



Kelly Denit, Director
Office of Sustainable Fisheries
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

October 10, 2025

RE: Recommendations for Restoring American Seafood Competitiveness

Dear Ms. Denit:

Don't Cage Our Oceans is a nationwide coalition of over sixty-five organizations and businesses working to stop industrial-scale offshore finfish farming, while promoting better seafood systems led by American coastal communities.

Our coalition agrees with EO 14276's assertion that aquaculture can play a role in our overall seafood production, but with a significant caveat - **the type of aquaculture matters**. Bivalve and seaweed farming, regulated by the states, is a welcome addition and supplement alongside our wild-capture fisheries. However, massive, polluting finfish farms in our oceans are an entirely different beast and should never have a place in our nation's waters.

America's commercial fishermen and coastal communities **resoundingly reject the development of massive finfish farms off of our nation's coasts**. These operations directly **discharge pollution and contaminants** into the surrounding waters, including fish waste, over-enriched excess fish feed, **diseases, antibiotics, and pesticides**. **Wild fish stocks are harmed** by being in close proximity to these factory fish farms, and so are the commercial fishermen who rely on healthy ecosystems to earn a living. The Federal government must not sacrifice these communities or our shared marine resources for a controversial industry that has proven that it will recklessly harm *existing* coastal waterfront businesses in its own quest for profit.

Despite fish farming's massive unpopularity and poor global track record (even in developed nations like Norway), NOAA Fisheries has spent roughly two decades seeking to develop and promote this deeply problematic industry. NOAA Fisheries has wasted millions of dollars of taxpayer money on controversial grants to subsidize the nascent aquaculture industry, rerouting funds granted through programs such as Sea Grant, the Saltonstall-Kennedy Grant program, and SBIR grants. Between 2017-2024, agencies spent nearly \$45 million promoting fish farms through these three grant programs alone.

In 2025, NOAA Fisheries announced a \$300 million funding opportunity to create a Cooperative Institute Fostering Aquaculture Research and Marketing (CIFARM). Despite a clear lack of buy-in from the American public, and no meaningful effort to address the adverse economic impacts of industrial aquaculture on independent fishermen, NOAA Fisheries invested an amount equivalent to roughly 25% of its enacted FY24 funding level into the establishment of a promotional entity for the aquaculture industry.

Both the U.S. Congress and the Federal Courts have had no interest in overruling the will of the people. The U.S. Congress has never authorized NOAA Fisheries to begin zoning the oceans for fish farms, yet the agency has been working with industry trade groups and large NGOs to do exactly that.

In ***Gulf Fishermen's Association v. NMFS***, the Fifth Circuit Court of Appeals [held](#) that the Manguson-Stevens Fishery Conservation and Management Act (MSA), the law of the land for fisheries management, **does not authorize** NOAA or its Regional Fishery Management Councils to regulate aquaculture in federal waters.

Right now, the drive for fish farms – *and the resulting demand for countless tons of wild fish to feed those farmed fish* – is spurring **Canadian companies to exploit state and federal waters, leaving America's fishermen and coastal residents out to dry**. The irony here is that Canada is also placing restrictions on open net pens in their own waters because of detrimental impacts. Canadian company Cooke Aquaculture is farming salmon in Maine waters, and is currently being sued for allegedly violating effluent discharge permits. The salmon [sometimes escape](#) these facilities, as 50,000 of them did from Maine's Machias Bay in 2023, and the toxic chemicals that the company uses to treat sea lice are particularly harmful to crustaceans, thereby a direct threat to the state's lobster industry.

Cooke Aquaculture, through its subsidiary Omega Protein, is also plundering waters further south, from Virginia to Texas, in its quest for wild forage fish (menhaden), which it makes into fish meal and fish oil, key ingredients in the salmon feed at its aquaculture operations. This decimates critically-needed fish from the marine food web, that would otherwise support the larger fish that commercial and recreational fishermen catch. Fishermen have documented these harms in a [video](#) reposted by the President himself, urging the Administration to keep Cooke Aquaculture out of our country's waters

Bipartisan legislation in Congress now, called the [Keep Finfish Free Act of 2025](#), would bring agency overreach to heel, and keep big aquaculture interests from capturing agencies and driving America's fishermen out of business. This bill would ensure that coastal fishing economies are not destroyed to pave the way for offshore fish farming. The people who have been catching our seafood for generations want community-operated fishing and aquaculture, not factory-scale, outside-owned fish farming behemoths that extract public resources, damage the ecosystem, harm tourism, and tank local fishing economies.

Don't Cage Our Oceans encourages the Administration to likewise curb excess agency overreach and to make sure that the fairytales told by fish farm companies (like co-opted catch phrases of "sustainable seafood") are seen for what they are — false promises that will plunder wild forage fish, decimate small-scale fishing businesses, and hollow out working waterfronts.

This Executive Order provides NOAA Fisheries with an opportunity to place our seafood system and working waterfront families at the center of policymaking. To truly restore American seafood competitiveness, we must stop harmful finfish farms from destroying our waters and fishing livelihoods. We encourage NOAA Fisheries leadership to reach out with additional questions, and we stand ready to support the agency's work on these critical issues. Thank you for considering our comments.

Sincerely,

James Mitchell, Esq.
Legislative Director
Don't Cage Our Oceans