

USDA Agricultural Marketing Service (AMS) National Organic Program
Wild-Caught Fish Listening Session
Chat Record

Thursday, March 18, 2021

2:00 - 3:00 pm edt

| Participant Name | Message |
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| Kirby Rootes-Murdy | Hi Everyone, this Kirby Rootes-Murdy, with Atlantic States Marine Fisheries Commission |
| Paul Zajicek | Paul Zajicek, Executive Director, National Aquaculture Association |
| jodi blanch | Jodi Blanch- Gorton's Gloucester |
| Craig Morris | Craig Morris, Association of Genuine Alaska Pollock Producers |
| Evelyn Drawec` | Evelyn from Seychelles Organic Programme |
| Amanda Johnson | Amanda Johnson, Dramm Corporation |
| Samantha Carroll | Samantha Carroll - Louisiana Seafood Promotion and Marketing Board |
| Jennifer Reed-Harry | Jennifer Reed-Harry, Pennsylvania Aquaculture Advisory Commitee |
| Colleen Coyne | Colleen Coyne, Seafood Program Coordinator, Food Export USA-Northeast |
| Christa Biggs | Clara Gareis from Aptar Food Protection |
| Joseph Logan | Joe Logan, Trident Seafoods |
| Jason Anderson | Jason Anderson, O'Hara Corporation |
| Jim Rodgers | Good afternoon. Jim Rodgers with StarKist Tuna |
| Steve Etko | Steve Etko, with National Organic Coalition |
| Andrew Nagle | Andrew Nagle, John Nagle Co |
| John Burrows | John Burrows, Alaska Seafood Marketing Institute |
| Margaret Malkoski | Margaret Malkoski, National Fisheries Institute |
| Nina Schlossman | Nina Schlossman, Global Food & Nutrition & Alaska Seafood Marketing Istitute |
| Richard McGowan | Rick McGowan Biloxi Freezing & Processing |
| Suzanne Dugas | Suzanne Dugas, Twin Parish Port District (Port of Delcambre), coastal Louisiana |
| Patty Lovera | Patty Lovera, Organic Farmers Association |
| Max Goldberg | Max Goldberg from Organic Insider (organicinsider.com) |
| Harriet Behar | Harriet Behar, organic farmer, educator and advocate |
| joshua farinella | Josh Farinella - Lund's Fisheries |
| MichÃ"le Stark | MichÃ"le Stark from Seafood Advisory |
| Marissa Wilson | Marissa Wilson, Alaska Marine Conservation Council (akmarine.org) |
| Gwendolyn Wyard | Gwendolyn Wyard, Organic Trade Association |
| Christina Grant | Christina Grant, CA Department of Public Health |
| Grace Bartolillo | Grace Bartolillo, Registered Dietitian, NYS Certified Dietitian-Nutritionist |

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| George Lockwood | George Lockwood, Chair Aquaculture Working Group |
| Bill Wolf | Bill Wolf, Wolf & Associates, Inc. |
| Mike Cusack | Mike Cusack- American Seafoods Alaska Pollock and Pacific Hake catcher/processor |
| Katie Prickett | Katie Prickett, Wild for Salmon |
| Gregory Silkes | Gregory Silkes - American Mussel Harvesters, Inc. |
| Ann He | Ann He, Seafood Products Association |
| James Cook | James Cook at SGS |
| Natalie Sattler | Natalie Sattler, Alaskans Own and Alaska Longline Fishermen's Association |
| Kellie Scutt | Kellie Scutt - PackGen - Hybrid IBC provider |
| Jeff Mattocks | Jeff Mattocks, The Fertrell Company |
| Lisa Gast-Corbett | Lisa Gast-Corbett, BJ's Wholesale Club |
| Monique Moore | Monique Moore - Icicle Seafoods, Inc. / OBI Seafoods LLC |
| Alyssa Walsh | Alyssa Walsh, The Fertrell Company |
| Nate Lewis | Nate Lewis, Oyster Bay Farm - aspiring shellfish farmer on Puget sound, WA. |
| Justin Henry | Justin Henry - UBC and Canadian Organic Aquaculture Association |
| Evelyn Drawec` | Gregory Berke Seychelles Fisheries Authority |
| Annika Saltman | Annika Saltman, Fishermen's Finest, Inc.- harvester of wild Alaska groundfish. |
| Wendy Vandersteen | Wendy Vandersteen, Taplow |
| Chris Woodley | Chris Woodley, Groundfish Forum |
| Cody Sander | Cody Sander - Pro-Cert |
| Noah Lakritz | Noah Lakritz, California Certified Organic Farmers |
| sebastian belle | Sebastian Belle , Maine aquaculture association, National Aquaculture Association and MAFAC. |
| Marie Burcham | Marie Burcham, Policy Director with The Cornucopia Institute |
| Abby Youngblood | Abby Youngblood, National Organic Coalition |
| Ron Batcher | Ron Batcher, USDA AMS Architect |
| William Kammin | Will Kammin - Alaska General Seafoods |
| Katherine DiMatteo | Katherine DiMatteo - consultant |
| David Gould | David Gould, Global Head of Sustainability Programs for Bioagricert/FoodChain ID |
| Christie Badger | Christie Badger, Independent Organic Inspector & National Organic Coalition |
| Jeffrey Nichols | Jeff Nichols, Maine Department of Marine Resources |
| Emily Lane | Emily Lane Blue Lobster Consulting LLC |
| Meredith Stevenson | Meredith Stevenson, Associate Attorney at Center for Food Safety |
| Kevin Edwards | Kevin Edwards - SGS Group, Seafood Sector |
| Aimee Simpson | Aimee Simpson, Director of Advocacy & Product Sustainability, PCC Community Markets |
| Matt Tinning | Matt Tinning, Director of Sustainability and Public Affairs, At-sea Processors Association |

