

Neal, Arthur

From: mlebert@umich.edu
Sent: Friday, April 07, 2006 4:03 PM
To: NOSB Livestock
Subject: Better Standards for Better Fish

Dear National Organic Standards Board,

Thank you for the opportunity to comment on your proposed standards for organic aquaculture. It is of the utmost importance that these standards guarantee a safe, healthy and sustainable product for me and my family.

This guarantee rests on the establishment of highly detailed and enforceable standards with no room left for interpretation.

More specifically, I am concerned about the utilization of wild fish and fish oil in the feed used at organic fish farms. Because high levels of contaminants have been found in fish reared on wild fish feed, organic farmed fish must be fed only certified, organic species, as according to the organic standards. Capturing wild feed increases the stress on wild fish populations and must be prohibited to mitigate environmental harm.

In addition, only closed systems, where all inputs and outputs can be controlled, should be eligible for organic certification. Open ocean aquaculture experiences too many variables, such as water flow and influences from wild fish populations to guarantee a truly organic product. Aquatic species grown in open ocean aquaculture must not be permitted for organic certification.

Thank you for your thoughtful consideration of my suggestions and amendments. I look forward to the establishment of organic aquaculture standards that will ensure a high level of confidence for me and other consumers when buying farmed fish.

Sincerely,

Mary Lebert
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Brighton, MI 48116