My name is Robin Downey. I’m the executive director of the Pacific Coast Shellfish Growers Association. We represent shellfish farmers from Alaska, Washington, Oregon, California and Hawaii. I want to thank the Commission for providing this opportunity to share the shellfish industry’s concerns and ideas here today.

There has – rightfully -- been a focus on what’s wrong with our marine ecosystem and how current policy isn’t working.

In keeping with this theme, I, too, am going to add to the growing list of what isn’t working from the perspective of the shellfish farmer. But what I really want to focus on is what IS WORKING and how to better support that.

First, just a bit of background for those of you not familiar with the shellfish aquaculture industry:

We are unique in several respects. We really are farmers in every sense of the word. We produce most of our seed in nurseries, then seed, tend and harvest our crops just as most farmers do. One important difference though – we do not feed our animals. Shellfish feed on the nutrients found naturally in the marine water column. Another unique aspect of the West Coast shellfish industry -- unlike some areas of the country -- we are not diminishing wild resources. Our farming practices and propagation of shellfish assures an environmentally sustainable, renewable harvest.

To put this into economic perspective: the oysters, clams, and mussels we produce on the West Coast on an annual basis amounts to roughly $87 million in farm-gate value alone. And the shellfish farming industry makes up one of the largest, living-wage employers in rural coastal communities. And Washington holds the record as the largest producer of farmed shellfish in the nation.

Another aspect of the industry which makes us unique is our dependence on the marine environment. We can’t grow shellfish in water that doesn’t meet extremely stringent water quality standards. There is a very real, very tangible relationship between the health of our marine environment and the health of our businesses. And so we straddle the line between environmentalist and business interest every day.

The bad news, and what I’ll add to the list of “what’s wrong: ”

Since 1985, as our populations along the shorelines have increased exponentially, we have correspondingly lost 29% of our shellfish growing areas to non-point pollution -- from failing septic systems, increased impervious surfaces and road runoff, and agricultural wastes.
So what IS working?

For starters, shellfish themselves. As biofilters, the presence of shellfish is critical to the health of the marine ecosystem. A single oyster typically filters 55 gallons of water a day, and shellfish beds themselves provide forage and shelter for a host of other marine species.

And then there are the shellfish farmers, who represent an incredible – and I would argue largely unappreciated -- resource in the protection of our coastal estuaries and watersheds. Because of their dependence on water quality -- and the fact that they are physically there, working in the environment every day -- they have become the first line of defense for coastal water quality.

We take this stewardship role seriously, and in fact have recently completed development of Environmental Codes of Practice for the West Coast shellfish industry that is being published this month. These codes spell out how we go about implementing our Environmental Policy – a document we produced last year and which I’ve brought with me here today and will be happy to share with you.

In fact, the shellfish farmers’ role as stewards of the marine environment goes back more than half a century. When toxic effluent from pulp mills was wiping out our native oysters and poisoning Puget Sound in the 1940’s, 50’s and 60’s, it was the oyster farmers that took on the battle to get stricter laws passed to keep untreated effluent from being dumped into our bays. It’s hard to fathom where we would be today in terms of water quality if we hadn’t been successful in that battle some 40 years ago.

We’ve lost several skirmishes since then, unfortunately, as the 29% loss in growing areas is testament, but we haven’t yet lost the war, and with appropriate support through environmental policy being forged today, the shellfish industry is poised to help win not only the war for environmental protection, but a war being waged on another front. That front is Economic and has to do with our current $75 million seafood trade deficit. This deficit is second only to our oil deficit.

The Dept. of Commerce has already declared their intent to grow aquaculture 5-fold by the year 2025, in the interest of offsetting this deficit. We applaud this goal and urge the policy and decision makers here today to consider the West Coast shellfish industry a partner that is willing and uniquely positioned to lend a hand in both the economic and environmental arenas.

To help realize both these economic and environmental goals, we have two specific recommendations:
First: The industry urges the Commission to support environmentally sustainable marine aquaculture development by forming a separate marine aquaculture advisory committee to advise NMFS. This is a request industry representatives have made already to Director Hogarth. In lieu of this the director suggested we get aquaculture representatives appointed to the Marine Fisheries Advisory Committee. We are concerned that, given the slate of issues this committee is already charged with, marine aquaculture issues will not get the attention they deserve, making the five-fold increase in aquaculture goal far less likely to be obtained.

Second: We also recommend that we put more of our resources into the research and development needed to achieve the 5-fold increase. The U.S. lags embarrassingly far behind other nations in support of aquaculture development, which helps to explain the huge trade deficit we are currently faced with.

Given our expanding population and diminishing natural resources, it is absolutely critical that we develop the tools and technologies to do “more with less.”

As has already been recommended in a NOAA priorities and planning session in D.C. about 2 years ago, we support the concept of investing merely ONE PERCENT of the current seafood trade deficit of $75 million per year into aquaculture research and development – about $7.5 million a year - which would help to bring us a bit closer to the investment being made by other countries around the world.

Given the critical role that shellfish farmers – and shellfish -- play in protecting and restoring our marine environment, it makes sense to protect the resource our industry represents by supporting what we do and helping us realize both our environmental and economic potentials.

Again, thank you for the opportunity to present our recommendations to you, and for seriously considering their merit.