



UNITED FISHERMEN OF ALASKA

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Testimony for House Resources Subcommittee on Insular Affairs, Oceans And Wildlife Oversight Hearing on Offshore Aquaculture

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Thank you for the opportunity to testify. Our perspective from Alaska on a framework for sustainable management of our fishery resources and the habitats that these depend on can simply be stated as “the fish come first”.

United Fishermen of Alaska (UFA) represents 37 commercial fishing organizations, including fisheries of every species commercially fished in the U.S. Exclusive Economic Zone (EEZ) of the North Pacific and the state waters of Alaska. These fisheries represent roughly 60% of U.S domestic seafood production, and are seen as a model for sustainable fisheries management worldwide. The seafood industry of harvester and processor businesses represents the largest private sector employer in Alaska, with many of these jobs located in rural areas that do not have other employment options available. UFA’s mission is “to promote and protect the common interests of the Alaska commercial fishing industry, as a vital component of Alaska’s social and economic well-being.” This social and economic well-being depends first and foremost on the health of our fisheries resources, and on the vitality of the tens of thousands of fishing businesses, with the majority of these being small family businesses spanning multiple generations.

Recognition of the dependency of our state on its fishery resources has been pivotal in Alaska’s development as a U.S. state, and how we manage our resources. The public process based on sound science is the key. Alaska state management through the Board of Fisheries and federal management through the North Pacific Council are based on science, current information, and adaptability, with the overriding idea that the long term health of the resource comes first. The federal Council and state Board of Fisheries processes include local meetings in affected communities, with all stakeholders invited. The inclusion of all stakeholders in the process is essential to acceptance of the outcomes.

Alaska’s legislature banned finfish farming in Alaska in 1990 after convening a task force that studied the risks and benefits. The concerns anticipated at that time, to the ecosystem, fish stocks, and economy, have not been diminished. UFA’s current position is to oppose offshore aquaculture that would grow finfish to market size, however, we are willing to hear the concerns of others and consider any legislation on its merits. As of yet we have not seen legislation introduced that would provide the protections we feel are called for to protect the fragile economies of Alaska and the nation’s fishing dependent communities.

National Standard 8 of Magnuson-Stevens calls for conservation and management measures to take into account the importance of fishery resources to fishing communities in order to:

- (1) Provide for the sustained participation of such communities; and
- (2) To the extent practicable, minimize adverse economic impacts on such communities.

Major shifts in markets in recent memory have hurt Alaska fishing communities, as expansion of industrial scale fish farms raised production to the extent that prices, even for their own farmed fish, decreased by roughly half. We cannot forget that an overproduction of farmed salmon in excess of market demand caused much hardship and dislocation from multi-generational fishing businesses, and severely harmed the social and economic well-being of Alaska.

Now just a few years later, we have a lot to learn from the example in Chile where fish farm growth was most pronounced. Layoffs in the tens of thousands, the widespread disease of infectious salmon anemia, and the use of pesticides that are not allowed in the U.S. and many other markets will continue to plague Chile as evidence that the environmental effects and social and economic well-being were not adequately considered.

Thankfully this is not the story in the U.S. We thank this committee for not rushing forward with previous legislation that did not adequately address the dire risk to the environment, and the social and economic stability of fishing dependent communities.

In setting a national policy for offshore aquaculture, we ask Congress to take existing wild fishery resources, participants and communities into account **as a priority over new industrial offshore aquaculture**, and ensure that development of a potential U.S. aquaculture industry is not simply moving economic activity away from traditional fishing communities and into other businesses.

Congress should ask, along with recognition of the very serious risks to ocean environments and communities, what are the benefits to the public of bringing industrial scale aquaculture to the United States, because these are unlikely to be small business ventures.

We question whether development of an offshore fish farm industry in the U.S. is really likely to improve the nation's seafood balance of trade. Seafood is a global market, and labor, energy, and real estate for processing in U.S. coastal areas may not prove competitive with foreign countries.

We also question whether farming of carnivorous fish to adult size is a net gain in protein or food production, and we remain concerned about the harvest of krill and other important forage from the natural ocean food web to feed farmed fish. Additionally, what are the impacts of alternative feeds, like soy, in the marine environment?

