April 2, 2025

Brooke Rollins, Secretary of Agriculture
United States Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250
Email: agsec@usda.gov

Dear Secretary Rollins:

The National Aquaculture Association[1] respectfully requests the U.S. Department of Agriculture, as lead agency with primary oversight for food production in the United States, lead an effort to effectuate meaningful regulatory changes for aquaculture. As part of that effort, we further request your assistance with organizing the respective DOGE agency team leaders for Army Corps of Engineers, Council on Environmental Quality, Department of Agriculture, Department of Transportation, Environmental Protection Agency, Fish and Wildlife Service, Food and Drug Administration, and National Marine Fisheries Service to work with the National Aquaculture Association to finally implement the vision and intent of the national aquaculture policy expressed by Congress within the National Aquaculture Act of 1980.

We make this request based upon:

Domestic aquaculture is composed of 3,500 farms, of which 87% reported farmgate sales of $100,000 or less during 2023.[2] Our small, family run operations do not have the resources, infrastructure or expertise to litigate the excessively protective, often redundant and sometimes illegal federal regulations that prevent production from occurring and, in all instances, greatly contribute to costs, thereby reducing profitability and making our farms uncompetitive against a tidal wave of imported seafood.

A recent study, based upon actual farm economic data, estimated federal and state regulations resulted in annual lost revenue of $807 million (36% of total sales value) from lost sales and thwarted expansion opportunities from regulatory actions that either closed access to existing markets, forced reduced scales of production, or prevented attempts to expand production to meet existing demand for the farm's products. Accounting for multiplier effects, lost economic contributions were $1.4 billion annually, with >8,000 jobs lost nationally from farms alone, not including associated supply chain partners.[3]

---

[1] The National Aquaculture Association (NAA) is a U.S. producer-based, non-profit trade association founded in 1991 that supports the establishment of governmental programs that further the common interest of our membership, both as individual producers and as members of the aquaculture community. For over 34 years NAA has been the united voice of the domestic aquaculture sector committed to the continued growth, creating a business climate conducive to our success, and fostering cost-effective environmental stewardship and sustainability.
[2] 2023 Census of Aquaculture: Summary by Value of Aquaculture Products Sold.
[3] The National Regulatory Cost Burden on US aquaculture farms - Engle - 2025 - Journal of the World Aquaculture Society - Wiley Online Library

There are a myriad of regulations constraining land-based, near shore and potential offshore farms. The U.S. aquaculture community participated in nine federally funded, peer-reviewed studies conducted by independent, objective economists from 2013 to 2023 quantifying the costs and impacts of state and federal regulations. The studies were recently summarized,[4] and the team of authors pointed to solutions. These solutions can inform and amend regulations and regulatory policy efficiencies identified by the National Science and Technology Council (NSTC), Subcommittee on Aquaculture, that published in 2022 a Strategic Plan to Enhance Regulatory Efficiency in Aquaculture.[5]

During 2022, the last year for which data is available, the United States consumed a total of 6.82 billion pounds of edible seafood. Imports accounted for 5.65 billion pounds of that total, or 82.83%, contributing to a seafood trade deficit of $24 billion.[6] The heavy reliance on imports for a foodstuff critical to people's health[7] not only creates a massive trade imbalance; it also creates food security[8] and food safety[9] issues for our country. Along with rare earth minerals and pharmaceuticals, we believe it is critical to our national interest, and consistent with the current administration's goals, to "onshore" the source of our seafood. With wild seafood production essentially at maximum sustainable yield, aquaculture is the only way we're going to accomplish this imperative. The good news is that this presents a massive entrepreneurial opportunity for the United States…if only the handcuffs were removed…particularly for marine aquaculture where scaling is more easily achieved.

Federally managed marine waters beyond coastal state boundaries (the Exclusive Economic Zone) encompass 4.4 million square miles. A U.S. study estimated that only 195 square miles of ocean could produce 1.3 billion pounds or more of high-quality seafood.[10] Theoretically, the farming of 970 sq. miles, an area representing .0002% of the Exclusive Economic Zone, 14 times the size of the District of Columbia, would double U.S. edible seafood production. A doubling of

---

[4] The National Regulatory Cost Burden on US aquaculture farms - Engle - 2025 - Journal of the World Aquaculture Society - Wiley Online Library
[5] Strategic Plan to Enhance Regulatory Efficiency in Aquaculture
[6] Fisheries of the United States, 2022
[7] Scientific Report of the 2025 Dietary Guidelines Advisory Committee
[8] Threats to Food and Agriculture Resources
[9] Imported Seafood Safety: FDA Should Improve Monitoring of Its Warning Letter Process and Better Assess Its Effectiveness | U.S. GAO
Food Safety: FDA's Imported Seafood Safety Program Shows Some Progress, but Further Improvements Are Needed | U.S. GAO
Imported Seafood Safety: Actions Needed to Improve FDA Oversight of Import Alert Removal Decisions | U.S. GAO
Imported Seafood Safety: FDA and USDA Could Strengthen Efforts to Prevent Unsafe Drug Residues | U.S. GAO
Seafood Safety: FDA Needs to Improve Oversight of Imported Seafood and Better Leverage Limited Resources | U.S. GAO
[10] Achieving policy objectives to increase the value of the seafood industry in the United States: the technical feasibility and associated constraints - ScienceDirect

U.S. aquaculture production to about 2 billion pounds could create an estimated additional 50,000 farm and non-farm jobs.[11]

What's keeping us from accomplishing this dramatic increase in production?

