

Maine Aquaculture Association

June 7, 2020

Comments in SUPPORT of Cooke Aquaculture application to modify WA state NPDES permits. The Maine Aquaculture Association (MAA) is the oldest state aquaculture association in the US. Our members grow finfish, shellfish and sea vegetables using a variety of methods, in both fresh and saltwater, on the land and in the ocean. Cooke Aquaculture has been a member of MAA since they acquired the assets of several pre-existing salmon net pen operations here in Maine. Upon the acquisition of those assets Cooke Aquaculture began to immediately to invest in the upgrade of those operations and as a result has achieved several environmental recognitions.

Cooke Aquaculture was an early participant in the development of the MAA Code of Practice, MAA Biosecurity Management Program (BMP), and the MAA Containment Management System (CMS). Both the BMP and CMS were the first of their kind in the world and were developed in cooperation with several environmental groups and state and federal regulators. The MAA BMP and CMS have subsequently formed the basis for several the international sustainability certification programs and regulations in a number of other states and countries. Since that pioneering work, Cooke has continued their sustainability work and pursued certification under a number of these independent programs. For example: Cooke Aquaculture submitted its salmon farms to audits by independent, third-party certification bodies beginning in June 2011. By March 2015, Cooke Aquaculture had achieved four-star Best Aquaculture Practices (BAP) status, one of only three salmon-farming companies in the world to do so at the time. Four-star BAP status is the highest achievement in the BAP program, requiring a combination of the company's processing plants, farms, hatcheries and feed mills are BAP certified. BAP is the world's most comprehensive aquaculture certification program, with standards encompassing environmental responsibility, social accountability, animal health and welfare, and food safety. Processing plants, farms, hatcheries and feed mills must demonstrate 100 percent compliance to these standards in an annual audit to attain BAP certification.

Cooke Aquaculture has also made strides in greatly reducing the use of antibiotics, and in the development of nonchemical sea lice management methods. Several of its salmon hatcheries and farms were third party audited last year to verify that no antibiotics were used throughout the entire life cycle of those fish. This has not yet been achieved for all salmon produced by Cooke Aquaculture, but they are a clear leader in responsible use of therapeutants and novel animal health management methods. Another good example of Cooke's dedication to excellence, community and environmental sustainability is their upgrade by the Monterey Bay Aquarium Seafood Watch program.

It is unfortunate that the Cooke Aquaculture salmon farm in Washington suffered damage and fish escapes shortly after it was acquired and before the facility could undergo planned renovations. Cooke's track record here in Maine shows that they invest significantly to upgrade any operations they acquire. Often existing regulations or permit conditions unintentionally slow down their ability to upgrade a facility and innovate to more sustainable production methods. While there is no evidence of any lasting ecological impact of the fish that escaped from the farms in Washington state, the blanket prohibition of the culture of Atlantic Salmon in the state was clearly a political decision driven by emotion not by science. Ironically the prohibition of culturing a non-native

finfish species is clearly inconsistent with state's policy of actively supporting the commercial culture of non-native shellfish species.

The Coller Fairr Protein Index, which ranks protein producers on material environmental, social and governance issues against the United Nations Sustainable Development Goals, ranks aquaculture at the top for sustainability. Some players in the global seafood arena have gone above and beyond the call of organizations like the United Nations, and Cooke Aquaculture is such a player. While half of all the seafood we eat in this country is farmed, the U.S., unfortunately, remains a comparatively minor aquaculture producer. This needs to change. The National Oceanic and Atmospheric Administration says, "aquaculture in the United States contributes to seafood supply, supports commercial fisheries, restores habitat and at-risk species, and maintains economic activity in coastal communities and at working waterfronts in every coastal state." Sustainable aquaculture growth can benefit not only economic and environmental health but public health as well. The U.S. Dietary Guidelines recommend Americans eat at least two to three servings of seafood per week, but we eat, on average, just one. A Harvard University study shows low seafood intake is responsible for 84,000 preventable deaths a year in this country. Positive nutrition outcomes coupled with economic and environmental benefits make aquaculture an important aspect of our food security. Aquaculture is a science-based business and relies on veterinarians, biologists and environmental scientists for advice and oversight of everyday farming practices.

The proposed amendments to Cooke's Washington state NPDES permits would allow Cooke to continue to operate and invest in renovated facilities and use sterile steelhead trout. This would allow Cooke to contribute to a domestic supply of healthy seafood and the strengthening the states working waterfronts. The use of sterile steelhead trout will have no impact on the level or nature of any nutrients released into the local environment. Washington state has done extensive research and monitoring of net pen operations in the state and the current regulations on any discharges from net pen operations are some of the strictest in the world. The proposed permit modification is required by those regulations and as such should be granted. Having read most of the comments submitted so far it is astounding the level of misunderstanding and intentionally inflammatory misinformation that is being allowed into the record. I strongly urge the agency to view these comments for what they are and to discount them as nothing more than scare tactics designed to politically pressure the agency. I strongly support the proposed permit amendments and encourage the agency to make its decision based on science not emotion or political pressures from special interest groups who push the "send button" on e mail campaigns designed to support their fundraising efforts.

I would be glad to answer any questions the agency has with respect to Cooke's long track record of environmental leadership here in Maine.

Respectfully Submitted
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