

## Draft ECSGA Restoration Policy

We support community based shellfish restoration projects because of the environmental services they provide and the educational opportunities they present. Large populations of restored filter-feeding shellfish can improve water quality, improve habitat value and remove excess nutrients from sensitive coastal habitats. Well-designed restoration projects have strong educational components that raise awareness about water quality issues and the important role of shellfish in coastal ecosystems. Raising public awareness is a critical step towards improving degraded water quality, which is one of our top priorities.

However, our members are very concerned that restoration projects in waters not approved for harvest may lead to illegal harvest and illness, damaging our markets. Therefore, we support restoration efforts in other-than-approved waters only when the authorities responsible for the shellfish sanitation program have the resources necessary to prevent illegal harvesting or are confident that illegal harvesting will not occur.

We have several important recommendations to reduce this risk:

- Shellfish “gardening” efforts should be accompanied with strong mandatory educational components that teach participants about the National Shellfish Sanitation Program and the potential negative market impacts that occur when illnesses occur. Curricula should cover issues such as ISDS maintenance, pet waste, use and disposal of toxic chemicals, vessel pump outs, lawn fertilizers and herbicide use, as well as the rationale and regulations for disease inspection of transplanted seed. There is immense value in educational programs that instruct the public about their role in preserving and restoring coastal water quality. Education should be done in concert with appropriate state agencies responsible for shellfish water classification, management, and food safety.
- Shellfish “gardening” projects in other-than-approved waters should be conducted in containers that are clearly marked with appropriate warnings, and shellfish should be removed to sites with appropriate surveillance before shellfish approach market size.
- When shellfish are being restored in sanctuaries that are in other-than-approved waters, adequate surveillance must be provided to ensure that these shellfish are not harvested. We encourage the use of electronic surveillance, citizen patrols, public education efforts and whatever means can be adopted to ensure that restored shellfish in closed waters are not consumed. Sites should be selected for ease of surveillance and be well marked.
- States that cannot afford to rigorously monitor and adequately enforce their restoration projects should be prevented from placing shellfish sanctuaries

in unapproved waters. Non-commercial species can be considered as alternatives, reducing the risk of illegal harvest.

- Penalties for violators should be severe and judges should be educated about the importance of deterrence.
- Riparian landowners, fishermen and boaters should be consulted in the collaborative process of site selection, and where possible, encouraged to participate in the process of creating the sanctuaries so they are vested in the success of the project.