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| kathy balcom | Kathy Balcom, QA Manager, OBI Seafoods - Seward |
| Phil Stober | Div. Chief for Economic Development PA Dept of Ag & Director of PA's Agricultural Business Development Center. PA Aquaculture is under our purview. |
| brian regan | Brian Regan - MI Dept. of Agriculture & Rural Development |
| Rebecca Robinson | Rebecca Robinson, Product Sustainability Specialist at PCC Community Markets |
| Lori Steele | Lori Steele, Executive Director, West Coast Seafood Processors Association |
| Patrick Weber | Patrick Weber - Director of Sales and Marketing; Fishermen's Finest |
| Steven Summerfelt | Steven Summerfelt, Chief Science Officer, Superior Fresh LLC |
| Brian Himelbloom | Brian Himelbloom, PhD, CFS, Associate Professor of Seafood Microbiology (retired), University of Alaska Fairbanks, Kodiak Seafood and Marine Science Center |
| Fred Villa Alaska | Fred Villa, Alaska Development Team, Office of Governor www.north2opportunity.com |
| Todd Linsky | Todd Linsky- CEO-TLC Family of Companies |
| Marianne LaCroix | Marianne LaCroix, Maine Lobster Marketing Collaborative |
| Steve Ela | Steve Ela - Ela Family Farms, chair NOSB |
| Laura Johnson | Laura Johnson - Senior Commercial Manager, Marine Stewardship Council. Thanks for the shout out! |
| Yelena Nowak | Yelena Nowak, Executive Director, Oregon Trawl Commission |
| Robert Vidal | Robert Vidal - Director of FSQA, Unisea, Inc |
| Mike Szymanski | Mike Szymanski , former |
| Eric Critchlow | Eric Critchlow, MSC Program Director, US |
| Scott Rice | Scott Rice, External Affairs Coordinator, WA State Dept of Agriculture Organic Program, past NOSB member |
| joshua farinella | Joshua Farinella, Director, Compliance/QA, Lund's Fisheries |
| Michael Thompson | Michael Thompson, International Specialist at CCOF Certification Services, LLC |
| Marin Hawk | Marin Hawk, Fisheries and Commercial Manager, Marine Stewardship Council |
| Niki Kunioka-Volz | Niki Kunioka-Volz, County of Kauai, Office of Economic Development |
| Jhana Young | Jhana Young, Sustainable Seafood Manager - Conservation International |
| Mike Szymanski | Mike Szymanski, former Alaska Legislator and involved in Alaska fisheries for past 20 years. Interested in seeing wild Alaska species such as Rockfish, flatfish, that are not migratory species obtaining Organic status. |
| Jennifer Tucker | 1 - What is the industry's definition of wild caught fish? |
| Aimee Simpson | (1)When PCC uses the term "wild-caught" to describe the fish for sale, this designation means that the fish has been caught in the wild. |
| Bruce Odegaard | 1 - Caught in natural environment. |
| Christina Grant | 1. Not grown and raised in controlled waters, pens, nets, and without adding feed to those waters where fish will be harvested from. |

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| Robert Kock | Would this include wild stock enhancement species like sockeye or how about seeded species like Hokaido Scallops? |
| Emily Lane | 1-caught in the wild not farmed |
| Justin Henry | 1 - fish caught in the wild that originated from natural reproduction (i.e. not enhanced fish) |
| Evelyn Drawec` | 1- Fish that are captured from the natural environment. |
| jodi blanch | 1. Fish caught in open water |
| Harriet Behar | I noted that the current definition has the fish coming from an "uncontrolled" location, which seems to be problematic for oversight. |
| James Cook | 1 - fish not raised in ponds, open fenced areas and those typically considered farmed raised that have been caught in approval open waters. |
| Virginia Ng | 1. Fish caught in their natural habitats. Fish that consume their nutrients from their existing environment. |
| David Gould | 3 - need to assure sustainability of the catch, just like for wild crops, and address by-catch; processing should at least have National List implications. |
| Joseph Logan | 2.Organic standing could help Marketing of Wild fish |
| Andrew Nagle | 1- Fish caught in the wild without rearing or unnatural containment past the smolt stage |
| dennis moran | 1. wild caught fish and wild caught organic fish appear to be something to discuss. For example, with crops, there is wild harvest organic that includes a requirement that the crops be grown in organic conditions. With fish, there are organic parts of the water and non-organic, so it seems there should be a distinction between organic wild caught which means an area of pristine waters as opposed to wild caught in an area that might be least pristine, like certain rivers, lakes, etc. |
| Robert Vidal | 2. All wild caught should be organic. |
| Yelena Nowak | 1. Fish harvested in their natural wild habitat |
| Jeffrey Nichols | 1 - Fish that was reared and harvested in the wild versus hatchery reared fish or fish cultivated in aquaculture facilities |
| Robert Kock | Would be hard to ID specifically which individual sockeye were hatchery and none hatchery except for presence or absence of adipose fin |
| Evelyn Drawec` | 1- Fish raised but then released into the wild and captured technically fit this. However this may not be the best route for organic |
| Jennifer Tucker | 2 - What is your feedback about the development of organic production and handling regulations for wild caught fish? |
| Catherine McGuinn | 1. Fish and shellfish harvested from their natural wild habitat |
| jodi blanch | Wild caught fish should be considered as part of the NOP. |

