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The Honourable Keith Ashfield
House of Commons
Minister of Fisheries and Oceans
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Dear Mr. Schuessler and Minister Ashfield:

We, the undersigned are submitting the following comments to the Canadian General Standards Board Committee and Department of Fisheries and Oceans with regards to the proposed Canadian Organic Aquaculture Standard. This submission is a consensus of **61** concerned organizations, businesses and fishermen 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 standard fails to reflect its core objective: to “*protect the environment, minimize benthic degradation and erosion and water quality degradation, decrease pollution, optimize biological productivity and promote a sound state of health*” (Canadian Organic Aquaculture Standard 032-312-e-n-cd-01-110325.doc). The proposed standard would allow organic certification of practices that have been shown through published scientific research to negatively impact marine ecosystems.

The draft proposed standards for Aquatic Animal Production, which includes the farming of finfish in open net pen systems, allows for uncontrolled waste disposal into the marine environment, the use of synthetic pesticides and fish feed from non-organic and possibly unsustainable sources. These practices clearly 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 cultivating finfish in net pens contradicts organic principles and we, the undersigned, oppose organic certification of this type of production for the following reasons:

Synthetic Parasiticides

The draft Canadian Organic Aquaculture Standard 6.10.7.4.9 prohibits the use of synthetic pesticides for invertebrates, but 6.5.15b allows the use of synthetic parasiticides, such as emamectin benzoate (a registered pesticide), azamethiphos (a registered pesticide currently allowed in Atlantic Canada), and deltamethrin (currently under review for registration) to combat infestations of copepod parasites on farmed fish. It should be noted that synthetic parasiticides, especially those applied by bath treatment, have been shown to be toxic to non-target crustacean

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species, including lobster, at and below treatment levels. Farmed fish produced in closed containment facilities have demonstrated synthetic parasiticides are not needed when culture methods are limited to pathogen-free water sources. 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.

Allowance for Use of 100% NON-Organic Feed

The draft Canadian Organic Aquaculture Standard 6.4.2 allows for potentially all fish feed to be derived from non-organic sources, creating the possibility for unsustainable and potentially contaminated sources when organic fishmeal is “not commercially available”. Together with the disclaimer in 6.4.4, “at the time of the original publication of the standard, insufficient supplies of organic fishmeal exist to satisfy the sector”, the standard as written allows current practice to continue under organic certification.

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 resulting net-loss of marine protein and loss in associated biological productivity in already strained marine ecosystems directly contradicts the Canadian General Principles of Organic Production.

Toxins

There are no measures in the standard to assess or regulate the level of toxins that may be contained in farmed fish carrying an organic label. Toxins such as PCBs, heavy metals and dioxins in farmed fish could possibly be derived from wild fish meal and oil milled into their feed or could result from exposure to toxins in the ocean net pen rearing environment where effluent from other industries may be present. An example of this exposure may be found in the occasional detection of malachite green in farmed salmon, despite the aquaculture industry’s claim that it is no longer in use on farms.

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 inadequately 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 pens cannot and do not control flows of waste and disease or, despite the industry’s efforts, the frequent escapes of farmed fish.

Escaped net pen salmon have the potential to transmit disease and parasites, as well as compete and hybridize with wild salmon. The recent assessment of Atlantic salmon populations on the East Coast of Canada by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) stated that, “Current threats include poor marine survival related to substantial but incompletely understood changes in marine ecosystems, and negative effects of interbreeding or ecological interactions with escaped domestic salmon from fish farms”. The General Principles of Canadian Organic Aquaculture Production are thus in direct contradiction with the threat from open net pen aquaculture activity to the disappearance of endangered wild Atlantic salmon.

Furthermore, feed waste can create an associated increase in the concentrations of heavy metals such as zinc and cadmium associated with the trace minerals used in feed. The deleterious effect of these impacts on the marine ecosystem make net pens incompatible with the principles of organics, therefore their inclusion in an organic standard is scientifically indefensible.

Marine Mammal Deaths

The standard 6.6.7 inadequately addresses the occurrence of marine mammal deaths associated with open net systems. British Columbian open net salmon farmers only recently (December, 2010) became required to report marine mammal drowning deaths caused by net pen entanglements. Due to the absence of reporting data, the death toll of marine mammals including threatened and endangered species remains unknown, and potentially high. The limited records that are available before mandatory reporting, include the drowning of 51 California sea lions in May 2007 at Creative Salmon operations (Westcoaster, April 20 2007) and the death of one harbour porpoise and a Steller sea lion (both listed as species of special concern under Canada's Species at Risk Act) found within a two week period in March 2007, at Mainstream's Wehlis Bay farm (Vancouver Sun, April 23 2007). DFO records indicate that between 1990 and 2008, B.C. salmon farmers legally killed approximately 7,650 seals and sea lions including more than 370 Steller sea lions. Organic standards should only allow culture systems that do not pose a risk to marine mammals or other predators. Closed culture systems would eliminate drowning deaths caused by entanglement in nets and greatly reduce marine mammal kills.

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 disturbance of and unnecessary destruction of aquatic organisms or their habitat and require the collection and proper disposal of all wastes. Yet standard 6.1.3, which applies to open net fish farms only, requires 'sediment' build-up to 'not exceed the assimilation capacity at the local environment', with no performance measures outlined. The proposed standard for net pens ignores the loss of local biodiversity in areas around salmon farms that result from waste build up and fails to require waste recapture that is possible in closed containment 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 Principles 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 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 violate the underlying principles of organic production as set out by existing standards. A standard that allows conventional aquaculture practices such as the use of chemicals, uncontrolled disposal of waste into the marine environment, 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 2007/2008 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 labelled fish should be free of, or low in, toxins and contaminants.
- 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 chemicals, and allow open net pen systems.

The undersigned are in support of the development of organic aquaculture standards (especially 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 endorse 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 that their choice of an organic food product supports a safer, more humane, more sustainable environment.

Sincerely,

The Undersigned

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