



Northeast Organic Farming Association of New Hampshire

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NOSB, USDA-AMS-TMD-NOP
1400 Independence Ave., SW.
Room 4008-So., Ag Stop 0268
Washington, DC 20250-0268

October 2, 2007

Dear Ms. Frances:

The New Hampshire Chapter of the Northeast Organic Farming Association would like to go on public record in support of the Board's recommendation to exclude open net-cage production and animals requiring wild fish in their diet from organic standards. Our concerns include the following:

- Carnivorous fish (like salmon) are raised on wild fish for feed. Because wild fish cannot be certified organic by the NOSB, evaluating farm raised salmon for organic certification is not possible.
- Open net-cage production systems are a major concern due to the inability of the contained specie to protect itself from pathogens, parasites and disease; often exposing wild species to disease and parasites.
- The risk of fish escapes from open net-cage production is a constant concern.
- The continuous release of untreated waste that accumulates in our oceans expose marine life to contamination

These impacts are not consistent with current organic livestock standards which require production practices to maintain or enhance the natural resources of an operation, including the soil and water.

Organic principles also require respect for the physiological and behavioral needs of farmed species. Enclosing a migratory species such as salmon in a net-cage violates this principle.

The organic market continues to grow and with it come attempts to dilute the organic standards. Our membership of 400 supports only strong organic standards which the proposed salmon production does not reflect. Exclude open net-cage production and animals requiring wild fish in their diet from organic standards

Sincerely, on behalf of NOFA-NH Board and Membership:

Elizabeth Obelenus
Program & Membership Coordinator