



DON'T CAGE
OUR OCEANS

October 31, 2024

DNR, Aquatic Resources Division
Attn: Noel Sharp
1111 Washington St SE; MS: 47027
Olympia, WA 98504

Dear Ms. Sharp:

Don't Cage Our Oceans ("DCO2") is a nationwide coalition of over fifty-five organizations and businesses representing over 4.5 million individuals. Our members are working to stop industrial-scale offshore finfish farming, while uplifting values-based seafood systems led by local communities. DCO2 is a project of the North American Marine Alliance, whose interconnected networks represent hundreds of thousands of fishing families, food advocates, scientists, and more across North America and beyond. Several of our member organizations and businesses are either based in Washington or have close ties to the state.

Responsible forms of aquaculture are community-driven, thoughtfully-sited, and appropriately scaled, using low-impact methods. *Commercial finfish net pen aquaculture is a practice that fails all of those criteria*, and has enormous negative impacts on the marine environment and wild fish populations, due to the **open discharge of untreated pollution, toxic chemicals, and disease incubation and transfer to wild populations**.

DNR has rightfully focused on *habitats and habitat elements, effluent, and marine debris* as key factors for banning the harmful practice of commercial finfish net pen aquaculture in Washington state waters. The practice also threatens Tribal culture and livelihood across what is now Washington state, and harms Washington's coastal communities and economies. For these many reasons and more, **DCO2 supports the agency's proposed rule**.

Recognizing the regularity of fish escapes from ocean-based net pens, the U.S. Council on Environmental Quality and the U.S. Office of Science and Technology Policy have long stated that it "[must be assumed that escapes will occur](#)" from net pens. Of course, Washington state has already moved beyond hypotheticals and into reality, with the devastating [2017 escape of over 260,000 Atlantic salmon](#) from salmon farms owned by Cooke Aquaculture of Canada. For more on the aftermath of the net pen collapse and experience of those left to clean up Cooke's mess, we encourage you to read [the personal account](#) provided in the Seattle Times by Carl Wassilie, a Yup'ik biologist and member of Salmonberry Tribal Associates, a DCO2 member.

Recent cutting-edge research in the journal [Science Advances](#) (**featuring ten peer-reviewed articles on global aquaculture, published on October 18, 2024**) has reaffirmed and shown that, for example, net pen finfish aquaculture transmits harmful viruses and pathogens from farmed salmon to wild salmon, is an industry fraught with a lack of transparency (as seen with Cooke's disastrous response to the 2017 spill), and has been making highly exaggerated claims of feed efficiency. In other words, when factoring in the ecological impact of sourcing fish feed, the practice of raising finfish in net pens is even more environmentally devastating, a contributing factor to overfishing, and [a threat to global food security](#), as it "diverts millions of tons of food-grade fish (e.g., anchovies and sardines) and nutrients from countries with high rates of hunger to farmed aquatic animals...intended for luxury markets."¹ It is a farming method that creates a massive net *loss* of animal protein.

There is tremendous pressure from the commercial fish farming industry to develop more net pens in the U.S., in both state and federal waters. These special interests continue to pressure the U.S. Congress, the Administration, and state governments to carve up our publicly-held oceans into zones that would be exclusively used for private profit, to the detriment of all other stakeholders.

Here, Washington's proposed rule would be in the best interests of its ecosystems, Tribal communities, and Pacific coastal communities. It would *protect* them, instead of turning the keys over to an industry with a poor track record in the state and worldwide. It would also align Washington with others in the regional movement away from commercial finfish net pen

¹ Spencer Roberts *et al.*, Feeding global aquaculture. *Sci. Adv.* 10, eadn9698 (2024). DOI: 10.1126/sciadv.adn9698.

aquaculture, which is banned in Alaska, to be phased out in British Columbia, and partially banned in California (no salmonid, transgenic, and non-native finfish).

For the aforementioned reasons and more, **Don't Cage Our Oceans supports DNR's proposed definition of commercial finfish net pen aquaculture and enthusiastically endorses the new proposed rule: WAC 332-30-138 Commercial finfish net pen aquaculture. Commercial finfish net pen aquaculture shall not be authorized on state-owned aquatic lands.**

On behalf of our members, we thank you for your diligent efforts in protecting Washingtonians and the marine environment.

Sincerely,

/s/ James Mitchell

James Mitchell
Legislative Director
Don't Cage Our Oceans
North American Marine Alliance