



August 28, 2018

The Honorable John Barrasso  
Chairman, Senate Environment and Public Works Committee  
410 Dirksen Senate Office Building  
Washington, D.C. 20510

Dear Chairman Barrasso:

On behalf of the 3,000 farms in the United States that raise and market aquatic animals and plants, it is our pleasure to voice support for your effort to amend and update the Endangered Species Act to better reflect the investment of land, money and expertise as well as the nationwide conservation ethic supported and embraced by Americans since 1973 when the Act was signed.

The National Aquaculture Association is a U.S. producer-based, 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 27 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.

In addition to the improvements proposed, we suggest that new language be adopted to:

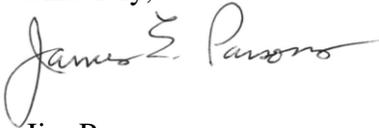
- Include, where appropriate, U.S. Department of Agriculture and state department of agriculture representatives, as recovery team members. The designation of private or public farm and forest lands for conservation purposes necessitates their inclusion.
- Restrict public petitions to one species. Multi-species petitions have been developed from publicly accessible, non-governmental organization websites designed to inform the public about at-risk species but do not provide the in-depth information necessary to assess species status. Public petitions have been assembled quickly from such sources and for an agency to reach a decision they are essentially forced to accept the petition and then are unlikely to render a proposed listing decision within the timeframe established by the Act. Missing these deadlines can result in successful litigation by the petitioner which further distracts and hampers agency efforts to achieve species recovery.
- Require petitioners and the listing agencies to inventory and summarize state, tribal, local and private regulations, programs, and lands that have been adopted or set aside to benefit the species proposed for listing. We have observed that these efforts are not fully appreciated when a listing is proposed to inform the public and agencies to improve listing decision making.

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- Create a captive-bred exemption for listed species with the Act that mirrors the captive-bred exemption within the Convention on International Trade in Endangered Species of Wild Fauna and Flora that the Act authorizes the United States to implement (Section 8A). A captive-bred exemption under the Act should also preempt state, tribal or local listings. In conformance with the Convention the U.S. Fish and Wildlife Service has codified captive-bred exemption requirements within 50 CFR Part 23 that are unavailable to U.S. farmers, ranchers or breeders because the Act does not authorize similar exemptions in the United States.
- Recognize under ESA Section 4(d) as conservation benefits the significant animal husbandry experience, knowledge, applied science and services that have been and could be to a greater extent shared by the farming and ranching communities to assist state and federal agencies in the recovery of listed or at-risk species through public or private captive breeding directed towards population recovery.

Thank you for the opportunity to comment and support much needed modernization of the Endangered Species Act. Please do not hesitate to contact us to answer questions or provide additional comments.

Sincerely,

A handwritten signature in cursive script that reads "Jim Parsons". The signature is written in black ink and is positioned above the printed name.

Jim Parsons  
President