

Organic Farmed Salmon *If You're Not Confused, You Should Be*

The United States does not have “organic” standards for seafood yet. So why is organic salmon and organic cod appearing on local restaurant menus and at seafood counters across the US?

The simple answer – if there is one - is that in the absence of US organic standards for seafood, the US agencies overseeing the organic label claim that they can't enforce foreign fish products making organic claims in the US market. So, until there is a US organic standard for seafood, imported seafood can be labeled organic as long as it has been certified by a foreign organic certification body. There is some debate, however, if it is actually within the scope of responsibility for the US to regulate foreign organic claims in the US market, even in the absence of US organic standards.

Already perplexed? Take a look at one of the many foreign “organic” standards for farmed salmon and see if it matches your definition of “organic.” For instance, we doubt you'd expect that the organic salmon was raised in an open net cage that directly discharged waste into the marine environment. Or, that it could have been treated with toxic chemicals. Or, that it might have been fed non-organic feed. Or, that it may not be cleaned of harmful contaminants such as PCBs, dioxins and DDT (even though the technology exists).

Due to this state of confusion surrounding the organic label for seafood, the state of California has banned the use of any organic label on seafood until US organic seafood standards are developed. Similarly, Whole Foods Markets has adopted a policy not to label any of its seafood as organic – including salmon – until a US standard exists.

In the world of confusion that is “organic” seafood, here is what you should know:

Organic, According to Whom?

While the US currently has no organic seafood standard, it is on its way to establishing organic standards for at least some farmed fish in the not too distant future (see following section).

In the absence of US organic standards for farmed fish, the US has been allowing imported seafood to be labeled as organic within the US marketplace. Not only is there major concern among consumer advocacy and conservation groups that this practice leads to consumer confusion, but that some of this so-called “organic” seafood in our markets today does not meet US organic principles. For instance, “organic” farmed salmon certified by the UK Soil Association allows farmers to use toxic chemicals to treat parasites and allows them to discharge untreated wastes (including these chemicals) into the marine environment.

Furthermore, many of these groups in the US and Canada argue that carnivorous fish (require wild fish for feed) and open net cage systems are inherently incompatible with organic principles. Thus, carnivorous fish that are farmed in open net cages – such as salmon and cod – should not be even considered for the US organic label. If the National Organic Standards Board (NOSB) agrees - and chooses not include carnivorous fish or fish farmed in open net cages in its upcoming

organic standards - the question becomes whether or not the US will continue to allow imported “organic” seafood of this nature into the US market given there will still be no US standard.

The Pure Salmon Campaign argues that in order to maintain the integrity of the organic label, only those products for which there is an established USDA organic standard should be allowed to carry an “organic” label in the US market. And, if the USDA decides to abandon or postpone an organic standard for certain seafood like farmed salmon, then there should be no “organic” product of this nature in the US market. Period.

Similarly, the Center for Food Safety believes that, “the allowance of fish products to be sold in the US under any label claiming to be organic is contrary to the law (Organic Foods Production Act) and is misleading to consumers.” The Center states that consumers “are being induced to buy products that are produced in a way that has no integrity under US law and the USDA should act immediately to stop such marketing of seafood products.”

Even more distressing is the lack of consistency in the “organic” standards that are currently being used to certify seafood. For instance, there is no EU- wide organic standard for farmed fish. This means that every certifying body in Europe – there are many certification bodies for organic farmed salmon alone – can define “organic” farmed seafood as they see fit. Note that most of the “organic” farmed salmon we import into the US comes from Europe.

Further, the definition of “organic” can vary across food products. For instance, the UK’s Soil Association has received strong criticism from one of its own board members (who resigned over this issue) that its organic salmon standards fail to meet most if not all of the organic principles applied to its other certified products such as organic chicken. Also, the organic certification body may be based in a different country than the fish farm for which it is providing an organic label. So, the organic salmon you buy from your local Stop and Shop may have been farmed in Ireland but then certified by a German or Swiss certification body.

