NATIONAL Aquaculture ASSOCIATION

6 November 2026

Mike Illenbeg
Director
Office of Seafood
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Mr. Illenberg,

On behalf of the National Aquaculture Association (NAA), thank you for meeting with us on October 20th. We greatly value being part of these conversations and having the opportunity to communicate our members' concerns directly. We are writing to follow up on the issues we discussed and to offer constructive suggestions for how the Office of Seafood and the aquaculture sector can work together to promote U.S. aquaculture and seafood in a manner that recognizes the important role aquaculture plays in reducing the U.S. seafood trade deficit and growing domestic seafood production.

One major goal the Office of Seafood has expressed is taking a holistic approach to supporting seafood production within the United States. NAA would like to see more tangible efforts and concrete goals for how the Office plans to do this, particularly given the America First Seafood Strategy (AFSS) released on October 23, 2026. The AFSS does not reflect a holistic approach to U.S. seafood production. Rather, it centers its focus on commercial fishing, and relegates aquaculture to a minor supporting role, referring to it only in terms of how it might "complement" commercial fishing.

To put this in perspective, aquaculture now accounts for 53% of global seafood production. According to recent reporting from the Food and Agriculture Organization of the United Nations, all of the growth in seafood production over the past 30 years has come from aquaculture. In the U.S., 70-85% of seafood is imported, and NOAA estimates that more than half of those imports are farmed overseas.

Concurrently, it is also important to recognize that fisheries are subject to biological limits, and when managed at maximum sustainable yield, production is consistent but limited. Aquaculture is the key to growing seafood production beyond these limits, if we are to directly compete with farmed products imported into the United States. It is not merely a complement to the commercial fishing sector. It is its own unique production method, sharing considerable overlap with many of the challenges faced by commercial fishing, but also differing from it in major ways. Aquaculture should receive equal focus in any U.S. seafood strategy, particularly from the Office of Seafood and USDA.

Additionally, while the AFSS identifies regulatory hurdles as a major constraint to aquaculture growth, its overview reflects only a surface-level understanding of the challenges the sector faces. Permitting is only one facet of those challenges, and even within permitting there is significant variation between

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production methods and species. This surface-level analysis, compared with the in-depth, detail-oriented approach taken toward commercial fishing, demonstrates exactly what NAA and our members have been concerned about regarding the development of the Office of Seafood and the broader embrace of commercial fishing within USDA.

We agree that many topics addressed in the AFSS also apply to aquaculture, particularly trade and import issues. We also recognize that efforts to support U.S. seafood positively impact both the aquaculture and commercial fishing sectors. However, equity in how these initiatives support both sectors will not be achieved until the USDA and Office of Seafood definitively recognize and respect aquaculture as a critical seafood producer, acknowledge its growth potential, and commit to tangible, deliverable goals that address both the challenges and the tremendous potential of the aquaculture sector. To that end, NAA encourages USDA and the Office of Seafood to commit to stakeholder engagement, particularly as USDA, the White House, and other federal partners work toward expanding the AFSS to include more aquaculture-related initiatives. NAA would be happy to help facilitate listening sessions or roundtables directly with producers and USDA staff, so that USDA and the Office of Seafood can hear directly from producers about the challenges they face, support they need, and what they hope to see in an aquaculture-focused strategy.

NAA also believes firmly that both aquaculture and commercial fishing are two sectors which can coexist and support each other. We also believe that expanding USDA programs and initiatives that include commercial fishing must not be done in a manner which disadvantages aquaculture, even inadvertently, and must be done with the input of the aquaculture sector. We appreciate that the Office of Seafood has clearly communicated the need to support both sectors, but unfortunately, our members' experience with the commercial fishing sector has not always been one of partnership. At times, aquaculture producers have faced criticism and competitive misinformation from parts of the commercial fishing community, perpetuating the idea of "wild not farmed". We raise this not to assign blame, because our members would like to move beyond that dichotomy, but find it difficult to do without some acknowledgment of this history, and substantial confidence that support from the commercial fishing sector will be genuine. We want to be allies. Getting there will require some honest conversations between the two sectors so that each can better understand the other. We welcome that dialogue.

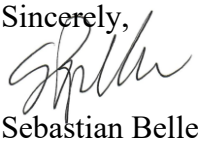
The recent AFSS, which centers commercial fishing with little mention of aquaculture, has continued to contribute to this divide. NAA wants to move beyond it and end the "wild versus farmed" dichotomy; we want "wild *and* farmed" to become the new way of describing U.S. seafood. NAA proposes that USDA work with NOAA to convene a series of mediated roundtable discussions bringing together key stakeholders from both sectors. The goal would be to help each sector better understand the other and to move forward on a path of mutual support, without either sector feeling deprioritized or sidelined. NAA would welcome the opportunity to participate and work with USDA on this, and we believe a series of mediated roundtables would be an important first step that would also help USDA and NOAA gain better understanding of both sectors.

NAA is committed to working constructively with the Office of Seafood, NOAA, and the commercial fishing community, and we appreciate your consideration of the points raised in this letter. We will be candid that our members are disappointed in the direction of the AFSS and have significant concerns

about what it signals for the future of aquaculture within USDA. At the same time, we are optimistic that these concerns can be addressed, and we see a real opportunity for the Office of Seafood and the aquaculture sector to work together.

We would welcome a follow-up meeting to talk through these issues in more depth and to identify a path for NAA and our membership to provide stakeholder input on future initiatives involving aquaculture. Thank you again for your time and for your continued engagement with the aquaculture community.

Sincerely,



Sebastian Belle
President

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