

# ORGANIC AQUACULTURE POSITION STATEMENT

**We, the undersigned, stand united in our opposition to allowing the following aquaculture practices to be certified organic:**

- ▶ **Open-ocean aquaculture systems of any type.** *Open-ocean fish farms can never be organic* because inputs and outputs to the system cannot be monitored or controlled and neither can a farmed fish's exposure to synthetic, toxic chemicals present in the marine environment, most of which are prohibited by law.
- ▶ **Migratory fish production.** *Farming migratory fish can never be organic, regardless of the type of system in which they are reared* because their confinement in fish farms would curtail their biological need to swim far distances, creating stress. Some migratory species are also anadromous, such as salmon, migrating between freshwater and ocean environments, a behavior not possible while in containment.
- ▶ **Wild caught fish, fish meal and/or fish oil used as feed.** *Farmed fish that have been fed wild caught fish, or fish meal or oil from wild fish can never be organic* because OFPA requires that all certified organic species are fed a certified organic diet. Feeding farmed fish wild caught fish and related products—fish meal and fish oil—would increase pressure on already over-exploited or recovering fisheries that form the basis of the marine food web. It would also decrease the food supply for a wide range of native, aquatic species, including seabirds and sea mammals, contravening the USDA organic biological diversity conservation requirements.

**We believe that allowing these practices undermines the integrity of all organic farming systems and the organic label, and they do not meet the requirements of OFPA. Such practices compete with wild fisheries and other marine life by reducing their opportunities for food. They also threaten marine ecosystems with the spread of disease and parasites.**

*Path to Certified Organic Aquaculture Systems:*

Land-based, closed-loop, recirculating aquaculture systems have the potential to meet the spirit, intent, and letter of the Organic Foods Production Act (OFPA). But operational criteria for organic aquaculture systems have yet to be developed and tested. To be certified organic, a land-based aquaculture facility must promote biodiversity and ecological harmony and rely upon the system's underlying ecology to feed plants and animals. Synthetic materials must not be routinely used to fulfill or prop-up system functions.

Given the departure of aquaculture systems from the soil-based systems around which OFPA was created, specific land-based fish farm regulations must be developed. We strongly recommend mandating substantial field-testing to ensure that operational criteria for different types of land-based fish farms can meet OFPA's high bar for organic integrity. Such systems must be evaluated and approved by the USDA's National Organic Program, at first on a case-by-case basis, in consultation with the National Organic Standards Board and with public input. This would allow for the highest level of scientific and policy-making expertise to be brought to bear on the development of this novel, organic, industrial sector before it is fully commercialized.

## ORGANIC AQUACULTURE POSITION STATEMENT ENDORSEMENTS

Alaska Marine Conservation Council  
Animal Legal Defense Fund  
Beyond Pesticides  
Bristol Bay Regional Seafood Development Association  
Center for Biological Diversity  
Center for Environmental Health  
Center for Food Safety  
Center for a Livable Future  
Coastal Trollers Association  
Colorado Ocean Coalition  
Consumers Union  
Equal Exchange  
Farm Forward  
Farm Sanctuary  
Fearless Fund  
Food & Water Watch  
Friends of Clayoquot Sound  
Global Alliance Against Industrial Aquaculture  
Go Wild Campaign  
Gulf Restoration Network  
Hawaiian Learning Center  
Hui o Kuapa  
Independent Shellfish Growers of Wa. State  
La Montanita Coop, NM  
Living Oceans Society  
Maine Organic Farmers and Gardeners Association  
Mangrove Action Project  
MAP Question Your Shrimp  
Mari's Garden, HI  
Midwest Organic & Sustainable Education Service  
Moby Dick Hotel and Oyster Farm, WA  
National Cooperative Grocers Association  
National Organic Coalition  
New Natives, CA  
Northeast Organic Farming Association – Interstate Council  
Northeast Organic Farming Association: Massachusetts  
Northeast Organic Farming Association of New Jersey  
Northeast Organic Dairy Producers Alliance  
NorthWest Atlantic Marine Alliance  
Northwest Center for Alternatives to Pesticides  
Ohio Ecological Food and Farm Association  
Organic Consumers Association  
Organic Seed Alliance  
PCC Natural Markets, WA  
Public Employees for Environmental Responsibility  
Rural Advancement Foundation International-USA  
Raincoast Conservation Foundation  
Rivers Without Borders  
Save Our Wild Salmon  
Seafood Producers Cooperative  
Washington Trollers Association  
Wild Farm Alliance  
Wild Oceans