

Northwest Aquaculture Alliance

October 26, 2020

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

Re: Comments on Ecology Draft Permit Modifications for Cooke Aquaculture Pacific

Dear Ms. Niewolny:

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 comment on the DRAFT revised permits for Cooke Aquaculture Pacific (CAP), a global industry leader in sustainable seafood production for both wild and farmed species.

First and foremost, we are pleased that the agency has correctly concluded, based on best available science from leading researchers from the public and the private sector, that little or no difference exists in feed utilization and nutrient waste production between Atlantic salmon and rainbow trout/steelhead. This finding of fact should clear the way for a swift granting of permits so that this company can get back to doing what it does best: Producing high-quality, high-value, nutritious seafood for human consumption, creating well-paying jobs along the way.

At the same time, however, we urge the Department of Ecology to use restraint by not requiring CAP or any company in a similar situation to divulge proprietary information to the state. We see this as a dangerous precedent, and we respectfully request that the agency avoid adding additional new requirements or constraints on this company's existing permits.

We are all aware that there are very vocal groups in this state that do not support having net pens in state waters. However, it should be noted that commercial net pen aquaculture has been going on in Washington waters for more than 30 years. Today, in fact, several tribes are growing salmon for their delayed release fish enhancement projects by using net pens in the early life stages of their fish.

Technology has made this form of farming—in the water—the most sustainable, environmentally friendly form of food production of all types of protein production. As the federal government works toward its vision of farming in the open ocean, and seafood companies look to both offshore aquaculture as well as experimental land-based fish growing operations, the reality is that marine aquaculture worldwide remains one of the most efficient, environmentally responsible, and sustainable ways to produce the protein the world needs.

As our organization's diverse membership shows, the business of aquaculture is heavily dependent on science. To grow any kind of finfish (or shellfish), growers rely heavily upon science—including genetics, breeding, animal health, veterinary medicine, and nutrition, to name just a few areas of

study.

It is also heavily reliant on technology, including but not limited to the use of computers and underwater cameras that make sure no feed is being wasted to robotics to GPS systems. Companies like Cooke continue to embrace new technologies that help grow much-needed protein more efficiently, allowing producers to monitor the fish growing process through their entire life cycle.

In addition, feed companies have also embraced innovation, creating fish feeds that minimize the use of marine ingredients, increase the digestibility, and meet the exact nutritional requirements of the fish stocks at each stage of the growth cycle. We have come a long way as an industry and companies in our organization—particularly CAP in this instance—are leading the way in being stewards of the environment.

Finally, if the COVID-19 pandemic has taught us anything, it is that we as a state, region, and country need to put ourselves in the position of being food secure. That means, among other things, "growing our own" rather than importing. It means encouraging the development of rural natural resource jobs, of taking pride in what we grow in Washington's lands and waters.

Aquaculture is the future, and we in Washington are at a crossroads. We can either lead, follow, or get out of the way and let our food come from other countries where regulations may not be as stringent as those in the United States. There is no reason the United States cannot cultivate its own seafood resources and businesses right here at home in our own waters.

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 are hopeful that Cooke Aquaculture Pacific will be granted the permits it seeks to begin to supply local and regional markets once again.

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 permits to begin operating, and to do so in an expeditious manner.

Thank you.

Sincerely,

Jeanne McKnight, Ph.D.
Executive Director
Northwest Aquaculture Alliance
P.O. Box 8562
Covington, Washington 98042 USA