Even more concerning is that some organic certification bodies are not as transparent as you might hope. The Organic Food Federation, one of two bodies that certifies salmon as organic in the UK, refused to provide the Pure Salmon Campaign with a list of the Scottish salmon farm sites it certifies as “organic.” Even if you are savvy enough to track down data on a particular farmed salmon producer, in some cases, there is no way for you to check where their organic product is coming from.

What Can You Expect from the “Organic” Salmon in the Market Today?

The answer is - unless you know the specific certifying body that certified your salmon as organic - the definition of “organic” is at best confusing. What we do know about your farmed “organic” salmon is that it is farmed in an open net cage system, the same system used for conventional farmed salmon. In turn, what we’re relatively certain of is that the organic farmed salmon on the market today:

- Ate wild fish for feed (though the make up of the diet can vary considerably)
- The farm provided no complete barrier between farmed fish and the marine environment
- The farm did not contain wastes - uneaten feed, feces and possibly harmful chemicals
- Farmed did not prevent the transmission of diseases and parasites to/from wild fish

And, depending on where your organic salmon came from and who certified it, it may have been:

- Treated with toxic chemicals (some like Cypermethrin and Emamectin benzoate classified as “marine pollutants”) used to kill parasites called sea lice
- Treated with antibiotics at some stage of its life cycle
- Fed wild fish products that did not come from certified sustainable sources
- Fed feed that was not tested for or cleaned of PCBs, dioxins and other contaminants¹
- From a farm site that experienced escapes of farmed fish into the environment

The Pure Salmon Campaign has obtained site-specific environmental impact data from the Scottish Environmental Protection Agency (SEPA) and the Scottish Executive, which we have compared to the organic salmon sites certified by the Soil Association (one of two certification bodies in the UK for organic farmed; the Organic Food Federation refused to provide a list of its organic sites). It appears from a comparison of this data that some of these organic farmed salmon sites used chemicals, exceeded their consented biomass levels, and experienced escape incidents in recent years. All “organic” salmon farms discharged significant quantities of untreated wastes such as Nitrogen, Phosphorus and Organic Carbon and had significant quantities of dead farmed salmon (known as ‘morts’). For access to detailed data, please contact the Pure Salmon Campaign.

Why are Wild Fish Not Being Considered for a USDA Organic Label?

The US National Organics Standards Board (NOSB) originally looked into certifying both wild and farmed seafood. Ultimately - though you might argue that wild fish are more “natural” than farmed fish – the Aquatic Animal Task Force recommended that “wild aquatic animals do not reflect the degree of producer management, continuous oversight, and discretionary decision-making that are characteristic of an organic system.”

What are the Current Attitudes to the US Draft Standards for Organic Aquaculture?

In some shape or form, the NOSB has been attempting to define organic aquaculture standards since 2000. More recently, it has tasked the National Organic Aquaculture Working Group (AWG) or “task force” with drafting organic standards for both finfish and bivalves. Given the number of fish species that are farmed, the difference in these species and the production methods, defining an aquaculture-wide organic standard has proven no easy task. The AWG’s first draft organic aquaculture standards were released in February 2006 and a revised draft was sent to the NOSB in early February 2007.² Both drafts allow carnivorous fish and fish farmed in open net cages to be considered for an organic label.

In response to the first draft organic standards and specific questions raised by the AWG, many conservation organizations from the US and Canada submitted written and oral statements regarding their concerns over the organic label for farmed fish.³ While these organizations largely support organic labeling for low food chain, vegetarian fish species farmed in closed systems,

¹ In one recent study, PCBs in an “organic” farmed salmon from Norway were found to be higher than conventional farmed salmon samples.: http://www.puresalmon.org/scientific_papers.html

² These revised draft standards have not yet been released publicly, but the Pure Salmon Campaign has an electronic copy of these standards, which it will provide upon request. This draft it expected to be posed on the NOSB website shortly.

³ All public comments, including the Pure Salmon Campaign submission, are available at: <http://www.ams.usda.gov/nosb/PublicComments/Oct06/Livestock.html>

they addressed serious concerns over labeling carnivorous finfish farmed in open net cages as “organic.”

