

## Idaho Aquaculture Association Inc.

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January 25, 2013

**Re: 58.01.02 - WATER QUALITY STANDARDS, DOCKET NO. 58-0102-1201**

Dear Ms. Wilson:

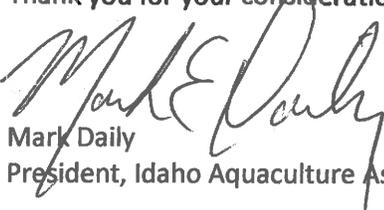
On behalf of the members of the Idaho Aquaculture Association, I would like to submit these comments on the proposed rulemaking concerning fish consumption.

Any limit on the consumption of fish should apply only to wild-caught freshwater fish for recreation or subsistence. Consumption of freshwater market and hatchery-raised fish should be explicitly and clearly excluded.

Hatchery-raised fish are grown in protected environments and fed carefully controlled diets. These fish are not grown in state waters where they may potentially become contaminated with toxins. Commercial aquaculture products are regulated by the U.S. Food and Drug Administration for food safety. Aquaculture products are tested and fish processing plants are required to implement a food safety management system known as Hazard Analysis and Critical Control Point, or HACCP. Idaho aquaculture products are safe, wholesome and of the highest quality available.

Numerous studies show that Americans should increase their consumption of seafood, which includes aquaculture products, for improved health and nutrition (see the 2010 Dietary Guidelines for Americans; <http://www.cnpp.usda.gov/dietaryguidelines.htm>). Studies also show that advisories, however well intentioned, can have the opposite unintended effect of decreasing consumption of a healthy food. Thus, the Idaho Aquaculture Association requests that the consumption of freshwater market and hatchery-raised fish should be explicitly and clearly excluded in order to avoid, as much as possible, any misunderstandings.

Thank you for your consideration.

  
Mark Daily  
President, Idaho Aquaculture Association