

*Submitted via [AquaSciencePlan@usda.gov](mailto:AquaSciencePlan@usda.gov)*

September 17, 2021

Dr. Caird Rexroad  
Chair, Science Planning Task Force  
Subcommittee on Aquaculture  
5601 Sunnyside Avenue, Room 4-2106  
Beltsville, MD 20705

Re: Comments on A National Strategic Plan for Aquaculture Research 2021-2025, 86 FR 42776

Dear Dr. Rexroad:

Please accept the following comments on behalf of the organizations below, regarding the National Science and Technology Council's Committee on Environment's Subcommittee on Aquaculture's Science Planning Task Force's "A National Strategic Plan for Aquaculture Research 2021-2025" ("Report").

Industrial ocean fish farming – also known as marine finfish or offshore aquaculture – is the mass cultivation of finned fish in marine waters, in net pens, pods, cages and other confinements. These are essentially floating feedlots in our ocean, which can have devastating environmental and socio-economic impacts. Other forms of aquaculture can also be destructive to habitat and water quality when poorly sited and scaled. We have been closely tracking – and are entirely opposed to – the administration's dedication of significant resources and ongoing push to quickly and recklessly develop and expand potentially destructive and unnecessary forms of the aquaculture industry in the United States

While we appreciate the acknowledgement that there are risks associated with aquaculture, the Report reinforces our deep concerns with the Administration's promotion of marine aquaculture in various forms, without sufficient regard for the wide-ranging environmental, public health, and socio-economic impacts.

Because we are entirely opposed to open water marine finfish aquaculture, we urge you to stop all plans for expansion of this industry in United States' waters, including research into this area, as enough money and resources have been expended on such endeavors for many years, even in the face of massive public opposition.

The promotion of marine finfish aquaculture is troubling; the United States does not have a regular permitting process for marine aquaculture, as it has been widely opposed and unpopular, and thus it has not advanced through legislation or agency rulemakings. Also, federal agencies lack specific authority to permit marine aquaculture. To be allocating resources toward research for development and expansion of marine finfish aquaculture is premature, legally questionable, and irresponsible.

Another notable issue is the lack of discussion regarding impacts for Black, Indigenous, People of Color (BIPOC) communities. BIPOC people have long been ignored and marginalized in scientific data collection, review and analysis, and specifically recognizing, and preventing this should be part of any meaningful scientific plan.

Please see the letter submitted to the Regulatory Efficiency Task Force dated September 17, 2021, attached to this letter, which we incorporate by reference, for a detailed explanation of the many varied concerns associated with offshore marine finfish aquaculture.

As a task force dedicated to scientific research under an administration that has pledged to “follow the science,” we strongly urge you to consider only sustainable and responsible aquaculture development and production in the United States. The task force must devote sufficient resources to studying and understanding the risks and impacts of the industry for the environment, society, and the economy before anything else. This includes both *thorough and separate* review of all forms of aquaculture. Not all aquaculture is the same, and finfish facilities, in particular, pose very different threats and consequences than others.

However, the Report focuses on a utopian view of greatly expanded aquaculture, as evidenced by glowing descriptions of the many benefits of aquaculture, without adequately distinguishing between the different types of aquaculture, and the attendant risks of these different methods. If the task force is truly about good science, it would not include offshore marine finfish aquaculture at all, as it is well known to be problematic. Indeed, other countries, like Canada and Denmark, often considered leaders in the field, are pulling back from the practice due to the many negative impacts associated with it.

Thus, despite the mention of risks in some places, it is very clear that the task force, and federal agencies involved, are prematurely pushing forward the expansion of an industry, about which very little is actually being reviewed and discussed. For example, the Report states that “[a]quaculture offers the United States a tremendous opportunity for economic growth through expansion into aquatic resources not currently used to farm fish, including the Great Lakes or offshore in the Gulf of Mexico or Exclusive Economic Zone.”<sup>1</sup> Targeting certain areas, without any scientific background or analysis, is irresponsible. The global experience with offshore finfish aquaculture should be enough to preclude development of a domestic program.

Additionally, there are concerning statistics relied on in the Report – for example the Report notes that the United States imports 90% of its seafood consumption by value<sup>2</sup> – and that includes items shipped abroad for processing, and then sent back to the United States for sale and consumption. Failing to separately account those values – the amount of seafood that comes to the United States from elsewhere and the seafood we produce, export for processing, and ship back – inflates how reliant we are on food caught elsewhere and misunderstands our seafood economy. Relying on this type of manipulated data cannot result in good scientific analysis.

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<sup>1</sup> Report, at 5.

<sup>2</sup> *Id.* At 4.

As we discussed in our previous comments on the Draft Outline for the National Strategic Plan for Federal Aquaculture Research, 2020-2024, dated April 19, 2019, we again strongly recommend placing a hold on any task force actions, and related activities, that promote offshore aquaculture.

Finally, if the task force moves forward, we recommend that the following action items be implemented before anything else moves forward:

**Goal 1. Comprehensively analyze the risks and impacts of commercial aquaculture in the United States.**

Objective 1.1: Conduct socioeconomic research to discover the impacts that aquaculture would have on marine-reliant industries, coastal economies, and land-based crop production

Objective 1.2: Compile and analyze the range of environmental harms of commercial-scale aquaculture (shellfish, finfish and plants)

Objective 1.3: Research environmental and public health impacts of veterinary drugs and other chemicals used in aquaculture

Objective 1.4: Implement proper mitigation and alleviation strategies, including consideration of alternatives to marine aquaculture, like recirculating systems on land, and elimination of marine finfish aquaculture production from the national strategic plan.

We also recommend transparency be required. This means noticing meetings, encouraging and soliciting public input, and allowing for a meaningful comment period with any future plans. Failing to disclose and notice any work of the task force is problematic, as marine aquaculture affects public resources, meant to be used and managed for the benefit of the public, not just special interests.

Finally, we urge the task force to require that all research carried out pursuant to its work be entirely independent, to ensure that there is no conflict of interest or bias in the analysis and conclusions.

We look forward to engaging further in this process at every available opportunity

Sincerely,

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