



CENTER FOR  
FOOD SAFETY

28 October 2014

**Testimony of Lisa J. Bunin, Ph.D.  
to the National Organic Standards Board  
Louisville, Kentucky**

Good morning. My name is Lisa Bunin. I am the Organic Policy Director at the Center for Food Safety, a public interest organization with a membership base of a half million people, nationwide.

My remarks address ocean-based fish farming, compost, gellan gum and whole agar flour.

Last week, Center for Food Safety released its report: *Like Oil and Water: Ocean-Based Fish Farms and Organic Don't Mix*. The Report provides scientific evidence to explain why fish, farmed at sea, can never be certified organic. Even though the NOSB has discussed aquaculture for more than a decade, neither the Aquatic Animal Task Force nor the Aquaculture Working Group have satisfactorily resolved four thorny issues:

1) How can harm to wild fish and marine and river ecosystems from the spread of parasites, pathogens, and diseases carried by farmed fish be prevented? Our investigative report documents 24 million reported fish escapes (Appendix B) in two decades, demonstrating that escapes are unavoidable. This represents the tip of the iceberg, since governments not only allow self-reporting but they also allow a certain number of escapes to go unreported.

2) How can organic regulations permit the farming of migratory fish, such as the economically-coveted Atlantic and Pacific salmon? Caging them would severely constrain their natural, instinctual behavior of swimming long-distances between fresh and salt waters. This goes against organic's animal welfare and stewardship requirements.

3) How can fish farms at sea contain, monitor, and control inputs and outputs, when sea water regularly flows in and out of the facility? How can those unknown inputs and outputs, some of which are synthetics prohibited under OFPA, be accurately documented in an Organic System Plan?

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4) How can feed, consisting of wild caught fish or their by-products, be considered part of an organic practice when all other organic animals are required to be fed a 100% organic diet?

When the Aquatic Animal Task Force warned in 2001<sup>1</sup> that some of these issues may not be resolvable and that they contravened OFPA, the aquaculture industry successfully lobbied to halt the development of regulations.<sup>2</sup> They warned that to do otherwise would cast serious doubt on the potential of some major species — most notably salmon — to be certified organic.

The assumption seemed to be that if regulations were delayed, tough questions about the viability of organic aquaculture would somehow vanish. In a way, they did. Four years later, in 2005, the AWG released a report with the thorny issues mentioned, but their importance minimized in the recommendations it made to the NOP for organic standards development.

CFS has reviewed documents produced by the NOSB and its workgroups. Nowhere, have we seen either group scientifically evaluate the impacts of ocean-based aquaculture against the principles and standards of organic production. These groups also have failed to objectively assess the technological feasibility of resolving outstanding problems known to be associated with ocean-based fish farming.

CFS's Report demonstrates the *impossibility* of rectifying them in a way that would allow ocean-based fish farms to qualify as certified organic. Farming fish at sea can never meet the high bar of integrity that is integral to all organic systems of production. CFS urges the NOP and NOSB to advise the Secretary of Agriculture to withdraw plans to allow ocean-based fish farming in the organic aquaculture regulations.

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<sup>1</sup> Aquatic Animal Task Force. (2001) "Recommendation on Operations that Produce Aquatic Animals," 30 May.

<sup>2</sup> In the May 2005 Aquaculture Working Group report it states that "...since the final recommendation of the NOSB Aquatic Animal Task Force (2001) departed significantly from the ad-hoc NOSB Aquaculture Working Group majority recommendations, the industry requested that the NOP not proceed further towards the establishment of organic standards for aquaculture at this time. To do otherwise would have placed some major species of potential organic certification, most notably (salmon, trout, catfish, shrimp, striped bass, sturgeon, and shellfish) into doubt." National Organic Aquaculture Work Group (NOAWG). (2005) "Proposed national organic standards for farmed aquatic animals and plants (aquaculture) with supporting documentation and information", USDA White Paper. George Lockwood, Richard Nelson, and Gary Jenson (eds.). P. 3.

***Moving on to Compost:***

Compost is vital to the success of organic farming. But contamination with prohibited substances is a problem that we all know exists and must be addressed head-on.

It is essential to assess the root causes, beginning with the identification and elimination of high-risk sources of feedstock contamination. Solutions must not overburden farmers or leave them without inputs for their compost. We urge the NOSB keep the conversation going, and keep it transparent,

***Confidential Business information and Sunset***

With respect to gellan gum & whole agar flour, it is CFS's position that no substance should be considered for relisting if the confidential business information (CBI) in the original petition is not revealed at Sunset.

Thank you.