NOSB Board Meeting

May 21-23, 2008

While I certainly can support the zero fish meal and fish oil recommendations, it will hamper the development of the organic aquaculture industry. This is not all bad. As I have mentioned many times at NOSB meetings, production of organic seafood SHOULD be difficult. We must at all costs protect the organic label, and these recommendations certainly do that. However, we do need to foster and encourage development of the industry, if we are to have one of any significance in the immediate future. This is especially important since the foreign certifiers (ie Naturland etc) are moving ahead at a rapid pace. This is the main reason I supported the 12/12 rule with the sunset provision. It would have allowed producers to enter the organic aquaculture sector a little easier, but with the sunset provision, would have forced them into elimination of wild-caught fish meal from non-sustainable sources. On this note, I will add that I do have a problem with certain stocks being classified as sustainable. In the grand scheme of traditional aquaculture production for the future, I do not feel that use of any fisheries products is sustainable—whoever may certify it as so. In any event, although I do favor the recommendations of the Organic Aquaculture Task Force in terms of the 12/12 fishmeal/fish oil rule, I will support the final decision of the NOSB on this extremely important topic.

I would also like to comment on the eligibility of organically derived thermophilic compost as a nutrient source for organic production systems, especially those involving marine shrimp culture. We provided scientifically published evidence of the benefits of compost supplementation to shrimp ponds being cultured under organic conditions in 2005 (McLean, E., B. Reid, D. Fegan, D. Kuhn*, and S.R. Craig. 2006. Total replacement of fishmeal with an organically certified yeast-based protein in Pacific white shrimp (*Litopenaeus vannamei*) diets: Laboratory and field trials**.** **Ribarstvo**, 64, 47-58. Available on-line). We achieved feed conversion ratios of 0.5 to 1..that is a half of kilogram of feed produced 1 kg of shrimp. The non-utilization of this organic nutrient source cannot be overlooked or disregarded. Please consider the proper recycling of nutrients through composting technologies as legitimate nutrient sources for organic aquaculture, just as it is for organic agriculture. It represents a tremendous potential for nutrient recycling and re-utilization and is essential for the further development of the organic market. It also represents the one of the basic tenets of organic production, that of nutrient recycling and utilization. Along these lines of thinking, even though I know from previous NOSB meetings that the subject of animal by-product protein sources are off the table do to organic consumer demands, I would urge that this aspect of organic protein sources not be overlooked, especially that of organic poultry meal and feather meal for inclusion in organic aquafeeds. It simply makes sense to recycle these valuable nutrients, to me, a basic tenet of

organic production as a whole. These “waste” products cannot be ignored and must be utilized in the future if organic production is to be taken seriously in the US. This is especially true since this recycling of nutrients would not be to the same species of production.

I would like to end my comments by thanking all the NOSB members who are so tireless in their efforts. They always seem to restore my faith in governmental organizations and I salute their dedication to the organic industry.

Respectfully,

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