

Gulf of Mexico Fishery Management Council
2203 North Lois Avenue, Suite 1100
Tampa, Florida 33607
gulfcouncil@gulfcouncil.org

To: Doug Boyd, Chair
Members of the Gulf of Mexico Regional Fishery Management Council

Submitted via e-mail

RE: Deeming Regulations for the *Final Fishery Management Plan for Regulating Offshore Marine Aquaculture in the Gulf of Mexico (Jan. 2009)*

February 5, 2012

Dear Mr. Boyd and Members of the Gulf of Mexico Regional Fishery Management Council:

We, the 42 organizations signed below, representing over 3 million people belonging to consumer, environmental, commercial and recreational fishing, tourism, small-business and community organizations nationwide urge you to vote against implementing regulations for the *Fishery Management Plan for Regulating Offshore Marine Aquaculture in the Gulf of Mexico* (the Plan). In addition to the numerous negative environmental and socioeconomic concerns it presents, the plan is out-of-date, failing to take into account lessons learned in open ocean aquaculture since 2009 and most importantly, fails to meet even the most basic safeguards set-forth in the National Aquaculture Policy (the Policy).

The Plan paves the way for between 5 and 20 industrial scale open water aquaculture facilities to begin growing carnivorous finfish in cages in the Gulf of Mexico over the next ten years, producing an estimated 64 million pounds of fish annually.ⁱ Wastes, including excess feed, as well as any antibiotics or chemicals used to treat the fish and cages will flow directly into the Gulf, which in the wake of various hurricanes, an ever-growing dead zone and the massive 2010 oil spill has seen more than enough pollution. Local wild fish populations may be harmed through interactions with both caged and escaped farmed fish – such as disease transfer, competition or interbreeding. Worldwide, stress would likely be increased on species such as menhaden and anchovies, which are captured en masse and processed into fish meal and oil to feed farmed fish.ⁱⁱ It is unknown how Gulf waters and fisheries will handle this source of significant pollution and stress. Important industries, such as fishing (both commercial and recreational) and tourism, may be harmed due to competition both for space and in the marketplace and for fish.ⁱⁱⁱ

Finalized in 2009, the Plan is now well out-of-date. Since then, existing operations based in Hawai'i which the Plan cited have gone bankrupt, violated numerous safety laws, and ventured into federal waters with untethered cages, losing two of them in the process.^{iv} New studies have also shed light on the damage that can be done by open water aquaculture, including a 2011 study in the journal *Marine Environmental Research* which analyzed the impacts of marine

aquaculture on a large scale and found that aquaculture facilities have been responsible for an increase of nutrients in a gulf off the Italian Coast and wrote that “off-shore aquaculture may affect the marine ecosystem well beyond the local scale.”^v Similarly, a research team at Stanford used numerical modeling to discover that plumes of fish waste may travel much further than originally anticipated, questioning previous assumptions made about dilution being the solution to pollution.^{vi}

Finally, the Plan is not in line with many very basic requirements of the National Aquaculture Policy. For example:

- The Policy emphasizes “sustainable aquaculture . . . in harmony with healthy, productive, and resilient marine ecosystems.”^{vii} The Plan fails to include measures to ensure operations will not harm the marine environment.
- The Policy “encourag[es] the use of aquaculture feeds that either use fish from sustainably managed fisheries or alternative protein and lipid sources[.]”^{viii} Nothing in the Plan does this.
- The Policy calls for “assurance bond[s] to address facility removal and site remediation.” The Plan’s authorization of assurance bonds only for the removal of aquaculture facilities.^{ix}
- The Policy calls for agencies to “monitor[], evaluat[e], and maintain[] databases on the impacts of aquaculture, including cumulative impacts, on biodiversity, predator-prey relationships, and other important characteristics of healthy and productive ecosystems[.]”^x The Plan contains few monitoring requirements.
- The Policy calls for the creation of “opportunities for new aquaculture jobs and economic growth for U.S. communities that complement commercial and recreational fishing . . .” The Plan, however, does not provide analysis of the “social, economic, and cultural impacts of management decisions, individually and cumulatively, over both the short and long term, . . . including impacts on employment and the economic viability of working waterfronts,” despite the Policy’s call for it.^{xi}

Given these inconsistencies it is highly troubling for the Council to issue deeming regulations for the Plan in its current form, at this time. We call on the Council to send the Plan back to the drawing board, to provide a detailed analysis of how it believes the Plan is in line with the National Policy and to address the areas where it is lacking before moving forward. Given the substantive nature of the changes needed, the public needs to be fully involved in the process.

