

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