

September 11, 2007

Dear COABC Directors:

We are writing with regard to the Certified Organic Associations of British Columbia's current consideration of organic aquaculture standards. On behalf of the undersigned organizations, we want to thank you for your careful attention to the development of organic aquaculture standards in the past and request that you commit to following the full standards review process for the most recent version of the aquaculture standards that have been submitted to your association.

We are aware that the COABC has been considering committing to the development of organic aquaculture standards for many years now. In 2003 and the years immediately following, much effort was put into investigating aquaculture practices in BC and soliciting input from a variety of stakeholders as well as the public. Organic certification of the full spectrum of aquaculture practices represents a significantly broader application of current organic principles and we appreciate the COABC's efforts to carefully evaluate the proposed options.

It has come to our attention that the COABC has received a revised version of organic aquaculture standards from the standard's proponents. However, the most recently available version of the aquaculture standards on the COABC website are from the earlier period of consultations and are dated 2004. These publicly available standards remain in draft form with question marks denoting uncertainty regarding adequate standards for key issues including water quality, biodiversity impacts, escape response, transition to polyculture, stock density, siting and the allowable amount of wild fish meal and oil in feed. There have been no updates on the status of the aquaculture standards development process on the COABC website or newsletter since December 2005.

Given that much time has elapsed since public consultation on this issue—including consultation of COABC members—and that finalized standards have not been made available, we would like to request that the revised standards now before the COABC directors go through the full Standards Review process. Following the Standards Review process would ensure that new scientific information, data and regulatory developments from other jurisdictions, and information on technological advancements that have occurred over the last few years are considered as well as allowing input from COABC members and BC consumers.

As a significant move in the development of BC's organic sector we urge the COABC to provide this opportunity for full review. If you have any questions or would like to discuss this issue further please contact us directly.

Sincerely,

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