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| Mike Szymanski | 1-All species such as near shore Rockfish, Dover Sole such as Yellowfin sole, Rocksole, and multitude of fisheries. That are all monitored and scientifically monitored by the NOAA scientists on continues basis. These species are age structured, stomach content etc. and as such should be organic certified. |
| Steve Etko | 2)Since organic is a processed verified label, it's unclear how you would verify the production process for wild seafood? You can certainly verify the catch procedures and the processing, but how do you determine anything about the conditions under which the fish was born and grown? |
| Patty Lovera | 2 - Organic is an existing label covering many other animal products that come from domesticated animals where the conditions they are grown in are controlled. What will USDA to do assess the compatibility of an organic label on fish will interact with existing standards for livestock? Also will USDA assess impact on consumer understanding of organic standards for animal products? |
| David Gould | 2 - as someone who was part of the original NOSB WG on this topic, we experienced gridlock - I never saw two sides of an issue not communicate more. The fundamental question of if wild caught animals should even qualify for organic was the main question where the two sides could never agree. |
| Robert Vidal | 3. This would depend if finished product has other ingredients |
| Phil Stober | 2. I believe certified organic designation will give consumers more confidence in the U.S. fish catch, as the the acceptance of the USDA Certified Organic logo still has great market credibility. |
| James Cook | 2 - From a trade perspective US is behind other countries that have organic fish regulations and wild caught provides an entry into this trade area. |
| Joseph Logan | 3. Many facilities exclusively process Wild Fish only, such as Alaska Seafood Plants, so I feel differentiation should not be created for Production, Processing/Handling phases for single ingredient primary product forms such as fillets and portions |
| Craig Morris | 2. We at the Association of Genuine Alaska Pollock Producers support the development of meaningful standards for wild-caught seafood to be eligible to bear the marketing claim USDA Organic because we believe there is truly no more organic product than wild-caught Alaska seafood. The Alaska seafood industry stands ready to help the Department with this endeavor in any way possible and looks forward to continued discussions on this important issue on behalf of our shared stakeholders. |
| Michele Stark | 3. humane stunning/slaughtering |
| Andrew Nagle | 2- Domestic wild fish are inherently organic with or without USDA certification. Additives may break that definition and should be the only regulated factor in USDA certified seafood. |
| Bruce Odegaard | 2 - Hard to be much more organic than fish coming from their natural environment. |
| David Gould | 2 - Organic is based on soil and farming, but organic Principles could be applied to an extent, just as they have for aquaculture. |
| Bradley Hicks | Part of organic management is about the control of inputs. How will input be controlled for wild fish? |

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| Jeffrey Nichols | 2 - If there are benefits such as health or yield that appeal to consumers and garner a premium price, it might make sense from a marketing standpoint. If there are benefits to the genetic makeup of an existing population in wild, that might make sense from an ecological standpoint. |
| dennis moran | 3. on the production phase, its hard to see a difference between handling. But to be consistent with the wild crop harvest model, a wild harvest organic should be all 3, raised in an organic qualifying part of the ocean, 2) harvested consistent with organic principals and 3) produced- through the factory process, consistent with organic principals. But its hard to see how a fish that's harvested from an inorganic location in the sea, like polluted water, can ever be organic regardless of how organic the harvesting and processing methods are. |
| Virginia Ng | 2. Organic regulations not adding repetitive requirements from other regulations. Industry already has a lot of paperwork from other regulations, so using some of those existing paperwork towards applicable Organic requirements is appreciated. Organic committee working with other regulatory agencies to understand industry better. Creating flexible requirements. |
| Adrienne Wojciechowski | 2. Wondering how without the control feed sources of fish in the wild, as they can't be controlled and monitored how that meets the OFPA regulations and law. Who is to certify that a watershed didn't experience a population event, etc... |
| Lori Steele | 2 - Wild caught fish are organic by their very nature |
| Justin Henry | 2 - organic is a process, not a product. That would be very difficult to certify the process of production of a wild animal living in an environment that cannot be monitored. |
| Grace Bartolillo | 3. Organic Wild caught fish tested for a variety of contaminates including common drug and pesticide contaminates with a max standard established-not practical to test each fish but a standard for each 100-100,000 catches(?) |
| Harriet Behar | 2. I am concerned about oversight on a product where the full life of the fish, what it ate, and what environment it had been exposed to, would not be known. I have followed this issue for many years, and the organic price premium in the marketplace should be reserved for products where consumers are assured that all aspects of production and known and follow the foundational principles of organic. I do not see a way that wild fish can meet this requirement. |
| Evelyn Drawec` | 2-Due to the nature of organic certification, the fact that fish live in a volume of water that accumulates runoff materials such as pesticides and chemicals from land activity, and that fish are mobile and not contained in this body of water, how would it be possible to enforce the principles of organic? |
| Mike Szymanski | 2-curent production and handling of wild caught fish is driven by the market. Not sure what œOrganic production and handling regulations would add to the fishery. |

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| Robert Kock | There are natural toxins in the environment and in some areas more concentrated than others. Should toxins like mercury and PCB's be organic? |
| Kevin Edwards | 2 - No moisture retention agents, or other processing aids, would be allowed in the production and handling. Presumably you would consider Organic requirements on packaging? |
| Grace Bartolillo | 2-3. Unfortunately wild caught fish are not necessarily organic by nature due to the fact that us humans have so contaminated nature |
| Marie Burcham | 2. Cornucopia's feedback is that creating new standards for wild caught fish when there are much more urgent matters within the organic standards to attend to first (origin of livestock, protecting native ecosystems, for example) is worrisome. We understand this is an ask from Congress. How would inputs be controlled? How would ecosystem health be tracked, especially with migratory fish? There are lots of problems to tackle here. |
| Max Goldberg | 1 - Organic is a production method of farming, and catching wild fish at sea is hunting and gathering. We have absolutely no idea how these fish have been impacted by their environment, and there is no way to guarantee that they have consumed 100% organic feed, a legal requirement for all organic food. |
| Patty Lovera | 2 - What is the equivalent of an Organic System Plan (that organic producers have to develop for their certification) for wild fish " is it possible to assess what fish ate or what kind of conditions they were raised in ? |
| Colleen Coyne | 2. Wild caught fish are organic - free range & natural feed & not genetically modified or manipulated |
| James Cook | 3- Using only organic approved chemicals in the production phase and standard separation of organic from non-organic processing/handling operations. |
| Aimee Simpson | (2) If organic is to develop regulations for wild caught fish, it would need to be done with an extreme amount of caution and leadership in establishing strong sustainable harvest standards, monitoring of cross-species and marine ecosystem impacts and safeguards against abuse in other industries. Organic is uniquely situated to also evaluate toxic contaminants and incorporate testing and meaningful limits in its standard. |
| Steven Summerfelt | 2 - Knowing the environment where a wild fish has lived and the feed that it has eaten is impossible. The wild fish can be tested for contaminants, but otherwise it doesn't seem to me that wild fish can be audited with any degree of certainty. This is not a farmed animal raised in a controlled / defined environment with defined inputs. With these limitations, how can it be certified organic? |
| Justin Henry | 2 - If wild caught includes ranches or enhanced, those practices during the captive stages would need to follow organic standards. Unfortunately, without tracking each fish, that does not seem possible. |

