

## NATIONAL ORGANIC AQUACULTURE WORKING GROUP

September 29, 2004

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National Organic Standards Board  
National Organic Program  
United States Department of Agriculture  
1400 Independence Avenue, SW  
Room 4008 South Building, Ag Stop 0268  
Washington, D.C. 20250-0200

Ladies and Gentlemen:

The National Organic Aquaculture Working Group ("NOAWG") represents an alliance of approximately 80 aquaculture professionals and related parties with a strong interest and goal to assist in developing workable, science based organic standards for aquaculture production and handling practices. Our work is aimed at proposing organic standards for rulemaking procedures under the Organic Food Production Act of 1990 that are consistent with NOSB Principals of Organic Production and Handling.

The NOAWG was organized approximately one year ago. In addition to considering organic farming practice options for growing such species as salmon and trout, shrimp, catfish and tilapia, we recently organized a Bivalve Subgroup to address organic issues specific to bivalve molluscs. We plan to draft for consideration appropriate organic standards for practices utilized to grow each of these farm-raised aquatic species.

We three co-chairs were members of the Aquaculture Working Group organized by the NOSB in 2000 to prepare a report with recommendations in 2001. Some of our NOAWG members also were members of that 2001 effort. In 2001, this report was referred to an NOSB Aquatic Animal Task Force for review and comment.

We are very interested to note a proposal from the Livestock Committee for "the establishment of a new task force on standards for wild-caught and farmed aquatic animals" to be considered at the October 2004 NOSB meeting. This new task force "would be structured ... with two working groups - one on wild caught and one on farmed species." It is proposed that these two working groups develop recommendations for consideration by the full task force, which in turn would issue recommendations to the NOSB, including possible draft standards. This par-

allels our common interest to develop needed organic standards for aquatic species.

However, we are concerned that the 2001 Aquatic Animal Task Force report might be the basis for developing organic standards for farmed fish and shellfish. We have serious reservations with this approach. This report was prepared by a Task Force of non-aquaculturists with no opportunities for review and comment by the public and aquaculture experts. Nor was there opportunity for any comments prior to the October 2001 acceptance by the NOSB of this document. This report lacks a clear understanding of diverse aquaculture practices, and the application of a science-based approach to develop acceptable standards.

The proposed new Aquatic Species Task Force may face difficulties addressing both wild caught and farmed aquatic animals. There are few areas in common and many areas of difference. Although there are proposed to be separate working groups for wild caught and farmed aquatic species, special consideration of differences and issues is needed. We understand the importance of responding to legislation relative to wild caught fish. The NOSB may benefit by forming a task force to address only wild caught.

For farm grown aquatic species, we strongly recommend that the NOSB acknowledge the expertise, interest and common objectives of the NOAWG, and carefully consider how our group can be meaningfully integrated into NOSB planned activities. We suggest that NOSB not address aquaculture standards through this Task Force, nor through a separate working group, at this time, but wait for NOAWG to prepare its proposals for your future consideration. We also request that any recommendations from the NOAWG be considered directly by NOSB via reports and presentations by us in the future.

We are also aware that you will be considering fish meal and related matters at your October 2004 meeting. This is a subject of considerable importance to us since fish meal and oil, in large amounts, and properly protected against oxidation, are essential for virtually all aquaculture species grown and consumed in the United States today, except molluscs. We request that any decisions regarding the approved use of fish meal for terrestrial livestock not prejudice the use of fish meal in farm-raised aquatic species in which natural aquatic species are commonly incorporated in the diets of commercially important species being evaluated for organic standards.

We believe that work undertaken by the NOAWG, and due consideration of it by NOSB, is of national importance. Some imports from foreign nations of organic labeled aquaculture products are now in United States markets. We expect that quantities of imported aquaculture products with organic labels will continue to increase because of the lack of USDA national organic standards and sales based on foreign organic claims. Aquaculture is a rapidly growing source of healthy fish and shellfish in our American diet.

It is important to note that many organic certification standards for a wide range of aquaculture products and practices have been adopted in other countries. More are under consideration. The International Federation of Organic Agriculture Movements ("IFOAM") is actively considering model Aquaculture Production Standards.

A primary objective of NOAWG is to assist NOSB and NOP to develop workable, science-based organic standards for certification of domestic aquaculture production so that American aqua-farmers have equal and fair access to organic aquaculture markets in our country that are now open to foreign producers. It is also important that American consumers have the confidence in organic aquaculture that belongs with the USDA Organic label. With organic standards in place for terrestrial livestock, poultry, dairy products, and many crops, consumers deserve choices that include aquatic foods. Domestic aquaculture producers also deserve equitable access to organic markets similar to other sectors of animal agriculture and crop producers.

In summary, the National Organic Aquaculture Working Group respectfully requests that NOSB adopt the following recommendations:

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1. Wild-captured fish and aquaculture production be handled completely separately and independent of each other.
2. NOSB and NOP integrate the expertise and common objectives of the NOAWG into the process to develop organic standards for farm-raised aquatic species based on science-based approaches to characterize organic farming principles, production systems, and handling practices.
3. The establishment of a proposed Task Force to draft standards and make recommendations for farm grown aquatic animals be postponed to allow NOAWG to propose draft organic standards for NOSB consideration.
4. Future recommendations of NOAWG be considered directly by the NOSB and NOP in public forum, and that all future fish farming proposals be published at least 60 days prior to NOSB meetings where they are proposed for consideration.
5. Should NOSB and NOP not concur with the above recommendations and move to establish a new Aquatic Animal Task Force at this time to deal with aquaculture, then we request that a minimum of 50% of the members of this Task Force be aquaculturists appointed by the co-chairs of NOAWG.
6. The 2001 Aquatic Animal Task Force report not become the basis for future considerations for organic aquaculture because of science deficiencies and lack of public review and comment.
7. Future organic standards include the definition for aquatic species as defined in the National Aquaculture Act of 1980, and that aquatic species not be defined as livestock.
8. No action be taken relative to fish meal and related issues that could adversely prejudice aquaculture.

The co-chairs of NOAWG plan to attend the October 2004 NOSB meeting, as will other NOAWG members. We respectfully request your attention and careful consideration of our recommendations at your meeting. We look forward to working with you on these very important matters. In the meantime, should you have any questions, please contact one of our co-chairs at telephone numbers listed below.

Sincerely,

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Richard Neslon, Co-chair

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