



## POSITION PAPER

# UPPER PENINSULA ENVIRONMENTAL COALITION

Abstract: *Comments to the Michigan Department of Natural Resources from the Upper Peninsula Environmental Coalition on Proposed Net-Pen Aquaculture in the Great Lakes*

November 23, 2015

The Upper Peninsula Environmental Coalition (UPEC) is strongly opposed to the proposal to raise farmed fish in the Great Lakes using net-pen aquaculture. We believe that this practice would pose far too great a threat to our public waters, and also to public health.

We have reviewed the recently-released report from the scientific advisory panel that was established by MDNR, MDEQ, and MDARD. The findings from this report confirm our concerns with the proposal. Some of the concerns we have (most of which agree with the findings from the above report) are as follows.

Net-pen aquaculture in the Great Lakes has the potential to:

- add excessive amounts of phosphorus and nitrogen each year into the Great Lakes, as a result of discharge from the operations. This could have many negative impacts, including potentially triggering toxic algae outbreaks like the ones that have affected Lake Erie in recent years;
- provide a breeding ground for diseases that could spread from caged fish to wild populations, putting the Great Lakes fishery and ecosystem at risk;
- lead to escapes that can have wide-ranging negative genetic effects on native populations and erode our wild fish population's ability to adapt and survive;
- lead to introductions of non-native fish species into the Great Lakes;

- unfairly compete with environmentally friendly aquaculture systems, since these responsible, self-contained projects must capture and treat the waste they produce, rather than dumping it untreated into a public water body for free.

While the report concludes that the ultimate effects of net-pen aquaculture industry on lake ecosystems are not entirely known, the scientific panel still believes that the state must err on the side of caution – and we strongly agree. The risks are far too great for Michigan's most significant resource, our freshwater lakes.

There can be benefits from aquaculture in Michigan, if it is done differently. Michigan already has closed-loop aquaculture. These promising ventures (which can be established in vacant warehouses and other buildings) re-circulate water and capture all the waste. Completely separated from rivers and lakes, these operations can be a sustainable source of food and economic development, while we keep the Great Lakes and inland waterways protected.

The Great Lakes belong to all of us, and private interests should not be allowed to transfer the risks of their business venture to the citizens of this state, and the future generations who will inherit our natural resources.

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