

February 26, 2025

Testimony re: HB 2965

Co-Chairs Helm & Owens and Committee members:

Center for Food Safety (CFS) is a national non-profit member-based organization dedicated to empowering people, supporting farmers, and protecting the environment from industrial agriculture. This mission includes protecting Oregon and the larger Pacific Northwest from the harms of industrial agriculture and aquaculture, work CFS has engaged in for years on behalf of our thousands of members in Oregon. CFS strongly supports HB 2965 with the -5 amendment.

Oregon is now a magnet for large industrial aquaculture given the bans and serious limits on marine net pen fish farms on the rest of the West Coast, and the increasing regulation in other aquaculture-heavy countries. These states (CA, WA, and Alaska) and nations (like Norway) have seen the damage that massive fish factory farms can cause to aquatic habitats, wild species, and commercial and recreational wild fisheries.¹ The industrial aquaculture industry has for decades been trying to open our federal waters to these floating factory farms, to the detriment of traditional fishers, threatened and endangered species, and the coastal communities that rely on the health of our oceans.²

While Oregonians prize our local food production, industrial fish farming is a false promise.³ Industrial aquaculture is the mass cultivation of fish and shellfish in marine and freshwater. Open water net pens, one of the most-used methods for finfish, are essentially floating feedlots in open water, which can have devastating environmental and socio-economic impacts. Industrial aquaculture is associated with many environmental and public health concerns, including: the escape of farmed fish into the wild;⁴ outcompeting wild fish for habitat, food, and mates or intermixing with wild fish and altering their genetics and behaviors; the spread of diseases and parasites from farmed fish to wild fish and other marine life; and pollution from excess feed, wastes and any antibiotics or other chemicals used flowing through the open pens into natural waters. Industrial aquaculture also significantly affects public health, as antibiotics, pesticides and other chemicals that are heavily used to prevent disease and parasites in industrial aquaculture can accumulate in fish tissues. Countries around the world, and states here in the US have for years learned the toll these floating factory farms can take on aquatic habitats and wild

¹ Isabella Breda, *WA bans commercial net-pen fish farming in state waters*, Seattle Times (Nov. 18, 2022) (enclosed); Sierra Club, *The Promise and Challenge of "Restorative Aquaculture"* (2021) (enclosed); FoodPrint, *The FoodPrint of Farmed Seafood* (2020) (enclosed); CFS, *Ocean-Based Fish Farming: Pollution, Pathogens & Environmental Impacts* (2015) (enclosed); CFS, *The Catch with Seafood: Human Health Impacts of Drugs & Chemical Used by the Aquaculture Industry* (2005).

² CFS, Comments on Propose to Reissue and Modify Nationwide Permits, COE-2020-0002 (Nov. 16, 2020) (providing detail on the dangers of offshore open ocean aquaculture) (enclosed).

³ CFS, *Finfish Aquaculture: A False Solution to Overfishing* (Nov. 2022) (enclosed).

⁴ CFS, *Reported Escapes from Fish Farms 1996-2012* (2012) (enclosed).

fisheries. We know the risks; now we have the opportunity to prevent any damage to Oregon's coastal waters and communities.

Fish escapes are inevitable with net pens and mass escapes with their related environmental disasters keep happening, not just Washington State and not with just one bad actor:

- In the summer of 2023, **50,000** farmed salmon escaped from net pens in Maine (Global seafood company Mowi). The escape raised concerns about the spread of disease to endangered wild salmon.⁵
- In January 2020, **73,600** salmon escaped from a net pen in Scotland, marking the third major escape in the area since October 2019 (Mowi).⁶
- AquaChile reported the escape of **787,929** fish in 2013 due to bad weather damaging cages.⁷ Five years later, in 2018, **680,000** fish escaped from Marine Harvest Chile, **109,515** from Bakkafrøst Faroe Islands, **258,000** from Scottish Sea Farm in Scotland in 2000, and **120,000** from Huon Aquaculture in Tasmania in 2018.⁸ Earlier this month, a net pen failed off the coast of Norway, releasing **27,000** farmed fish into the wild.⁹
- Pacific Seafood--who is opposing the bill--does not come with clean hands either.¹⁰

Since net pens are placed directly in the water, fish feed, feces, pharmaceuticals, and other chemicals are released directly into the surrounding waters.¹¹ A typical industrial farm of several hundred thousand fish produces around one million pounds of waste annually.¹² These facilities not only pollute surrounding waters but can spread diseases and parasites from farmed to wild fish. This emerging industrial practice is not compatible with sustainable commercial

⁵ <https://www.clf.org/blog/dirty-unregulated-industrial-salmon-farms-put-our-waters-at-risk/>

⁶ <https://thefishsite.com/articles/mowi-reports-mass-salmon-escape-from-colonsay>

⁷ Lola Navarro, Here are the largest recorded farmed Atlantic salmon escapes in history, IntraFish (Feb. 1, 2019), <https://www.intrafish.com/aquaculture/here-are-the-largest-recorded-farmed-atlantic-salmon-escapes-in-history/2-1-388082>.