We strongly urge you not to implement a plan that is out-of-date and out-of-line with the National Marine Fisheries Service and National Oceanic and Atmospheric Administration’s own guidelines, putting our fisheries and all those that depend on them at risk.

Sincerely,

Charles Flaherty
Executive Director
`Apono Hawai`i

Dale Kelly
Executive Director
Alaska Trollers Association

Tina Jackson
President
**American Alliance of Fishermen and
Their Communities**

Mike Roberts
President
Association of Family Fishermen

Bill Snape
Senior Counsel
Center for Biological Diversity

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Center for Food Safety

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Northwest Atlantic Marine Alliance

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David E. Guggenheim
President
Ocean Doctor

Jack Curlett
Director
Ocean Reef Conservation Association

Jack Curlett
Director
Ocean Reef Rod & Gun Club

Ronnie Cummings
International Director
Organic Consumers Association

William F. "Zeke" Grader
Executive Director
Pacific Coast Federation of Fishermen's Associations

Captain Robert F. Zales, II
President
Panama City Boatman's Association

Father Sinclair Oubre, J.C.L.
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Port Arthur Area Shrimpers Association

Marianne Cufone
Executive Director
Recirculating Farms Coalition

Tom Oiye
Director
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President
Rhode Island Fishermen's Alliance

Dave Raney
Team Leader
Sierra Club Marine Action Team

David Lane
Executive Director
T. Buck Suzuki Environmental Foundation

Juan Parras
Executive Director
Texas Environmental Justice Advocacy Service

Robert Wintner
Executive Director
The Snorkel Bob Foundation

George Barasich
President
United Commercial Fishermen's Association

ⁱ Gulf of Mexico Regional Fishery Management Council. "Fishery Management Plan for Regulating Offshore Marine Aquaculture in the Gulf of Mexico." January 2009 at 36.

ⁱⁱ For an outline of the environmental risks posed by large-scale, open ocean aquaculture see Goldberg, Rebecca and Rosamond Naylor. "Future seascapes, fishing, and fish farming." *Frontiers in Ecology and the Environment*, vol. 3, iss. 1. 2005.

ⁱⁱⁱ Upton, Harold F. and Eugene H. Buck. "CRS Report for Congress: Open Ocean Aquaculture." Congressional Research Service, August 9, 2010 at 8.

^{iv} "Fish farming firm found at fault in diver's death." Honolulu Star Advertiser. November 10, 2011. ; Gomes, Andrew. "Fish farm hauls in its cages." Honolulu Star Advertiser. July 25, 2012.; Flickenger, Reed. "Towed aquaculture pens break free." West Hawaii today. March 29, 2011.

^v Sarà, G. et al. "Impacts of marine aquaculture at large spatial scales: evidences from n and p catchment loading and phytoplankton biomass." *Marine Environmental Research*, February 24, 2011.

^{vi} Venayagamoorthy. Subhas K. et. al. "Numerical modeling of aquaculture dissolved waste transport in a coastal embayment." *Environmental Fluid Mechanics*. Vol. 11. February 18, 2011.

^{vii} National Aquaculture Policy at 1

^{viii} National Aquaculture Policy at 9.

^{ix} National Aquaculture Policy at 11.

^x National Aquaculture Policy at 10.

^{xi} National Aquaculture Policy at 11 (emphasis added).

Gulf of Mexico Fishery Management Council
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National Oceanic & Atmospheric Administration
National Marine Fisheries Service
Southeast Regional Office
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To: The Gulf of Mexico Regional Fishery Management Council

Re: Deeming Regulations for the *Final Fishery Management Plan for Regulating Offshore Marine Aquaculture in the Gulf of Mexico* (Jan. 2009)

Submitted via email on January 31, 2013

Introduction

Please accept the following as Food & Water Watch¹ (“FWW”) and the Recirculating Farms Coalition (“RFC”)²’s comments on the Gulf of Mexico Fishery Management Council (“Council”)³’s proposal to deem “necessary and appropriate” implementing regulations for the *Final Fishery Management Plan for Regulating Offshore Marine Aquaculture in the Gulf of Mexico* (Jan. 2009) (“OMA FMP”). In addition to these comments, both organizations incorporate by reference all of the prior comments that they have already submitted on the OMA FMP.

