



March 18, 2025

Submitter: Pamela Barrow

On Behalf Of: Food Northwest

Committee: House Committee on Climate, Energy, and Environment

**RE: Support for House Bill 3814**

Food Northwest appreciates the opportunity to submit written testimony in support of HB 3814. Established in 1914, Food Northwest is a trade association of food processors in Oregon, Washington, and Idaho, including seafood processors, who are essential to the region's economic and food security. Food processors support thousands of jobs within Oregon and are critical in providing safe, sustainable, and locally produced food.

HB 3814, as amended, provides necessary regulatory clarity by ensuring that seafood processors are granted a mixing zone to meet bacteria limits. Current regulations do not account for the fact that seafood processing is not a source of fecal coliform bacteria, as they are specific to the guts and waste of warm-blooded animals. The unintended consequence of applying these standards to seafood processors is placing an unnecessary burden on an industry already operating under stringent environmental and food safety regulations.

Scientific evidence and industry experience demonstrate that:

- Seafood processing facilities do not introduce fecal coliform into wastewater at levels comparable to sources like human waste or concentrated animal feeding operations (CAFOs).
- Current testing methods for bacterial analysis in seafood processing effluent yield inaccurate or unrepresentative results, making compliance with these limits difficult or impossible.
- Available treatment technologies are not well-suited for seafood wastewater due to the higher level of solids allowed in the effluent, which provides surfaces for bacteria to grow.
- Processors face significant space constraints in coastal facilities, limiting the feasibility of installing large-scale treatment systems.

By aligning regulatory requirements with scientific understanding and practical realities, HB 3814 ensures that seafood processors can continue to operate without being unfairly penalized for bacteria levels that do not originate from human fecal sources. Additionally, allowing for appropriate regulatory flexibility, such as allowing mixing zones for non-human sources, would provide a more effective and science-based approach to water quality regulation in the seafood industry.

We urge your support for HB 3814, which would provide a balanced and evidence-based approach to water quality regulation in the seafood industry. Thank you for your time and consideration.

Pamela Barrow  
Vice President  
Food Northwest

