Oregon Fish and Game
3406 Cherry Avenue N.E.
Salem, OR 97303 -4924

Ladies and Gentlemen

Subject: Proposed changes in 635-056-070 regarding Tilapia:

Oreochromis and Sarotherodon; Tilapia have been farm raised for close to 5,000 years and therefore their genealogy is not as simple as animals in the wild. Think of them as dogs, cats, cattle and other domesticated critters, these just happen to be fish; one solution might be to list Tilapia exempt under 635-056-0020. A very remarkable fish originally from Africa, “Oreochromis niloticus” Nile tilapia grow mostly north of the equator in the Nile River drainage and “Oreochromis mossambicus” Mozambique Tilapia grow wild mainly south of the equator in the Zaire River drainage. Sarotherodon are believed to have originated in the rivers of West Africa. Modern DNA testing shows a high degree of crossbreeds and new breeds just like other domesticated animals.

In the tropics they are grown in ponds that can be drained or in pens suspended in rivers and ponds. They are almost impossible to net. You can slowly herd them with one net into another, but if you try a fast swoop with a dip net or a seine, you will have fish everywhere but in the net. Think of them as cattle and work them slowly and gently and they will not stampede. They are the perfect fish for indoor Aquaculture in Oregon including Aquaponics, a sustainable food production system that combines a traditional Aquaculture (raising aquatic animals such as fish, crayfish or prawns in tanks) with Hydroponics (cultivating plants in water) in a symbiotic environment. In the Aquaculture, effluents accumulate in the water, increasing toxicity for the fish. This water is led to a hydroponic system where the by-products from the aquaculture are filtered out by the plants as vital nutrients, after which the cleansed water is recirculated back to the animals. Using this process Oregonians could grow a much greater share of the food they consume. The current law restricts us from this growing market and people in Oregon are criminals if they raise Tilapia without an expensive license.

Tilapia are not a danger to our wild or any other fish in Oregon. They are a tropical fish and no more dangerous than a guppy or neon tetra. They are happy at 78f to 82f degrees,
but like it a little warmer to breed like 86f to 90f. When temperatures drop to the low 70s they quit eating and in the 60s they quit swimming; by the time temperature drops into the 50s they are dead. They are plant eaters and mouth brooders; the male chases the other males away and the female lays her eggs and the male fertilizes them as they dance in a circle. Then the female Oreochromis picks the eggs up in her mouth, where they hatch and there they live for a couple of weeks, darting back in mom’s mouth at the first sign of danger. The Sarotherodon males also mouth brood the eggs.

1. Tilapia grown for private consumption should be legal in Oregon.
2. Tilapia transported to and from an Oregon licensed prorogation facility should be exempt from 635-56-070 and no transportation permit required provided an invoice accompanies the fish in transit including the propagation licensee name and number.
3. The definition of Tilapia should be more clearly spelled out to include all species of Oreochromis and Sarotherodon, which are 2 genus of the tilapiine tribe of fish known as Cichlids fishes from the family Cichlidae.

The market for Tilapia is huge and it is growing worldwide, frozen filets from Asia and Central America are available in most supermarkets, fresh local grown not yet. The grow-out market (average order of 20,000 fish) is supplied by three different types of all male fish: genetically modified (they actually got a patent), or hormone treated eggs and/or fry. The third type is crossbreeds that are all male because certain species when cross result in all male offspring. All male fish grow faster not being distracted from eating. Raising fish for this market is big business; a large gene pool is needed to be competitive. The smaller market for breeding fish average order of 20 fish is sold out most of the time, but that will change if we are allowed to supply it. There is even a smaller market, but good sized and we can not supply it either. That is the customer that wants fresh fish and who believes that only guarantee of fresh is to buy a live fish average order 2 fish.

Implementing these changes will make it legal to raise this important food source close to home and utilize wasted food as fish food and therefore people food. For a $20.00 investment in a hydroponic system one can have $100.00 worth of fish and a lot fresh vegetables.

Please accept the attached petition to effect this needed change.

Green Hill Gardens Inc
Fredrick David Haase president