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April 4, 2024

Ms. Gabriela McMurtry
Attn: Aquaculture Economic Development Plan Comments
National Marine Fisheries Service
National Oceanic and Atmospheric Administration
Office of Policy, F/AQ
1315 East-West Highway, 14th Floor
Silver Spring, MD 20910

Via email: AquacultureEcoDev@usda.gov

Dear Ms. McMurtry:

Thank you for the opportunity to comment on the NOAA Fisheries draft Aquaculture Economic Development Plan, Docket Number RTID-0648-XD729, published in the Federal Register on February 20, 2024.

Stronger America Through Seafood is a coalition of industry partners representing the seafood supply chain working in support of increased U.S. production of healthful, sustainable, and affordable seafood. We are grateful for the agency's support of a robust, resilient, globally competitive, and environmentally sustainable domestic aquaculture sector in the U.S.

Aquaculture is the fastest growing food production sector in the world and is responsible for nearly all global supply growth since the 1990s. Today, half of all seafood consumed is farm raised. The U.S. lags far behind the rest of the world in farmed seafood production. As a result, the U.S. imports at least 70% of its seafood. An expanded U.S. aquaculture industry presents a unique opportunity to improve American food security and nutrition, create quality jobs, and ensure that seafood continues to be an important part of the global food supply.

We appreciate the agency's focus on and support for an expanded U.S. aquaculture industry. However, the U.S. federal government's existing statutory authorities and budgetary resources are insufficient to meet the scope of the challenge. In order to build a robust, resilient, globally competitive, and environmentally sustainable domestic aquaculture sector, federal agencies must have clear statutory authority and a timely and affordable regulatory process to establish farms in U.S. waters.

Today, the U.S. lacks both of these essential prerequisites to achieving this goal for aquaculture. No federal agency has clear authority to establish aquaculture operations in U.S. waters. Further, permitting takes decades, even for demonstration projects. This deters investment and drives U.S. aquaculture producers to develop offshore operations in other countries. In over thirty years, not a single commercial-scale finfish farm has made it through the regulatory process.

In order to create the conditions for industry growth, SATS has been working to pass the bipartisan “*Advancing the Quality and Understanding of American Aquaculture Act*” or the “*AQUAA Act*,” a comprehensive, nationwide permitting system for, and management of, marine aquaculture facilities in the Exclusive Economic Zone (EEZ). The bill was introduced in June by Sen. Roger Wicker (R-Miss.) and Sen. Brian Schatz (D-Hawaii) in the Senate and by Rep. Kat Cammack (R-Florida), Rep. Ed Case (D-Hawaii) and Rep. Mike Ezell (R-Miss.) in the House.

As we work to pass federal legislation, there is certainly good work that can be accomplished in support of the aquaculture industry. There are several very worthwhile components of the Economic Development Plan.

SATS finds the following proposals particularly valuable:

- expanded siting analysis for future Aquaculture Opportunity Areas (AOAs) in federal waters
- interagency coordination on National Environmental Protection Act (NEPA) review and Environmental Impact Statements (EIS)
- development of science-based tools and modeling
- workforce training and community planning activities
- expanded financing opportunities through grants and loans
- investments in development of aquaculture technology and transfer
- increased investment in physical infrastructure such as hatcheries and nurseries as well as port facilities and cold storage facilities
- economic analyses of the viability of marine species in the marketplace
- trade policy, market access, and trade promotion to support legal and sustainable U.S. seafood products, and
- community outreach strategies to increase aquaculture literacy among various stakeholders, including the general public, environmental organizations, community development leaders, and Congress.

In addition, enhanced federal research into sustainable feed ingredients and addressing drug approvals for use of therapeutants for marine species will continue to be important, but are not captured in this plan.

Thank you again for the opportunity to comment. SATS stands ready to assist you in working towards a vibrant and expanded U.S. aquaculture industry and a stronger, more resilient seafood sector supported by both well-managed sustainable aquaculture and wild fisheries.

Sincerely,



R. Chris Stock
President