



March 19, 2025

RE: Opposition to HB 3814

Dear Chair Representative Lively and Members of the House Committee on Climate, Energy, and Environment,

On behalf of the [Oregon Shores Conservation Coalition](#), whose mission is to educate and empower people to protect our coastal ecosystems and communities, **I am writing to express our strong opposition to HB 3814.** As written, this bill would prohibit the state's Environmental Quality Commission and the Department of Environmental Quality (DEQ) from enforcing water quality standards for bacteria in effluent discharges from seafood processing facilities. This irresponsible bill threatens the health of our coastal waters, fisheries, and communities by removing critical regulatory oversight of bacterial pollution. If this bill moves forward, sideboards for the protection of public health are needed.

Seafood processing effluent often [contains high levels of organic matter and bacteria](#), including [pathogenic microbes](#) and in some cases, [fecal coliform](#). Though it has been claimed by seafood processors, it is simply unverified that seafood byproducts don't contain bacteria. There are ubiquitous rich microbial ecosystems associated with virtually everything in or from the ocean, dead or alive, which can include fecal, enterococcus, or other single celled or multicellular microbial pathogens. Collectively these contaminants in effluent can [degrade water quality, harm marine wildlife, and pose significant risks to public health](#). Pollution from seafood processing facilities also has other well-documented negative impacts on water quality, including increasing the occurrence of algal blooms and hypoxia. Weakening or eliminating regulatory oversight would allow unchecked pollution to enter Oregon's estuaries and endanger the livelihoods of all those dependent on clean water and healthy marine environments.

DEQ's bacterial standards on seafood processing effluent were put in place to protect public health. Not only do these regulations protect people from illness via physical contact with wastewater, but they also protect seafood consumers. The bacteria found in effluent are not necessarily what makes people sick, but rather they are indicators of other more dangerous pathogens associated with fecal coliform bacteria. In fact, bacterial pathogens are regularly responsible for the closing of shellfish harvest periods and [entire oyster aquaculture operations](#) due to increased risk of foodborne illness. Ironically, this harms the seafood industry at large, including seafood processors who rely on shellfish as a product.

Furthermore, coastal water contact advisories are a critical component of protecting public health in the recreation sector, and these advisories also rely on indicator bacteria to keep the public informed on potential risks. A [Scripps study from 2021](#) pointed out that in the U.S. alone, an estimated 90 million cases of waterborne illness of the gastrointestinal tract, ear, eye, respiratory tract and skin occur every year from recreational contact. Discharge in our estuaries eventually makes its way to our coastal ocean, where people regularly recreate and surf.

Coastal communities deserve stringent water quality protections to protect their health and wellbeing and their economies reliant on tourism and ocean recreation.

Moreover, this legislation sets a dangerous precedent by exempting a specific industry from compliance with essential environmental standards. If passed, it could open the door for further erosion of clean water protections, undermining public trust and the long-term health of our waterways. It is also a violation of the Clean Water Act and amplifies recent rollbacks to environmental regulations [related to sewage discharge](#) at the federal level, further endangering public health and safety.

We urge you to reject HB 3814 and uphold DEQ's well-intentioned and responsible regulations aimed at maintaining clean water and protecting public health. If the committee chooses to move forward with this bill, we strongly encourage bill sponsors to include amendments that provide specific sideboards to protect public health, which has been done in other coastal states including [WA](#), [CA](#), and [AK](#).

Thank you for your consideration.

Sincerely,

Annie Merrill
Marine Conservation Manager
Oregon Shores Conservation Coalition

In Oregon, the beaches belong to the people.

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