

November 8, 2006

National Organic Standards Board
United States Department of Agriculture
Room 4008 - South Building
1400 Independence Ave., SW
Washington, DC 20250-0001

Dear NOSB Member:

On behalf of the undersigned organizations, we want to thank you for your careful attention to the development of organic aquaculture standards. As you know, at the last National Organic Standards Board (NOSB) meeting a number of consumer and environmental organizations raised concerns and opposition to proposed regulatory provisions that would allow, among other things, organic aquaculture production to use open water net pens and fish meal and fish oil derived from wild caught forage fish. We would like to reiterate our opposition to allowing fish products raised using such practices to be certified organic.

In developing U.S. organic standards over the last sixteen-plus years, Congress, USDA, the NOSB, and consumer and environmental advocates all have recognized that creating ecological balance and conserving biodiversity are guiding principles of organic systems. There are a number of reasons why the use of carnivorous finfish raised in open-net pens (including all open systems) are inconsistent with these and other organic principles, including:

- Use of fish meal and fish oil to grow carnivores supports the ecologically unsustainable practice of overfishing forage fisheries that are one of the most important foundations of healthy marine ecosystems;
- Prohibiting the innate migratory behavior of species such as salmon is inconsistent with providing the animal living conditions that accommodate health and natural behaviors of the animal;
- Use of open water net pens and other open systems allow escaped farmed species into the marine environment where they can cause significant declines on native populations;
- Open water net-pens and other open systems do not minimize the occurrence and spread of diseases and parasites but rather facilitate their transfer from farmed to wild species;
- Use of open water net pens and other open systems do not foster the cycling of resources and instead allow indiscriminate and unmanaged waste dispersal into the marine environment;

- Contrary to organic consumer expectations, studies have consistently shown that the use of fish meal in open net pen systems significantly increases the levels of environmental contaminants, such as PCBs, in farm raised fish when compared to wild caught fish.

We urge the NOSB to remain consistent with organic principles and develop organic aquaculture standards in a judicious manner. To that end, we also strongly support the proposal that any organically raised seafood product must be derived from facilities that take into consideration and ensure the health of the surrounding aquatic and terrestrial ecosystems.

The undersigned encourage the Board to move forward with developing standards only for low trophic level, non-net pen fish such as tilapia and catfish. Such standards would ensure that consumer expectation is met and that the organic label remains free from endorsing aquaculture practices that can create significant negative ecological impacts.

Sincerely,

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Beyond Pesticides

Joseph Mendelson
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Dom Repta
Coastal Alliance for Aquaculture Reform

Will Fantle
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