

**Wild Aquatic Species Working Group
Report to the National Organic Standards Board
Friday, November 17, 2000**

Members: Miles McEvoy (chair), Paul Peyton, Carolyn Brickey, Steve Harper, Jim Humphreys, Jim Riddle, Chris Dorsett, Jan Konigsberg, John Pappalardo, Willie Lockeretz, David Gould, Katherine DiMatteo, Zeke Grader

Summary points:

Legal

- OFPA is ambiguous about whether wild fish are included under the act. Some members believe that act excludes wild fish while others believe that the act specifically includes wild fish.

Wild organic fish

- Three members don't feel that the organic label is the best word to use to describe wild systems, whether land based or aquatic.
- One member believes organic agriculture is exclusively land based.
- One member believes that organic includes wild land based systems and aquaculture but not wild aquatic systems.
- Six members believe that organic systems should include wild aquatic species. They believe that there is a continuum between land based and aquatic systems as well as between farm based and wild based systems.

Standards

- The Marine Stewardship Council standards are a good starting point to address the sustainable harvest part of wild organic aquatic standards.
- The fact that marine systems are publicly owned adds a level of complexity to the development of standards and the certification systems necessary to verify that the standards are implemented.
- Fishmeal and fish oil for organic aquaculture should be required to come from organic systems.
- Issues of biodiversity and the environmental health of the habitat will need to be explored in depth.

Notes from November 6 conference call:

1. Is there a line between which systems can be described as organic and which systems are outside the boundaries of organic agriculture?

Can wild systems be organic?

Can aquatic systems be organic?

Is there a continuum between farm based terrestrial systems and wild aquatic systems?

Miles McEvoy - Miles discussed his thoughts on what types of food products should be labeled as organic. He stated that there appears to be a continuum of organic systems from highly managed organic farms to wild systems. The continuum goes from highly managed and high input organic row crop farms to low-input organic permaculture systems that try to imitate natural systems. There are highly managed organic poultry operations that rely on purchased organic feed and low-input range-fed organic cattle operations. There are cultivated organic rice systems and wild organic rice systems and organic sea vegetables. The question seems to be where do we draw the line between which systems can be considered organic and which ones cannot be considered organic. Is the line between terrestrial and aquatic systems or between wild and managed systems, or is there no line at all.

Miles proposed that there is no clear line to draw, that we have a continuum of systems and that organic systems could relate to all types of systems, both wild and domesticated, both aquatic and terrestrial.

Paul Peyton – Paul believes that organic systems include wild aquatic systems. Paul referenced the paper he submitted (attached). Paul believes wild, uncontaminated systems are inherently organic and are organic by design not neglect.

Steve Harper – Steve stated that he thought that wild systems, aquatic systems and wild aquatic systems could all be appropriate for organic. He does not see a clear, firm line between those systems that can be described as organic and those that cannot be described as organic

Jim Humphreys – He thinks that there is nothing inherent in wild aquatic systems that would make them outside the scope of organic agriculture.

Jim Riddle – Jim stated that he thought that wild, land based systems could fit into the organic system because they meet the conditions of the OFPA. Those criteria include a designated area from which wild crops are harvested, no applications of prohibited materials for three years, and a sustainable harvest that does not damage the environment. Jim mentioned that he thought that aquaculture systems could meet the organic label because they have a designated area and can meet the other conditions of the OFPA.

Chris Dorsett – Chris feels that a sustainable label would be more appropriate for wild fish than the organic label. He does not feel that wild systems are appropriate within organic agriculture standards.

Jan Konigsberg – He believes that wild fish are not excluded from the OFPA. He believes that the OFPA would need to be amended to exclude wild fish from the organic standards. He feels that there are both economic and philosophical factors involved in people's opinions on this matter. He believes that there many problems in wild fish systems such as habitat destruction, biodiversity, and quality. He feels that organic agriculture has a higher level of credibility in regards to food quality and environmental quality than wild fish.

Willie Lockeretz – Land based systems are the only systems that fit organic systems. Organic agriculture is based on nature farming, utilizing mixed crops, protecting the soil from erosion, soil fertility. He can only picture aquatic systems if they are coupled with land based farm systems (e.g. on-farm ponds). He could accept some level of wild harvest land based crops.

Carolyn Brickey – Carolyn supported the comments of Jan Konigsberg. She feels that the OFPA is ambiguous on wild aquatic species and that she could defend both sides of a legal argument. She feels that at this point wild aquatic species should not be excluded, that the question is not whether the systems are managed but who is managing the systems.

