



Dear Sir or Madam:

The Indiana Soybean Alliance, representing Indiana's soybean farmers, would like to begin by commending NOAA for taking the lead on developing Aquaculture Policy. We fully support their position that no further legislation is required in order for them to regulate a sustainable and vibrant offshore aquaculture industry. The negative seafood trade balance in the United States is well known and it is time for our nation to address this critical need; especially at a time when Federal guidelines are recommending that Americans increase their consumption of seafood.

The United States' agriculture industry and the farmers that form its foundation are global leaders. As a country, we are also blessed with tremendous natural resources. Despite these natural advantages, the domestic aquaculture industry has been stagnant and the lack of a clear regulatory framework has prohibited any development in Federal waters. In an attempt to evaluate the potential to change this dynamic, a group representing state and national soybean checkoff organizations, aquaculture producers and researchers met last year to develop a clearer vision of the prospects for developing domestic aquaculture production in a global economy. The group concluded that both the underlying economic and environmental/sustainability fundamentals are in place to support a domestic aquaculture industry. Not surprisingly, we also concluded that significant technological and regulatory barriers to increasing aquaculture production in the U.S. persist.

In many ways, the technological barriers are easier to tackle. While, it is clear that highly credible science must be the foundation upon which U.S. aquaculture is structured, the review papers and strategic research plans have been written, implemented and updated. There is adequate technological capacity to increase offshore production and, in light of the state of the economy, there is an environment conducive to research and innovation within the Administration and Congress. Innovative aquaculture technologies developed in the U.S. such as monitoring and hatchery technologies, better understanding of the nutrient requirements of fish, improved fish genetics to grow efficiently, effective vaccines for marine species, and bio-based materials in production systems (for example, for netting, filters, and structural components) will continue to be exported.

The regulatory impediments to aquaculture that persist at all levels of government are less tractable. The dialogue around aquaculture characterizes the national dialogue around the balancing act between jobs, productivity, and tax revenue on one hand and a convoluted regulatory environment that does not contribute to human health, the environment or the economy on the other. But in this climate of streamlining regulation to allow business to thrive, we are optimistic that if consumers' concerns are rigorously addressed and the data are made available in a way that is understandable and credible, the availability of safe, locally and responsibly grown seafood can prevail if NOAA continues to provide the leadership.

Therefore, we will continue to support a coherent, environmentally and economically sustainable regulatory framework for aquaculture in the EEZ. We urge NOAA to move forward with an action plan to expeditiously advance fish production in the federal waters. In addition, we ask NOAA to revise the draft policy so that commercial marine aquaculture for domestic seafood production is clearly identifiable as a priority. As drafted, the policy does not provide the clarity that would encourage the private sector to invest in open ocean aquaculture – despite the economic fundamentals.



There is an opportunity to build something unique - American aquaculture that is high-tech, transparent, higher-quality, much fresher, environmentally friendly, safer, and more sustainable; grown in proximity to the most abundant freshwater resources and raw materials for plant protein based fish feed in the world. Not only would a revitalized aquaculture industry provide consumers with products that meet our rigorous quality standards, rural coastal communities with the expertise to produce fish, could be revitalized and unemployment decreased.

The backbone of such a success is the ability of industry and all levels of government to work together. In the past year, the soy industry has taken the lead in strategic planning and coordinating investments in support of domestic production of finfish species. Representatives from DOC and USDA are involved along with those from the aquaculture and feed sectors in this process as it moves toward developing replicable production system(s). We look forward to continuing to work with both agencies and to bringing resources from both the public and private sectors to the table as part of a thoughtful, comprehensive and coordinated approach to supporting growth in the U.S. aquaculture industry. In an effort to highlight this desire to coordinate with private, public and governmental stakeholders, we would like to highlight our support of the **Coalition for Action on Open Ocean Aquaculture** that was submitted by Don Kent, John Corbin and John Forster. We believe the regional management approach suggested by the coalition is the correct approach to manage an offshore aquaculture industry. We also want to clearly encourage NOAA to include very specific language that will allow for scalability and an increase of offshore production within a specific timeframe. In order to be truly competitive, a U.S. offshore aquaculture industry will have to be allowed to grow at a sustainable rate that allows the industry to be economically viable as well as environmentally benign.

We welcome the opportunity to work with any combination of aquaculture industry, feed industry, government regulators, researchers and engineers to identify approaches that would allow private commercial farms to begin an open ocean operation in the near future to demonstrate the environmental and economic sustainability of aquaculture in federal waters. The U.S. is the #1 producer of compound feeds and of feed ingredients that are alternatives to fishmeal and fish oil. For 20 years, U.S. soybean farmers have invested in developing soy-based feeds and sustainable aquaculture production. Worldwide, our organizations work with fish farmers to improve their production capabilities with sustainable production methodologies and feeds that minimize the demand for fishmeal and fish oil. U.S. soybean farmers are well positioned to apply these feed technologies in U.S. waters.

We appreciate your consideration of our views.

Sincerely,

A handwritten signature in black ink that reads "Steven Hart". The signature is written in a cursive, slightly stylized font.

Steven Hart, Ph.D.
Director of Aquaculture