As detailed below, the implementing regulations currently under review by the Council should not be passed – they fail to meet a number of standards and requirements under existing law and policies. Given that the Council is unable to fix the many problems that plague the OMA FMP,³ while following the required process for developing fisheries management regulations, any implementing regulations are procedurally flawed if they are deemed necessary and appropriate without first revisiting and amending the FMP in accord with the law and standard procedures. Further, the National Environmental Policy Act (“NEPA”) requires that the Council revisit the OMA FMP as part of the Supplemental Environmental Impact Statement

¹ FWW is a non-profit organization that works to create an economically and environmentally viable future and advocates for safe, wholesome food, produced in a humane and sustainable manner.

² The Recirculating Farms Coalition is a collaborative group of farmers, educators, non-profit organizations and many others committed to building local sources of healthy, accessible food. Through research, education and advocacy, we work together to support the development of eco-efficient farms that use clean recycled water as the basis to grow food. We believe these recirculating farms can create stable green jobs and supply sustainably-grown food – fruits, vegetables, herbs and humanely-raised seafood – in diverse communities nationwide, and someday, worldwide. The Recirculating Farms Coalition is headquartered in New Orleans, Louisiana, <http://www.recirculatingfarms.org>.

³ See FWW’s comments submitted to the National Marine Fisheries Service (“NMFS”) on August 8, 2009.

(“SEIS”) process. Therefore, the Council should not take any action on implementing rules prior to the SEIS’s finalization. In sum, this means the Council cannot legally vote to deem regulations for the OMA FMP appropriate for action by the National Marine Fisheries Service (NMFS) at the February 2013 Council meeting.

Background

As noted in the many comments submitted on the OMA FMP, open water aquaculture often involves the raising of carnivorous finfish in crowded cages, where untreated fish waste and excess feed empty directly into the ocean. Facilities’ waste, antibiotics, pesticides, and the other drugs or chemicals used can harm marine habitats. This form of fish farming can also impact surrounding wild fish populations: parasites and diseases may spread from farmed fish to wild fish and escaped farmed fish might interbreed with or outcompete wild fish for food, habitat, and mates. Additionally, much fish feed used in fish farming is made from fishmeal and oil derived almost exclusively from small ocean fish such as sardines, anchovies, herring, and menhaden, which are a vital component of marine ecosystems, an important source of bait for fishermen, and a crucial food source for birds, marine mammals, and larger wild fish that are higher up the food chain. Significantly, these same small fish provide the main protein source for people in various coastal countries with limited food availability. Farming of more carnivorous fish means more wild prey fish converted to fish feed – and with a food conversion ratio of several pounds of wild fish to raise just one pound of farmed fish – this is an extremely inefficient use of a key marine resource. Taking more small fish for ocean aquaculture, means less availability for wildlife and people that rely on them to survive.

Moreover, offshore fish farming can have devastating socioeconomic effects on commercial fishermen, who are already struggling from competition with lower priced imported seafood and still recovering from disruption of their fisheries due to disasters such as Hurricane Katrina and the BP Deepwater Horizon explosion.

FWW’s last set of comments in October 12, 2012 pointed out that these and other issues have never been adequately addressed by the OMA FMP, and how both the Council and NMFS have failed to evaluate whether the plan is consistent with the NOAA’s National Aquaculture Policy (“Aquaculture Policy”). This point has been further highlighted by NMFS’s failure to make public any documents even resembling such a consistency analysis.

FWW’s last comments also demonstrated that the OMA FMP is, in fact, not in compliance with the Aquaculture Policy and that the implementing regulations cannot address these deficiencies without dramatically revising or withdrawing the OMA FMP. Finally, FWW pointed out that the U.S. Court of Appeals for the Ninth Circuit is currently reviewing the very basis of authority that NMFS has asserted for issuing such a plan, and, therefore, the Council should wait until this decision is made before wasting its time on reviewing and forwarding implementing rules that may be unauthorized under the MSA.

