

## **FAQ regarding WDFW permitting requirements for wet storage and live holding facilities**

### **What is wet storage?**

- The term “wet storage” refers to practices involving temporary storage of live seafood and shellfish products after harvest but before going to market. This can include storing live shellfish on a beach, hanging product off a dock or floating structure, and utilizing sink floats, flow-through tanks, or upland holding facilities. Wet storage may take place in closed, recirculating systems or in open, flow-through systems. The goal of wet storage practices is to keep shellfish alive during transport or to “freshen” products before consumption.

### **When is a Shellfish Transfer Permit required for wet storage of shellfish product?**

- A Shellfish Transfer Permit is required for wet storage of any Washington-origin shellfish product that is not “market ready” and will be wet stored in a facility or location that is in state waters or connected to state waters.
- If you do not know whether this requirement applies to your wet storage practices, please contact [shellfishpermits@dfw.wa.gov](mailto:shellfishpermits@dfw.wa.gov) for a consultation.

### **When is a Shellfish Import Permit required for wet storage of shellfish product?**

- A Shellfish Import Permit is required for wet storage of any live shellfish product originating from outside Washington that is not “market ready” (see below for definition) and will be wet stored in a facility or location that is in state waters or connected to state waters.
- Additionally, a Shellfish Import Permit is required for wet storage of any shellfish that is not “market ready” and not native to Washington state, regardless of the type of wet storage facility and its connection to state waters.
- If you do not know whether this requirement applies to your wet storage practices, please contact [shellfishpermits@dfw.wa.gov](mailto:shellfishpermits@dfw.wa.gov) for a consultation.

### **What does “market ready” mean?**

- As defined in Washington Administrative Code (WAC) 220-370-050
  - o *(16) "Market ready shellfish" are defined as aquatic invertebrate species which are intended for immediate human consumption and will not be placed into or come in contact with state waters.*
  - o To be considered “market ready” the shellfish in question has to satisfy the prerequisites of 1) not being placed into or in contact with state waters. AND 2) being sold for immediate human consumption, meaning not sold wholesale for resale.
  - o Shellfish product placed into wet storage is not considered “market ready” as it is either stored in state waters or a facility that is connected to state waters, and/or it is not being sold for immediate human consumption. Accordingly, a Shellfish Transfer Permit or Shellfish Import Permit may be required.

### **What does it mean to be connected to state waters?**

- Wet storage systems can be connected to state waters in various ways. On-beach or float-based wet storage takes place directly in state waters. If a live holding facility discharges water in a way that directly or indirectly contacts water bodies or shorelines, it is considered connected to state waters. All of the above storage types pose an increased biosecurity risk because live seafood may carry invasive species or diseases that could accidentally be introduced into state waters. An invasive species or disease introduction could adversely affect shellfish resources, aquaculture production, and aquatic ecosystems. These risks can be mitigated with proper effluent treatment and decontamination.

### **Is this a new requirement?**

- This is not a new requirement. Per Washington Administrative Code ([WAC](#) 220-340-150), a permit has always been required to transfer shellfish or shellfish aquaculture products into and between state waters.

### **What if I only wet store harvested shellfish on the same tideland parcel where the product was harvested?**

- If the wet storage is located on the same tideland parcel where the shellfish is harvested, you do not need to have a Shellfish Transfer Permit. However, if you transfer any shellfish from another tideland parcel or state water body to the wet storage site, then you need a permit.
- Every shellfish transfer situation is unique and WDFW shellfish transfer/import permits are not limited to wet storage activities. If you are transferring shellfish between tideland parcels for wet storage or for any other reason, please contact [shellfishpermits@dfw.wa.gov](mailto:shellfishpermits@dfw.wa.gov) to verify whether a Shellfish Transfer Permit is required.

### **What should I do if I received this letter and do not know if it applies to me?**

- Please contact Washington Department of Fish and Wildlife (WDFW) to discuss your operations and determine if a shellfish transfer or import permit is required.
  - o WDFW Shellfish Permit Coordinator: Nam Siu, (360) 316-6898
  - o [Shellfishpermits@dfw.wa.gov](mailto:Shellfishpermits@dfw.wa.gov)

### **What should I do if I already have a Shellfish Transfer or Import Permit for my wet storage?**

- If all your wet storage activities and facilities are covered by active Shellfish Transfer or Import Permits, you do not need to take any action. Please make sure to check the dates, species, and locations on your permit(s) to ensure they are active and valid.

### **Why is WDFW issuing wet storage requirement notifications?**

- WDFW has been permitting wet storage as part of shellfish transfer permitting for some time, and many parties are already permitted. WDFW is reminding stakeholders of permitting requirements, in part, because of increased international trade of live shellfish—including from countries with known shellfish pests and diseases not currently found in Washington state—and continued concern about the spread of invasive European green crab and other invasive species. It is vital that all wet storage and live holding facility operators are aware of these concerns and work with WDFW to manage biosecurity risks. Sharing the common goal of preventing the introduction and spread of pests and diseases will ensure Washington state's shellfish resources and marine ecosystems remain healthy.
- Our team has recently increased outreach and education to the industry on our permitting program and requirements; our July 2024 letters to seafood buyers and wet storage operators was part of that effort. Information regarding shellfish transfer/import permits, as well as requirements for wet storage operators, has long been available on our [website](#). In our continuing effort to keep operators informed, we have given multiple presentations highlighting the increased focus on wet storage permitting at industry meetings and conferences over the past year, in advance of the July 2024 letter to license holders.

### **Why is it important that wet storage operations obtain the necessary Shellfish Transfer or Import Permit(s)?**

- Transfers of shellfish are a well-documented pathway for introduction of invasive species and pests, as well as marine diseases. It is important that any movements of shellfish into or between state waters is reviewed and permitted by WDFW's Shellfish Health and Biosecurity team to ensure all risks are minimized or avoided.
- Shellfish transfer and import requests are all individually reviewed, associated risks are evaluated, and consultations are provided to the permit applicant. Permits come with a suite of customized conditions to address risks and outline best management practices.
- It is unlawful to transfer shellfish without a permit. Failure to comply with this requirement may put Washington's shellfish and marine ecosystems at risk and will result in enforcement actions.

### **Will wet storage permitting requirements affect my business?**

- WDFW will work with wet storage operators to develop permitting that meets our responsibilities, as well as fits their needs to the extent possible. Many of our permit holders will recognize our efforts to work with applicants—and we have been very successful in identifying workable approaches. That said, there are some transfers and imports that can't be permitted. Contacting us at [shellfishpermits@dfw.wa.gov](mailto:shellfishpermits@dfw.wa.gov) is the best course of action to discuss requirements and possibilities.
- Note that there is no cost for a Shellfish Transfer or Import Permit.
- Note that it usually takes up to 30 days for a permit to be processed and issued, so please plan ahead!

**For more information please see the “[Temporary wet storage of shellfish](#)” tab at our Shellfish and Seaweed Health and Biosecurity website.**