



# SIERRA CLUB

## MAINE CHAPTER

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Regarding the scope and focus of the working group, Sierra Club has identified key areas where current statute is missing or falls short of protecting against ill effects of net pen finfish facilities. We recommend the working group consider:

- Requiring all net pen finfish operations to adhere to the Clean Water Act standards of discharge elimination;
- Requiring livestock be disease free to ensure the health of the surrounding environment, and requiring frequent testing for disease and reporting to the public and regulatory agencies;
- Developing a stiff penalty for escapes and requiring 24 hour monitoring with real time data uploading for enforcement purposes;
- Requiring 4D modeling programs to ensure there is no accumulation of effluent in the facilities or current driven ecosystems, and set standards for testing protocols and measurable requirements;
- Establish a set of measurable water quality metrics to be maintained, with stiff fines that adequately incentivize proper procedure and revocation of permits if the metrics are not met;
- Study the need for further collaboration and clarification of roles for DMR and DEP regarding permitting;
- Create recommendations for the addition of DEP staff and capacity for the enforcement of any requirements; and
- Analyze the current fee structure for large aquaculture projects to ensure fees are meeting the scale of enforcement needed for the facilities

Additionally, the Sierra Club testified earlier this year on L.D. 586, a bill regarding Industrial Recirculating Aquaculture Systems (RAS). Though these two types of facilities differ greatly in possible environmental impacts, there are similar shortfalls in the current regulations of the facilities. We encourage the committee to refer to our letter to the Marine Resources Committee on RAS for further ideas and suggestions of possible changes to statute: <https://bit.ly/LD586letter>

In summary, the creation of a working group to review the environmental permitting laws regarding net pen finfish aquaculture is vital to protecting the environment and resources of Maine. We urge the committee to vote 'ought to pass' on L.D. 508. Thank you for your time and consideration.

Sincerely,

Ania Wright  
Legislative and Political Specialist  
Sierra Club Maine