February 8, 2016

TO: Chair LaFontaine and the House Natural Resources Committee
RE: Testimony in support of House Bill 5255

West Michigan Environmental Action Council supports House Bill 5255 as introduced.

Commercial Net Pen Aquaculture would contribute pollution to the Great Lakes
Net pen aquaculture would release untreated waste directly into the Great Lakes and could jeopardize local fish populations. There are several pollutants at issue, but the use of parasiticides is of particular concern. Its effects have already been seen in other US aquacultures, such as Maine's salmon aquacultures. Parasiticides, which are toxic to marine invertebrates, can remain in the water for up to five hours and travel up to half a mile[1]. Concentrated fish pens create concentrated areas of pollutants and degrade the local environment.

Nitrogen and phosphorus are also of concern, potentially contributing or causing algae breakouts. The enormous amount of pollution that these fish farms can generate has caused at least one existing Ontario operation to close. These floating cages allow feces, waste feed, disease and parasites to pass through the nets and into the surrounding waters.

Monitoring of Commercial Net Pen Aquaculture is Difficult and Carries Significant Ecological Consequences
MDEQ, MDARD, and MQOL released a report on the science of aquaculture in October of 2015 to provide insight and management recommendations should Great Lakes aquaculture be approved in Michigan. The report gives an overview of Great Lakes aquaculture and details a number of concerns that even the best adaptive management practices cannot properly measure or control.

Hazards such as disease outbreak; disease can lead to upwards of 90 percent mortality in wild fish and the detection and containment of such diseases is difficult and costly. The report states that, "without large fish kills, determining which diseases or pathogens occur in wild fish populations is extremely difficult."

Escapes are also a concern. Interaction of aquaculture species with native populations has ecological consequences. New species can outcompete native species and damage the native population, which is vital to the sustainability of the ecosystem. The report states "that escapes can and will occur."

Potential economic benefits outweighed by economic risk
WMEAC understands the potential economic benefits of fish farming are attractive, but benefits must be weighed against costs and risk. It is possible that commercial net pen aquaculture would do more economic harm than good. The proposed fish farms would generate approximately 44 new jobs, and while we would expect the industry to grow, that growth could come at the expense of fishing activities.

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[1] Goldberg, Rebecca J., Matthew S. Elliot, and Rosamond L. Taylor. "Marine Aquaculture in the United States: Environmental Impacts and Policy Options." Marine Aquaculture in the United States: Environmental Impacts and Policy Options. Pew Oceans Commision, n.d. Web. 08 Feb. 2016.

Sport fishery in the Great Lakes alone generates 38,000 jobs and adds $4 billion to the economy each year[2].

Net pen aquaculture in the Great Lakes would also put existing, environmentally friendly fish farms at a disadvantage.
Existing, self-contained fish farm operations pay the cost to capture and treat the waste they produce, rather than releasing it into a public body of water. Responsible fish farming includes farms with man-made ponds or above ground tanks. Net pen farms in the Great Lakes would pass this cost on to the public, other Michigan industries and the environment by releasing waste into the surrounding waters.

The West Michigan Environmental Action Council supports the passage of House Bill 5255 prohibiting net pen aquaculture in the Great Lakes.

Sincerely,

David Porte
WMEAC Policy Intern

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[2] Hammond, Sean. "We Must Keep Factory Fish Farms out of Our Shared Waters." Grand Haven Tribune. Grand Haven Tribune, 15 Jan. 2016. Web. 08 Feb. 2016.

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