

September 30, 2013

Ms. Michelle Arsenault National Organic Standards Board USDA-AMS-NOP 1400 Independence Avenue, SW Room 2648-So, Ag Stop 0268 Washington, DC 20250-0268

RE: Docket: AMS-NOP-13-0049

NOSB Livestock Sub-Committee

Tocopherols Aquaculture

We agree with the Livestock Committee's recommendation to add tocopherols to the National List for use in aquaculture livestock production but do not support the annotation. We recommend using the annotation at §205.605(b), which does not include the requirement that tocopherols be extracted without the use of volatile synthetic solvents.

§205.605 (b) Tocopherols—derived from vegetable oil when rosemary extracts are not a suitable alternative.

We are concerned that the prohibition against solvent extracted tocopherols will create an insurmountable barrier to producing organic aquaculture under the pending NOP regulations. It is clear in the TR that tocopherols are essential to the health of aquatic animals but it is not clear when solvent extraction is, or is not, essential to production, and how easy or difficult it will be to source tocopherols that are not solvent extracted. The TR at line 362 indicates that solvents are "commonly and traditionally" used. We do not support this annotation without assurance that there is a dependable supply of tocopherols that meet this criteria since, as the TR at line 595 concludes; No sources were identified that discussed alternative practices that would make the use of an antioxidant unnecessary in aquatic animal feed. Tucker (2012) reports that antioxidants are necessary in aquaculture feeds because the oxidative rancidity of lipids in feeds can affect the survival and growth of fish.

Respectfully Submitted,

Oregon Tilth

Oregon Tilth is a nonprofit organization supporting and promoting biologically sound and socially equitable agriculture through education, research, advocacy, and certification. Oregon Tilth advocates sustainable approaches to agricultural production systems and processing, handling, and marketing.

References: 1995 Technical Advisory Panel (TAP) Report for Tocopherols