Don’t Cage Our Oceans is committed to preventing finfish farming in the open ocean and marine waters of the United States. At this time, we oppose all forms of this practice, with the exception of indigenous, small-scale, or “pono” aquaculture, which primarily occurs nearshore.

Further we agree on the following concerns associated with offshore finfish farming:

Environmental Concerns:

1. Escapement of farmed fish from their containment can adversely affect ecosystems, particularly wild fish of the same species. Farmed fish are often raised to grow bigger, faster and eat more to do so. When these revved up fish escape, they can outcompete wild fish for habitat, food, and mates. These fish might also not be the best fit genetically or behaviorally for life in the wild, so they potentially pass on inferior genes and behaviors – weakening wild populations over time.

2. Many fish farms densely stock cages/pens. Stress from confinement and close proximity of predators outside cages, for example, as well as cage conditions can make farmed fish more likely to get sick. Finfish farms can spread diseases and/or parasites to wild fish and other marine life, which could significantly harm ecosystems and wild fish populations.

3. Pollution is a serious concern. Waste from intensive finfish farming (excess feed, fish waste and any chemicals used on the fish or pens) can flow from the net pens into natural waters. This is especially concerning given widespread coral die off and algal blooms - red tide. Dilution is not the solution to pollution – it all goes somewhere.

4. If finfish farms have buffer zones (no fishing areas) around the cages, this could displace both commercial and recreational fishing, causing increases/concentration of fishing pressure in
certain areas, and increases in fuel cost to go around/avoid the industrial finfish farming facilities.

5. Fish cages will act as fish attractant devices (FADS), as fish like structure. Captive fish and their feed attract fish and other wildlife. Fish attracted to the cages have potential to be eaten by other predators, which are also attracted to the cages, or caught easily if fishing is allowed around the cages. Either way, more fish than would otherwise normally be caught/eaten/taken, might die, reducing populations more quickly than expected, and lowering reproductive potential each consecutive year, impacting the long-term health of fish populations and creating further inaccuracies in fisheries management efforts.

6. Marine life attracted to the cages have potential to be harmed by entanglement in lines, nets, and other equipment.

7. Increased take of wild bait and forage fish, such as menhaden, an unsustainable fishery, to feed farmed fish. The take of forage fish negatively impacts ecosystems, and reduces stability, rebuilding, and maintenance of existing recreational and commercial fisheries. Additionally, it could significantly increase the price of bait.

8. Farmed Fish are fed with soy and corn grown on industrial farms in the middle of the country. These farms have negative environmental and social impacts associated with genetically modified crops, water usage, and land grabs.

9. Open water finfish farming contributes to Climate Change with the vast amount of energy required to construct and maintain the actual farms, feed the fish, and transportation of labor, processing, and marketing.

Social & Economic Concerns:

1. Places that have had industrial marine finfish farming, such as Washington State, Denmark, and Canada are all moving away from and even banning offshore finfish farming because of the economic and ecological impacts.

2. In other marine industries, bonding, insurance, or a fund for potential environmental and economic damages is required. There is no such requirement, to cover either environmental or economic damages that may result from marine finfish farming. Millions of coastal U.S. businesses and residents will be forced to take on the risk associated with these facilities.

3. “First do no harm” should be the goal. The existing multi-billion dollar recreational and commercial fishing industries, and others who rely on marine waters for recreation, business etc. should not bear the risk, burden, or unintended consequences from ocean finfish farming.

4. Cheap, industrial-scale farmed finfish threatens to devalue the ex-vessel price paid to commercial fishing boats. This will have negative ripple effects on working waterfronts, especially in rural fishing communities, where small businesses are already operating on thin
profit margins. In addition, for those regions operating under ITQ/IFQ systems, the devaluation of ex-vessel fish value will result in devaluing quota and leasing prices.

**Governance & Oversight Processes:**

1. Any individuals, businesses, or community that may be impacted must be fully informed of any attempts toward open water marine finfish farming projects, and involved in the permitting process. Public hearings are a MUST throughout any potentially affected area. The lack of opportunity for public notice and comment is especially concerning with respect to the new nationwide permits approved by the Army Corps of Engineers. Having nationwide permits for offshore finfish farming leads to a rapid approval process and less opportunity for public participation and other agency review and input.

2. Commercial fishermen could lose money. Often fishermen lose jobs and/or money when wild caught target species are also farmed. Raising farmed fish of the same species that fishermen catch in the wild creates an immediate competitive structure in the marketplace. Farmed fish are grown faster and larger than those in the wild and in greater abundance. Therefore, the marketplace could be regularly flooded with product that out-compete wild caught fish in price and volume.

3. Investors with no accountability to the region, may build these facilities, outsource labor, gather the profit, then move to exploit another region when the economic or ecological conditions are no longer productive.

4. Recreational fishing men and women, who work as guides or run charters could lose money too. If the fish populations are reduced or the water quality is degraded – no one wants to spend money to go fishing.

**Public Resource:**

1. Fish Farm facilities occupy real space in the environment, displacing other activities, and pave the way for ocean space to become private property.

2. The Oceans is a public space and should not be cordoned off for industrial aquaculture.

As a coalition, we support the following in lieu of Offshore Finfish Farming (OFF):

1. **Community-based Food Systems.** Food systems that are embedded in the local communities, where the collection, production, and distribution are based on local human and natural culture. Within communities, those most unrepresented and under-resourced are lifted up and celebrated. Seafood production is appropriately-scaled and sited. A sea-food system that values quality over quantity, and communities and the environment over the corporate bottom-line.

2. **Diversity & Environmental Respect and Protection.** Rich and vibrant diversity of both the human and natural world. Black, Indigenous, and people of color (BIPOC) voices are highlighted
and uplifted. Natural resources are valued for their rich diversity and the food systems reflect and protect natural abundance.

3. **Food Sovereignty.** Communities have control over their food systems, including the governance and market structures. Food is a basic human right and must not be used as a weapon of war. Food Sovereignty recognizes that the rights of mother earth are at the heart of food systems.

4. **Science-based Advocacy.** Our work is based in sound scientific research that is not influenced or dominated by corporate interests. Traditional knowledge is acknowledged and respected.

5. **Oceans Commons.** Respect and value the public commons of our oceans. Protect our oceans from efforts to cordon off areas for industrial aquaculture.