

Exhibit C. Staff Response to Public Comment

Attachment 4

| Comment # | Commenter | Comment Summary | Response to Comments* |
|-----------|--|--|--|
| 1 | William Ahlquist | Taxonomic reference for the Asian Small-clawed Otter should be changed to reflect most up to date genus and species. Generally, supports this species remaining prohibited. | Staff included the phrase “also classified as” to reflect the updated taxonomy. Similar references for other species in Division 56 were also made for consistency. |
| 2* | Josh Diamond | Requests octopuses be placed on the prohibited species list to prevent aquaculture operations. Arguments: <ul style="list-style-type: none"> Oregon crustation populations have declined and octopuses require 3:1 live prey to weight to feed; causing a burden on native species. Two species of octopus used in farming research are not native to PNW and are adept at escaping aquariums. Possibility of large amounts of waste being produced could increase algal blooms. Octopuses cannot be vaccinated, have the ability to transmit pathogens harmful to humans. | <p>Staff recommend not changing the status of octopus in Division 56. ODFW’s authority to prohibit species is based solely on potential ecological impacts. Other state agencies regulate water quality and quantity. The following summarizes the department’s response to comments submitted:</p> <ul style="list-style-type: none"> Decisions to list a species as “Prohibited” are based on ecological risk; this risk is unknown for non-native octopus. No scientific literature was provided to support an impact. Per OAR 635-007-0650, risks to native species associated with escape, disease, or other culture activities would be addressed during review of an application for culture. Impacts to water quality and quantity would be assessed by ODEQ and OWRD respectively. Multiple news reports corroborate the current increase in native common octopus populations in England; reports attribute the increase to natural adaptability to warmer ocean conditions. Similar increases are reported to have been recorded in 1899, 1950, and 2022, after which populations declined. There is currently no octopus farming in Oregon and ODFW has received no inquiries of interest to date. |
| 3* | Amanda Fox (Senior Research Executive for Animal Research Initiative) - Written report | Submitted paper: <i>Outrageously Unnatural: The Dangers of Octopus Farming</i> that asserts recommending ‘proactively rejecting aquaculture models that profit from ecological imbalance, specifically octopus farming.’ Arguments: <ul style="list-style-type: none"> Unique Intelligence and ability to escape. Venomous Nature and harm to humans. Carry pathogens and parasites that could spread to wild populations or humans through raw consumption. Accidental Release. Aquaculture facilities attract vandalism. Potential algal blooms from facilities. Threat to crustation population and fisheries. Possible competition with native species. Ethical concerns based on intelligence and psychology. | |
| 4* | Amanda Fox - Verbal comment at June 13, 2025 Commission meeting | Support for adding live octopuses to the prohibited species list. Arguments: <ul style="list-style-type: none"> Unique adaptability and propensity to become invasive. England experiencing invasion of 6’ octopuses. Damage local crabbing and lobster population and fishery. High capability of escape based on unique intelligence. | |

* Due to the similar request and arguments presented in comments 2, 3, and 4, a single combined response is presented here.