



Northwest Aquaculture Alliance
P.O. Box 8562
Covington, Washington 98042
206-963-6478

June 8, 2020

Laurie Niewolny, Water Quality Program
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504

Re: Cooke Aquaculture NPDES Permit Modification Request

The Northwest Aquaculture Alliance (NWAA), an organization of producers and support businesses in Washington, Oregon, Idaho, Montana, and British Columbia that share a commitment to responsible aquaculture and a robust Blue Economy, appreciates the opportunity to support our member, Cooke Aquaculture Pacific (CAP), in its permit modification request.

We believe it is important to state for the record that our predecessor organization, the Washington Fish Growers Association, worked hard to defeat HB 2957 as a politically driven decision with no scientific evidence to support it. But the law passed; the Governor did not listen to our pleas to veto the legislation, and the rest is history.

Given this challenging situation, we at NWAA applaud Cooke for finding a way to “make aquaculture work” here in Washington, and for continuing to advocate for its 60 direct employees, 25+ contract processing workers, and suppliers of goods and services that benefit from CAP’s presence here.

Here is the current situation:

The United Nations Food and Agriculture has just released its report, State of the World Fisheries and Aquaculture 2020 (attached to this document), highlighting the growing importance of aquaculture in feeding a growing world population. An interactive version can be accessed here:
<http://www.fao.org/state-of-fisheries-aquaculture>

Add to this very important report the fact that the COVID-19 pandemic is now shining a spotlight on the need for food security—as never before—and the recently issued Executive Order makes it clear that aquaculture will be an important part of US food security strategy going forward. And so, we in this state must decide: Will we continue to import the seafood we consume, or will we—in a responsible way—produce it here?

The Washington State Department of Ecology must decide, based on the science, whether the switch in species from Atlantic salmon to sterile steelhead trout will affect water quality (and the science presented by fish nutrition experts makes it clear that there is little or no difference—or as Dr. Ronald W. Hardy asserts, the difference “favors trout”)—we believe that moving forward with marine aquaculture is *the environmentally responsible choice*.



Northwest Aquaculture Alliance

The fact is, by the year 2050, the world population is expected to exceed 9.8 billion people. In terms of what we need for food, that translates into needing 50 percent more protein than we produce today.

What can we grow or produce in 30 years that will not impact the climate? Terrestrial agriculture requires land and water; many thoughtful food futurists believe that the only way to increase food production without causing irreversible harm to the Earth is to reduce our dependence on land-based proteins and increase our consumption of plant-based foods...and seafood.

And much as we all love the wild—salmon, halibut, cod, shellfish—the fact is, there are not enough fish in the sea to feed the growing protein demand. The most logical and environmentally friendly solution is, indeed, the only solution that works. Aquaculture.

It is estimated that by 2030, some 60 percent of the seafood we eat will come from aquaculture. The question is: Will Washington state reap the benefits of this food production system, or will we continue to import much the seafood we consume?

Yes, aquaculture has impacts. All food-growing systems do. And aquaculture has its detractors. But the environmental impacts of aquaculture—including net pen aquaculture—are small compared with other food growing systems. And the detractors, in most cases, are relying on decades-old ways of growing fish. Aquaculture is an evolving, ever-improving business, reliant on technology, feed improvements, and skilled labor—as never before.

Cooke Aquaculture Pacific employs 60 people, largely in rural areas where family-wage jobs are desperately needed. In Seattle, Cooke is responsible for the year-round jobs of approximately 25 processing workers. In addition, CAP purchases a range of products from feed companies, egg producers, technology companies, veterinarians, and other support services. Retailers and foodservice establishments up and down the West Coast purchase CAP's Best Aquaculture Practices (BAP)-certified salmon, reducing the trade deficit that currently exists in seafood. In short, CAP in this state has been an important part of the Blue Economy that is growing throughout the United States (and the world), to the benefit of the people who produce the product as well as consume it.

Our view is that the proposed amendments to CAP's Washington state NPDES permits would make it possible for Cooke to continue to operate—which we support as necessary for the rural economies where their facilities are located. We would like to see an outcome in which CAP is able to invest in renovated facilities, farming sterile, all-female rainbow trout (steelhead).

This would allow Cooke to continue doing what it is doing all over the USA: contribute to a domestic supply of healthy seafood and the strengthening nation's working waterfronts. As many experts have pointed out during this comment period, the switch to sterile, all-female rainbow trout will have no impact on the level or nature of any nutrients released into the local environment.

Because Washington state has done extensive research and monitoring of net pen operations in the state, and because current regulations on any discharges from net pen operations are among of world's most stringent, we believe that the proposed permit modification—required by those regulations—should be granted. In the process of making its decision, we urge the Department of Ecology to discount the many ill-informed comments that have been placed into the record.



Northwest Aquaculture Alliance

On behalf of our fish and shellfish grower members as well as the many companies involved in supplying our producers, we urge you to take a broad view of this request and grant Cooke Aquaculture Pacific the permit modifications the company is seeking.

Thank you again.

Sincerely,

Jeanne McKnight

Jeanne McKnight, Ph.D.
Executive Director

Attachments: UN Food and Agriculture Report, STATE OF THE WORLD FISHERIES AND AQUACULTURE 2020 (SOFIA).