New York State Conservation Council Inc.
8 East Main Street, Ilion, New York 13357-1899

MEMORANDUM IN OPPOSITION

Bill #	**A 3377** Thiele		Same as **S 831** Young
	A 3960 Thiele		Same as **S 563** Young

Title: Transfers the regulation of aquaculture from the Department of Environmental Conservation to the Department of Agriculture and Markets.

The purpose of these bills is to transfer the regulatory authority over various forms of aquaculture from the Department of Environmental Conservation to the Department of Agriculture and Markets in an effort to better regulate and promote this aspect of agriculture.

Justification:

The NYSCC opposes these proposals. This is not opposition to aquaculture but a recognition that it poses a different set of risks than terrestrial farming and that the DEC is best qualified to provide regulatory oversite of those issues with potential environmental impact.

Aquaculture and mariculture are unlike terrestrial agriculture in that, if not properly managed, can pose a significant risk to wild populations through the introduction of selectively bred native, non-native and transgenic species into the environment. Risks common in all forms of farming – nutrient pollution, disease and parasite propagation and habitat modification – are not as easily contained in the more mobile aquatic environment.

This is an area with which the DEC has the familiarity acquired through its responsibility for wildlife management. It also has a great deal of hard won knowledge gained from its experience in dealing with invasive species and pollution problems. A&M's focus, as the sponsors' memos reiterate, is on the safety of the human food supply and the promotion of agriculture as an industry.

These are all vital responsibilities and we believe that they are currently located in the right departments.

Contact:

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