John Pappalardo – John is not sure whether organic is appropriate for wild aquatic systems. He questions whether the organic label is the ultimate or best designation, that maybe wild is a better term to use. He isn't sure whether wild fish fit under the OFPA. He thinks that investigating a separate set of principles and standards for wild aquatic species may be the way to go. At the end, he is a fence sitter that could go either way on whether the organic label is appropriate for wild aquatic systems.

2. If there are wild organic aquatic standards, what are the standards?

Feed – Do we follow the aquaculture groups recommendations that feed from sustainably managed resources would be allowed?

Sustainable Harvest – Are the Marine Stewardship Council's standards appropriate for organic standards?

No application of prohibited materials – Are natural environments where there is no intentional application of pesticides or prohibited materials analogous to a terrestrial system that has no prohibited materials directly applied to a farm?

Biodiversity - No hatchery fish?

Paul Peyton – Natural wild feed should be considered organic. The Marine Stewardship Council standards are a good start to address the sustainable harvest conditions. He noted that the salmon certified to date were species by species, area by area rather than a statewide blanket certification, The issue of the application of prohibited materials to the spawning, feeding and harvesting areas can be managed.

Steve Harper – Wild systems with the right standards can fit the organic system.

Jim Humphreys – He tends to agree with Paul and Steve. He thinks that there is a way in which it could be done. The issue of standards for sustainable harvest – MSC has an international sustainable fishing standard. There are three components – 1) A healthy status of fish stocks, 2) the impact of fishery on the ecosystem and the maintenance of healthy ecosystem, and 3) the effectiveness of the fishery management system.

The MSC standards were developed to address the issue of sustainability. They were not developed to address food safety, food purity, or contaminant issues.

The MSC standards could be used as a model or methodology for the sustainability portion of a wild organic fish standard.

The qualifications of the people doing the certification are critical. Marine systems are substantially different from land based agricultural systems. Organic certification agencies do not have the necessary expertise in marine systems.

Jim Riddle – He doesn't have a vested interest. He likes the MSC system but feels it is appropriate for a separate label and doesn't fit organic. He sees wild sustainable standards and procedures as parallel to organic, but not organic, and it would be inappropriate to call such systems organic.

Chris Dorsett – It appears that the MSC standards should be relevant for the sustainable harvest portion.

Jan Konigsberg – We need a different frame of reference for the organic standards that includes habitat and the health of the ecosystem. Biodiversity issues should be included as a component of the sustainable harvest. Marine systems are fundamentally different from land based systems because of the ownership and management of the resource. Organic farms are almost exclusively privately owned. Wild aquatic systems are publicly owned resources, common property fisheries. Who oversees standards? Can a non-governmental organization oversee the management of a publicly owned system? It is a government oversight responsibility. Who are we certifying? MSC certifies the fishery manager, the agency that does the management. The certification will need to broaden the agencies involved. It is an interjurisdictional problem. MSC is looking only at the state fish and game department. Will the organic standards be applied on other agencies? What is an acceptable quality level for the fish habitat? Will it be more stringent than state or federal standards? Is the habitat managed for food/fish production or to protect the environment?

How are we going to define biodiversity for marine systems?

Willie Lockeretz - Willie referred to a point made earlier that it would be inconsistent not to allow wild fish for human consumption to be labeled organic if we were allowing the inedible portions of those fish to count as organic feed. He agreed, but favored resolving the inconsistency by allowing neither, rather than by allowing both.

CB – What agencies are managing these systems? This will be very difficult to oversee.

3. Next steps

Miles McEvoy – A summary of the discussion will be presented to the NOSB on November 17. The summary will include working group member's submissions (Paul Peyton, David Gould, Jim Riddle, and Jan Konigsberg). The next steps for the working group will be to discuss and develop positions on the standards for the organic certification of wild aquatic species.

Willie Lockeretz – We need a resolution from a higher authority (NOSB or USDA) on whether there will be wild organic standards before we put more energy into this. Should this be done? Willie is concerned that if we start to discuss what the standards should be then the question of whether we have standards or not is no longer the question. If we start to discuss the standards then it becomes inevitable that wild organic fish standards are a reality.

Carolyn Brickey – We need to discuss the standards in order to fully understand and analyze the issues and in order to make complete recommendations.