



March 26, 2021

USDA-AMS-NOP
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Re: Organic Wild Caught Seafood

PCC would like to thank the National Organic Program (NOP) for engaging the organic community on the subject of organic wild caught seafood and for hosting the March 18, 2021 public feedback webinar. In addition to the responses provided during the webinar, PCC Community Markets is submitting the following comments to provide more background on PCC's experience and position on this important topic.

PCC Community Markets is the nation's largest community-owned food market, with over 90,000 active members, 15 stores across the Puget Sound region and over \$300 million in sales. PCC's vision is to inspire and advance the health and well-being of people, their communities and our planet. It is our mission to ensure that good food nourishes the communities we serve while cultivating vibrant local, organic food systems.

We are a co-op located in a region with deep cultural and economic connections to the sea, its connected waterways, and all of the lifeforms and industries that rely on this essential part of our environment. Seafood is also a key part of our business and our members and shoppers depend on us to provide seafood products that meet strict sustainability criteria. Because of this, PCC advocates on numerous seafood and aquatic conservation matters and is a leader in establishing protective and forward-thinking seafood sustainability standards.

In doing this work, we have formed lasting partnerships with science-based conservation organizations and continue to set ourselves apart in our efforts to address both local and global challenges facing our aquatic ecosystems. For example, in 2020, after two years of research and collaboration with our partners at the National Fisheries Conservation Center, PCC implemented its very own PCC Chinook Sourcing Standard.¹ This standard applies a place-based analysis of individual fisheries to assess our sourcing of Chinook salmon and its potential impacts on Southern Resident orca populations and threatened and endangered Chinook stocks. Beyond the Chinook standard, we have also maintained a long-time alliance and partnership with the Monterey Bay Aquarium Seafood Watch program and evaluate all of our fresh and frozen whole seafood offerings against Seafood Watch ratings, in addition to requiring many independent health and conservation standards not addressed through broader eco-evaluation programs.

We share this background with you so that you can understand our deep commitment to sustainable seafood and unique experience as a certified organic retailer in engaging on this important issue. With this understanding established, we would like to provide some additional thoughts and details on a few of the key of the questions presented during the NOP's listening session:

¹ <https://www.pccmarkets.com/sustainability/honest-transparent-products/#chinookstandards>

What is your feedback about the development of organic production and handling regulations for wild caught fish?

PCC recognizes that there are many in the organic industry with concerns surrounding the development of organic wild caught seafood standards. While we do not subscribe to the opinion that development of these regulations is implicitly outside of the realm of the production certification program envisioned by the Organic Foods Production Act (OFPA), we do share many of the concerns about potential missteps or abuses in a wild caught seafood program and the impact these missteps or abuses could have on the delicate state of our aquatic ecosystems.

Should the NOP wish to wade into these waters, it is imperative that it be done to elevate the protection and conservation of these resources and to better protect public health in consuming seafood. With that cautionary and protective imperative in mind, PCC does believe there is already a demonstrated need to for the organic program to address the impacts from harvest and cultivation of many aquatic-based food products and inputs (e.g., seaweeds, macroalgae, fish oil, etc.). These products are already a part of the certified organic supply chain, and as we have seen in the deliberations of the National Organic Standards Board concerning the continuing place of these products in organic, a necessary part of addressing organic suitability is to look at the bigger ecosystem picture, including wild caught fish.

What types of provisions might differentiate organic wild caught fish from conventional wild caught fish in the production phase? During the processing/handling phase?

Wild caught seafood is unique in that it is the only mainstream food category that relies on a non-agriculturally produced food product. It is the model of a food supply system that does not need human manipulation or inputs. In this way, many of the issues that are inherent to the human construct of agriculture and what organic standards try to improve upon within that construct are not an issue in the wild context. For example, fish are allowed to roam freely and do not rely on humans for their feed, so these areas of agriculturally focused regulations do not really apply.

Instead, the challenge becomes how do we ensure that humans are not disrupting these natural processes or placing unnecessary strain on the resources through controls on harvesting methods, location, frequency, bycatch, and broader ecosystem impacts. Indeed, it is these kinds of controls that OFPA indicates in its wild crop harvest provisions and emphasizes in developing plans for “the harvesting or gathering of the wild crops assuring that such harvesting or gathering will not be destructive to the environment and will sustain the growth and production of the wild crop.”²

Existing seafood eco ratings and certification frameworks, such as Seafood Watch and the Marine Stewardship Council (MSC), have modeled this approach, but there is a need to take these certification systems even further to address the additional stresses and complexities we are now seeing on our aquatic ecosystems. Additionally, beyond the “production” elements of wild caught seafood, less attention has been paid to the processing elements of seafood. Organic offers a strong framework to address the increasing concerns surrounding thaw-drip preservatives, coloring, heavy metal monitoring and contamination, traceability/fraud and much more.

² 7 U.S.C. 6513(f).

What would the impact of organic production and handling regulation be on the wild caught seafood industry?

The answer to this question is based on the rigor of the regulations and program developed as well as the protections built into the program against abuses. For example, there are strong concerns within the organic community that certification of wild caught fish would primarily be a mechanism to allow organic aquaculture certification and provide “certified organic” feed for those programs. Because we have seen first-hand in our region the damage these aquaculture facilities can have on native species and ecosystems, PCC remains firmly against the organic certification of open ocean aquaculture for finfish and their operation in general. Yet, should the organic program approve these types of facilities and organic wild caught fish then be permitted for use as feed in these open ocean, and even other closed-loop aquaculture facilities, the impacts could be catastrophic to both the marine ecosystems and consumer confidence in the organic label.

On the other hand, if the wild caught provisions truly enabled retailers and consumers to have confidence in elevated protective standards, traceability, additive limitations, and toxicity testing, it could help move the industry forward.

How does the wild-caught fish industry control the origin of harvested fish, control what is fed to their harvest fish, and treat medical conditions of their harvested fish?

As noted in an earlier comment, the questions of what fish are fed and how they are treated for medical conditions in the wild context are largely moot. Concerning the origin of harvest fish, however, there are new technology and conservation-based traceability initiatives that are being developed and would be an exciting area for organic to foster and implement.

Overall, we encourage the NOP to continue these conversations with a mind towards advancing aquatic conservation. Should the NOP determine that it can elevate existing seafood certification frameworks, we encourage the NOP to continue to work collaboratively with experts in the field of fishery management, conservation, and improvement, including sovereign nations, private industry, and non-profits to identify a protective and workable framework.

Thank you again for the opportunity to provide this input. We look forward to future opportunities to further discuss these and other ideas on this important topic.

Sincerely,

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Director of Advocacy & Product Sustainability
PCC Community Markets