



THE GREAT GEORGIA OYSTER COMPANY

The Great Georgia Oyster Company is a group of four veterans of three branches of the military. Joined together by the shared values that drove us to the service of our country, we were then brought together by our passion for veterans and for community, meeting in Middle Georgia through our volunteer work with small farms and agriculture nonprofits training and supporting veterans transitioning into second careers in agriculture.

Now, it is our own team making the transition into agribusiness, training for the past year in order to be part of the formation and flourishing of Georgia's oyster mariculture industry.

We have worked with and learned from researchers, scholars, farmers, distributors, chefs, shuckers, and writers deeply involved in the farmed oyster industry from Prince Edward Island to Beaufort, SC, from Apalachicola to Louisiana to Washington State.

Georgia used to be one of the premier oyster producing areas in the world. We are excited to contribute our efforts to all the work done by the UGA Extension and by other shellfish growers who have been working toward making oysters Georgia again.

Of all the factors that will lead to a successful industry and to successful oyster mariculture businesses, there is one factor that stands above all others: food safety. Even if every other resource is available, and if every other decision made is the best possible decision, if we don't get product safety right, then every other piece is wasted time because no business or industry can survive that does not ensure its product is safe for customers.

We bring opposition to HB501 and SB182 not because we oppose regulation and oversight of our industry. Quite the opposite is true. We know that the regulatory agencies are critical to the well-being of our customers and therefore the survival of our business and industry. But we want to have a bill that introduces the right kind of regulation, and establishes the right kind of relationship between regulators and industry, where we are all working together toward everyone's highest priority of product safety.

We want to know that our regulatory partners have our back, and we want legislation that gives them the authority and the mandate to shut down harvest when conditions are unsafe.

We need for them to have our backs. We need and want for them to tell us when extreme weather conditions threaten the health of our animals. We need and want for them to tell us when bacteria levels are unsafe. We want and need for them to tell us when we have poor water conditions or pollution that affects our animals.

But we need for them to make these decisions based on known information. The proposed legislations assume a closed fall-to-spring oyster season, based on the inaccurate belief that bacteria are most prevalent in the warmest months. (Recent research, by the way, indicates that while high water temperature can kill oysters, the warmest months were not those with the highest concentrations of



THE GREAT GEORGIA OYSTER COMPANY

bacteria). We need our industry to have food safety awareness based on science, not on which months have the letter "R" in them.

If water quality is poor, we need our regulators to tell us that regardless if it's March or November. If unsafe bacteria levels are present, that information is as important to growers in January as it is in July.

All of our neighboring coastal states have 12-month harvest seasons and excellent safety records. Commercial customers and consumers know that oysters can be grown and harvested safely year-round, and expect a year-round supply from the farms they purchase from. The potential of a closed season - even in the short term - would set the reputation of Georgia Oysters as an unreliable, inconsistent product that restaurants and distributors cannot count on as a staple.

We are asking for you to support legislation that bases oyster harvesting on facts and not on folktale. We cannot meet industry standards that purchasers and restaurants expect without a presumptive 12-month season written in legislation. Having said that, again, we also need our regulators to have fine-grained access, knowledge, and data access about true risks and hazards, and we need them to be empowered to protect our industry year-round.

A proliferation of oyster farms, rather than being a burden to regulators to keep pace, through collaboration in monitoring, can become a key ally to regulators and researchers. Each farm can collect and deliver samples or data for analysis. The more farms there are, the safer the industry would become because each farm would become a data point, allowing regulators to gain an increasingly fine-grained and detailed understanding of what is happening in our coastal waters.

But this can only take place in a twelve-month season.

As we mentioned above, the partners of the Great Georgia Oyster Company met through volunteering with small family farms and with nonprofits assisting military veterans to transition into careers as small farmers. Sustainability, community, family, and social responsibility are keystone values of our work. Small farms are vitally important to maintaining a healthy, local food-supply in our communities. Small businesses and small agriculture are critical to building communities, creating jobs, and developing the economy, especially in rural areas.

Current legislation suggests the assignment of oyster farming leases in coastal waters based on a lottery system, where applications are filed, then permits and leases issued or granted based on agency discretion.

This system prices out small and family farmers.

The initial investment to start an oyster farm is in the neighborhood of \$100,000 - \$500,000.



THE GREAT GEORGIA OYSTER COMPANY

Minimum necessary investment includes a commercial refrigeration unit, a boat, and a dock within range of the lease site.

To meet time-to-temperature requirements, a shore facility cannot be too far from the farm site. Renting or purchasing waterfront with a suitable dock is no small expense. This is to say nothing of the actual oyster gear, which will cost approx. \$250 - \$300 per cage. Recent analysis suggests that for an oyster mariculture business to be profitable within 4 years requires a yearly yield of about 1 million oysters, which can be done in about 800 oyster cages.

Without an assurance that a lease will be issued, and without knowing where that lease will be located, no investor will provide capital for a small mariculture startup. Traditional watermen will be completely priced out of the industry, and a way of life will fall away while large enterprises will be the only ones in position to risk this substantial up-front investment.

The proposed bills leave out any mention of type of gear that can be used for oyster farming. The modern methods use either floating gear (in cages or bags or both) that is anchored to the water bottom or suspended gear (Australian long line or variations thereof). The older method of putting a cage on the water bottom leads to increased mortality before harvest and the finished product that does survive has a higher risk of invasive pests that make the product less desirable for market. A line as simple as "gear anchored to the water bottom" would assure growers and investors that the latest mariculture methods can be utilized.

The final item we ask is that an advisory board be created that contains regulatory, grower, distributor and end consumer members. This board would have authority to advise and propose changes to the regulatory agencies as technology, climate, and growing methods evolve to ensure that the Georgia mariculture industry can continue to thrive and change as the industry and environment evolves.

In summary we truly appreciate that the legislature and regulatory agencies are interested in the Georgia mariculture industry and that the conversation has started. We just cannot support HB501, SB182 as written. There is too much uncertainty built in to the bills by not explicitly defining in statute the measurements and benchmarks the industry needs to start a business and have a framework to make accurate business decisions.



THE GREAT GEORGIA OYSTER COMPANY

Signed,

Justin Dotson
3/17/19

Justin Dotson
Managing Partner
Great Georgia Oyster Co.