March 9, 2023

Ms. Janet Coit
Assistant Administrator for Fisheries
NOAA Fisheries
1315 East West Highway
Silver Spring, MD 20910

Dear Assistant Administrator Coit:

Thank you for the opportunity to comment on NOAA Fisheries' Draft National Seafood Strategy (Strategy). Stronger America Through Seafood (SATS), an industry coalition that advocates for increasing Americans' access to healthful, sustainable, and affordable seafood, applauds NOAA Fisheries for recognizing the need to increase U.S. aquaculture production. Our members include seafood processors and distributors, feed ingredient suppliers, aquaculture farmers, technology providers, and capital partners. With supply chain disruptions due to COVID-19 and uncertainty for wild capture in the face of climate change, it has never been more important for the U.S. to diversify its seafood supply through U.S. offshore aquaculture. The growth of domestic aquaculture is an important part of a holistic approach to a more diverse, sustainable, healthful food strategy.

SATS fully supports Goal Two of the Strategy which calls for increasing sustainable U.S. aquaculture production. We applaud the agency's plan to accelerate progress towards an efficient, predictable, timely, and science-based regulatory framework for marine aquaculture. Further, we recognize the value of NOAA Fisheries' science-based advice and tools and coordinated, applied scientific research in support of sustainable industry development. We encourage the continued progress in these areas.

Responsible marine aquaculture has the potential to feed a growing population, mitigate climate change, increase the resilience of the global food system, and be a major economic engine for the country. The U.S. aquaculture supply chain supports many American industries on land and sea. If we expanded the industry to the deep Pacific and Atlantic waters off our coasts, it would boost the fish feed market and seafood retail businesses and supply restaurants, markets and grocery stores with locally grown, sustainable seafood. In addition to boosting growth for the seafood industry, American aquaculture would provide a new market for U.S. farmers, specifically for crops such soybeans, corn and peas, which can be used to create fish feed and ease pressure on ocean resources. The growth of aquaculture production would also spur job creation and revenue across the country and lessen dependence on the uncertainty of foreign trade relationships.

Further, offshore aquaculture has been recognized as one of the most resource-efficient methods for producing animal protein. Modern science and technology have helped make the production of sustainable seafood possible, fueling the growth of the aquaculture industry worldwide. With a far

lower environmental impact than most terrestrial means of food production, aquaculture has been identified as a remedy to address threats to global food security resulting from climate change and a growing population.

Use of advanced technology combined with careful management and science-based techniques, continue to build the case for aquaculture as a safe and environmentally responsible way to produce seafood. Applications of emerging technology in aquaculture, such as AI and machine learning, computer vision, sensors, and biotechnology, help fish farmers produce healthy fish efficiently and sustainably. We support NOAA Fisheries' commitment to providing science-based advice and tools to minimize potential effects of an aquaculture operation on the environment and conducting applied scientific research in support of sustainable industry development.

There is great potential for expansion of U.S. marine aquaculture where vast expanses of favorable growing areas with suitable depths, current speeds, temperatures, and access to ports create some of the highest production potential in the world. **However, the lack of a comprehensive, nationwide system for permitting in federal waters is limiting the development of U.S. marine aquaculture farms. Few venture capital investors and even fewer entrepreneurs are willing to invest without the certainty of obtaining long term permits or licenses.** The agency's focus on developing an efficient, predictable, timely, and science-based regulatory framework for marine aquaculture is essential to creating a thriving offshore aquaculture industry and the benefits it provides.

SATS supports a clear permitting process for U.S. marine aquaculture that also prioritizes environmental and societal health as provided for in the bipartisan Advancing the Quality and Understanding of American Aquaculture (AQUAA) Act. For example, the proposed AQUAA legislation would establish National Standards for Sustainable Offshore Aquaculture which, like the National Standards for commercial fishing outlined in the Magnuson Stevens Act, are guiding principles for growing coastal economies, protecting ecosystems, and avoiding conflict among stakeholders. AQUAA leverages modern siting and monitoring technologies to mitigate potential environmental impacts. It also provides for strict federal enforcement and includes a process for robust public input which ensures that coastal communities and states are considered prior to permitting new operations. In short, AQUAA provides much-needed regulatory certainty for U.S. marine farmers while also preserving the environment, local economies, and public health.

Thank you again for recognizing the importance of a thriving U.S. aquaculture industry to the seafood economy and the resilience of the seafood sector in the face of climate change and other stressors. We appreciate the opportunity to comment.

Sincerely,

Drue Banta Winters
Campaign Manag**er**
Stronger America Through Seafood