



March 31, 2023

Ms. Janet Coit
Assistant Administrator for Fisheries
NOAA Fisheries
1315 East West Highway
Silver Spring, MD 20910

Dear Asst. Administrator Coit,

Thank you for this opportunity to provide feedback on NOAA Fisheries' Draft National Seafood Strategy. Don't Cage Our Oceans endorses the comments of our member organization, North American Marine Alliance (NAMA), and would like to provide additional comments. First, we welcome an open conversation on how NOAA Fisheries can support national seafood systems in a way that benefits people and the planet. Coastal communities, local seaweed and shellfish aquaculture producers, and fishing families should be active designers of these systems, and the economic proceeds of catching and growing seafood should go back to those who live and work in the affected communities.

A Deeper Dive into GOAL 2 of the Draft National Seafood Strategy

Goal 2 of the draft National Seafood Strategy, entitled, "Increase sustainable U.S. aquaculture production," would not normally be a cause for concern when taken at face value. However, our coalition members and allies in coastal communities have witnessed time and time again that the agency is operating with a very loose interpretation of the word "sustainable." Offshore finfish aquaculture has been proven worldwide to be harmful to the ocean ecosystem, and to coastal communities and their economies. The practice, more akin to floating factory farms, exhibits many of the same characteristics of its land-based cousins: massive fecal pollution and excess nutrient discharge, parasitic disease incubation and spread, toxic chemical dosing and overuse of antibiotics, and extremely high carbon-intensive feed inputs.

Research & Development in this field generally focuses on minor, mitigative measures, yet contrary to industry statements, the underlying broken factory farming model of using the ocean as a receiving body for agricultural waste remains the same. The industry mantra that "the solution to pollution is dilution" may have been a wishful hypothesis in the 18th Century, but it is contrary to modern scientific understanding in the fields of oceanography, biology, and microbiology, and undermines the precautionary principle. The entire offshore finfish farming

industry relies upon key decision makers to subscribe to this false mantra for it to succeed in obtaining permits.

For the federal government to endorse and fund offshore finfish farming at the expense of existing small businesses and coastal residents runs contrary to NOAA's mission and does a disservice to all Americans. Furthermore, NOAA does not have the legal authority to regulate aquaculture, as ruled by the U.S. Fifth Circuit Court of Appeals.¹ Offshore fish farming on a large scale will [only benefit massive corporations](#) who are far from needing any extra economic support. This makes NOAA's multi-million dollar effort to fund these agribusiness-backed interests even more shocking; indeed, from 2017-2022, [NOAA spent \\$36.3 million directly backing offshore aquaculture interests](#) via the Sea Grant program, S-K grant program, and SBIR grants. NOAA's Aquaculture Opportunity Area (AOA) Atlas is already attracting the interest of foreign aquaculture companies.

Seafood should not replicate the failures of land-based agribusiness practices

NOAA's strategy makes several broad-stroke claims about seafood being good for people, the planet, and the economy, but this is only true under certain scenarios. Mismanaging our marine resources and deferring to industry's judgment regarding the best ways to privately exploit our publicly-held waters means that we, as a nation, will collectively fail on delivering any of these stated goals. With industrial-scale offshore fish farming, we would *actively harm* public health, the environment, and our coastal economies.

We saw a similar trajectory when the so-called "green revolution" in agriculture favored large agribusinesses with destructive business models. The result was consolidated access to markets, land, and supplies. This shifted our country away from community-based and regional food systems. Our seafood system must avoid those same mistakes. Truly sustainable aquaculture should focus on seaweed and shellfish aquaculture that is community-driven and supported, and land-based *recirculating* aquaculture systems that focus on growing low-impact and more affordable finfish, such as tilapia and catfish. Supporting these forms of aquaculture would be better for the planet and actually feed the people, and must be coupled with an economy that supports a living wage for everyone in the supply chain, not just record profits at the top.

NOAA's AOA process so far has valued profit over people

Currently, the strategy fails to acknowledge that NOAA's stated goals regarding the promotion and development of offshore aquaculture run counter to and directly conflict with the very principles that the agency purports to uplift. People are not being heard. In the recent comments and listening sessions on the proposed Aquaculture Opportunity Areas, the overwhelming majority of comments were in opposition to offshore fish farms. In the Gulf of Mexico and Southern California AOA proposals, only 4.9% and 7.9% of respondents, respectively, actually supported the agency's proposals. Unsurprisingly, these comments came almost exclusively from those who stand to profit from offshore aquaculture. NOAA has a responsibility to listen to

¹ See *Gulf Fishermens Ass'n v. Nat'l Marine Fisheries Serv.*, N. 19-30006, 2020 WL 4433100, (5th Cir. 3 August 2020).

and incorporate feedback from the public as it determines its policies with regard to aquaculture in federal waters. Currently, the American public is not supportive of finfish aquaculture. If stakeholders' input were actually being considered, this public opposition should have halted the AOA proposals dead in their tracks. Instead, the voices of a small but vocal coalition of private interests – including some of the largest agriculture, pharmaceutical, and food service corporations in the nation – have much greater weight in NOAA's strategies and decision making processes. When independent fishermen and coastal communities are unable to meaningfully engage in the management of their fishery or coastal resources, companies with the most resources are empowered to [heavily skew decision-making in their favor](#). The success and monetary profits of corporate fish farm proposals directly rely upon other existing stakeholders to lose out. Coastal economies and marine ecosystems will suffer in order for these profits to be made.

We appreciate the opportunity to provide feedback to this seafood strategy. There are many people in fishing and coastal communities who are excited and determined to ensure our seafood is sustainable - both environmentally and economically - and we hope that their numerous voices are heard over offshore fish farming conglomerates, agribusiness and pharmaceutical companies. There is still time to turn this ship around.

Sincerely,

James Mitchell
Legislative Director
Don't Cage our Oceans