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| Yelena Nowak | 2. Fishery sustainability should be one of the major factors in the development of the Organic standard for wild-caught seafood |
| dennis moran | 3. NMFS has tons of data about some species in the bering sea for example, stomach contents, roaming areas, etc. that can be mined and make it not so hard to identify at least some species, like yellowfin sole, are entirely raised in an organic area, eat organic stuff and would qualify as organic under organic principals of wild harvest, just like wild crop harvest. Other species might be harder, easier, and some impossible to qualify. |
| Mark Zieff | I would like to know whether consumers would see value in organic wild caught fish. Most already see seafood as inherently healthy. |
| Annika Saltman | 2- Organic fish in the US market is currently uncommon because there have been no wild-caught species certified as organic and the US government has not approved standards that would allow the certification of US-raised organic seafood. However, certified organic seafood is raised overseas and harvested there, then imported and sold into the US market as such. Thus we have a situation where US fish- the best, cleanest and most organic wild fish in the world- is not allowed to carry the organic label, but inferior quality foreign fish raised or harvested in far worse conditions, can be imported and sold into the US market as Organic. US consumers seeing that label will naturally believe that the inferior foreign fish is superior to the domestic, and health conscious buyers will pay more for it- all in error. Currently, several species of lesser quality fish are being imported into the US market carrying organic certifications from the European Union. |
| Jennifer Tucker | 3 - What types of provisions might differentiate organic wild caught fish from conventional wild caught fish in the production phase? During the processing/handling phase? |
| Kevin Edwards | 2 - do you mean production in the catch method (no dynamite!!) or the processing / production? |
| Annika Saltman | 2-Unless this problem is addressed, the organic seafood category in the US market will be populated exclusively by foreign producers of lower quality fish. Market place distinctions between a wild-caught domestic groundfish and an organic groundfish will become a source of confusion to consumers, always to the disadvantage to the US producers and the US consumers. Simply stated, the average consumer's reaction to the stamped word Organic on a groundfish product may be the very thing that convinces them to buy that lower quality imported product instead of a wild-caught, sustainably harvested, domestic groundfish without an Organic label. We believe that the lack of this one word creates a substantial, and avoidable, threat to US seafood harvesters and producers. If you can't call a wild Alaska groundfish true and organic, then what can you call organic? |
| David Gould | 2 - How much of a priority this should be for the NOP is a big question. Other topics should rise to a higher priority. |

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| Andrew Nagle | 3- Solely additives. If contaminations are found in the wild environment then organic certification should reflect that. Our regulatory bodies already prevent us from harvesting in areas with negative effects on human health as well as preventing unethical harvest practices. |
| Catherine McGuinn | 2/3 - I agree with the statement that organic is a process, not a product. I am curious to see how this process of certifying a wild caught animal will be applied. |
| Bill Wolf | 3. Only fish that can be verified to be from sites that can be inspected to meet organic standards should be eligible for certification. It would be difficult to certify migratory species. |
| Harriet Behar | 2. The NOSB has been reviewing the known contamination issues in fish, as well as the problematic issues of over-fishing and other environmental damage, this also makes organic certification of the wild fish problematic and could damage the trust in the organic label. |
| Phil Stober | 2. How the fish are handled and, more specifically, processed, will be most important. Anything caught in the 'wild' is almost by definition 'organic'. As long as the fish are processed using materials on the USDA's approved organic certification processing and handling list. |
| Craig Morris | 1. Alaska statute 16.40.210 would be a good reference document when working on this question of defining wild caught seafood. |
| Rosanna Marie Neil | 2 " Organic labeling for wild-caught fish could be misused as a marketing tool for large companies that can afford the certification, and give those companies an unfair advantage over smaller (and even more responsible) operations with fewer resources. |
| Steven Summerfelt | 2 - How can "Anything caught in the 'wild' is almost by definition 'organic'?" |
| joshua farinella | 2-3-4 What is the benefit to having a "certified organic" label on our wild caught fish? It seems only natural that when you see a whole fish in a display case or at a market that is labeled as wild caught, the organic part goes without saying. |
| Mike Szymanski | 3- provisions might be needed to differentiate organic fish that are not migratory species. Where salmon as an example is highly migratory and hard to determine where they have lived once they leave the reproduction life cycle area. |
| Kevin Edwards | 3 - At vessel level, you are asking for similar separation like the MSC requirements. From the Processing level back, your systems must facilitate traceability and mass balance exercises. |
| Evelyn Drawec` | 3 - Every single fish would need to be tested for presence of any prohibited material because every fish is mobile and we would not know what is has been in contact with or consumed otherwise. |

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| Michelle Stark | 3. a generic provision on humane slaughtering and traceability instead of a full organic standard may better address any gap/consumer interest. the number of standards/claims within seafood is already extremely large (compared to e.g. agriculture) and will not help clarify sustainable choices for the consumer. |
| James Cook | 4 - potential expansion of trade/sales of wild caught organic within US and expansion of markets outside of US provide alignment with other countries organic programs. |
| Jeffrey Nichols | 3 - A lack of additives in processing |
| Eric Critchlow | Pre and post processing random sampling for chemical presence that do not meet Organic parameters |
| Max Goldberg | 2 - Developing standards for organic fish is a very, very low priority for the NOP. We have many more pressing issues that the the USDA should be spending its time and energy on. |
| John Burrows | 2. The Alaska Seafood Marketing Institute supports the effort to build a recognizable organic standard for the evaluation of wild capture fish. The Alaska seafood industry and its many partners in the development of the existing frameworks designed to promote quality and sustainability (including existing standards) are willing and able to assist in this endeavor. |
| Phil Stober | 2 As Jennifer said, it is the 'processing' that is the more defining principle. It is impossible to manage and control what a fish might eat. |
| Steve Etko | 2. Do wild caught organic standards exist in other countries? |
| Marie Burcham | 3. We don't think that there should be an organic label for wild fish at this time. Most wild fisheries are stressed or poorly monitored. However, if it was to be done, there would absolutely need to be standards of environmental protection above and beyond normal fishery management that would make "organic" fish stand out. The wild crop standards are not enough of a framework to build on, as they are vague and problematic (discussion of marine materials, seaweeds, and fish emulsion highlight this issue already). We need to strengthen the regulations we have to ensure a solid framework for tackling issues like this one. |
| Craig Morris | 3. Clearly the processing/handling phase will be easier to address as issues will be more in line with the processing of other USDA Organic foods. As for the production phase, that is where our members will want to ensure that any USDA Organic seal does not undermine the work we have done to build a premium for wild caught Alaska seafood. The work we do related to sustainability of the biomass and the fact the fish come from such a pristine environment will need to be taken into account when considering other wild capture fisheries. |
| Virginia Ng | @Grace B I respectfully disagree. You can say that human impact can also result in land-based agriculture being "contaminated" and not "organic" as well. Lots of years of pesticide use, plastics (from landfills), and heavy metals exist in soils as well and can transfer via wind currents. |

