

Sea Grant Association

November 30, 2006

Dr. Michael Rubino
Manager, NOAA Aquaculture Program
National Oceanic and Atmospheric Administration
1315 East-West Highway, Rm. 13117
Silver Spring, MD 20910

Dear Dr. Rubino:

On behalf of the Sea Grant Association (SGA), I am pleased to offer comments on the *Interim Final 10-Year Plan for the NOAA Aquaculture Program* (November 2006). NOAA is to be commended for recognizing the overall contributions of aquaculture to the economy of this nation and the health of its citizens. Through this 10-year planning process, NOAA has an opportunity to usher-in a new era of safe and sustainable seafood production by providing a regulatory framework that balances resource use and conservation. In addition, we hope this planning process will yield a mechanism upon which current aquaculture research, outreach, and education capabilities can be nurtured, which can in turn lead to economically viable and ecologically sustainable aquaculture.

The NOAA National Sea Grant College Program has a 40-year track record in support of aquaculture research, outreach, and education activities which are well-respected by the industry, far-reaching in their application and, importantly, largely inline with many of the points made within the interim 10-year plan. The Sea Grant network has addressed the industry's information needs in many areas, including seafood science, systems development, genetics, physiology, endocrinology, policy and management. Sea Grant's investments in aquaculture have helped spur the development of new aquaculture-based industries which have since flourished. Given Sea Grant's long-standing involvement in aquaculture, I offer the following specific comments on behalf of the SGA.

First, the 10-year plan seeks to "build and maintain a sufficient in-house scientific capability" through the establishment of a new Office of Aquaculture within NMFS. Among the responsibilities of this office would be to "administer regulatory functions, coordinate NOAA aquaculture-related activities, and provide liaison with stakeholders," and this would be accomplished by expanding on the current capabilities of NMFS, OAR (particularly Sea Grant), and NOS. While SGA agrees that aquaculture regulatory and management functions should be maintained within NMFS, we suggest that NOAA's programmatic (i.e. research, education, and outreach) aquaculture portfolio be placed under the direct management of the National Sea Grant Office where many of NOAA's extramural research interests and functions currently exist and could continue to be coordinated and managed.

Second, a major focus of this plan should be to clearly delineate the roles and responsibilities of the various federal entities with interest in aquaculture as well as pursue a cooperative legal/management framework or mechanism upon which these entities should operate. Coordination is desperately needed among the "myriad overlapping government regulations" and a clear set of rules is needed in order for marine aquaculture industries to flourish. For example,

The *Sea Grant Association* (SGA) is a non-profit organization dedicated to furthering the Sea Grant program concept. SGA's regular members are the academic institutions that participate in the National Sea Grant College Program. The SGA advocates for greater understanding, use, and conservation of marine, coastal and Great Lakes resources.

For more information, please visit www.sga.seagrant.org or contact:

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Sea Grant Association

while the plan makes mention of NOS as contributing to the new NOAA aquaculture infrastructure, its role is not clearly defined. Responsibilities should be clearly identified with respect to which NOAA offices are accountable for regulatory functions, management, and the provision of science-based information. At the same time, NOAA should attempt to minimize the creation additional layers of bureaucracy that further complicate the process for managing NOAA's aquaculture activities, oversight and procedures. Existing infrastructure and expertise should be utilized and enhanced at all levels in order to address the challenges set forth in this plan, and from our perspective, should acknowledge and engage Sea Grant's proven aquaculture capabilities and expertise found throughout the country.

We are in full agreement that in order for a forward-looking plan such as this to be effective, major budgetary needs and staffing requirements must be met. Recent flat-funding trends have significantly compromised Sea Grant's ability to serve the nation's interests and address the larger NOAA mission. Commensurate budget and staff increases must be provided in support of NOAA's aquaculture program to ensure the successful implementation of the 10-year plan once finalized.

Finally, we encourage NOAA to develop within this plan a number of short- and longer-term success markers that are realistic and achievable and have been agreed upon by all stakeholders (NOAA, industry, academia, other management agencies, etc.). And we strongly encourage NOAA to identify within the plan mechanisms through which partnerships with other relevant agencies such as the U.S. Department of Agriculture and their regional aquaculture centers can be nurtured. The interim plan makes brief mention of such partnerships; however, innovative thinking is needed to turn these partnerships into a reality.

In closing, I would like to thank NOAA again for recognizing the importance of aquaculture to the nation and for facilitating this very important planning process for future directions. The *U.S. Commission on Ocean Policy* in its 2004 report provided a clear mandate – provide the Secretary of Commerce with the authority to develop U.S. offshore aquaculture. This interim report is a positive step in that direction. We hope you will take into consideration some of the comments offered in this letter. If at any time I can provide you with additional information, please do not hesitate to contact me at (301) 405-7500 or kramer@mdsg.umd.edu.

Sincerely,



Jonathan G. Kramer
President, Sea Grant Association
Director, Maryland Sea Grant College

cc: Leon Cammen, Director, National Sea Grant Office, NOAA