

ProFish International Inc

My comment letter is attached in the uploaded files (2 pages)



October 26, 2020

Laurie Neiwolny, 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:

This letter is in full support of the request by Cooke Aquaculture Pacific (Cooke) to modify its existing permits to allow the company to switch the species it is cultivating from Atlantic salmon (*Salmo salar*) to triploid rainbow trout, also known as steelhead, (*Oncorhynchus mykiss*).

I am the sole owner and Chair of ProFish International Inc., a Washington State corporation which was founded in 1983. Our principal involvement has been in the Bering Sea pollock fishery. In 2008 we expanded our involvement in the seafood industry with the formation of a tilapia farm in Peten, Guatemala. Our grow-out operations are conducted in cages situated in a large lake, Lago Izabal. We have successfully operated in full compliance with environmental permit requirements required by the Ministerio de Ambiente y Recursos Naturales (MARN).

I am a certified fisheries biologist who was employed by NOAA for fifteen years prior to entering the seafood business. I also have served 9 years on the North Pacific Fishery Management Council, six of which as Vice Chair.

It is noteworthy that following a full review of public comments and statements by leading scientists in response to the posting of Cooke's request for its permit modifications, the Department has concluded that *little or no difference exists in feed utilization and nutrient waste production between Atlantic salmon and rainbow trout/steelhead*. Considering that both species are Salmonids and have strikingly similar nutritional needs and metabolic processes, it would be surprising if a contrary conclusion were reached. Certainly, the conclusion of *little or no difference* fully supports the species change requested by Cooke.

In looking to the future, it should be noted that there currently is considerable research being conducted by feed companies and those raising fish in cages and elsewhere directed at improving feed conversion rates (FCRs) and further reducing metabolic and excrement waste. This research is being driven by efforts to improve the economics of aquaculture operations themselves, but also in response by aquaculture companies themselves to be good stewards of our environment and produce nutritious protein for an expanding world population. Cooke has been a leader in these efforts for which we can expect continued improvements in feed utilization and waste reduction.





It is truly unfortunate that we still see opposition to aquaculture operations in Puget Sound from those who do not want to see them in our waters under any conditions. This opposition is largely based on false information, hearsay and untruths devoid of sound science and objective reasoning. The development of aquaculture in Washington state is vital to our food security and public health. Denying the development of aquaculture in Puget Sound only hurts our regional economy, particularly in rural areas, and our native tribes that are trying to develop responsible aquaculture operations to support their communities and replace salmon production lost over the years.

In conclusion it is quite apparent that the scientific literature clearly demonstrates the remarkable similarities of Atlantic salmon and rainbow trout/steelhead in feed digestion, growth and excretion of excess feed nutrients. Therefore, on the basis of these important metrics the request by Cooke Aquaculture Pacific to modify its existing permits to allow the company to switch the species it is cultivating from Atlantic salmon to triploid rainbow trout/steelhead should be approved.

Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "W. Pereyra".

Walter Pereyra, Ph.D.
Principal and Chair
ProFish International Inc.



