

Ocean Conservancy Public Comments to NOSB
November 17, 2008
Delivered by Shauna MacKinnon, Living Oceans Society

Good afternoon. My name is Shauna MacKinnon from the Living Oceans Society and I am here to enter into the record today comments by George Leonard, Aquaculture Director at Ocean Conservancy, who couldn't be in attendance.

Thank you for the opportunity to comment on the proposed organic aquaculture standards for feed and net pens dated September 28, 2008. Ocean Conservancy has engaged in the NOSB's deliberations on these issues over the last several years through George Leonard's current affiliation with Ocean Conservancy as well as his previous affiliation with Monterey Bay Aquarium. We commend the National Organic Standards Board for their diligence in attempting to resolve the substantial challenges surrounding the concept of organic, open net pen farming systems. As the Board is all too aware, this issue is both intellectually complex and politically charged.

A large number of conservation, fishing and consumer groups have been, and continue to be opposed to fish meal-dependent species, grown in open net pen systems, being eligible to receive the coveted USDA organic label. There is considerable merit to the arguments that have been made to date before the NOSB. At this stage in the debate, the NOSB must make a decision about which of two potential paths to pursue to resolve this issue. The first and simplest path is to exclude net pens and fish meal/oil-dependent species from consideration of the USDA organic label at this time. This would allow a US organic fish farming industry to develop around low trophic level species such as catfish, tilapia and shellfish, while a reliable source of organic feed is developed and sustainability solutions for net pen aquaculture are explored. The second, and much riskier path, is to allow wild fish and net pens to move forward, as reflected in the proposed organic aquaculture standards. The success of this second path is far from assured. It is highly dependent on developing successful compliance and verification procedures and seriously risks the reputation of the organic label through both consumer confusion and allowing environmental degradation to occur under the auspices of the USDA organic program.

Like many conservation groups, Ocean Conservancy remains troubled that the Board appears poised to pursue the second path. We believe the most prudent approach is to reject the proposed standards and return to recommendation to exclude wild-caught fish and net pen systems at this time. Should the NOSB move forward with its current approach, we conclude that it must fully embrace performance based metrics throughout *all* of the standards and build a robust mechanism for their verification for the resulting standards and certified product to be able to withstand public scrutiny. In more formally making our case in our written comments, we build on a discussion paper authored by Corey Peet and George Leonard and delivered at the NOSB organic aquaculture symposium in October 2007.

We conclude that should the NOSB not be willing to fully embrace performance metrics for wild fish and net pens, and fully support the development of a verification and compliance system, then we would strongly recommend that the Board choose to exclude wild fish and open net pen systems from consideration for organic status at this time. Given the substantial environment challenges of these production systems and the high expectations of organic consumers, there is only one chance for NOSB to “get it right”. If the Board has any doubt that these issues can not be satisfactorily resolved, moving forward with the proposed standards, as written, is ill-advised.

Thank you for your consideration of our comments and for entertaining our written submission. Thank you.