These prior comments have built on even older comments showing that the plan violates assorted laws because, among other reason, NMFS and the Council cannot rely on the unsupported general determination that aquaculture is “fishing” under the MSA; the Council

does not have authority to develop a permitting regime for aquaculture facilities, because such facilities are neither “fishing vessels” under the MSA, nor “vessels” under 1 U.S.C. § 3 (an argument that is strongly supported by the U.S. Supreme Court decision two weeks ago in *Lozman v. City of Riviera*, 568 U. S. ____, slip op. at 4 (2013) (finding that simply because a structure can float and proceeds under tow does not make it a “vessel”)); the plan does not fulfill conservation and management purposes for any “fishery” under the MSA;⁴ the plan fails to minimize the adverse effect of offshore aquaculture on essential fish habitat and fishing communities nor does it meet other requirements of the MSA; and the plan fails to take a hard look at the environmental impacts and reasonable alternatives, as required under NEPA.

The Council and NMFS have thus far ignored these comments.

Comments

The comments submitted today address two specific issues not raised previously: (1) The implementing regulations being reviewed by the Council are illegal and cannot be submitted to the Secretary without revising the OMA FMP; and (2) The Council is required to revisit the OMA FMP as part of the SEIS process under NEPA.

A. The Council Must Revisit and Amend the FMP Before Deeming the Implementing Regulations “Necessary and Appropriate.”

First, the Council cannot submit draft regulations without amending the OMA FMP. The OMA FMP was originally submitted for Commerce Secretary (and NMFS, by delegation) review on August 4, 2009. The plan was not approved, however. Rather, on September 3, 2009, the plan went into effect as a matter of law when NMFS and the Secretary of Commerce failed to approve, partially approve, or disapprove it.

NMFS at that time did not take any of the required actions on implementing regulations, as is required under 16 U.S.C. § 1854(b) (2006). Now, the Council is attempting to cure this procedural failure by submitting implementing regulations for the 2009 plan in 2013. Such an action is problematic however, as the MSA clearly provides that “proposed regulations which the Council deems necessary or appropriate for the purposes of . . . implementing a fishery management plan or plan amendment shall be submitted to the Secretary *simultaneously* with the plan or amendment . . .” 16 U.S.C. § 1853(c)(1) (2006) (emphasis added). Here, the implementing regulations are not being simultaneously submitted at the time of the plan; instead, different regulations are being submitted and far later, many years after the plan was submitted.⁵ *Cf. Fishing Co. of Alaska, Inc. v. Gutierrez*, 510 F.3d 328, 333 (D.C. Cir. 2007) (rejecting the Commerce Secretary’s promulgation of regulations that the Council did not properly deem and

⁴ The newest proposed implementing regulations, which make the required 50 C.F.R. 600.725(v) submission, also make clear that the Council considers “offshore aquaculture” to be the “fishery” and the “cages” and “net pens” to be “fishing gear.” This is blatantly illegal because the under the MSA, a “fishery” is a fish stock “requir[ing] conservation and management.” *Flaherty v. Bryson*, 850 F. Supp. 2d 38, 51 (D.D.C. 2012) (quoting 16 U.S.C. §§ 1802(13), 1852(h)(1) (2006)) and “aquaculture” is not a fish stock at all, no less a fish stock needing conservation and management. NOAA defines it as the propagation and rearing of marine species.

⁵ 16 U.S.C. § 1853(c)(2) (2006) is not applicable, since it only applied to modifications of implementing regulations, and NMFS has never issued implementing regulations.

submit). Because of these deficiencies, the Council must revisit the OMA FMP before it can deem the regulations necessary and appropriate. The Secretary of Commerce and NMFS must then review and take action on the implementing regulations and the simultaneously submitted plan.

The need for such actions is magnified by the proposed regulations' dramatic and legally questionable departure from the OMA FMP. The MSA requires implementing regulations that are *consistent* with the FMP. *See* 16 U.S.C. §§ 1854(b)(1)(B), (c)(7) (2006). The most recent draft proposed rule blatantly ignores this requirement. Notably, the plan specifically states that inspections of aquaculture facilities will be done by NMFS staff and officers. *See* OMA FMP at 44-45 ("NOAA Fisheries Service shall conduct at least annual inspections of each permitted aquaculture facility.") The proposed rule that is now up for the Council's consideration, to the contrary, allows inspections by third-party contractors hired by the aquaculture companies.

Council members and the public should have the opportunity fully debate this gross deviation from the OMA FMP as passed. It raises many new questions about whether it makes any sense to implement a plan that allows inspection obligations to be passed from the government to private parties with clear conflicts of interest, or whether it would be better to only not allow aquaculture facilities into the Gulf at all, or at least only allow them under Experimental Fishing Permits, the OMA FMP's no-action alternative.

