

**Comments on the
National Organic Standards Board (NOSB)
Aquaculture Working Group Interim Final Report**

Thank you for the opportunity to submit comments on the Interim Final Report of the Aquaculture Working Group of the National Organic Standards Board.

Development of organic standards for aquaculture products is an important step for the U.S. aquaculture industry. The absence of standards in the U.S. provides an opportunity for growers in other countries to establish a foothold in the organic market regardless of the standards to which they are being held.

Thus, consistent organic standards for the U.S. market are critical. I am very pleased to see this initiative be developed to this point and urge that these standards be moved forward expeditiously for final approval.

I offer the following specific comments on this interim final report:

1. The term “genetically modified aquatic animals and plants” needs to be defined in Section 205.2. There are different meanings to this term and it is important to define clearly what is meant here.
2. I disagree with the provision that triploid animals cannot be considered organic. No rationale or justification is provided for this provision. Triploid animals are not genetically modified in the manner that has created concern on the part of consumers.
3. I disagree that “cultured aquatic animals should be provided their natural foods as closely as possible.” What is important is that the diets fed are formulated in a way so as to maintain healthy animals. In the wild, many fish eat what they can find and there are many instances in which wild fish consume things other than what textbooks describe as their “natural food”. This type of provision appears to be based on an overly simplistic view of what many types of fish do in the wild. So, how is a fish’s “natural food” to be defined and who is going to define it? There is a great deal of ambiguity in this phrase in terms of how it would be implemented in a certification process. I would suggest the following wording to replace this: “Cultured animals should be provided with foods demonstrated to promote the health of the animal.” What is important is that the fish is fed properly. Formulated feeds and culture conditions in the vast majority of cases result in much healthier animals than those found in the wild.
4. The requirement for a nutrient management plan should be restricted to flow-through and recirculating aquaculture systems. A nutrient management plan makes little sense for an earthen pond. There is an abundance of research that shows how effective static earthen ponds are at assimilating wastes. The only difference between a sewage treatment lagoon and an earthen fish pond is that the sewage treatment lagoon has nutrient loadings several orders of magnitude higher than does the earthen fish pond. Thus, there are no nutrients to manage from an earthen fish pond. A good reference for this is:

Tomasso, J.P. (Editor). 2002. Aquaculture and the Environment in the United States. U.S. Aquaculture Society, A Chapter of the World Aquaculture Society, Baton Rouge, Louisiana, USA.