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| George Lockwood | 3- when developing standards for aquaculture, a major requirement was management of the system. Most standards are management standards. |
| Bill Wolf | 4. Organic certification of species from aquatic environments can provide an economic incentive and a benefit that encourages the protection of that environment. |
| Harriet Behar | 3. The original fish would need to be certifiable to the current standards, Processing and handling of fish from an uncontrolled source cannot turn that fish into an "organic" fish. Fish raised in a controlled environment, such as in tanks, with all organic feed and health care products approved, would be the first place to start when considering fish for organic certification. |
| Abby Youngblood | 2 - We have big concerns about certifying wild forage fish as organic because they are not grown and managed in accordance with OFPA's 100% organic feed requirement, and also because they can contain synthetic toxic chemicals from exposure to those substances in the marine environment. |
| Todd Linsky | 2-How would you ever truly verify the safety and integrity of wild caught vs always knowing what a farmed raised system plan would be? Seems that farmed raised might be a more logical solution to protect organic consumers. |
| Adrienne Wojciechowski | 3- how could a certifier make an unannounced inspection on a fishing vessel at sea? |
| Jennifer Tucker | 4 - What would the impact of organic production and handling regulation be on the wild caught seafood industry? |
| Justin Henry | 3 - processing and handling is easy as standards are readily available; however, that is only 1 day out of a multiple year production cycle. Somehow the production of those fish would have to be distinguishable and verifiable. It does not seem to be a fit for organic. |
| David Gould | 4 - consumers could be alerted to important issues of sustainability and quality - as long as they don't get confused! |
| Patty Lovera | 4 - Has USDA assessed consumer understanding of existing fish eco-labels? How would a certified organic wild fish label fit into existing market landscape – would it actually help consumers differentiate environmental practices of products in the marketplace? |
| Eric Critchlow | 4 - Additional testing and certification costs that market demand would need to justify |
| Jeffrey Nichols | 4 - It would depend on the cost/benefit. |
| Bill Wolf | 3. The provisions should provide clear guidance that delineates the parameters and conditions required for a site to meet organic certification. |
| Craig Morris | 4. The answer to this question will greatly rely upon how much the regulations would recognize existing industry programs you already mentioned like the Responsible Fisheries Management Program. |

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| Aimee Simpson | 3 - There are many, but a few to consider would be standards concerning bycatch, catch method, ecosystem impacts and impacts on other sensitive species, stock and species health, external impacts (ocean warming, pollution), toxicity from heavy metals and pollutants, prohibitions against uses that would place unnecessary strain on the system (e.g. using wild-caught product for feed in aquaculture), and overall support of organic principles. |
| Grace Bartolillo | 4. Seems like it would only be feasible or plausible for very large companies. Perhaps wild caught should just be wild caught and we should consider organic standards for farmed fish(?) |
| Steve Etko | 4) At the time the Stevens amendment was added to OFPA in 2003 to include the section on wild fish, it is my understanding that the Alaskan wild seafood industry was trying to find a way to get a premium in the marketplace relative to farm raised fish. But since that time, it seems that the branding of Alaskan wild seafood has resulted in a successful premium for wild caught fish. Even if there were a way to fit a square peg into a round hole by allowing wild seafood to be certified and labeled as organic, it's unclear whether there would be any real economic benefit to the wild seafood industry for doing so, beyond the benefit they already get from being labeled as wild caught. |
| Kevin Edwards | 3 - Another commercial provision is the marketing expense and who absorbs that. Most of the seafood sector does not want to do anything that raises the cost of seafood over alternate proteins. Alaska has their own marketing engine, and building that brand is millions of \$ invested, outside of the purchase price? This is conjecture on my part. |
| dennis moran | 4. It would help incentivize a domestic fish processing investment, shifting away from foreign processing of domestic us caught fish. That's because foreign processing wouldn't so easy to control as US domestic processing, so if there was an opportunity to command higher retail prices with us wild harvest organic branding, then it would incentivize the development of that industry over shipping and processing foreign. |
| Gwendolyn Wyard | It would be helpful if NOP could explain what the NOSB recommendations addressed in regards to wild caught fish (or didn't address), and why NOP did not include wild caught in the proposed rule that was never published. We would like to see NOP complete their work on advancing the proposed rule that was removed from the Unified Agenda. Bivalves, Aquatic Plants, farmed fish; all the areas where the organic community found consensus after years and years of work. |
| Evelyn Drawec` | 4 - the cost of testing and verification methods needed to meet organic requirements would be cost prohibitive to the producer/processor due to the unknown factor of where a fish has been. |