Because the OMA FMP must be revisited, put through a rigorous public review process, and amended, and the Council should reject the proposed rules currently up for consideration at the February 2013 meeting.

B. The Council Should Not Deem the Implementing Regulations "Necessary and Appropriate" Without a Final Supplemental Environmental Impact Statement.

FWW and RFC were pleased to learn that NMFS is planning to issue an SEIS. The OMA FMP's EIS is now extremely outdated and, therefore, does not include the most recent information about aquaculture and its effects – as detailed by FWW's most recent comments. The plan pre-dates the Deepwater Horizon explosion. Indeed, instead of assessing recent data on water quality and how this might impact fish farming, the outdated plan ridiculously touts fish farming on and around oil facilities. This failure to assess new information from the Deepwater Horizon incident, alone, renders the OMA FMP's EIS contrary to NEPA, as well as the MSA's requirement that the best science available be utilized.

It is not enough that NMFS issue an SEIS, however. The Council should not deem the implementing rules necessary and appropriate for the OMA FMP until this SEIS is complete.

The CEQ's binding NEPA regulations provide that an EIS "shall be prepared early enough so that it can serve practically as an important contribution to the decisionmaking process and will not be used to rationalize or justify decisions already made" 40 C.F.R. § 1502.5 (2012). Prior to taking any action on a proposal, agencies are required to issue a Record of Decision ("ROD") pursuant to 40 C.F.R. § 1505.2 (2012).

Here, NMFS never issued an ROD on the OMA FMP, and its rules were never proposed or finalized. Thus, the SEIS is necessary to serve in the OMA FMP decisionmaking process and cannot be used to justify the plan *after the fact*. While the EIS contained within the OMA FMP is final, the very purpose of an SEIS is to provide the Council and NMFS with additional information prior to a final ROD. Therefore, NEPA requires that NMFS only issue its ROD for the OMA FMP based on the SEIS.

It appears that, instead, NMFS will either (1) fail to issue an ROD on the OMA FMP on the theory that the OMA FMP is already in effect as a matter of law and only issue an ROD on the SEIS; and/or (2) issue the final rules implementing the OMA FMP without the benefit of finalizing the SEIS. But the former would blatantly violate NEPA's requirement to issue an ROD. While the MSA may provide for an FMP to go into effect as a matter of law without the Commerce Secretary's approval, nothing in NEPA removes the requirement for the agency to issue an ROD on an EIS. Any further actions under the plan without an ROD, such as permit issuances, would be contrary to 40 C.F.R. § 1506.1(a) (2012). Therefore, an ROD is still needed on the OMA FMP, with or without the SEIS.

The latter option – issuing the rules prior to the SEIS's finalization – would first require the Council to revisit the OMA FMP.⁶ A failure to do so would violate NEPA's requirement that the SEIS be issued when the action is still in the proposal stage. *See* 40 C.F.R. § 1502.9(c)(1)(i) (2012). Further, meaningful actions and alternatives will no longer be available to the Council without revisiting the plan.⁷

The only way to avoid these NEPA violations is for the Council to revisit and amend the OMA FMP as part of the SEIS process, an action that – as discussed above – is also mandated by the MSA. Any amendments to the FMP, such as those allowing third-party, aquaculture-company-hired inspections must be voted on by the full Council and reviewed by the Secretary of Commerce after the public has a meaningful opportunity review the final SEIS. Only then can the Council deem regulations necessary and appropriate.

Conclusion

Based on the discussion above, the Council should reject the proposed rules for the OMA FMP. Deeming the proposed rules necessary and appropriate at this time would violate the MSA and jeopardize the SEIS's validity under NEPA, in addition to going against overwhelming public opinion and triggering other serious concerns.

FWW and RFC strongly urge the Council members to honor the oath they took upon

⁶ Of course, NMFS could not possibly issue the ROD for the SEIS at the same time as it approves the final rules without the Council first reevaluating the OMA FMP, since NMFS's Notice of Intent to prepare a SEIS indicates that it intends to determine if and how the Deepwater Horizon “may affect the actions and alternatives analyzed in the FMP.” NMFS has no ability to address actions and alternatives when it is reviewing and promulgating implementing regulations. Thus, were an ROD on the SEIS to be issued prior to the Council revisiting the plan, the SEIS would violate NEPA because it would be inappropriately late after the OMA FMP was finalized and would fail to present a full range of reasonable alternatives and mitigation measures.

