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United Fishermen of Alaska Comments to Marine Aquaculture Task Force

United Fishermen of Alaska (UFA) represents 31 Alaska commercial fishing organizations as well as hundreds of individual fishing members and fishing related businesses.

Welcome to Alaska. While here, I hope you will have the opportunity to enjoy the exceptional nutritional and recreational value of Alaska's vibrant and healthy fisheries. The fish on your plate or at the end of your fishing line would not be available if not for Alaska's world leadership in science-based management of our fisheries and natural resources, and the attention given to science by the North Pacific Fishery Management Council that regulates our Exclusive Economic Zone with the cooperation of Alaska's fishing industry.

According to Alaska's Constitution, the State's fisheries and other replenishable resources are managed "for the maximum benefit of its people" under the "sustained yield principle". And "wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use".

As you have heard from previous speakers, Alaska has viable aquaculture operations producing a variety of shellfish and enhancing our natural salmon runs. In the siting of areas for shellfish aquaculture, the legislature passed a law defining a threshold for significant standing stock, which must be made available for a harvest before the shellfish farm begins operations. Alaska's regional salmon aquaculture associations release salmon as fry or fingerlings in coastal bays, not in rivers where their return would interfere with natural stocks, and from that point on they are a common property resource available for commercial, sport and subsistence users. Their egg takes, production volumes, and release locations are subject to the authority of the Department of Fish and Game with the goal of enhancement in harmony with natural stocks, not to compete with or replace wild fish.

The precautionary principle is the concept of proving no harm before implementing changes or approving projects, and is a guiding fundamental behind Alaska's fisheries and resource management. The cost of altering a project or not moving forward with a proposed change, to prevent damage, is far less than trying to restore damage that is already done.

Your press release upon forming this task force states "For the first time in history, technology and economic incentives are aligned to bring large-scale agriculture into the oceans". We question whether the technology is yet in place to move forward with aquaculture and still ensure that no harm is done to ocean and coastal ecosystems.

This week, in Norway, the world's leader in marine aquaculture technology, nearly half a million salmon escaped from a single salmon farm, at an estimated cost of almost 5 million dollars. The value of the damage to them is the value of the fish, but if this kind of tragedy happened in Alaska, the value of the lost fish would likely be a tiny fraction of the potential damage to Alaskans who depend year after year on our healthy fish runs. And offshore oil rigs that have been hit hard in the Gulf of Mexico are not a safe center of operations for offshore fish farms.

The U.S. Commission on Ocean Policy, and Pew Oceans commission, both pointed to the need for ecosystem-based management, and called for increased funding for ocean science to better understand these highly dynamic systems. Meanwhile, climate and regime changes are occurring that compound the difficulties in obtaining this baseline science. To introduce large-scale aquaculture to these ocean systems without thorough scientific understanding in place to gauge the effects as they occur is irresponsible. It is very troubling that S.1195 contains very little wording on environmental considerations – less than it includes on the considerations for existing offshore oil platforms.

Progress has been made in some areas of large scale fish farming that were troublesome. Antibiotics are not widely used in the technologically advanced aquaculture operations, having been replaced by vaccines that are cheaper and more effective. And it may seem that the concentration of wastes may be less of a problem in the open ocean than they are in nearshore environments. But the oceans are not limitless and in large scale operations the effects may not be as noticeable but are there nonetheless. The Pew Oceans report noted that the cumulative effects of many sources of non-point source pollution are a huge problem to ocean health, and introduction of large scale fish farms would further this problem. A further problem with cumulative non-point source pollution is that it precludes any meaningful concept of responsibility. Waiting until the fish are gone, then trying to figure out who to blame does not protect the fish. Fish farms need to prove no harm will occur before permitting.

Siting of long term leases or permits for offshore fish farms brings up other problems, in light of changing ocean conditions. A fish farm operator might desire to utilize areas of upwelling to benefit from the availability of a natural free food source. But the ocean environment is fluid and dynamic, different than uncultivated farmland, in that every component of the food chain, from the microscopic to our dinner plates is a necessary component in this complex web of life. We are concerned that placement of large scale

fish farms in areas of open ocean would rob the existing web of life in unpredictable ways.

Near shore fish farms continue to suffer from increased parasites such as sea lice with harm to natural fish stocks that pass through the area, even in the most technically advanced operations. This problem will not go away in the open ocean environment, and would likely affect more fish, less predictably, than in the nearshore farms. With a tremendous increase in investment in science required for ecosystem based management, we may someday be able to pick a site for a fish farm where we can safely assure that no natural fish will be affected, but we are a long way from that level of knowledge now. We feel that the potential environmental impacts justify a thorough Legislative Environmental Impact Statement.

The North Pacific Fishery Management Council has a good track record of looking into the science and economics of fisheries, and taking a precautionary approach to opening new fisheries and management concepts. They have made difficult decisions and set harvest levels in favor of maintaining fish stocks over short term economics. They have a proven track record of good judgement and are the only forum in place for prudent management of our offshore waters. Fishermen will be affected by location and operation of fish farms in areas where they fish or travel. The regional councils should hold management *authority* over fish farm operations, with consideration of the social, environmental and economic effects among other users of the ocean and coasts, not merely *consultation* as included in S.1195.

There should be no exemption from existing labor laws and applicable regulations concerning transportation such as the Jones Act, and no bypassing of regulatory framework in place for our coasts and oceans. State's should have the option to prevent fish farm sites of their shores through coastal zone management plans or other mechanisms. UFA opposes any voluntary regulatory measures for fish farms; all regulations need to be mandatory and enforced.

The term "Exclusive Economic Zone" clearly should preclude foreign ownership.

Species that do not occur naturally in an area should not be considered, as they will escape with unpredictable consequences. Genetically modified fish, even if sterile, still have the likelihood of elbowing out local fish from their spawning beds in ages-old mating rituals where the big fish gets the mate.

Homeland Security Director Tom Ridge spoke of the seafood balance of trade as a top national security priority this spring, but here in Alaska we still have tons of fish that each year are not harvested due to a lack of basic infrastructure and transportation. There is no fish farm technology that can more cheaply produce the "superfood" that is Alaska's pink salmon – for which this year's average dock price of 12-14 cents per pound is a strong uptick – and which is proving to be an important source of non perishable quality protein in government aid programs as we speak. There is much that the federal government can do to help with the seafood balance of trade though infrastructure projects to allow more of Alaska's fish to be harvested and brought to market economically.

In the future, there may be a place for aquaculture in maintaining healthy oceans, but current technology does not adequately protect existing ocean resources from harm from fish farms seeking to grow fish to market size in coastal or ocean waters. It may be worthwhile to look to the model of Alaska's salmon aquaculture programs to raise and release fingerlings with the emphasis on enhancing rather than replacing natural stocks, for a common property resource available to all, and to help restore diminished fish stocks with long life cycles and extended predicted rebuilding times, for the benefit of all Americans. These operations must be consistent with ecosystem based management based on sound science and a precautionary approach. We urge this task force to take a very cautious approach in developing recommendations for national aquaculture standards, and heed the old saying – *first, do no harm.*

Thank you for the opportunity to present, and we hope you enjoy your visit to Alaska.

Mark Vinsel
Executive Director
United Fishermen of Alaska