



March 18, 2021

Jenny Tucker
Deputy Administrator
USDA, Agricultural Marketing Service
National Organic Program
Rm. 2642
1400 Independence Ave., SW
Washington, DC 20250-0268

RE: Comments in Response to the National Organic Program's Wild Caught Fish Virtual Town Hall

Dear Deputy Administrator Tucker:

Thank you for the opportunity to provide comment as the USDA National Organic Program (NOP) assesses the feasibility and appropriateness of developing organic production, handling, and labeling standards for wild-caught seafood.

As Alaska seafood producers and representatives, we applaud the NOP for renewing its consideration of how organic standards could apply to wild-capture fisheries. We acknowledge that the considerations and potential trade-offs are complex, but we believe that the Program will be strengthened considerably if a decision is made to advance standards that can apply to wild-caught seafood. Americans rely on and trust the USDA Organic seal. Its complete absence from the seafood sector is an enormous missed opportunity. We welcome the chance to work with the NOP to rectify this. The key will be to do so in a way that (i) builds on and complements existing sustainability initiatives in the seafood sector; and (ii) effectively aligns the values and objectives of the NOP with the realities of wild-capture seafood production.

Leading U.S. policymakers have long recognized that the absence of U.S. organic standards in the seafood sector has the potential to confuse buyers, distort markets, and exacerbate dietary choices that fall short of expert recommendations relating to seafood consumption. In particular, Alaska Senator Lisa Murkowski has repeatedly encouraged the NOP to grapple with the complex questions relating to organic standards for wild-capture fisheries—through legislation she championed as early as 2003, and most recently in FY21 appropriations report language. We applaud Senator Murkowski's vision, and believe this comment period should mark the commencement of a serious dialogue about the choices and tradeoffs involved in extending U.S. organic standards to our sector.

Alaska Fisheries

The Alaska region leads the world in its science-based conservation of marine resources and fishery management practices. For the last 45 years, North Pacific fisheries have been managed sustainably in

accordance with conservation mandates contained in the Magnuson-Stevens Fishery Conservation and Management Act. Our region has entirely avoided the overfishing practices that have depleted fisheries in some other U.S. regions and many fisheries internationally. The North Pacific Fishery Management Council has also pioneered ecosystem-based fishery management approaches, which have ensured the health not only of target species but also the broader marine environment. It is also leading scientific and management thinking relating to the intersection of fisheries and climate change, ensuring that management practices adapt effectively to accelerating changes in marine ecosystems.

This global leadership role has repeatedly been recognized by independent third parties. Most Alaska seafood is certified as sustainableⁱ by the Marine Stewardship Councilⁱⁱ as well as the Responsible Fishery Management Program.ⁱⁱⁱ It is also widely acknowledged that Alaska wild-caught seafood has among the lowest carbon footprints of any protein available.^{iv}

Finally, the nutritional benefits of seafood are widely acknowledged, and dietary experts are urging Americans to significantly increase their levels of seafood consumption. In that context, Alaska seafood can offer the public an unmatched record of nutritional benefits^v and food safety^{vi}.

Against this backdrop of outstanding performance, the Alaska seafood industry has invested heavily to build awareness and demand for our products in both domestic and international markets. As a result, product labeled as “wild-caught” and “Alaska-origin” seafood attract a premium in the marketplace. These promotional efforts are grounded in consumer insights and data that clearly show consumers gravitate towards the high standards held by Alaska fisheries and their harvesting practices. Similar to organic marketing efforts, the story and attributes behind Alaska seafood is especially motivating in terms of consumer purchase intent. The Alaska seafood marketing initiatives and campaigns have also played a significant role in building the Alaska seafood industry into the important driver it is for both the Alaska and U.S. economy^{vii}.

Alignment between Alaska Seafood and National Organic Program Values

We believe that the values underpinning Alaska seafood—and the messages we have long sought to convey to consumers—are strongly aligned with organic producers and the NOP. We also believe that specific features of Alaska seafood, harvested from the pristine waters of Alaska, overwhelmingly share the core characteristics of organic food produced in accordance with existing USDA standards. Indeed, wild-caught Alaska seafood is routinely tested for compounds in the environment,^{viii} tests that consistently demonstrate that Alaska seafood products are themselves a reflection of the pristine environment from which they are harvested.

As the NOP considers how organic standards could be credibly applied to wild capture fisheries, we hope that core alignment between Alaska seafood and existing certified organic produce can be a focal point, and a basis from which to develop standards over time. In that context, it needs to be acknowledged that not all wild-caught seafood shares these characteristics and would be appropriate for organic certification. Where to “draw the line” is obviously a challenging a complex question, and one we welcome the opportunity to engage with you on over time.

