

# Tommaso Shellfish

Dear Alaska Department of Environmental Conservation,

We are writing this letter to ask that you reconsider and take no action on the proposed regulation changes to Title 18 Chapter 34 of the Alaska Administrative Code, Seafood Processing and Inspections. The proposed fee increases are for laboratory analysis and testing for paralytic shellfish poisoning (PSP) toxin and shellfish growing water.

Small farms and local businesses will be hurt the most by this fee increase. Many people invest their own capital into building and establishing a Mariculture farm while supporting the rural local economy with their production of oysters. This fee increase will take away from profits needed to maintain operations of an oyster farm leading ultimately to closure.

The intended increase in fees for paralytic shellfish poisoning (PSP) toxin testing and analysis from \$125 to \$312 will further rub salt in the wounds of Alaskan Shellfish Growers.

We are already facing unknown times with the impact of COVID-19. The COVID-19 pandemic has forced Alaskan business and restaurants to temporarily close their doors as well delay summer tourism and travel. All these closures and delays contribute to revenue loss with further uncertainty as to when this pandemic will subside and businesses will be able to return to normal operation.

Safe consumption of shellfish is the number one priority to commercial shellfish growers and we need lab testing to be affordable (with farms in remote locations paying up to \$100 in shipping fees per test sample through airlines). During peak summer season, samples are sometimes sent more than once a week to ensure quality and safety meets with customer demand. With an increase in testing fees and potential for farmers to pay the full amount (shipping lab fee) will inevitably lead to the risk of untested product being sold to consumers with potentially dangerous outcomes and risks the reputation of Alaskan Seafood as a whole. We are in an already unstable health crisis and potential huge economic setback. This is a risk Alaska cannot take, and puts unneeded pressure on the farmers themselves.

We appreciate everything the Alaska DEC Laboratory provides and ask that you to please keep us and the many other Shellfish Growers in Alaska in mind.

Thank you.