

Sustainable Fishery Advocates
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National Organic Standards Board
c/o Valerie Frances, Executive Director; Executive Director
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Dear NOSB Livestock Committee,

Thank you for giving me the chance to submit comments regarding organic standards for finfish and crustacea for the meeting on October 17, 2006 on behalf of the Sustainable Fishery Advocates. SFA's flagship program, FishWise, works with seafood retailers to provide point of sale information about seafood sustainability. Our member retailers must label all the fish in their seafood counter according to the sustainability of the product, so we have a vested interest in the integrity of the organic label. Our member retailers and their customers have been wading through the confusing mish-mash of organic labels, and are looking forward to having an organic standard they can trust. That being said, it is imperative that the USDA organic standard ensures both health and environmental integrity of the certified products. Our comments below reflect our assertion that the organic standards for aquaculture must be robust and represent the highest standard in both health and environmental welfare.

Species or Production Method Specific Standards

We support the Livestock Committee's commitment for a single standard for all aquaculture species and production methods. A single standard ensures fairness amongst aquaculture operations and integrity of the organic label. Under a single standard, producers have an incentive to move toward the. Likewise, by using a single standard, consumers will have confidence in the organic label for farm-raised products without having to know anything about the production method or species for which the label applies. By creating separate standards for individual species and production methods, both producers and consumers would be subjected to unnecessary confusion and ultimately the power of the organic label would be weakened. We believe that consumers want an organic standard that is universal for all their favorite farmed fish and crustacea, and that clear standards that apply to all production methods and species will ensure this.

Impact on the Environment

The Livestock Committee invites input from the organic community, consumers, aquaculture professionals, environmentalists and other interested parties as to how organic aquaculture will meet the requirement of maintaining or improving the

environment, including the use of integrated net pen systems as proposed in the Aquaculture Working Group Interim Final Report.

In order to maintain or improve the environment within the context of aquaculture the standards must both address land use and water quality. For aquaculture systems built on land, the standards should address not only the effluent from the farm and total water use, but also land use. Farms should only be built on previously degraded land. In the case of wetlands, riparian areas and sensitive habitats, restoration should be part of the standard. In all cases, water usage/exchange rates and effluent should be monitored on both local and regional scales, and their cumulative impacts should be measured. Integrated net pens or poly culture operations should be encouraged to reduce the impacts of effluent on surrounding areas. However, these practices are not enough by themselves and should be combined with local and regional monitoring. Like standards for terrestrial livestock, the impacts of aquaculture on surrounding water and terrestrial resources should not affect the long-term viability of those ecosystems.

Differences between Organic and Conventional Aquaculture Standards

Comments from organic consumers and other stakeholders on their expectations and explanations of the differences between organic aquaculture and conventional aquaculture methods and products are invited.

Organic aquaculture standards should ensure a high level of environmental and human health. In the case of aquaculture products that have low environmental impacts and low concerns for contamination, the difference between the conventional and organic products may simply be the use of conventional versus organic grains in the feed, but for species that have clear environmental threats or are known to contain contamination levels above the acceptable limits, the difference should be great. For such species, organic standards should ensure that the fish were produced sustainably with substantially less marine resources and with fewer impacts on the surrounding ecosystem compared to their conventional counterparts.

Use of Fish Meal and Fish Oil

Will the organic consumer find the temporary 12% fish oil and fish meal allowances acceptable and what will consumer reaction be if (in a worst case scenario) certain aquaculture products no longer qualify as organic after the seven year fish oil and fish meal allowance period expires?

Since most consumers are unaware of the details of organic standards, it is only when their favorite organic fish is no longer certified organic that consumers will be alerted to a change in the standards. Our concern lies in the problems that may occur at the retailer or distributor level if the farm loses its organic certification. Following the seven year period, stores and distributors who are carrying product that lost its certification will be forced to seek out new suppliers who have adapted to meet the new standards. This is a burden on smaller retailers or distributors who may not have the ability to research new suppliers a second time or may lead to the incorrect continued use of the organic label on products which have had their certification lapse. Furthermore, during the 7-year interim period, those products that are certified organic will not necessarily meet the criteria for

‘sustainable’ that a number of conservation groups currently use. During this period, consumers could be confused as to what the organic label includes. We recommend using a transitional label, similar to how produce is labeled as the farms move out of conventional production to organic production. During this period, consumers can choose the transitional label, knowing that it does not meet the sustainability criteria of full organic certification, but that they are still supporting an aquaculture operation that has made a commitment to improving its practices.

Will it be possible for other feed ingredients or organic sources of fish oil and fish meal to be developed within this time frame to replace fish oil and fish meal from sustainable capture fisheries?

This question is inherently tied to the slaughter by-products issue. If slaughter by-products from organic livestock are allowed in organic production, the ability to replace fish meal and oil for organic aquaculture will increase. While trimmings are widely available to replace fish oil and meal, there is concern that increased use of trimmings will increase contamination levels.

Sources of Fish Meal and Fish Oil

The Livestock Committee invites suggestions for appropriate criteria for sources of fish meal and fish oil and methods to verify that sources meet such criteria.

The preferred option would be to use fishmeal and oil that are independently verified as sustainable by a non-industry affiliated group. If no verification body exists, any reduction fishery considered overfished or undergoing overfishing should not be allowed in organic aquaculture production. Beyond simply remaining within the maximum sustainable yield of the fishery, vetting of the sustainability of reduction fisheries should include a measure of the overall ecosystem impact and show a record of the long term management of the fishery. A complete sustainability report should be performed on the fishery, similar to those used by the conservation community to assess the sustainability of wild-capture food fisheries. These reports contain an analysis of the inherent vulnerability of the species, status of the stocks, nature and extent of bycatch in the fishery, impacts on habitats and ecosystems and management. While the method of performing the analysis varies between the organizations, these five principles are common to most of the groups and should be considered when determining the sustainability of a fishery.

Slaughter By-products in Aquaculture Feed

Should by-products from processing of terrestrial organic livestock, now prohibited in feeds for organic terrestrial mammals and poultry, be allowed as ingredients in organic aquaculture feeds?

Consumers will undoubtedly be put off with the concept of terrestrial animals in aquaculture feed; however the organic standards should be based on sound science and risk, rather than consumer fears and misinformation. Given that the use of slaughter by-products from organically raised livestock encourages waste recycling, reduces the amount of natural resources (i.e. fish from reduction fisheries) needed and provides a source of feed that is unlikely to be contaminated with chemicals typically associated

with fish, slaughter by-products provide a source of sustainable alternatives to wild-caught fish that are closer to the fishes' 'natural' diet than grains.

Thank you,

A handwritten signature in black ink, appearing to read 'Teresa Ish', with a long, sweeping underline.

Teresa Ish, Director of Science and Co-founder
Sustainable Fishery Advocates