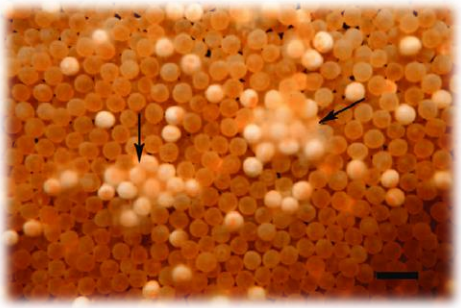
NATIONAL Aquaculture ASSOCIATION

Support the Sound Science for Farmers Act
And
No Industrial Restrictions in Secret Act



The U.S. Environmental Protection Agency has proposed a 11 parts per billion formaldehyde worker exposure limit which is ~30 times below Europe's recently updated worker exposure limit of 300 ppb using the latest science. Or ~70 times below OSHA's worker exposure limit of 750 ppb. This restriction occurred under the guise of EPA's Integrated Risk Information System (IRIS) behind closed doors with no stakeholder input or consultation with federal agencies.

The National Aquaculture Association[1] requests Congressional support to:

- Introduce a House companion bill to S 3719 Sound Science for Farmers Act.
- Pass the S 3724 / HR 3724 No Industrial Restrictions In Secret Act (No IRIS Act).
- Ask EPA why they are not balancing risk and benefit.

There is no known substitute or alternative to formalin that provides an equivalent balance of effectiveness and safety to eggs or animals particularly with respect to the fungus and parasites that cannot be eradicated or controlled through normal biosecurity practices.

Formalin has been in use as a fish therapeutant since at least 1909. It is currently approved by the U.S. Food and Drug Administration as a parasiticide for cultured finfish, shrimp, and finfish eggs. It is delivered via the water in which the eggs or animals are being reared to control infestations of fungal and protozoan parasites that reduce animal welfare and cause mortality. Untreated eggs show fungus infection which is marked by arrows in the image.

There are approximately 3,000 commercial fish farms producing farmed seafood, bait, fish for recreational stocking and ornamental fish for aquariums and water gardens and approximately 600 publicly operated fish hatcheries annually producing at least 1.7 billion fish that are publicly stocked for recreational fishing and to recover at-risk fish species. These farms and hatcheries use formalin in their operations to treat fertilized eggs for fungus infection or growing fish or broodstock for external parasites.

[1] The National Aquaculture Association is a U.S. producer-driven, non-profit 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 33 years NAA has been the united voice of the domestic aquaculture sector committed to the continued growth of our industry, working with state and federal governments to create a business climate conducive to our success, and fostering cost-effective environmental stewardship and sustainability.

Please email or call the NAA Office at naa@nationalaquaculture.org or 850-443-3456 for additional information.