



17 March 2023

The Ecological Aquaculture Foundation LLC (EAF), with offices in Maine and three additional, international locations, **strongly opposes LD 586** “An Act to Protect Maine Fisheries from the Effects of Industrial Recirculating Aquaculture Operations”.

Our business supports the development of scientifically-based regulations and standards that fulfill the highest international metrics for the production of sustainable seafoods in the USA and internationally. We assisted the United Nations Food and Agriculture Organization (FAO) to develop the FAO “Ecosystem Approach to Aquaculture”, and this month our international team will release a comprehensive study on aquaculture’s contribution to the United Nation’s Sustainable Development Goals (SDGs). We share with the world the progress that Maine has made as a global leader in the research, development, and commercialization of many types of aquaculture which have had demonstrable public benefits, especially to fishing communities, diverse, women-owned businesses, and Maine’s rural communities where the development of aquaculture has its greatest potential. EAF is involved in both small scale and large commercial businesses, from seaweeds and shellfish to salmonids in recirculating aquaculture systems (RAS) in Norway, the Middle East, and the USA, and we were planning to expand our business here in Maine.

This bill includes outdated, non-scientific, and very inflammatory language. There are no definitions or explicit metrics for any regulatory agency regarding “industrial” aquaculture, or “zero impact”, or “carbon neutral”. The bill’s prescription on “feed use” is out of date as the RAS and allied feed industries such as Skretting here in Maine have moved rapidly away from the use of ocean resources, with many conservation groups such as TNC, EDF, and the WWF praising RAS and aquaculture feed innovations. The RAS industry has a great awareness of its responsibility to steward wisely ocean resources in feeds. In addition, no form of existing food production system or wastewater treatment facility in Maine or anywhere else in the world could meet the zero-discharge demand as stated in this bill. The Maine Departments of Marine Resources and Environmental Protection do not need the addition of such unrealistic, technical mandates that this bill requires.

This bill is an unnecessary, very radical measure led by single-minded, scientifically illiterate interest groups that will directly impact Maine in so many ways, as well as our business development plans, and for job creation in Maine. The Ecological Aquaculture Foundation LLC **strongly opposes LD 586**.

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