We question whether the introduction of industrial scale aquaculture into the open ocean can be done without negative consequences, based on the volume of fish wastes, and concern that sea lice infections affect wild salmon stocks that pass near concentrated fish farms in British Columbia. We well know that the ocean is not an unlimited receptacle for the wastes of human endeavors.

In addition to a clear priority for wild fisheries, if you deem that the public interest is served by federal legislation for offshore aquaculture, we also recommend that the following be included as essential safeguards in any legislation:

- Programmatic Environmental Impact Statements at the regional level, subject to public comment and regional council approval, before individual site applications are invited.
- Analysis of economic conditions, markets, and effects of fish farm production on the economics of fishing communities. The State of Alaska testified in 2007 here and asked for a five year moratorium on offshore aquaculture for these studies, and they are still needed.
- Consideration of cumulative impacts. It should clearly be stated that a previously approved operation is no basis for any subsequent operation, on the contrary it should be noted that necessary precautions must be taken to ensure no damage from additive impacts of multiple operations.
- A fair playing field. Development funding for aquaculture should have parallel investment in wild capture fishery research, development and technology. If aquaculture operations are provided benefits in U.S. Department of Agriculture programs, we ask for similar treatment for wild harvest producers. If funding is provided for research, management, and pilot projects, we ask that this funding not be at the expense of funding for fisheries research, development and management.
- No siting of fish farms on or near oil production platforms. Previous legislation has included large sections specifically to allow conversion of obsolete energy platforms that would be otherwise be required to be dismantled. The cost that would have been paid for dismantling would be an artificial incentive for development of fish farms.
- No genetically modified species. Beyond the food safety questions that many share regarding genetic modifications, there is no proven technology that is guaranteed to prevent escapes, and the consequences of introducing genetically modified species into natural ecosystems cannot be predicted.
- No non-local species. Alaska continues to host escaped farmed Atlantic from British Columbia with the potential for displacement or interference with wild salmon. We also recommend that industrial fish farming not proceed with species for which there are wild capture species.
- Approval of Regional Fishery Management Councils on proposals that include species covered under existing Fishery Management Plans, or within the area of jurisdiction of a Council. And we ask that you secure the funding that the additional workload and staff for this addition to the Council process.
- Approval of adjacent states to the extent of the EEZ, not only twelve miles. We strongly support the State of Alaska 2007 position on this.
- Ability of states to “opt in” to selectively allow offshore aquaculture activities in the EEZ

adjacent their waters, to ensure that any programs are compatible with the state's fishery management program, where these are developed in longstanding practice.

-The bill should not include phrases such as "to the extent feasible" that undermine requirements. It is not always feasible to conduct an industrial activity while ensuring sustainability of wild fisheries resources, and when not – no permit should be allowed.

-No piecemeal approach. As we represent fisheries in and offshore from Alaska, United Fishermen of Alaska does not have a position on matters before the Gulf of Mexico Fishery Management Council. But we do not favor a "piecemeal" approach that would move forward with individual projects without strong federal protections and a framework for closely researching and addressing the environmental, social and economic consequences on the public, especially communities that depend on fishery resources.

In conclusion, we hope that you will scrutinize this issue with consideration for the social and economic well-being not only of Alaskans but other coastal and fishing dependent communities.

Thank you for listening to our concerns.

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Executive Director
United Fishermen of Alaska



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Executive Director

MEMBER ORGANIZATIONS

Alaska Crab Coalition • Alaska Independent Fishermen's Marketing Association • Alaska Independent Tendermen's Association
Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Trollers Association • Alaska Whitefish Trawlers Association
Armstrong Keta • At-sea Processors Association • Bristol Bay Reserve • Bristol Bay Regional Seafood Development Association • Cape Barnabas Inc.
Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United • Crab Group of Independent Harvesters
Douglas Island Pink and Chum • Fishing Vessel Owners Association • Groundfish Forum • Kenai Peninsula Fishermen's Association
Kodiak Regional Aquaculture Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association
Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel Owner Association
Seafood Producers Cooperative • Sitka Herring Association • Southeast Alaska Fisherman's Alliance • Southeast Alaska Regional Dive Fisheries Association
Southeast Alaska Seiners • Southern Southeast Regional Aquaculture Association • United Catcher Boats • United Cook Inlet Drift Association
United Southeast Alaska Gillnetters • Valdez Fisheries Development Association • Western Gulf of Alaska Fishermen