



National Association of Marine Laboratories

October 11, 2007

The Honorable Sander M. Levin
Chairman, Subcommittee on Trade
Committee on Ways and Means
United States House of Representatives
Washington, DC 20515

The Honorable Wally Herger
Ranking Member, Subcommittee on Trade
Committee on Ways and Means
United States House of Representatives
Washington, DC 20515

Dear Chairman Levin and Ranking Member Herger:

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 H.R. 2010 the National Offshore Aquaculture Act of 2007.

We are very encouraged by the overall focus of H.R. 2010, 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 H.R. 2010 includes increased environmental safeguards that were not present in the 2005 version. In addition, we are

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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,

Harbor Branch Oceanographic Institution, Inc.
Fort Pierce, Florida

Hawaii Institute of Marine Biology
Kaneohe, Hawaii

University of Southern California, Wrigley Institute for Environmental Studies
Los Angeles, California

Center for Economic and Environmental Development, Roger Williams University
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Dauphin Island, Alabama

Institute of Marine Sciences, University of North Carolina-Chapel Hill
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Oceanic Institute
Waimanalo, Hawaii

Mote Marine Laboratory
Sarasota, Florida

Gulf Coast Research Laboratory, University of Southern Mississippi
Ocean Springs, Mississippi

Louisiana Universities Marine Consortium
Chauvin, Louisiana

Hatfield Marine Science Center, Oregon State University
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Institute for Marine and Coastal Sciences, Rutgers University
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Center for Coastal Studies and Harte Institute for Gulf of Mexico Studies, Texas A&M
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University of Texas Marine Science Institute
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Humboldt State University Marine Lab
Trinidad, California

Skidaway Institute of Oceanography
Savannah, Georgia

Center for Marine Sciences and Technology, North Carolina State University
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Hubbs-SeaWorld Research Institute
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College of Marine and Earth Studies, University of Delaware
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The University of Connecticut Marine Programs, Avery Point Campus
Groton, Connecticut

cc: The Honorable Charles Rangel, Chairman, Committee on Ways and Means
The Honorable Jim McCrery, Ranking Minority Member, Committee on Ways and Means