



Northwest Aquaculture Alliance

January 26, 2023

Senator Jeff Golden, Chair
Oregon Senate Natural Resources Committee
900 Court Street NE, S-421
Salem, OR 97301

Re: SB 89-1

Dear Senator Golden:

The Northwest Aquaculture Alliance (NWAA), which represents aquaculture producers and support businesses in Washington, Oregon, Idaho, Alaska, and Hawaii, advocates for the responsible production of aquatic foods in both marine and freshwater environments. Our members, who include global and regional leaders in seafood, grow and deliver high-quality, responsibly produced finfish, shellfish, and sea vegetables. NWAA members also include the vital support businesses that supply eggs, feed, veterinary and animal health services, and innovative systems that are part of today's sustainable aquaculture industry.

While we support the original SB 89, we strongly oppose the proposed amendment to SB 89, known as SB 89-1.

We believe Oregon lawmakers should understand that aquaculture in the United States is very heavily regulated, both on a national and a state-by-state basis. We find the language in SB 89-1 to be unclear, and from a regulatory standpoint, it has the potential to open up a "can of worms": For starters, what specific kinds of aquaculture operations would be subject to the rules? How the provisions in this bill relate to existing rules? For shellfish producers, the rules are not only unclear but not applicable to shellfish aquaculture.

Regarding animal welfare: Our producer members all participate in one of several aquaculture certification programs—either Aquaculture Certification Council or Best Aquaculture Practices. (There are others as well, but these two of the most widely adopted programs.) Each standard includes animal welfare provisions that should be examined by the legislature before any agenda-laden language is adopted into law. We believe that the animal welfare aspects of this bill are not relevant to today's humane slaughter practices already adopted by industry.

Furthermore, If the real intent is to protect marine waters and the environment, then ALL SECTORS should share the burden, not just those entities that have the resources to bear the burden of overreaching regulations. In this context it could be interpreted to read that you can maliciously and clearly undertake inhumane slaughtering practices if your revenues are less than \$500,000.

Finally, we view this ill-conceived bill as an attempt to discourage investment in aquaculture in Oregon by slapping together a host of nonsense and ill-informed provisions and to do so without adequate engagement with affected stakeholders and state agencies.

We respectfully suggest that the bill's authors and proponents make every attempt to understand what is happening in aquaculture around the globe, to engage and consult industry, researchers, the scientific community, and trade associations to better understand current practices and existing regulations. If passed, SB 89-1 would result in creating the state as an aquaculture "desert" at a time when the world needs more nutritious foods from the sea.

Respectfully submitted,

Jeanne McKnight, Ph.D.
Executive Director