Although working through these challenges will not be easy, we must also recognize the clear failures of the status quo. One particularly egregious example of how the lack of a USDA organic certification for wild-caught seafood plays out can be seen in the market for fish meal and fish oil. Alaska fisheries produce significant amounts of fish meal and fish oil each year, and these products provide valuable

inputs into the production systems for other foods such as livestock^{ix} raised for meat. Yet these pristine and sustainable products are ineligible to be used by U.S.-based certified organic livestock operations due to existing NOP standards. The result is that organic livestock operators import more of their feed from international markets, while Alaska fish meal and fish oil is overwhelmingly exported for use outside the United States. This is a picture of failure, with domestic organic livestock missing out on a pristine and premium feed ingredient; imports needlessly displacing a domestically-produced product; and the environmental goals of the program undermined by market distortions that increase transport-related carbon emissions. We propose that fish meal and fish oil serve as an initial point of focus for new wild capture standards to address this failure.

Labelling

It is imperative that any USDA effort to develop USDA Organic standards for wild-caught seafood neither confuse the marketplace nor undermine the brand wild-caught Alaska seafood has built for the products of our respective fisheries. The Alaska seafood industry has worked hard and invested millions of dollars into building brand recognition to differentiate our products as we recognize that not all wild-caught seafood is held to the same sustainability and quality standards as wild-caught Alaska seafood.

Nevertheless, we recognize that USDA as well as the organic community and industry have also invested heavily in building awareness and demand for certified USDA Organic foods. As such, the Alaska seafood industry sees value in associating the products of our fishery with the USDA Organic seal so that consumers can look to that seal as a beacon for products that are sustainably produced in a way that is both good for people and the planet. Currently, with wild-caught Alaska seafood not eligible for the USDA Organic seal, consumers are left confused as to whether any single certification program can meet their needs in this regard and instead are bombarded by often contradictory seals and standards, which does not inspire their confidence. Data continues to show that multiple labels and standards are ultimately confusing to consumers and there is heightened desire, by consumers, for so-called “clean labels” that are easier to understand at point-of-sale. We believe that aligning behind the USDA Organic seal as the sole program and on-package mark would help consumers feel confident in the protein products—including seafood—that they purchase by having one consistent set of standards and messages.

As such, we support the eligibility of wild-caught Alaska seafood to be marketed with the USDA Organic seal as long as such standards for eligibility are written in a way that provides assurances to consumers that any wild-caught seafood carrying the USDA Organic seal addresses the issues of sustainability and safety that the Alaska seafood industry has worked so hard to address. We believe that Alaska seafood being eligible for this prestigious seal will only add value to the USDA NOP overall.

Conclusion

In closing, we support the development of meaningful standards for wild-caught seafood to be eligible to bear the marketing claim USDA Organic because we believe there is truly no more organic product than wild-caught Alaska seafood. While we understand the difficult challenge before USDA to address the issues we have outlined above, we believe the benefits far outweigh the challenges. We are committed to working collaboratively to advance standards that meet our mutual goals. Additionally, given the important role that seafood plays in human health and the joint U.S. Department of Agriculture and U.S. Department of Health and Human Services 2020-2025 Dietary Guidelines that

Americans eat more seafood^x, we find it especially critical that wild-caught Alaska seafood become eligible for the USDA Organic seal.

The Alaska seafood industry stands ready to help the Department with this endeavor in any way possible and looks forward to continued discussions on this important issue on behalf of our shared stakeholders.

Sincerely,



Craig A. Morris, Ph.D.
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Association of Genuine Alaska Pollock Producers



Stephanie Madsen
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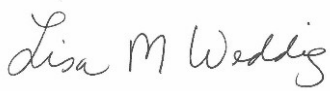


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ⁱ <https://www.alaskaseafood.org/sustainability/>

ⁱⁱ <https://www.msc.org/home>

ⁱⁱⁱ <https://www.alaskaseafood.org/rfm-certification/>

^{iv} <https://www.alaskapollock.org/about-us/news/wild-alaska-pollock-is-most-consumed-whitefish-with-lowest-carbon-footprint>

^v <https://www.alaskaseafood.org/health-nutrition/#diagram>

^{vi} <https://www.alaskaseafood.org/covid19/#foodsafety>

^{vii} <https://www.alaskaseafood.org/industry/seafood-market-info/economic-value-reports/>

^{viii} <https://dec.alaska.gov/media/18731/mercury-in-alaska-fish.pdf>

^{ix} <https://www.thepigsite.com/articles/high-quality-fishmeal-the-best-protein-source-for-weaned-piglets>

^x https://www.dietaryguidelines.gov/sites/default/files/2020-12/Dietary_Guidelines_for_Americans_2020-2025.pdf