

National Organic Standards Board
Livestock Committee
Response to Aquaculture Working Group (AWG)
Regarding Proposed Organic Standards for Bivalves

March 17, 2009

Document Objective: Over the past several months it has become very evident that the issues surrounding organic bivalve production are difficult for both the NOSB Livestock Committee (LC) and the Aquaculture Working Group (AWG) to grapple with. This short document is intended to list the points of concern in a simple format for each of the partners to address.

Recap of AWG Document: 1st paragraph of AWG's recommendation

"Developing organic standards for bivalve mollusks involves special considerations. Bivalves are farmed on seafloor parcels, and in the water column above, that are owned by the producer or on public owned seafloor parcels, and waters above, leased to the producer by a public body, rather than on privately owned farmland. Different states have different means for leasing publicly owned water bottoms or areas, and the water columns above, but practically all coastal states lease public water bottoms or areas, and their waters, to private entities. Wild bivalves are not considered for organic certification."

Based on the discussions over this time period (Nov. 2008 through February 2009) the LC has come up with (5) concerns that the AWG should address in order to better advise the LC and NOSB.

Five points of concern:

- **1. Feed control;** the system is generally one that is based on background water flow to supply feed material, the bivalves are not fed 100% organic feed and the system is not highly managed in terms of feed, and the bivalves eat 100% wild feed.
- **2. Water quality input;** primarily marine systems; concerns exist over the quality of water flowing over the bivalves as tides flow and the bivalves are exposed to any possible contaminate that may exist.
- **3. Control of harvest sediment;** this concern is in response to discussions regarding environmental issues as they relate specifically to harvest and the disturbance of tidal or sensitive areas.
- **4. Using sanitation measures as indicator for other toxins;** there are concerns regarding what is monitored for sanitation – coliforms & e.coli and not other toxins.
- **5. Containment – barrier from growing areas to everything else;** in terrestrial systems buffers or barriers are utilized to minimize any contamination from surrounding activities, in aquatic systems sited in tidal areas this is difficult or impossible.

In delivering this to the AWG we discussed the possibilities of addressing these concerns through fresh water production systems and/or poly culture systems that include a multi species system. These production systems may or may not include land based tanks or other possible scenarios.

It is generally agreed that the current AWG document does not adequately address these five concerns making it difficult for the LC to move forward. It is the goal of the LC to address these concerns and develop a guidance standard document that fully supports the production of organic bivalves that truly meets the goals of organic agriculture. The LC looks forward to feedback and comments from the public on these points as well.

Motion: Kevin Engelbert, Second: Tina Ellor

Committee Vote:

Yes – 6 No – 0 Absent – 1 Abstain – 0