NATIONAL Aquaculture ASSOCIATION

August 4, 2025

Rep. Harriet Hageman, Chair,
Rep. Val Hoyle, Ranking Member
Subcommittee on Water, Wildlife and Fisheries
House Committee on Natural Resources
1332 Longworth House Office Building
Washington, DC 20515

Dear Chair Hageman, Ranking Member Hoyle and Subcommittee Members:

On behalf of the National Aquaculture Association (NAA)[1] and our members, please accept our thanks for the recent hearing that included H.R. 4033, the Sturgeon Conservation and Sustainability Act of 2025. The NAA strongly supports this bill and provides the following information in response to Chair Hageman's question, "can wild and farm-raised sturgeon coexist."

The answer is a resounding ***yes***. Evidence shows that regulated, sustainable aquaculture production of at-risk species can reduce the demand and price for illegally harvested wild animals by lowering market prices and offering legal alternatives. Froehlich et al. (2017) suggested:

> "… a need for renewed focus on the potential for aquaculture to reduce pressure on certain highly threatened, overexploited species. Targeted production of endangered/black-market wild species (e.g., sturgeon for their caviar) may be a tractable approach - both from a consumptive and aquarium trade perspective."

There is a strong history of beneficial outcomes of farmed sturgeon production in the United States and overseas. Russian and Stellate sturgeons are farmed within the United States and in at least 16 other countries for caviar and meat (Bronzi et al., 2011). Although proposed for listing as endangered by the U.S. Fish and Wildlife Service (FWS) in May 2022, both species have been successfully and sustainably cultured for up to 20 years at nine U.S. farms, six farming Russian sturgeon and two farming Stellate.

According to a report from Bronzi et al. (2019), 2,329 farms in 46 countries are involved in sturgeon aquaculture, and in 2017 alone, farmed sturgeon production reached 102,327 metric tons. More than four times the volume of the wild sturgeon fishery during the 1970s-1980s. Russian sturgeon contributed 20% to 365 tons of global farmed caviar. Stellate production was combined with other species and not reported as a species.

Bronzi et al. (2019) also noted that:

1) These figures are under reported due to a lack of participation by several countries farming sturgeons (e.g., Japan, North Korea, Moldavia, South Korea, and United Kingdom) and

[1] The National Aquaculture Association (NAA) is a U.S. farmer-based, non-profit trade 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 34 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.

PO Box 167, Sorrento FL 32776
Tel: (856) 906-7018 ♦ Email: naa@nationalaquaculture.org
Home - National Aquaculture Association

2) *The expansion of farmed sturgeons has driven overall market prices down, which disincentivizes illegal wild harvest.*

Mr. Evans reported to the Subcommittee a petition has been accepted by the FWS during October 2024 to consider the listing of the California San Francisco Estuary population of white sturgeon, which inhabits the Sacramento and San Joaquin River systems and the San Francisco Estuary. A listing, whether endangered or threatened, would seriously jeopardize white sturgeon aquaculture in California, which has operated sustainably alongside wild white sturgeon populations since 1983. This success is exemplified and recognized by the Monterrey Bay Aquarium's Seafood Watch program, which rates U.S. farmed white sturgeon is a "Best Choice" for consumers. Furthermore, the program recommends buying "sturgeon farmed worldwide in recirculating aquaculture systems, though very little is available on the U.S. market." For more details, and to see a full report from Seafood Watch, regarding the sustainability of U.S. farmed white sturgeon we recommend visiting their website.

An endangered listing for Russian, stellate and white sturgeons would have sweeping consequences. Under the ESA, listings are unlimited in geographic scope as the phrase used by FWS in regulation is "wherever found." An endangered listing means that U.S. farms would be forced to shut down and depopulate their endangered sturgeon stocks in order to comply with the Endangered Species Act, regardless of the fact these animals are isolated from wild stocks and produced sustainably. Closing these farms will result in the loss of:

- considerable investment.
- employment and income to rural communities.
- opportunities to share technological and biological advancements with range and non-range countries working on sturgeon recovery and/or commercial production.
- the loss of thousands of individual sturgeon due to the required depopulation.

Ongoing Improvements in sturgeon husbandry, learned through commercial production, are recognized as highly valued activities that support global species survival and recovery efforts (Vasilyeva et al. 2019).

A threatened listing for the white sturgeon could potentially allow continued farming, only if the FWS writes a tailored protective regulation to consider culture "necessary and advisable to provide for the conservation of" threatened species as authorized by the Endangered Species Act. Given the only such regulation ever developed relative to farming concerned the Beluga sturgeon, and the rule and subsequent permit proved to be unachievable by family-owned farms, such a path is highly impractical, if not impossible. Making it unlikely white sturgeon farming would continue in California even if such a rule would technically allow commercial culture.

We urge the Committee to recognize the proven coexistence of wild and farmed sturgeon, and the important role sustainable aquaculture plays in conservation. Passage of H.R. 4033 would help ensure continued innovation, economic viability and protection for farmed sturgeons and their producers, while also advancing the conservation of wild sturgeon by reducing illicit harvest pressure, informing husbandry, and supporting global conversation of these critical species.

References

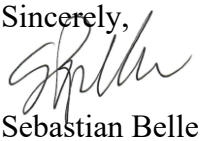
Bronzi P, Chebanov M, Michaels JT, Wei Q, Rosenthal H, Gessner J. 2019. Sturgeon meat and caviar production: Global update 2017. J Appl Ichthyol, 35(1): 257-266.

Bronzi P, Rosenthal H, Gessner J. 2011. Global sturgeon aquaculture production: an overview. J Appl Ichthyol, 27: 169-175.

Froehlich HE, Gentry RR, Halpern BS. 2017. Conservation aquaculture: Shifting the narrative and paradigm of aquaculture's role in resource management. Biological Conservation, 215: 162-168.

Vasilyeva LM, Elhetawy AIG, Sudakova NV, Astafyeva SS. 2019. History, current status and prospects of sturgeon aquaculture in Russia. Aqua Res, 50(4): 979-993.

Sincerely,



Sebastian Belle
President