the discouraging tone of the draft policy. The tone of draft NOAA policy comes across as enabling the growth of aquaculture as long as it doesn't impact or interfere with anything else. MAFAC fully understands NOAA's multiple stewardship missions and the need to ensure aquaculture fits within them. We fear the draft policy's heavily qualified support for aquaculture will discourage rather than encourage aquaculture development in the U.S.

MAFAC notes that nearly two years have been spent focusing on updating this policy rather than implementing the NOAA 10-year plan for marine aquaculture. We strongly urge NOAA to redouble its efforts to implement this policy and the 10-year plan once it is adopted to make up for this lost time.

<sup>1</sup> See [http://www.nmfs.noaa.gov/ocs/documents/Vision\\_2020\\_FINAL-1.pdf](http://www.nmfs.noaa.gov/ocs/documents/Vision_2020_FINAL-1.pdf)

<sup>2</sup> See <http://aquaculture.noaa.gov/pdf/finalnoaa10yrrweb.pdf>



Internationally, aquaculture is expanding rapidly to meet the growing demand for seafood. It is our belief in recent years that aquaculture production in the U.S. has actually declined. In the absence of a recent USDA census of aquaculture it is not possible to know for sure. It does not bode well for U.S. food security that only about 5 percent of the seafood consumed in the U.S. comes from domestic aquaculture production while worldwide aquaculture is generating approximately half the seafood consumed. More discouraging are continued reports that U.S. entrepreneurs are investing in other countries that embrace and encourage aquaculture rather than here! This disturbing trend must be reversed and the policy should acknowledge and address this food security and economic vulnerability.

While the policy notes the increasing demand for seafood, it fails to acknowledge the USDA Center for Nutrition Policy and Promotion, Dietary Guidelines for Americans, 2010. Significantly, the Guidelines recommend that to get the full health benefits of eating seafood that the current approximate mean seafood consumption of 3½ ounces per week be increased to 8 ounces per week. They also recommend that women who are pregnant or breast feeding consume 8 to 12 ounces of seafood per week from a variety of seafood types. This information should be added to NOAA's aquaculture policy. The U.S. policies for consuming fish and producing fish should be aligned. If we are going to encourage our citizens to more than double their seafood consumption, we should be aggressively encouraging aquaculture development to be able to fill that demand.

The first policy statement in the draft NOAA policy should be amended as follows to reflect this urgent need to grow domestic aquaculture production.

1. Encourage and foster ~~Enable~~-sustainable aquaculture development that provides domestic jobs, products, and services and ....

### **Implementation:**

The policy lacks specific implementation actions or projects. MAFAC urges NOAA to work with us and stakeholders to develop specific actions and projects that will implement the policy. MAFAC further recommends updating NOAA's 10-Year Plan for Marine Aquaculture to reflect the new Commerce and NOAA policies and to include specific actions and projects to implement them. The 10-Year Plan should be the prioritized implementation plan for both of the policies with short and long-term deliverables to achieve the goals and objectives of the policies. Specifically, MAFAC would like to ensure immediate and significant progress in advancing finfish, shellfish, sea vegetable, Integrated Multitrophic Aquaculture and offshore (EEZ) aquaculture. We also request that NOAA periodically report back to MAFAC regarding implementation progress and to reevaluate implementation priorities.

It will take a concerted, coordinated effort by multiple federal agencies (Commerce, Interior, ACOE, USDA, EPA) for the U.S. to make significant advancements in domestic aquaculture production. MAFAC urges NOAA to work, as stated in the draft policy, through the Joint Subcommittee on Aquaculture (JSA) to accomplish this federal coordination. MAFAC urges

NOAA request that JSA update their Aquaculture Research and Development Strategic Plan<sup>3</sup> to reflect the finalized NOAA and Commerce policies and develop an implementation plan that includes short and long-term deliverables to achieve the goals and objectives of JSA's Strategic Plan.

### **Immediate actions:**

While we would like NOAA to work with MAFAC to update the 10-Year Plan to be the implementation guide for both policies, we also believe there is merit to having immediate and significant deliverables to announce with the release of the finalized policies. In that vein, and consistent with the draft policy recommendations, MAFAC encourages NOAA to:

1. Launch a National Shellfish Initiative with the release of the policies. Consistent with the existing recommendation of shellfish organizations around the country, the goals of such a National Shellfish Initiative would be to:
  - a. Increase shellfish aquaculture and restoration activities to enhance shellfish resources and harvest opportunities;
  - b. Stimulate coastal economies on all three coasts with jobs and investment;
  - c. Improve the health of ailing coastal estuary;
  - d. Increase domestic seafood supply and food security as well as increasing shellfish exports and;
  - e. Provide oyster resource restoration to help the Gulf of Mexico recover from the Deepwater Horizon Oil Spill.
2. Enable aquaculture to proceed in federal waters by seeking to introduce legislation establishing the regulatory structure for aquaculture in the EEZ and/or urging the Regional Fishery Management Councils to adopt aquaculture regulations consistent with the principles for aquaculture in federal waters articulated in Appendix 1 of the draft NOAA policy.

Launching the National Shellfish Initiative and immediate efforts to develop the regulatory infrastructure for aquaculture in the EEZ in conjunction with the policy release would be a statement to the American public that aquaculture is critical to increase our nation's seafood supply. It would also be a statement to the aquaculture community that you are serious about implementing the policy.

### **Specific policy amendments and comments for the draft NOAA policy:**

Page 5, 2<sup>nd</sup> paragraph, 2<sup>nd</sup> sentence, amend to read: Most U.S. aquaculture production – both small-scale and large-scale – is evolving toward utilizing sustainable practices. These practices are being refined and further implemented through regulations at the federal and state levels,

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<sup>3</sup> See <http://aquanic.org/jsa/Strategicplan.htm>

scientific advancements, consumer demand, technological innovation, industry best management practices, and protocols for responsible stock replenishment and hatchery practices.

Page 6, Innovation, Partnerships and Outreach. The EEZ represents a major opportunity for expansion of domestic aquaculture product. The “Regulation” section and Appendix 1 in the draft policy speak to making it possible to locate a farm in the EEZ. A separate bullet under Innovation, Partnerships and Outreach should be added as well to encourage the development of the technology necessary to farm in open ocean conditions.

Page 10, #5. Goals for Industry Collaboration. As worded “...operators should be held accountable for protecting the environment, wild species, ...” may be interpreted by some to mean an unlimited liability. Such an interpretation would discourage investment in U.S. aquaculture. This goal should be amended to read as follows: “To secure long-term access to operate aquaculture facilities in federal waters, operators should be held accountable for adhering to all appropriate laws, regulations and permit conditions ~~for to protecting~~ the environment, wild species, and human safety and for conducting and reporting ongoing monitoring.

MAFAC appreciates NOAA’s efforts to update their aquaculture policy and the opportunity to comment on the draft. We look forward to the policy being finalized and continuing to work with you on implementation.

Sincerely,



Heather McCarty  
Chair  
Marine Fisheries Advisory Committee

Cc: Jane Lubchenco, NOAA Administrator  
Gary Locke, Commerce Secretary