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State of Alaska Comments on Offshore Aquaculture

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The State of Alaska wishes to share its views on a topic of great importance to Alaskans; the authorization of offshore aquaculture in U.S. waters. Legislation to establish a regulatory framework permitting aquaculture in federal waters has been introduced in Congress and the National Oceanic and Atmospheric Administration (NOAA) is developing a national aquaculture policy. The grave potential ramifications for our wild capture fisheries and the health of Alaska's marine resources compel us to state our concerns.

Alaska has a vital interest in protecting both the North Pacific ecosystem and its commercial fishing industry. Alaskans rely on our oceans for commercial, sport, and subsistence fisheries; recreation; transportation; and other uses. Due to both the region's natural bounty and prudent management, the waters off Alaska are among the most productive in the world. Over half the nation's wild caught seafood is harvested from Alaska waters, generating almost \$6 billion in annual economic activity. The seafood industry is the State's largest private sector employer, supporting more than 50 percent of the basic private sector jobs in dozens of communities on Alaska's coastline.

Alaskans firmly oppose the development of aquaculture in the State's nearshore and offshore waters. In 1990, the Alaska State Legislature passed a law prohibiting finfish aquaculture in state waters. In 2004 and 2005, several town hall meetings and forums were held in Alaska in response to the U.S. Commission on Oceans Policy report, which promoted offshore aquaculture, and the Bush Administration's proposed offshore aquaculture bill. At these events, Alaskans expressed deep concerns about aquaculture in federal waters.

A critical concern is the environmental threat offshore aquaculture poses to the North Pacific ecosystem. Substantial risks are associated with aquaculture activities, such as parasite transmission, escapes/releases that could lead to colonization, and the weakening of wild stock gene pools, as well as other environmental affects.

Alaska allows carefully controlled and regulated salmon enhancement projects in its waters, but imposes strict regulations, including use of local brood stock; requiring marking/tagging of hatchery fish; studies on hatchery/wild interactions; protection of wild stock genetics; prevention of invasive species introductions; and a preference for the preservation of wild stocks in all fisheries management decisions.

Alaskans consider these measures essential to preserving wild stocks and the health of the ecosystem and will not support a federal framework for offshore aquaculture unless it provides similar mechanisms to protect Alaska's natural runs and seafood industry.

Many Alaskans also fear aquaculture's potential impact on Alaska's thriving wild seafood market. The value of Alaska's wild fish products stems largely from market differentiation between wild and farmed seafood. Consumers choose Alaska seafood with the knowledge these products are wild and healthy. The introduction of aquaculture products from Alaska waters could create marketplace confusion, resulting in lost value to Alaska's wild capture fisheries.

For the aforementioned reasons, the State opposes aquaculture off Alaska and has substantial reservations about authorizing aquaculture in other federal waters. As NOAA is developing a national aquaculture policy and/or commenting on legislation, we hope that, at a minimum, the following recommendations are considered.

Alaska's Recommendations Concerning a Federal Regulatory Framework for Offshore Aquaculture

Five Year Moratorium on Offshore Aquaculture Development

Offshore aquaculture has the potential to jeopardize the marine environment and wild capture fisheries. Thus, these activities should not be authorized until adequate research on how aquaculture might affect the ecology of American waters and socio-economic impact analysis has been completed. While some structured studies have been conducted in these areas, a thorough, comprehensive study is needed. Alaska supports a five-year moratorium on offshore aquaculture for this purpose. The moratorium would allow time to conduct the study and evaluate its results.

Clear Framework for Evaluating Environmental and Socio-Economic Impacts

The State supports a clearly defined process for evaluating the environmental and socio-economic impacts of offshore aquaculture activities. This framework should be articulated in detail through legislation. Strong measures are needed to safeguard genetic resources, prevent diseases or parasites in wild stock, and limit species produced to species native to a region. The State has developed strict standards for its own enhancement activities in state waters and believes federal standards should be at least as rigorous as Alaska's standards.

Compliance with NEPA and MSA

The State considers the development of offshore aquaculture to be a major federal action, and thus believes it should be compliant with the National Environmental Policy Act (NEPA), or meet equivalent standards, at all levels. This requirement would help ensure adequate public involvement, as well as a thorough understanding of the activities to be undertaken and resultant impacts. Requiring NEPA compliance assures responsible decision-making through a public process with established timelines and criteria.

In addition, the State believes offshore aquaculture development should comply with the Magnuson-Stevens Act (MSA), the governing fisheries management structure in the Exclusive Economic Zone.

Appropriate Powers for States and Regional Fishery Management Councils

Under a federal aquaculture framework, states must retain the ability to fully protect the waters off their coasts from the negative affects of offshore aquaculture. Each state should have the authority to decide whether to engage in offshore aquaculture and the extent of this engagement. For example, some states may elect to allow offshore aquaculture in adjacent waters for shellfish but not finfish.

Merely granting a state the choice whether to permit offshore aquaculture activities off its own coast, however, is not sufficient to safeguard a state's interests. States must also have the ability to defend against both indigenous and non-indigenous migratory species that may enter their waters after escaping aquaculture operations in the waters off neighboring states. Alaska has already identified the migration of escaped fish from Washington state and British Columbia aquaculture operations to Alaska waters.

To address concerns involving multiple states, regional fishery management councils should possess the authority to evaluate the potential risks and benefits of offshore aquaculture in their areas of jurisdiction. Regional councils have the expertise necessary to make decisions implicating the biological, economic, and social welfare of their region's fisheries. Granting regional councils approval and management authority for offshore aquaculture activities also helps ensure these activities are consistent with conservation and management measures promulgated under MSA.

Banned Aquaculture Production of Certain Wild Capture Species

Alaska supports a statutory prohibition on farming certain species to prevent damaging the existing economy and the Alaska branding image and to protect recent increases in commodity value for these wild species. Specifically, the State encourages prohibiting the production of salmon, halibut, and blackcod through offshore aquaculture. After seeing a glut of mass-produced, farm-raised salmon from other countries drive down prices for its wild product, Alaska worked to distinguish wild Alaska salmon as a high-value brand in subsequent years. The Alaska seafood brand has earned a reputation for the highest quality, natural, wild fish products. Establishing species-specific prohibitions would help ensure that Alaska's marketing efforts are not undercut and that communities that depend on the demand for Alaska seafood products survive.

An Emphasis on Protecting the Wild Capture Industry

The federal government should develop programs to maintain and bolster the economic strength of existing wild capture fisheries. As mentioned above, the growth and development of the global salmon industry dramatically decreased the value of Alaska salmon between the early 1990s and 2002. Average total harvest values fell from \$500 million from 1990-1995 to \$162 million in 2002. Programs should be implemented that focus on market and product diversification for wild capture fisheries with an emphasis on highlighting the important characteristics of wild seafood to prevent similar consequences in other fisheries. These programs could provide improvement to harvesting and processing infrastructure, quality improvement investments, value-added equipment, and marketing funds. In addition, programs may be used to manage the growth of farmed fish production to prevent drastic drops in seafood prices.

Thank you for considering our comments on aquaculture in federal waters. The immense volume and value of Alaska fisheries make them important both to the U.S. and the Alaskan economy, as well as central to the cultures of numerous Alaskan coastal communities. We hope you will keep our concerns in mind as you develop your national policy for sustainable aquaculture.