⁸ Id.

⁹ <https://www.ecowatch.com/farmed-salmon-escape-norway.html>

¹⁰ <https://www.oregonlive.com/business/2024/09/lawsuit-claims-oregon-based-pacific-seafood-fired-exec-for-reporting-scheme-to-cheat-shrimp-boats-out-of-millions.html>; <https://www.seafoodsource.com/news/processing-equipment/pacific-seafood-fined-usd-222-000-for-water-quality-violations-at-washington-plant#:~:text=It%20has%20also%20been%20targeted,with%20the%20agency%20in%202020>.

¹¹ Stevenson, "Harmful Lessons."

¹² Chelsea Kendall, "Dirty, Unregulated Industrial Salmon Farms Put Our Waters at Risk," Conservation Law Foundation blog, March 11, 2024, <https://www.google.com/url?q=https://www.clf.org/blog/dirty-unregulated-industrial-salmon-farms-put-our-waters-at-risk/%23:~:text%3DInstead%252C%2520it%2520floats%2520out%2520through,and%2520shellfish%2520in%2520their%2520path&sa=D&source=docs&ust=1722900162823027&usg=AOvVaw3lNJcN1mj7bwOC85kQjtQV>.

fishing practices or recreation and tourism that is also the life blood of coastal economies. This is why commercial and recreational fishers regularly fight against aquaculture coming to their coastlines. Oregon is lucky to have the hindsight that other states and nations have not, and seeing the destruction caused by net pen aquaculture positions us well to avoid those impacts here.

HB 2965 -5 would supplement Oregon's existing protections for our environment, including both native fish and the wider aquatic ecosystem and the public interest. Oregon is now a magnet for large industrial aquaculture given the bans and serious limits on marine net pen fish farms on the rest of the West Coast, including Washington and British Columbia. It would ban marine net-pens because we know these operations cause some of the worst impacts.

HB 2965 will also protect commercial and recreational fishing, and the food and tourism industries that support our coastal communities. Organizations like the Pacific Coast Federation of Fishermen's Associations support this bill because they recognize that industrial fish farming in our oceans harms fishers in several ways. First, farmed fish undercut wild caught fish in the marketplace by externalizing the costs of their environmental damage to create a cheaper and often lower quality product. Second, these operations attract other fish when they discharge uneaten food and attract predators of the farmed fish. This can result in entanglements and escape of the farmed fish. Because fishers are excluded from the area, net pens interrupt their ability to engage in traditional fishing. Privatizing our oceans does not help either commercial or recreational fishers, but converts an otherwise public resource to private profit of a few. Center for Food Safety has litigated to prevent offshore net pen aquaculture in federal waters and is always joined by commercial and recreational fishing operations who also oppose industrial aquaculture.

There are many myths surrounding aquaculture and its sustainability, all of which are refutable based on science and empiric evidence. First, the environmental harms are well recorded: escapes from farmed fish are inevitable (not just due to one bad actor) and these escaped fish can compete with wild fish for food, prey on wild fish, and interbreed causing a decline in survival fitness. Because these nets or cages are fully open to the water, they release disease and parasites to wild fish and waste to the surrounding area. Second, farmed fish are primarily fish that eat other fish and result in further exploitation of forage fisheries, resulting in net protein *loss*. Essentially this is robbing Peter to pay Paul, and further stresses forage fish populations, which are the backbone of the ocean food web. Finally, the idea that aquaculture can reduce overfishing domestically is predicated on the falsehood that aquaculture operations will produce the same fish that are local to Oregon, when in fact they mainly grow Atlantic salmon.

For these reasons, we ask that the committee set a work session and vote to pass SB 89-1 out of committee with a do-pass recommendation.

Sincerely,

A handwritten signature in black ink, appearing to read "Amber", written in a cursive style.

Amy van Saun
Senior Attorney
CENTER FOR FOOD SAFETY
avansaun@centerforfoodsafety.org