

February 1, 2016

Michigan House of Representatives  
Natural Resources Committee  
Anderson House Office Building  
124 North Capitol Avenue  
PO Box 30014  
Lansing, MI 48909-7514

RE: Opposition to HB 5255

Hello,

My name is Robert Devine and I am the President and Owner of Coldwater Fisheries. I'm a farmer. I farmed beef cattle for 20 years and now have farmed Rainbow Trout for the past 22 years. Farmers have always operated on proven science, no "Political" Science when it comes to protecting the environment that a Farmers Livestock lives in which will be sold for human consumption.

Coldwater Fisheries is a family owned aquaculture business established in 1988. We have a total integrated fish farming operation except for broodstock – from hatchery to grow-out to processing. We produce an average of 4-6 million pounds of rainbow trout in the 2-4 pound range per year. We employ 100-120 people across Nova Scotia, Newfoundland, Prince Edward Island, and Ontario. We supply large retail chains including Costco & Sysco. We continually strive to be the best in customer satisfaction and produce the highest quality products on the market.

We are interested in expanding operations in the U.S. especially Chicago and Milwaukee markets. We want to help and bring our expertise to Michigan and grow Michigan food for Michigan people. We continue to believe the best way to study the science and impact on the Great Lakes is to conduct a controlled pilot project and we are willing to work with you and provide our expertise and financial resources to do this.

There are some points I ask you to consider as you determine your recommendations:

- Net Pen farming is not new to the Great Lakes it's been happening since the 1980's and Trout farms in Ontario are regulated by 26 different federal, provincial, and municipal authorities to ensure that they maintain the highest standard of environmental responsibility. Farms are zoned and managed by Best Practices. Over 20 years of testing by authorities has resulted in, NOT ONE REQUIRED

CHANGE of our farming practices for any reason.

- Fish Farms support the Commercial and Sports fishing Industries. Our farms must enhance the environment for all wildlife. It has been proven that the best location to place nets or cast a line is in the vicinity of a farm. Governments license the taking of wildlife through quota systems in order to preserve the species for future taking. Farmers want all their livestock to be harvested.
- Net pen Farming has the smallest foot print of all the farming sectors. The land required is the smallest per tone of all farming sectors.
- The years of work done by Canadian Department of Oceans and Fisheries on the effects of net pen farming on wildlife has proven evidence of better conditions in wild fish near cage sites. Phosphorus dissolved material is quickly diluted and dispersed into surrounding water. Particulate material deposition is more localized.
- Every effort is made to locate pens in areas that maximize the health of all fish, wild and farmed, as well as maximize the effect of the farm impact for the benefit of the Resort Industry, Tourism, Residential as well as Commercial Fishing. Areas where there is already an impact from Human activity are not conducive to fish farming because of previous negative impact on the water quality
- The construction, location, and fish density of the net pen design is done in a way to minimize any environmental impact to the area. There is a very thorough process that goes into siting a pen, and proper zoning and permitting takes place. There are profile and visual requirements managed by the Canadian Coast Guard. The net pens can't be huge, or blaze orange – they have to blend in with the natural environment. The goal is for them to be no more obtrusive than a navigational buoy. Just like proper zoning is needed in land for farms, the same thing is done for farms in the water.
- Rainbow Trout is already a species in the Great Lakes. We purchase our disease free certified eggs from Trout Lodge in WA. They are Rainbow Trout triploids - all females. The fingerlings aren't introduced in the water until they reach the right size. Typically, fingerlings are introduced into the cages in May or June and by Christmas the fish have reached one pound. The goal is to market fish that are 2.5 pounds in size.
- The trout are constantly monitored and tested for disease. Coldwater Fisheries has not administered one antibiotic in the past 5 years. If needed antibiotics would be administered under veterinary prescription and supervision. Diseases usually transfer from wild fish to farm fish. There have not been any documented cases in Canada of farm fish transferring disease to wild fish.
- Feed and feeding techniques are very important elements of Net Pen Aquaculture.

Feed suppliers are highly regulated and experienced in manufacturing pet food and feeds for livestock and poultry. Fish feed is composed primarily of fishmeal (herring or anchovy), fish oil, soybean meal, and a healthy diet of vitamins, minerals and beta-carotene. This diet closely approximates the diet of wild salmonids to ensure that the outcome is a fillet with fresh, bright color and excellent quality characteristics. To ensure maximum freshness, the fish are harvested to order and immediately chilled to the core. The fish are processed within hours and shipped out the same day.

- Advances in feed technology and feeding techniques ensure that the correct amount of feed is given for the number of fish in the pen and that the feed is formulated to so that the fish absorbs the maximum amount. Feed that is not eaten is money wasted by the farmer.
- Every effort is made to minimize escaping. The trout are contained in nets. Nets and infrastructure are monitored regularly and before and after major storms. The consequences are loss of the fish, sports fisherman could catch the trout, or the fish could die.

I would like an opportunity to address the concerns that interested parties have and welcome you to visit our Coldwater Fisheries facilities. We welcome the opportunity to work with you in this controlled pilot in order continue the improvement of the industry.

Sincerely,

*Robert Devine*

Robert Devine  
President and CEO  
Coldwater Fisheries