One of the major concerns was the dependence of carnivorous fish on wild fish for feed. Given the earlier decision not to consider wild fish for an organic label, this would mean that carnivorous fish considered for an organic label would be consuming non-organic feed. Additionally, conservation groups raised concerns over sustainability of farmed carnivorous fish – where these fish may require 3 – 10 units of wild fish for every unit of farmed fish produced.

Additionally, many raised concerns regarding the impacts of open net cage systems for farmed salmon on the marine environment and wild salmon populations and the addressed the contradiction between these impacts and US organic principles. These impacts - derived substantially from the open nature of the system – include disease and parasite transfer, escapes, and untreated waste emissions. The US organic livestock standards, for instance, require that production practices must maintain or enhance then natural resources of an operation, including the soil and water. National Organic Program Standards also explains that barriers should be established to prevent commingling of organic and non-organic products. Yet, in the open net cage system, there is simply no way to prevent this commingling or to eliminate the impacts of the farming practices on the marine environment.

Particular concern was also voiced over enclosing a migratory species such as salmon in a net enclosure and labeling it is organic – especially when the US organic principles requires respect for the physiological and behavioral needs of a species.

Overall, the opinion among these environmental organizations is that the organic certification of carnivorous finfish in open net cages would dilute the USDA organic label to such an extent that it would risk losing its credibility among US consumers.

What are the Next Steps towards US standards for Organic Aquaculture?

The next NOSB meeting has been scheduled for March 27 – 29, 2007.⁴ During this meeting, the NOSB’s Livestock Committee (which the AWG reports to) will discuss its’ organic aquaculture recommendation, which has just published one month prior to the March meeting.⁵

The Livestock Committee’s recommendation is based on the AWG’s revised draft organic aquaculture standards and for the most part adheres to the AWG’s draft. The Committee’s overall recommendation is that the “NOP [National Organic Program] implement rule change to allow for the production of organic aquatic species.”

However, the Committee also states that there is need for further public comment on wild fish as feed for organic aquaculture species and more dialogue on the allowance of net cage systems in organic production. As such, it recommends that these two categories not be permitted within the organic standard at this time. It does state, however, that it “intends to enter into further rule making to add these sections upon completion of further dialog with the aquaculture industry and the organic community.”

⁴ The meeting agenda can be found at: http://www.ams.usda.gov/nosb/meetings/03_07agenda.html

⁵ The Livestock Committee report is now available at: http://www.ams.usda.gov/nosb/CommitteeRecommendations/March_07_Meeting/Livestock/AquacultureRec.pdf

The Livestock Committee's recommendation to defer a decision on wild fish feed (carnivorous fish) and open net cages is a small victory for conservation groups and consumer groups who have been actively engaged in the NOSB process. However, the Committee's recommendation not only leaves the door open for organic labels for these categories in the future, but the NOSB also has the ability to disregard the Committee's recommendation to defer rule making for wild fish feed and for open net cage systems – meaning the NOSB can allow organic standards for these categories if it chooses. Opponents of organic labeling for carnivorous finfish farmed in open net cages - including the Pure Salmon Campaign - plan to attend the March meeting and will once again provide oral comments regarding the issues surrounding the labeling of fish such as farmed salmon and cod as organic.

For an environmentally or health conscious consumer, what are the best salmon options?

While many have come to equate organic with attributes like natural, healthy, or eco-friendly, it is important to understand that there is no consistent definition for organic seafood. Especially when it comes to organic salmon or cod, you may not be getting what you think you paid for.

Given the many concerns surrounding both conventional and organic farmed salmon (see www.puresalmon.org), the Pure Salmon Campaign encourages salmon consumers to demand that salmon farmers raise salmon in closed systems that create a permanent barrier between the farmed and wild environment. Additionally, given concerns over PCBs and other contaminants in farmed salmon, the Pure Salmon Campaign is urging farmed salmon producers to ensure that their salmon feed is cleaned of these contaminants so that the farmed salmon itself can be relatively contaminant-free. In the meantime, consumers should dine on wild salmon (frozen or fresh, in-season) and the many other sustainable farmed and wild seafood options available in their marketplace.