

TESTIMONY OF EVANS FARMS, LLC

BEFORE THE U.S. HOUSE OF REPRESENTATIVES

COMMITTEE ON NATURAL RESOURCES

LEGISLATIVE HEARING ON H.R. 4033, THE STURGEON CONSERVATION AND SUSTAINABILITY ACT OF 2025

JULY 2025

Chairman, Ranking Member, and Members of the Committee:

Thank you for the opportunity to submit this written testimony on behalf of Evans Farms, LLC, a U.S.-based, family owned aquaculture farm dedicated to sustainably producing sturgeon. We are grateful for your attention to H.R. 4033, the Sturgeon Conservation and Sustainability Act of 2025, and appreciate the opportunity to explain why the Act is needed and request your support for its passage.

I. Introduction and Background

Evans Farms was founded in 2003 with the introduction of Beluga Sturgeon (*Huso huso*) intended for future broodstock development. Since then, we have expanded into a leading aquaculture operation focused on developing multi-generational, closed-system production of several sturgeon species:

- Beluga Sturgeon (*Huso huso*)
- Osetra Sturgeon (*Acipenser gueldenstaedtii*)
- Siberian Sturgeon (*Acipenser baerii*)
- Sevruga Sturgeon (*Acipenser stellatus*)

In 2004, the Beluga Sturgeon was listed as threatened under the Endangered Species Act (ESA), and we have operated fully in compliance with all associated regulations, including a special rule under ESA Section 4(d). In 2021, we submitted ESA Permit Application CS0077270 to the U.S. Fish and Wildlife Service (FWS) to authorize regulated harvest from our captive-bred stock. Additionally, our farm is regulated by the Florida Department of Agriculture and Consumer Services which includes biannual inspection for compliance with the state's Best Management Practices (regulations governing commercial aquaculture).

Evans Farms' aquaculture model reduces pressure on wild sturgeon populations by producing premium-quality caviar entirely within a closed system. We serve as a model of how responsible American businesses can simultaneously advance economic opportunity and conservation.

II. Concerns Regarding the Proposed ESA Listing

On March 12, 2012, a petition was submitted to list 15 foreign sturgeon species under the ESA. Four species—Russian, ship, Persian, and stellate—are now the subject of a proposed rule for listing as endangered. These species are not native to the United States and are found in the Black, Azov, Aral, Caspian, and northern Aegean Sea basins.

FWS has held two formal comment periods (2013 and 2022) during which public input was nearly unanimous in opposition to the proposed listing. Among the 42 comments submitted in 2022, 41 opposed the rule and only one of the two petitioners for listing supported the rule. Commenters opposing the proposed rule included:

- U.S., Italian, and Chinese sturgeon farms
- Universities of Florida, Idaho, and North Carolina
- International trade and aquaculture organizations
- Government agencies from Israel, Russia, Azerbaijan, Bulgaria, and Uruguay
- Leading caviar and food service companies

The World Sturgeon Conservation Society noted that these species are already regulated under CITES Appendix II, with international trade subject to export quotas, range-state coordination, and independent review by the CITES Secretariat. They further emphasized:

- ESA listing would have no effect on poaching or habitat threats in sovereign nations
- Many range states maintain conservation programs that depend on controlled commercialization to fund restocking
- Over 90% of global caviar production now comes from aquaculture, reducing pressure on wild stocks and has resulted in declining market prices
- Blocking access to the U.S. market would disrupt sustainable farming globally, including U.S. producers with documented broodstock like Evans Farms

Despite this, the FWS issued its 12-month finding and proposed final rule in May 2022 to list Russian, ship, Persian, and stellate as endangered. More than three years later, no final rule has been published—leaving producers in a state of uncertainty and potential regulatory harm.

III. Legislative Solution: H.R. 4033

In response to these concerns, we support H.R. 4033, the Sturgeon Conservation and Sustainability Act of 2025, introduced by Representative Fine. This legislation would amend the ESA to:

- Exempt sturgeon legally held in captivity or controlled environments, and their progeny, from certain ESA prohibitions—unless reintroduced into the wild
- Require documentation and inventory controls to ensure regulatory compliance
- Prevent duplicative or unnecessary recordkeeping requirements

This legislation is narrowly tailored to ensure lawful aquaculture is not disrupted by listings that provide no conservation benefit to the wild species and their habitats overseas.

IV. Conclusion

Evans Farms respectfully urges the Committee to support H.R. 4033. The proposed ESA listing does not create additional conservation or protection to the four wild sturgeon populations, but does pose serious harm to responsible, law-abiding aquaculture operations in the United States and abroad.

Our farm's mission is aligned with conservation—providing a sustainable, ethical, and traceable source of sturgeon and caviar. The success of our broodstock program, including Beluga and other key species, depends on regulatory clarity and market access. H.R. 4033 offers a balanced path forward.

Thank you for your attention to this matter and for your continued leadership in supporting sound environmental policy and sustainable U.S. industry.

Respectfully submitted,

Geno Evans

Evans Farms, LLC