

March 27, 2007

Docket #: AMS-TM-07-0032; TM-07-05

Submitted via E-mail to: Valerie.Frances@usda.gov

Dear National Organic Standards Board:

In the push for the United States to certify farmed seafood as organic, the integrity of the entire 'organic' label is at stake. We're writing to ask you to ensure that you do not weaken our USDA organic standards in an effort to include carnivorous fish or fish farmed in open net cages within the organic fold.

We commend the NOSB's Livestock Committee for its recent recommendations not to include open net cage systems and wild fish meal and fish oil within the proposed organic aquaculture standards at this time. We understand that the Livestock Committee has expressed the need for more dialogue on these issues and were therefore encouraged to express the opinions of chefs and food professionals, which seem to have been absent from the dialogue until now.

As professionals that depend on quality, healthy and sustainable ingredients, we are avid supporters of 'organic' systems. To us and to our customers, the 'organic' label ensures us that our food was farmed in a way that was in balance with the natural environment, that minimized pollution, and that did not depend on pesticides or other potent chemicals common in industrial agriculture.

As appetites for seafood grow and many fish populations continue to shrink, we're well aware that we're going to increasingly depend on farmed fish for our seafood supply. Similar to wild fisheries, we support fish farming that is performed in a way that is environmentally sustainable. We are concerned, however, that some forms of aquaculture – namely those that farm carnivorous fish in open net cages such as farmed salmon – actually place further pressure on our dwindling wild fish populations.

In brief, we do not understand how farmed fish such as salmon could ever be considered 'organic.' As chefs and food professionals whose customers depend on us for truthful information about their food choices:

- We cannot support an 'organic' system that takes more resources (fish) from the natural environment than it provides in return, as is the case with farming all carnivorous finfish such as salmon.
- We cannot support encaging a highly migratory species like salmon, and labeling it organic.
- We cannot support organic certification for any food system that allows untreated wastes from the farm to be discharged directly into the ocean, as is the case in any open net cage fish farming system.
- We cannot support organic certification for any system that does not greatly minimize or eliminate the spread of harmful and sometimes lethal parasites to wildlife, as is the case with open net cage salmon farms.
- We cannot support an 'organic' system that does not prevent escapes of farmed fish into the wild, as is the case in any open net cage fish farming system.

- We cannot support an ‘organic’ label for a product where the feed, and therefore the product itself, may very well contain unhealthy levels of contaminants such as PCBs and dioxins (in sometimes higher quantities than conventionally farmed product)

We are aware that ‘organic’ farmed salmon certified in Europe is already available in the US market. In addition to all of our concerns addressed above, we are highly concerned that some if not all of the European organic certification standards for farmed salmon actually allow the use of toxic chemicals to control outbreaks of the parasite, sea lice. It is an upsetting paradox that while we do not allow ‘USDA organic’ foods to contain pesticides, we are allowing imports of farmed salmon that were treated with toxic chemicals to make ‘organic’ claims in the US market. How do we expect US consumers to make sense of these inconsistencies?

In order to correct for the current confusion surrounding ‘organic’ seafood and to avoid misleading US consumers regarding ‘organic’ seafood claims in the future, we urge the NOSB:

- 1) To permanently prohibit open net cage systems and wild fish meal and fish oil from USDA organic aquaculture standards;
- 2) To prohibit imported farmed fish from making ‘organic’ claims in the US market until US standards are adopted. In the event that the NOSB decides not to include farmed salmon within ‘USDA organic’ aquaculture standards, for instance, we urge the NOSB to not allow less stringent ‘organic’ claims for imported farmed salmon to in the US market.

We support organic labels for those fish species that can naturally meet ‘organic’ principles, such as vegetarian species like catfish and tilapia farmed in closed systems. If the US chooses to water down its organic standards to accommodate carnivorous farmed fish species from open net cage systems, however, it seriously risks losing our confidence in the USDA organic brand as a whole.

Comments presented to the NOSB by Rick Moonen on behalf of the undersigned:

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