

October 11, 2007

The Honorable Daniel Inouye Chairman, Committee on Commerce, Science and Transportation United States Senate Washington, DC 20510 The Honorable Ted Stevens Ranking Member, Committee on Commerce, Science and Transportation Unites States Senate Washington, DC 20510

Dear Chairman Inouye and Vice Chairman Stevens:

We, the undersigned members of the National Association of Marine Laboratories (NAML), are writing to provide comment on proposals to expand offshore aquaculture activities in the United States Exclusive Economic Zone (EEZ). NAML is a national organization of about 120 coastal and Great Lakes marine laboratories with thorough and comprehensive knowledge of our oceans, coasts, and marine resources. Through national and regional networking, NAML members are actively involved in ocean, coastal, and Great Lakes scientific research and education. Our network of marine laboratories acts as an interface between the science of the oceans and the education and outreach activities that create social value from that research. Many NAML members are directly involved in research related to aquaculture; and those that are not, nevertheless appreciate the importance of ensuring the use of sound science in aquaculture practices and application. Therefore, we respectfully provide the following comments on the development of U.S. offshore aquaculture operations and specifically S. 1609, the National Offshore Aquaculture Act of 2007.

We are very encouraged by the overall focus of S. 1609, which is to create a comprehensive, single structure for managing aquaculture in federal waters. As the U.S. demand for seafood continues to grow, so does the nation's trade deficit. Since we are currently unable to meet the domestic demand for seafood by relying on wild harvests, we are forced to depend more and more on imports of cultured seafood. The U.S. currently imports over 80 percent of the seafood consumed in this country and approximately 40 percent of that is farmed. Concerns have surfaced recently about the lack of quality control of imported seafood products, much of which come from countries without adequate controls on use of chemicals or feed quality. The reality is that whether the United States is involved or not, offshore aquaculture will continue to grow globally. In order for this country to compete effectively on the international stage and begin to address the current trade deficits associated with imported seafood, this nation needs to carefully evaluate the development of domestic offshore aquaculture operations. NAML believes that to be effective, we should have a set of national standards that preserve and protect our waters and that are adoptable and adaptable to all states. These operations must proceed with the most accurate and scientifically sound information available to help guide the important public policy decisions that must be made.

With respect to the bill before the Committee, NAML is encouraged that S. 1609 includes increased environmental safeguards that were not present in the 2005 version. In addition, we are

pleased that the bill includes a scientific research component for the purpose of helping develop aquaculture technologies that adequately protect marine ecosystems, but feel that the establishment of such a research program be required by changing the language in Section 5 from "may establish" to "shall establish." We also applaud that the bill was expanded to support sustainable land-based aquaculture research and production. However, NAML would like to see the research and development section of the bill broadened in order to take full advantage of the wealth of knowledge found throughout the research and education community, including marine labs and institutions of higher learning. This will help ensure that important decisions about the future of aquaculture operations are based on the best available scientific information.

In summary, demand for seafood has outstripped our ability to meet the demand from wild stocks. For a nation that is so dependent on imported seafood (at a rate of over 80 percent of that consumed), it is essential that we invest in offshore fish farming domestically using the best available science. We hope that as your Committee moves forward with this legislation our comments are given due consideration.

Thank you for the opportunity to express these views. If you would like additional information, please feel free to contact NAML's Washington Representatives Joel Widder (jwidder@lewis-burke.com) or Wendy Naus (wendy@lewis-burke.com) at (202) 289-7475.

Sincerely,

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