August 30, 2010

Anne Caron
Standards Division
Canadian General Standards Board
Gatineau, Quebec K1A 1G6

Dear Ms. Caron:

On behalf of the undersigned, we are submitting a comment to the Canadian General Standards Board Committee with regards to the proposed Canadian Organic Aquaculture Standard. This submission is a consensus of 43 leading organizations within the organic, conservation, and food safety communities from Canada and the United States. Together, we represent millions of voices including consumers, organic farmers, conservation organizations and scientists in major aquaculture producing and consuming regions.

The proposed organic standards for Aquatic Invertebrates (shellfish) prohibit the use of synthetic pesticides, prohibit the destruction of aquatic organisms or aquatic organism habitat, and prohibit direct dispersal of waste into the environment. The proposed standards for Aquatic Animal Production, which includes the farming of carnivorous finfish in open net pen systems, allow these practices and violate the spirit and intent of the organic law (CAN/CGSB-32.310-2006). In addition, the proposed Canadian draft sets a significantly lower bar for environmental and consumer standards than the recommendations for organic aquaculture standards passed by the US National Organic Standards Board in 2008.

The practice of farming carnivorous finfish in net pens inherently contradicts organic principles and we, the undersigned, oppose organic certification of this type of production for the following reasons:

Antibiotics
The draft Canadian organic aquaculture standard prohibits the use of antibiotics for invertebrates, but 6.5.8 and 6.5.9 allow the use of antibiotics in the production of farmed fish sold as organic. No other organic meat on the market may be sold as organic if antibiotics are used. The allowance of antibiotics in farmed fish would undermine the integrity of the organic label and, therefore, threaten the integrity and viability of other organic meat markets.

Synthetic parasiticides
The draft Canadian organic aquaculture standard 6.10.7.4.8 prohibits the use of pesticides for invertebrates, but 6.5.11 allows the routine use of synthetic parasiticides, such as emamectin benzoate–a registered pesticide, to combat sea lice infestation on fish farms. Current organic livestock standards only allow synthetic parasiticides as a last resort after mechanical or cultural methods to control parasites have failed. Farmed fish produced in closed containment facilities have demonstrated synthetic parasiticides are not needed when cultural methods allow pathogen-free water sources to be used. Synthetic parasiticides are only necessary in net pen systems because of the inability to provide pathogen-free water and should therefore be prohibited in organic standards as other cultural methods that avoid chemical use exist.

Allowance for Use of Non-Organic Feed
The draft Canadian organic aquaculture standards call for all feed to be derived from organic or sustainable sources “unless not commercially available”, in which case up to 30% of feed can come from non-organic, unsustainable sources. These standards directly contradict current organic livestock standards, which require 100% organic feed to be used. In addition,

there is no upper limit for the inclusion of fish meal or oil (derived from wild fish) in feed. This allows higher trophic species such as salmon and tuna to be farmed under organic certification even though farming these species requires much more wild fish to be consumed in feed than farmed fish produced. The losses of marine protein are substantial—research shows farmed salmon can use 5 times more wild fish in feed than salmon produced. The resulting net-loss of marine protein and loss in associated biological productivity in already strained marine ecosystems directly contradicts the General Principles of Organic Production.

Toxins
The allowance of wild fish (which are not produced under an organic system) in feed introduces a source of toxins with significant human health effects including PCBs, heavy metals, and dioxins. There are no measures to determine the level of toxins and pollutants that may be contained in farmed fish derived from wild fish in their feed or exposure to toxins in ocean net pens where effluent from other industries may be present.

Environmental degradation
The General Principles of Organic Production call for the protection of the environment from degradation, erosion and pollution. The standards for Aquaculture Animal Production lack any standards to address these issues despite the large body of scientific evidence linking net pen production of farmed salmon to wild salmon declines, the spread of disease and sea lice, escapes, and pollution that degrades the marine environment. Net pen practices cannot control flows of waste and disease or the escapes of farmed fish. The deleterious effect of these impacts on the marine ecosystem make net pens incompatible with the principles of organics, therefore this production system should not be included in an organic standard.

Inconsistent standards for waste and impacts on marine life
The aquatic invertebrate standards 6.10.7.4.6 and 6.10.8.2 prohibit the destruction of aquatic organisms or their habitat and require the collection and proper disposal of all wastes. Standard 6.1.4 which applies to open net fish farms only requires 'sediment' build-up to be 'minimized'. The proposed standard for net pens ignores the loss of local biodiversity in areas around salmon farms that result from waste build up and omits requirements for waste recapture that are possible in fish production. Organic standards should require recapture of farm waste to meet basic organic principles for "decreased pollution and recycling of materials and resources within the enterprise."

Aquaculture practices most compatible with organic not prioritized
The draft Canadian organic aquaculture standard for Aquatic Animal Production does not acknowledge that alternative feeds and specific production systems can successfully reduce toxins in feed, avoid the use of chemical treatments and antibiotics, and control waste and disease. An organic aquaculture standard should only allow aquaculture practices with a high level of environmental performance that do not depend on chemical treatments.

Components of the proposed, draft organic aquaculture standard violates the underlying principles of organic production as set out by existing standards. A standard that allows conventional aquaculture practices such as the use of antibiotics, chemicals, uncontrolled disposal of waste, and non-organic feed to be certified as organic threatens the integrity of the organic label and negates others' efforts to produce truly organic products.

Consumer polling completed in the United States in 2008 by Consumer Reports National Research Centre reflects consumer expectations of what an organic label on farmed fish should mean:

• 93% of consumers polled agree that fish labeled organic should be produced from 100% organic feed like all other organic food animals.

• 90% of consumers polled agree that organic fish farms should be required to recover all waste so they can't pollute the environment.

• 57% of consumers polled are concerned about ocean pollution caused by fish farms advertised as organic.

This joint submission reinforces the broad opposition to proposed regulatory provisions that would allow organic aquaculture production to use non-organic, wild fish as feed, enable the input of antibiotics and other chemicals, and allow open net pen systems.

The undersigned are in support of the development of organic aquaculture standards (specifically for invertebrates and herbivorous species) when grown in systems where inputs, outputs, health and animal welfare can be monitored and controlled. If a Canadian organic aquaculture standard is developed, it must reflect practices that address the well-researched impacts of aquaculture as well as uphold the integrity of the organic label. Such a standard would support producers that are using innovative practices to deliver truly sustainable products.

We urge the Canadian General Standards Board to ensure that the Canadian Organic Aquaculture standard does not accommodate the use of non-organic wild fish as feed, nor open net pen systems. It is our hope that the organic label will continue to provide consumers with a clear and consistent understanding of how their food is produced and ensure them that their choice of an organic food product supports a safer, more humane, more sustainable environment.

Sincerely,

The Undersigned

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