

NATIONAL
Aquaculture
ASSOCIATION

March 23, 2006

The National Organic Standards Board
c/o Valerie Frances
Room 4008 – South Building
1400 and Independence Avenue, SW
Washington, D.C. 20250-0001

Re: NOSB Aquaculture Working Group Interim Final Report

Dear Ms. Frances:

The National Aquaculture Association (NAA) is a national trade association representing a diversity of aquatic animal producers in the United States. Aquaculture is a well established agricultural industry in the US with over 4,000 farms producing a diversity of species such as catfish, trout, striped bass, tilapia, shellfish, aquatic plants, marine and freshwater ornamental and bait fish species. These species are produced for a variety of purposes including food, bait, to replenish diminished public fishery stocks, to control invasive aquatic plants and for the restoration of damaged wetlands. NAA appreciates the opportunity to comment on the NOSB-AWG Interim Final Report.

The NAA supports development of a national organic standard and domestic certification program for organic aquatic animal production. We believe such a program will enable US producers to compete with foreign imports holding international organic certification.

The NAA believes the goals set forth in the Interim Final Report have merit in that the program, “while raising the bar” might still be reasonably achieved by some growers farming specific species.

We do offer some specific comments below:

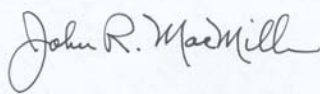
- Aquatic animals have distinct dietary needs for protein and fish oil compared to terrestrial animals. These particular needs vary with aquatic animal species. Organic standard limitations on protein and fish oil must not appreciably deviate from basic biological requirements if adequate health and nutritional concerns of the aquatic animal are to be met. In some cases, the basic biological requirements are poorly described. Good nutritional status is also essential for animal welfare reasons. We are opposed to artificial limits on fish meal or fish oil use that imperils the nutritional health and over-all welfare of the aquatic animal. We

support a standard that would allow fish meal and oil sources to be certifiable as sustainable thence allowing specific nutritional requirements of the aquatic animal to determine the level of fish meal and oil required in the feed.

- One of the notable features of many aquatic animals is that they can and often must be reared in high densities to maintain their normal social structure and wellbeing. This is in sharp contrast to many terrestrial animals that prefer low population numbers in a given rearing space. For organic standards, we suggest that the overall health of the aquatic animal be the determinant rather than some artificially contrived limitation.
- We support avoidance of the use of antimicrobial and other therapeutic agent use in organic aquatic animal production.
- The interim final report contemplates limitations on aquatic animal slaughter methods- particularly the use of ice or ice slurry. It is premature to arbitrarily eliminate effective slaughter methods that appear to ensure product safety and worker safety. There is scant scientific evidence that fish and shellfish are sentient or capable of feeling pain. Indeed, there is active scientific debate regarding these issues and it is by no means an accepted fact. The NAA is opposed to arbitrary standards that appear to have no bearing on wholesomeness, method of production that meet the organic bar or scientific credibility.

The NAA believes there are opportunities for organic certified aquatic animal and plant production in the US. Some US producers may elect to obtain certification as an organic producer but the standards for compliance must be compatible with the basic biological requirements of the animal. We appreciate the opportunity to comment on the Working Group's Interim Final Report. We look forward to further development of an appropriate organic certification program for domestically husbanded seafood.

Sincerely,



John R. MacMillan, Ph.D.
President

JRM:ml

cc: Max Rapert, President, Striped Bass Growers Association; Mark Willows, President, American Tilapia Association; John Bechtel, President, US Trout Farmers Association