

**National Organic Standards Board
Materials Committee
Proposed Discussion Document
Aquaculture Materials Review Update**

September 27, 2011

Background

Based on work of the Aquaculture Task Force over the period of several years, the NOSB has adopted some recommendations regarding aquaculture:

[Aquaculture Standards](#)

(<http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5056878>)

3/29/07

[Aquatic Plants](#)

(<http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5070396&acct=nosb>) 5/22/08

[Net Pens and Related Issues](#)

(<http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5074509&acct=nosb>) 11/19/08

[Fish Feed – Fish Oil and Fish Meal & Related Issues](#)

(<http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5074508&acct=nosb>) 11/19/08

[Bivalves](#)

(<http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5081491&acct=nosb>) 11/5/09

None of these have been implemented as regulations. If they were to become regulations, they would establish new sections of the National List:

§ 205.609 Synthetic substances allowed for use in organic aquatic plant production.

§ 205.610 Nonsynthetic substances prohibited for use in organic aquatic plant production.

§ 205.611 – Synthetic substances allowed for use in organic aquatic animal production.

§ 205.612 Nonsynthetic substances prohibited for use in organic aquatic animal production.

In order to determine what changes might need to be made to the materials evaluation process, the Aquaculture Task Force submitted two “trial balloon” petitions, for carbon dioxide and vitamins. The Materials Committee has drawn some conclusions from the process of considering those petitions and formulated some questions for discussion.

What we learned from the trial balloons

- We need different criteria for open systems as opposed to closed systems. We don't know what those criteria will be, but we can't even start to think about them without knowing whether the substance will be contained in a land-based pond or tank, or will be used in net pens in open water.
- Petitions need to include:
 - The use pattern of the material—quantity, how it is added to the system, etc.
 - Aquaculture-specific information—for example, on environmental fate, interactions with other substances and organisms.
 - References to applicable laws and regulations that are aquaculture-specific.
- Petitions should not only cite petitions and TRs for crops and livestock, but also cite references that are relevant to the use of the material in an aquatic system. Some issues will carry over, but others will not.
- We need to deal with specific materials, not categories, at least until we get our material evaluation process worked out.

Further Committee Thoughts on Development of an Aquaculture Review Process

- The review of aquaculture materials needs to align with NOP's drafting of proposed aquaculture standards. Petitioners may submit petitions to the NOP for review of aquaculture materials by the NOSB. However, the NOSB will defer requests for technical review until the program publishes proposed aquaculture standards, or until the NOP otherwise notifies the NOSB to take up these petitions to coordinate with rulemaking.
- The Materials committee will continue to develop the process of evaluating aquaculture materials through the review of the two "trial balloons" submitted by the Aquaculture Working Group.
- The Materials Committee proposes that a separate Aquaculture Committee, overlapping in membership with Crops and Livestock, be established to evaluate materials.

Questions about the Development Process for Board Discussion and Public Comment

1. Are there international bodies or organizations with a good material review process? If so, who? How could we interact with these entities to address material evaluation issues that we have?
2. How do we ensure that our organic aquaculture material review process is viewed from an aquaculture lens rather than a crop or livestock lens, while not compromising organic farming and environmental principles? In other words, how do we maintain the level of review of materials consistent with crops and livestock uses, while viewing materials in their unique application to aquaculture systems?

3. How can the review of aquaculture materials proceed cautiously while not compromising consumer expectation of the organic label? What do consumers expect from organically produced aquaculture products, and how does that translate into specific requirements concerning materials, e.g., environmental impacts, hormones, organic feed, etc.?

Questions Concerning the Material Evaluation Process:

1. What criteria are specific to open systems? Closed systems?
2. Which evaluation questions in current crops/livestock evaluations are relevant to aquaculture materials?
3. Which evaluation questions do not apply, or need to be modified?
4. What new questions need to be asked about aquaculture materials?
5. What information needs to be considered in assessing the essentiality of a material in the context of cultural practices as they apply to water instead of soil ecosystems?
6. Do different questions need to be asked about carnivorous and herbivorous fish? Carnivorous fish pose additional problems, as has been pointed out by commenters. Because of the bioaccumulation of toxic chemicals, it is difficult to find clean natural foods for carnivorous fish.

Committee Vote

Moved: Katina Heinze Second: Tina Ellor
Yes: 7 No: 0 Abstain: 0 Absent: 0