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| Harriet Behar | 4. The wild caught seafood industry has specifically stated they want the organic label to gain a higher price in the marketplace, with little to no change in their current harvest or processing standards. This industry should work on their own wild caught label to bring up their price and not push the organic program to water down our rules to figure out a way to allow this uncontrolled production system to carry the organic label. |
| Todd Linsky | 4- organic standards for farmed fish seems to be a logical discussion at the same time as wild caught. |
| Jhana Young | 3. Another layer to consider is the human rights standards at sea. This is currently being developed for high risk fisheries and could play a role in certification. |
| Rosanna Marie Neil | 3 - There are no practical and scientific ways to differentiate between "organic" wild-caught fish from "conventional" wild-caught fish. |
| Claudia Coles | If seafood is accepted into the NOP, will USDA consider the inspectional work that FDA, NMFS and State programs already perform? Or will this be another added on user fee program? |
| Annika Saltman | 3- Existing wild harvest statutes and regulations could be applicable to groundfish. A sedentary groundfish species like yellowfin sole in the Bering Sea and a clump of berries in a valley in Appalachia are both found in pristine, organic environments. Both items are free from toxins and otherwise satisfy all the criteria that the label Organic demands. Therefore, if existing federal statute permits wild groundfish to be considered a wild crop, then we could begin with the existing rules of wild crop harvest as a beginning framework and look to apply to groundfish. |
| Justin Henry | 4 - It would not be a production and handling regulation because it could not regulate the production part. |
| Andrew Nagle | 4. Ideally it would drive consumers to consume more seafood. Realistically we are likely to see it as another tax on our industry to either be in the certification club or not. I do not think it would be worth it for a small pack house to pay for certification meanwhile larger retailers may demand it or not. I don't think the price of fish will increase because of the organic label. I am hopeful that the amount of fish consumed would increase, however doubtful. |
| Mark Zieff | 4. Assuming the marketplace sees a value in an organic wild caught product and, more importantly is willing to pay a premium for it, the regulations would help eliminate any potential confusion and build trust in the quality of organic products. |
| Marissa Wilson | 2 - speaking personally, not on behalf of my organization if the purpose of organic standards for wild fish is to better inform consumers about quality, it is more important to inform consumers about the difference between sources wild and farmed, domestic and international. Trying to impose a process-based certification on animals that are not contained seems like a more expensive use of time and resources than an initiative to educate consumers about domestic food production. I believe it is more impactful to have consumers understand a process than to think simply about a label. |

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| Phil Stober | 4. It will probably upset many, but the opportunity to charge more for your product may help alleviate any 'extra regulatory' concerns. Wild caught for example can still be labeled 'wild caught', I believe, in the case of 'wild fish', organically processed may have more market value. If people believe the fish is not being cleaned in a far away production facility, that will be beneficial |
| Virginia Ng | 3. Some companies may use antimicrobials to control for pathogens. If organic land-based agriculture has approved "organic pesticides", this same thought process may need to occur for those industry practices (e.g., acidified sodium chloride, peracetic acid) currently used during processing (e.g., filleting). |
| Jennifer Tucker | End Top-Line Questions |
| sebastian belle | if usda organic is a process certification NOT a product certification how can wild seafood be certified? |
| Jennifer Tucker | What is the industry's definition of wild caught fish? |
| Steve Etko | 4) Is it possible that the certification of both wild caught and farm raised fish as organic could actually result in an erosion in the premium for wild caught fish? |
| Patty Lovera | 4 - It is hard to evaluate this proposal without considering the issue of whether to certify organic aquacultured products. will there be increased pressure to catch organic wild-caught fish to fill demand for fish meal or oil used as feed for organic aquaculture? |
| Harriet Behar | 4. Our wild harvest standard would not cover wild fish harvest, since the environment and fish are not tracked to verify they meet the current organic standards that all other organic products must meet. |
| John Burrows | 3. Given the great efforts undertaken by the seafood industry to apply third-party evaluation to all stages of harvest and production, ASMI would encourage the USDA to consult with existing third-party certifications for the establishment of benchmarks for attaining an organic label. Harvest practices, fishery management, chain of custody and processing/handling should all play a role in this |
| Bradley Hicks | 4. There would likely be a lot of confusion in the beginning. The standards would need to be customized for each of the major fishing groups (salmon, tuna, ground fish, forage fish etc) and each of the gear types (trawl, gill net, line caught etc.) This will take a couple of years. |
| Kevin Edwards | 4 - Added costs to the vessels if they have to use unique holds. Added costs to the processor who does not have a pre-existing means to separate organic and non-organic, and the software to support. |
| George Lockwood | 1-4 NOSB has recommended organic standards to NOP and NOP has received approval from OMB to publish a proposed final rule. The Aqua Working Group remains prepared to assist in assuring prompt publication. |
| Virginia Ng | Man, I thought I was just going to be listening |

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| Michelle Stark | 4. an organic certification for farmed seafood creates a bigger difference and therefore bigger benefit. So perhaps it best to produce the organic standards for farming prior to developing standards for wild catch. Also, the consumer would no longer be able to distinguish between the different "types" of organic. this would be a disadvantage. and...the partnership/equivalency to other organic programs would no longer work? |
| Bill Wolf | 2. There have been concerns about certification of marine environments, such as "water circulates and cannot be verified to be pure." The same thing can be said of land crops, i.e. "air and rain are not pure." That concern is a distraction. Instead there should be organic wild caught fish standards that define parameters for site delineation, just like farm parameters. |
| Joseph Logan | 4. Limiting USDA Organic standards to Product of USA facilities would help. Perhaps AMS and NOP could create a parallel "Wild and Natural" certification for Individual fisheries such as Alaska Pollock and others |
| Rosanna Marie Neil | 4 - Organic regulations will add an unnecessary layer of complexity to a fisheries management system that is already flawed and complicated. |
| Laura Johnson | 1. The Marine Stewardship Council (MSC) program is only applicable to wild-caught fisheries, and this is defined in our Standard. A summary is available at this link https://www.msc.org/docs/default-source/default-document-library/for-business/for-fishery-clients/fisheries-get-certified-2019.pdf . 2. Like the Alaska Seafood Marketing Institute, we are happy to contribute to the development of any standard. |
| Noah Lakritz | Can you past all of these questions in the chat box so we can copy |
| Mike Szymanski | 4-Alaska fish all reside in pristine waters off Alaska and the specific flat fish and rockfish live and reproduce in these pristine waters. These species are monitored and highly researched by NMFS scientists who can verify the entire lifecycle of all these fish. These NMFS scientists have a extensive data base on all these species to that can verify through stomach content, dating back over 30 years of monitoring. |
| Joseph Logan | 5. Similar to USDA COO labeling rules for Wild Seafood |
| David Gould | 8 - similar considerations as for wild harvested crops, especially as regards controlled/sustainable harvest; also considerations about full chain of custody and assurance of quality |
| dennis moran | 5. Easy for some, probably harder for others. In alaska, all harvest on the ships that would participate in organic contain double observers and heavy NMFS oversight already. Then Blockchain- existing blockchain, can track fish from catch to table. |
| David Gould | 5 - the entire supply chain needs to be controlled |
| Steven Summerfelt | 2, The organic standards for terrestrial crops are detailed. They are far beyond the claim above that "The same thing can be said of land crops, i.e. "air and rain are not pure."" |

