



State of Washington
DEPARTMENT OF FISH AND WILDLIFE
FISH PROGRAM, FISH MANAGEMENT DIVISION, PUGET SOUND SHELLFISH UNIT

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April 2, 2024

Dear Subcommittee,

Thank you for the opportunity to review and comment on the National Aquaculture Development Plan and Strategic Plan for Aquaculture Economic Development.

The Washington Department of Fish and Wildlife (WDFW) is charged with the protection and perpetuation of our state's rich fish and wildlife resources. Our agency engages with aquaculture in a variety of ways, including with regard to managing disease and invasive pest risk to wild and aquaculture animal and seaweed resources, in managing our state's Aquatic Farm program, and where aquaculture and native species restoration intersect—among other ways.

Both the National Aquaculture Development Plan and Strategic Plan for Aquaculture Economic Development describe goals related to expanding markets for U.S. aquaculture products. While we are supportive of this goal for both cultured and wild-caught domestic seafood generally, we are mindful that international trade is reciprocal, and expansion of market opportunity for domestic seafood globally may also come with more or new imports of seafood from elsewhere into the U.S. This was the case, for example, with the U.S. Food and Drug Administration's 2018 equivalence determination regarding European Union food safety control systems for raw molluscan shellfish—which opened new access to certain European countries to export live shellfish to the U.S. market. This action was taken despite no real shellfish biosecurity measures required by U.S. authorities, and despite the fact that the countries being approved to ship live shellfish to the United States are host to several serious shellfish disease concerns. This represents a concern to WDFW as an unnecessary risk for the introduction of novel pathogens harmful to shellfish to our state, with potential for serious ecological and economic harm to both cultured and wild marine resources. We communicated this in a 2018 letter of comment (Docket # FDA-2018-N-0810), and in several conversations with both the FDA and USDA APHIS. We continue to insist that safeguards be considered for imports of live shellfish and other seafood products to the U.S., as with other agricultural commodities.

Also concurrent with our agency's role to protect the health of wild and cultured populations, our agency requests to be engaged in explorations of any new candidate species for aquaculture that may be of relevance to Washington and in conversations related to aquaculture-based conservation and restoration of native species in our state.

Thank you for your consideration.

Sincerely,

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