⁷ For example, even with future framework actions, the “no action” alternative would no longer be available.

As of Tuesday, February 5, the Council has received 3285 E-mails regarding the Aquaculture Fishery Management Plan. Below is a sample of the email content.

Jan 31, 2013

Gulf of Mexico Fishery Management Council

Dear Fishery Management Council,

I strongly urge you to vote against implementing regulations for the Fishery Management Plan for Regulating Offshore Marine Aquaculture in the Gulf of Mexico (Plan).

I am a U.S. citizen deeply concerned about factory fish farming in the Gulf of Mexico.

Industrial scale agriculture has wreaked havoc on land; we don't want it in our oceans. You are making a precedent-setting decision by promoting open water fish farming through the fishery-management process. This can harm the Gulf, the rest of our ocean waters, marine wildlife and people too.

In addition to the numerous, negative environmental and socioeconomic concerns your plan presents, it is out-of-date, failing to take into account lessons learned in open ocean aquaculture since 2009. Most importantly, it fails to meet even the most basic safeguards set forth in the National Aquaculture Policy. To make matters worse, the rules that will be voted on this week will allow inspections of fish farm facilities to be done by companies that they hire. It is unnecessary to allow ocean fish farming in the Gulf of Mexico or anywhere in the U.S. for that matter. There are other, much more sustainable ways to raise fish, like recirculating aquaculture. These other options should be discussed and explored before pushing through regulations for an outdated and potentially harmful plan.

Ocean fish farming is dirty business:

Fish waste and chemicals can flush straight into the open ocean.

Fish can escape from farms and they can alter wild fish behavior, compete with wild fish and spread disease.

Farmed fish usually eat food containing small wild fish. These small fish are an important food source for marine wildlife. An increase in factory fish farms can mean less food for marine wildlife.

When fishmeal or oil isn't used in fish feed, genetically modified soy is often substituted. Soy does not belong in the marine environment, and it can have various negative impacts.

Despite the tens of thousands of people who voiced opposition to open water fish farming over the many years that you discussed this plan, you are still moving forward. I request that you stop, listen and think before voting in favor of implementing regulations for your Fishery Management Plan for Regulating Offshore Marine Aquaculture in the Gulf of Mexico.

At the very minimum, the plan must be revised to be in line with the basic standards established in the National Aquaculture Policy and contain the latest scientific findings. And, if the government cannot adequately police fish farming, causing the industry to become self-regulated, it has no business in our waterways. This means the Council must have a meaningful discussion that includes more public input and an update to the Plan before voting for it to be implemented.

The Gulf of Mexico has been battered by hurricanes, covered in oil and then sprayed above and below with chemicals in an effort to mask the terrible effects of the BP spill.

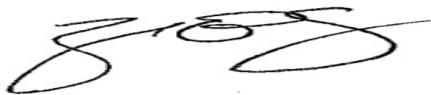
We do not want expansion of industrial fish farming to further degrade this precious resource.

Sincerely,

joining the Council to “conserve and manage the living marine resources of the United States of America by carrying out the business of the Council for the greatest overall benefit of the Nation” and recognize the “responsibility to serve as a knowledgeable and experienced trustee of the Nation’s marine fisheries resources, being careful to balance competing private or regional interests, and always aware and protective of the public interest in those resources.” Developing open water fish farms in the Gulf of Mexico does not benefit the nation and is not in the region or general public’s interest. Such operations have proven to be dirty, dangerous, and unstable around the world.⁸ Simply voting to deem the regulations necessary and appropriate for the sake of moving on is both legally questionable and socially irresponsible. At a minimum, the OMA FMP must be reviewed and amended, with meaningful public input, based on the new National Aquaculture Policy, the SEIS, and in light of new information regarding aquaculture since 2009.

We appreciate your attention to these very important matters.

Sincerely,



Zachary B. Corrigan, Esq.
Senior Staff Attorney
Food & Water Watch



Marianne Cufone, Esq.
Executive Director
Recirculating Farms Coalition

⁸ See Food & Water Watch, *Disasters in Ocean Aquaculture*, 2011, located at <http://www.foodandwaterwatch.org/factsheet/disasters-in-ocean-aquaculture-2/>.