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| Jennifer Tucker | 5. How could wild caught fish be regulated and enforced for organic labeling? |
| dennis moran | 6. depends on the fish. pelagic and widely roaming species it would be hard. But sedentary species that NMFS already has tons of data on, it would be easy. Not all species would probably qualify, but some will, and some easily with existing data that NMFS has. |
| Claudia Coles | If USDA has an organic seafood program, will imports be allowed into the US if they have organic labeling that is not part of the USDA program? |
| joshua farinella | BAP (Best Aquiculture Practices) also certifies wild caught species. Part of that certification includes sampling for lab analysis. How would Certified Organic be any different from BAP? |
| Craig Morris | 7. For the Alaska Pollock industry, this question is relatively easy to answer. We already have Federally-overseen observers on many of our harvesting vessels tracking bycatch and other issues. We also have routine Coast Guard inspections of our vessels at sea. Similarly, this wouldn't be unlike the audits we already have by AMS auditors for our Federal purchase sales for Government programs. |
| Steve Etko | 5-8. These are the questions I have as well, and the difficulty in answering is a good demonstration of how the existing organic certification model could be really challenging for wild seafood. |
| Annika Saltman | 4- A pathway for Organic designation of wild caught fish will significantly benefit domestic harvesters and processors by increasing the value, and ensure that US consumers are getting the healthiest and most nutritious seafood on the market. |
| Evelyn Drawec` | 6 - This cannot be done as fish are mobile and we cannot know where they have been. |
| Craig Morris | 6. Origin of fish is already well defined by FAO catch areas. Seafood sold in Europe and even in many U.S. retailers already has these catch areas on packages of fish. |
| Virginia Ng | 5. Some Alaskan processors are seasonal with 3 months of production. They already have third party auditors, state and federal regulators, customers, etc. visiting and auditing/inspecting. How can the Organic inspectors that only visit once a year accommodate industry and for industry to win without completely exhausting each other? |
| Evelyn Drawec` | 7 - Would need to do inspections at sea within fishing grounds to test for presence of any prohibited materials prior to fishing. |

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| Harriet Behar | 5. I cannot see a way that allowing wild caught fish to be certified organic would be on the same level of oversight as our currently labeled organic products and would damage consumer confidence in the entire label. If I hunt and harvest a wild goose or a wild deer, I don't know what they ate, what type of contaminants they might have been exposed to in the environment etc. Pheasants and trout are released into my landscape from farms and hatcheries, they were not fed organic feed, can eat GMO crops that are present in their environment etc. This is the same issue with ocean caught wild fish, where have they been? What have they eaten? Where they raised first on in a nonorganic environment and then released to the wild, after being given non-approved drugs or other health related items? There are too many unknowns to move forward with organic certification. |
| Kevin Edwards | 7. The seafood processor / re-processor location. Then there could be a provision for random at sea processing vessels. Afterall, scheduling an unannounced audit for a fishing vessel or at sea processor could be impossible (cost prohibitive) for an audit company. |
| Annika Saltman | 8-Existing wild harvest statutes and regulations could be applicable to sedentary groundfish. We could start with the existing rules of "wild crop harvest" as a beginning framework and look to apply to groundfish. |
| David Gould | 5 -being able to assess the sustainable harvest of wild fish is not trivial matter. ACA's should not be allowed to make that determination without substantial scientific backing. The MSC devotes and enormous amount of stakeholder engagement and scientific study to this; referring to them, partnering with them, or qualifying their assessments could be a reasonable support. |
| Sharon Natanblut | Have you considered organic labeling and cell-cultured seafood? |
| Joseph Logan | 6. N/A except nearly all Wild caught fish capture area is well documented. Adherence to existing regulations such as SIMP, USDA COOL and pending FDA Trace rules all work to establish capture area. Fishery Scientists in conjunction with Fishers and Processors help determine natal origins for species such as Salmon caught on the West Coast and in Alaska |
| Jeffrey Nichols | 5 - some type of organic food testing and verification program |
| Harriet Behar | 7. The organic inspector would need many months to track just one fishery, the economic cost is too great to be practical. |
| Marissa Wilson | 4 - this depends on how the certification would be implemented, but in my experience of certification programs, it would benefit the businesses/producers that are large enough to afford to navigate the additional layers of bureaucracy at the expense of small/new operations. |
| James Cook | 5 - MSC and IUU reporting coupled with processing inspection compliance criteria can help with the enforcement |

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| Mike Szymanski | 6- Mother nature controls the origin of harvested wild-caught fish off Alaska, mother nature also provides what is eaten by the wild-caught fish, which is analyzed by the NMFS scientists on a ongoing basis. |
| Michelle Stark | Question to ask the more fragmentation we have i.e. the more different different standards we have, the slower we progress in solving global issues. Therefore, what contribution would a US organic standard for wild capture have to improve/resolve global issues around stock health, water quality, unreported fishing, traceability? Is an additional (fragmented) system hindering efforts to resolve global issues? |
| Justin Henry | 6 - Taking salmon as an example, if ranching or enhancement facilities use antibiotics on their fish (which they frequently do), those fish will be mixed and indistinguishable from all of the other salmon caught. These enhanced fish may come from facilities in Canada, US, Japan, Russia, etc. Unless each fish can be identified, this cannot be controlled. |
| Craig Morris | 5. For Alaska Pollock, our product is already traceable back to the catch area as in the U.S. to call a fish Alaska Pollock it has to be caught in Alaskan waters. |
| Kevin Edwards | 6. Suggest you review the challenges of vessel monitoring, electronic catch monitoring, etc. though the US industry is considered low risk for IUU. But if you wish non-US controls, then the risk increases. |
| Aimee Simpson | 6-The question of how to control the origin of harvested fish is a complex one, one that has increasingly in the marine conservation arenas pointed to the need for targeted place-based sustainability and harvest standards. This would need to be approached with a mindset of moving the bar higher towards preservation and understanding the complexity of migratory patterns and dependent species. |
| Max Goldberg | Certifying wild-caught fish as organic would be incredibly damaging to the integrity of the USDA organic seal. |
| Jeffrey Nichols | 7 - at the wholesale dealer/processor |
| Grace Bartolillo | Good point Stark |
| Harriet Behar | The organic system plan would have very little management, since very little can be done, other than how much is harvested and what methods are used to lessen damaging by-catch. This is not a system of production, since those harvesting are not managing the fish, they are just managing the harvest. For that reason, it does not meet the basic definition of organic. |
| Marie Burcham | 5. It would be extremely complicated if not impossible. I worry the NOP does not have the staffing capacity for this kind of enforcement (through no fault of the NOP's). As others have mentioned, you would need to have regulations for each species and discreet fisheryâ€”you cannot have a blanket rule for wild fish given the complexity of the industry and still meet organic requirements for preventing environmental damage and/or resource depletion. |

