

Dear Sir or Madam:

The National Fisheries Institute (NFI) is a non-profit organization dedicated to education about seafood safety, sustainability, and nutrition. The members of NFI provide seafood to families from the fishing vessels at sea to national seafood restaurant chains. From responsible aquaculture, to a marketplace supporting free trade, to ensuring consumers have the facts on the health benefits of fish and shellfish, NFI and its members support and promote sound public policy based on scientific research.

Members of NFI, particularly those on the Organic Committee, are deeply disappointed that organic seafood is at an apparent stalemate. Several major issues have been referred to the Livestock Committee, notably, in regard to these NOAA comments, are fish meal and fish oil. NFI supports the concept of the 12% limits on fish meal and oil with the goal of sunseting those limits in 7 years. The goal cannot happen, however, unless research presses on with great urgency. Formulations with fish meal and oil have decreased in recent years, but fish oil is still a principal source of omega-3-fatty acids (e.g., EPA and DHA) required for all marine fish and the source of important health benefits to seafood-consuming humans. However, actual usage of fish meal and fish oil has increased because of the rapid growth in aquaculture. The growth in aquaculture must continue to keep up with the demand, though not at the cost of sustainability. Research for substitutes must keep in mind sustainability of the sources.

Regarding fish oil, there are algal sources of the omegas EPA and DHA, though costly. Some scientists believe that replacement of fish oil is easier than replacing fish meal. Neither will happen without research. To phase out fish meal will require an intense examination of alternative protein sources to manage against inadequate amino acid nutrition.

We remind the NOAA Aquaculture Program of the useful comments on research status made by Dr. Steven Craig of the Virginia Tech Aquaculture Center as germane to the queries raised in the Federal Register notice. Link is below:  
<http://www.ams.usda.gov/nosb/MeetingAgendas/Nov2007/OralPresentations/CraigSPanelistPaper11-07.pdf>

NFI commends NOAA for research initiatives in alternative feeds which may well secure the future of aquaculture and, in particular, organic aquaculture.

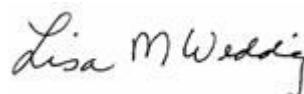
Sincerely,



Barbara Blakistone, Ph.D.

Director, Scientific Affairs

National Fisheries Institute



Lisa Weddig

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