

Strother, Toni

From: Pete Granger [granger@memes.com@i]
Sent: Tuesday, November 14, 2000 12:21 PM
To: Strother, Toni
Cc: Jim Zimmerman; Dan Swecker
Subject: Testimony for NOSB



Hardy FF & N Column
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Hello-

The following is intended as testimony for the public hearing before the National Organic Standards Board tomorrow in Washington DC:

The Washington Fish Growers Association represents saltwater and freshwater salmon and trout farmers, private hatcheries, feed companies, processors, and other private entities associated with growing fish in Washington State.

I have read with interest the discussions at the Organic Aquaculture Working Group (OAWG) discussion website. I believe OAWG is making great progress, but issues regarding net pen operations are obviously bogged down on the questions of:

1. Use of fish meal and oil derived from wild fish as feed source
2. Use of net pens with respect to effluent discharge and cage densities.

As to the first question, I believe the group can get to a point where it can justify use of sustainable wild stocks in fish feed on a careful, selective basis, if the majority of the working group would dismiss the misconceptions continually brought forward by a minority. These arguments against use of wild fish are the same misconceptions put forward in the Naylor paper in the June 29 edition of NATURE. You may have already have seen the attached rebuttal by Dr. Reid Hole of Nutreco, but I'm including it anyway. It puts forward an argument for use of wild stocks in managed fisheries while the industry works toward the use of vegetable proteins as substitutes in fish feed. The addition of Dr. Stewart Anderson to the chat group will be of great help in sorting out this question.

I thought Deborah Brister's questions to Rebecca Goldberg on Nov. 6, which I have included below, were right on point:

 Dear Becky,

What if we had the following scenario:

- (1) a fishery harvested for fish meal was identified and managed sustainably,
- (2) that particular fishery was even certified as sustainable,
- (3) an organic aquaculture facility was located in the same region as those harvested fish,
- (4) that facility was raising fish that were genetically predisposed to eating fish,
- (5) and that aquaculture facility used fish meal only from that particular sustainable fishery,

would you consider fish meal an allowable input for that particular

Dr. Hole also addresses the questions of effluent discharge, which again are misconstrued and generalized by the NATURE article. In Washington state, our net pen sites are located in well-flushed deepwater areas, which enable effluents to be dispersed effectively. Density questions can be worked through I believe. Finally, the nature of our effluents has been compared to sewage output from large metropolitan populations. Again, see NATURE article. I've attached an unpublished paper by Dr. Ron Hardy, which addresses this issue.

I believe if we can get past the untruths and misconceptions that continue to keep the aquaculture industry from reaching its true potential, the NOSB can eventually approve standards that give net pen operations that opportunity to take advantage of the growing organic market for seafood in this country.

Thanks for the opportunity to comment.

Sincerely,

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