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| dennis moran | 8. Just like wild crop organic harvest, pass a reg permitting it, set the same kinds of standards and delegate the power to certify to the states like WA which does it for both WA and Alaska. |
| James Cook | 6 - COOL requirements should apply and can be enforce and feeding them or treating them would create a farm-raised situation so would negate wild caught. |
| Mike Szymanski | 7- Maybe the organic inspection process could be delegated to the NMFS observers on each of the fishing vessels or at shore plants? Just a thought. |
| Nate Lewis | It seems like all "organic" wild caught seafood would be processed in some way, so the inspections would occur during processing. The assessment of compliance with the standards while in the water would be based on an audit of sustainability standards applied and recordkeeping compliance to those standards. |
| Brandii Holmdahl | What should be asked is there an existing audit framework that could be added to in order to accommodate organic labeling requirements - reducing, or at least not adding - to audit fatigue. |
| Harriet Behar | The NOP should not delegate oversight of organic certification of wild caught fish to individual states. |
| Jeffrey Nichols | 8- It would have to include chain of custody records |
| Kevin Edwards | Final thought - does the customer really care, if they are satisfied with MSC, ASC, FOS existing labels, or Swafood Watch labels? |
| James Cook | 7 - enforce at port and processing operations, if further processing beyond the catch location. |
| Mark Zieff | I would agree that this is not a question of processing or handling rather than what the fish has ingested. Unlike other farmed organic proteins, we have very little control if any over what a wild animal has consumed. |
| Virginia Ng | 7. Depends on the site. But for fishing vessels, unannounced is going to be difficult unless inspectors want to play "pirate". Maybe announced inspections can occur while vessel is at dock. |
| Yelena Nowak | Does USDA plan to allow an official public comment period on this topic? |
| David Gould | If NOP does open up this topic, it might consider including other wild animals as well - not just fish. |
| Grace Bartolillo | I think the customer thinks they care but are unaware of industry standards as a whole |
| Valeria Frances | Valerie.frances@usda.gov |
| Annika Saltman | We would like to see a feasible pathway for any groundfish species to acquire an "Organic" label. Although the achievement of the Organic designation would be on a species by species, facility by facility basis, with a significant workload to compile information to concretely determine that a certain species/facility meets the above criteria, there should be a true opportunity for wild-caught, domestic species to achieve an "Organic" designation. |

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| Joseph Logan | 8. Organic System plans and Organic labeling would be specific Fishery Dependent and there is not a need to consider certifying all wild caught Fish. Once a Fishery is certified, then industry within that fishery could join the program. Example Oregon Dungeness Crab, Alaska Pollock, Bristol Bay Salmon. None of these utilize hatchery, ranching or other human interventions |
| Patty Lovera | Question to ask - what expertise would accredited certifiers need to be able to inspect and certify wild-caught fish? |
| Christie Badger | Patty Lovera - Or inspectors... |
| Jhana Young | In Hawai the awareness for third party certifications is already low. Most consumers place a high value on locally harvested wild caught seafood and we've found they are willing to pay more for it too. |
| Mike Szymanski | 8-the organic system plan for wild-caught fish should be developed by the fishing industry, NMFS (National Marine Fishery Service), and Organic agency. |
| Harriet Behar | The report to Congress should state that wild caught fish cannot meet the OFPA, nor any of the current organic regulations and therefore wild caught fish cannot be certified as organic. |
| Alex Johnson | What is the expected timeline for NOP's delivery of the report to Congress? |
| Brian Himelbloom | Alaska has a wild fish and shellfish monitoring program for contaminants, see https://dec.alaska.gov/eh/vet/fish-monitoring-program/ |
| George C Kalogridis | Excellent presentation |
| Kirby Rootes-Murdy | Question you mentioned at the beginning that Congress had urged the National Organic Program to assess the feasibility and appropriateness of developing an organic production system for wild-caught fisheries- is there is a specific bill or piece of legislation? |
| Grace Bartolillo | Thank you for the opportunity to participate |
| Bill Wolf | Thank you for this opportunity. |
| John Burrows | Final thought especially on issues 5-8 Most of these issues (other than 6, which other than the many requirements for displaying origin is N/A) are well considered by existing seafood certification standards which are considered on a per-species basis. |
| Steve Etko | Thank you |
| James Cook | Thank you. |
| Mark Zieff | Thank You |
| Aimee Simpson | Thank you! |
| Natalie Sattler | Thank you! |
| Evelyn Drawec` | Thank you for this meeting - Evelyn Drawec and Gregory Berke |
| Nina Schlossman | Thank YOu |
| David Gould | Thank you! |
| Kirby Rootes-Murdy | Thank you |

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| Craig Morris | The Alaska seafood industry thanks you for the opportunity today to discuss this important issue. |
| Roxana Priego | Thank you |
| Phil Stober | Thank you for the opportunity to weigh in. Cheers |
| sebastian belle | If USDA develops standards for wild caught seafood BEFORE aquaculture It will seriously undermine the "organic brand" because of ll the scientific work that was done on aquaculture standards and because it will be responding to political pressure |
| Virginia Ng | Thank you! |
| Dudley Hoskins | Thank you Jenny, Valeria, Erin, Dave and the entire NOP TEAM! |
| CARLOS ARAUJO | Thanks |
| John Burrows | Thank you all! |
| sebastian belle | thank you all for the opportunity to comment |
| William Kammin | Thanks! |