We currently operate under a permitting system that is too lengthy, too costly, and too subject to legal challenges from groups opposed to commercial aquaculture.[12] As an example, a demonstration farm was funded in federal waters off the coast of Florida by Florida Sea Grant to experimentally raise a paltry 55,000 pounds of fish. Applications for the necessary permits from the Environmental Protection Agency (EPA) and the Army Corp of Engineers (ACOE) were made in November 2018. The EPA permit received 44,500 comments opposing the operation for reasons not supported by fact or science. The EPA permit was finally granted in June 2022. A change in production gear and fish species in 2023 resulted in an agency review of a modified EPA permit that may be completed by May 26, 2025. The modified EPA permit should be followed by the issuance of an ACOE permit. Going on seven years after application the end is not in sight as the permitting will be challenged in federal court. The current permitting system is ineffective for allowing an extremely small, publicly funded, noncommercial farm in federal waters.

What can be done to make the Exclusive Economic Zone accessible for aquaculture?

The long-term solution is legislation that authorizes the issuance of leases for aquaculture and mandates a streamlined, reasonable and achievable permitting process from agencies. More immediately, and without the need for legislation, an Executive Order directing the EPA and ACOE to develop general permits and programmatic general permits, respectively, for nearshore and offshore farms would greatly increase the opportunities for investment in domestic seafood production. The agencies currently have the authority to do this, and farms are perfectly suited for regulation by general permits, which rely on best management practices to guide and control activities. General permits and programmatic general permits would not only save applicants time and money; they would also convey similar savings to the agencies.

Finally, we share language from the National Aquaculture Act of 1980 as amended,[13] with its findings 45 years ago that are still relevant today:

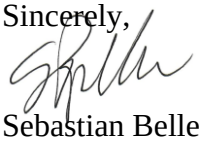
> "Congress declares that aquaculture has the potential for reducing the United States trade deficit in fisheries products, for augmenting existing commercial and recreational fisheries and for producing other renewable resources, thereby assisting

[11] The Political Economics of Marine Aquaculture in the United States: Reviews in Fisheries Science & Aquaculture: Vol 24, No 3 - Get Access
[12] Refuting Marine Aquaculture Myths, Unfounded Criticisms, and Assumptions
[13] 16 USC Ch. 48: NATIONAL AQUACULTURE POLICY, PLANNING, AND DEVELOPMENT

> the United States in meeting its future food needs and contributing to the solution of world resource problems. **It is, therefore, in the national interest, and it is the national policy, to encourage the development of aquaculture in the United States**."

If you have questions, we welcome the opportunity to meet with you to explore in detail our requests and greatly appreciate your time and effort required to review and assess our letter.

Sincerely,



Sebastian Belle
President

cc: Senator John Boozman, Chair, Committee on Agriculture, Nutrition and Forestry
Senator Susan Collins
Senator Angus King
Representative G.T. Thompson, Chair, Committee on Agriculture

Economic Analyses Quantifying Aquaculture Regulatory Costs

Boldt, N. C., Engle, C. R., van Senten, J., Cassiano, E. J., & DiMaggio, M. A. (2023). A regulatory cost assessment of ornamental aquaculture farms in Florida. Journal of the World Aquaculture Society, 54(3), 714–733. https://doi.org/10.1111/jwas.12881.

Engle, C. R., & van Senten, J. (2023). US hybrid striped bass and redfish farms: Economic effects of the US regulatory framework. North American Journal of Aquaculture, 85(4), 293–310. https://doi.org/10.1002/naaq.10297

Engle, C. R., & Stone, N. M. (2013). Competitiveness of US aquaculture within the current US regulatory framework. Aquaculture Economics & Management, 17(3), 251–280. https://doi.org/10.1080/13657305.2013.812158.

Engle, C. R., van Senten, J., & Fornshell, G. (2019). Regulatory costs on US salmonid farms. Journal of the World Aquaculture Society, 50(3), 522–549. https://doi.org/10.1111/jwas.12604.

Engle, C. R., van Senten, J., Hegde, S., Kumar, G., Clark, C., Boldt, N., Fornshell, G., Hudson, B., Cassiano, E. J., & DiMaggio, M. A. (2025). The National Regulatory Cost Burden on US aquaculture farms. Journal of the World Aquaculture Society, 56(2), e70005.70005. https://doi.org/10.1111/jwas.70005.

Engle, C. R., van Senten, J., Schwarz, M., Hartman, K., Gustafson, L., Johnson, K., & Creekmore, L. (2021). Farm-level cost drivers of salmonid fish health inspections. Journal of Aquatic Animal Health, 33(4), 199–219. https://doi.org/10.1002/aah.10139.

Hegde, S., Kumar, G., Engle, C., & van Senten, J. (2023). Cost of regulations on US catfish farms. Journal of the World Aqua culture Society, 54(1), 32–53. https://doi.org/10.1111/jwas.12917.

van Senten, J., Dey, M., & Engle, C. R. (2018). Effects of regulations on technical efficiency of US baitfish and sportfish producers. Aquaculture Economics & Management, 22(3), 284–305.

van Senten, J., & Engle, C. R. (2017). The costs of regulations on US baitfish and sportfish producers. Journal of the World Aquaculture Society, 48(3), 503–517. https://doi.org/10.1111/jwas.12416.

van Senten, J., Engle, C., Senten, J., Engle, C. R., Hartman, K., Johnson, K. K., & Gustafson, L. L. (2018). Is there an economic incentive for farmer participation in a uniform health standard for aquaculture farms? An empirical case study. Journal of Preventive Veterinary Medicine, 156,58–67. https://doi.org/10.1016/j.prevetmed.2018.05.007

van Senten, J., Engle, C. R., Hudson, B., & Conte, F. S. (2020). Regulatory costs on Pacific coast shellfish farms. Aquaculture Economics & Management, 24(4), 447–479. https://doi.org/10.1080/13657305.2020.1781293.

van Senten, J., Clark, C., & Engle, C. (In preparation). Regulatory costs on Atlantic Coast shellfish farms.