Greening the Pink Gold- A perspective on the economic potential and market/trade prospects of Organic Aqua-Products in India

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Yet to catch the fancy of either the Indian consumers or the organic practitioners, organic fish is the latest fad- but of course a very big market opportunity-that the organic bandwagon has offloaded. There is lot of demand in countries like US for organically grown fish products. It is surprising that the Indian entrepreneurs are hesitant to latch on organic fish esp. shrimp unlike that of the organic agricultural produce like mangoes, tea or spices. But it is high time for us to switch over to organic ways at least to reap the premium price it offers in the export market. The most recent development like the decision of the US Congress to allow labeling of wild seafood as organic (http://juneauempire.com) has opened an array of business opportunities to the seafood exporting countries.

In most of the developed countries environment is no longer a trend but a standard issue in business negotiations (Stern,2002). Many counties like Ecuador with stringent standards have taken the lead in capturing the organic pie. On the global fish market, shrimp accounts for only 3% by weight, but 20% by monetary value. More than 30% of shrimp imported by the major markets like USA, Japan and Europe comes from aquaculture i.e. about 800 000 metric tonnes and about 2 million tones contributed by capture fisheries. But the real future development lies in shrimp farming and especially produced in the organic way. This paper is a wake-up call for engendering proactive initiatives to tap the potential benefits from this emerging market.

The booming organic market

The global market for organic food is booming, worth approximately US$ 20 billion in 2000. (Lockwood, 2000). The largest single market for organic food is the US with sales of around US$ 10 billion followed by Europe with about US $9 billion and Japan US$ 1.5 billion. In Europe Germany alone accounted for up to US$ 2.5 billion. (Table 1)

Table-1. European market for organic products

Country	Retail sales (million US$)	Annual growth rate (%)
Germany	2 500	10
Italy	1 100	20
France	1 250	20-25
UK	900	25-30
Switzerland	700	20-30
Netherlands	600	15-20
Denmark	600	30-40
Austria	400	15
Sweden	400	30-40
Others	500	NA
Total	9 900	NA

Source: Stern, 2002.

However compared to the global conventional food market (worth an estimated US$5 trillion), the organic market is still a niche market (0.3% market share). But the organic growth rate exhibited by many countries can not be brushed aside. Over all the growth rate is 20-30 % in countries like Denmark, Germany, The Netherlands etc. This represents an interesting combination of product and market diversification whose rationale is based upon the consumer perceiving value to be added to the product through its differentiated, more natural but controlled production regime. The group of consumers prepared to pay a price premium for the product constitutes a discreet yet growing market segment (Young,2001).

The sale of *organic salmon* in Europe has in-

creased from 12 mt in 1997 to 500 mt in 1999 and almost 2000 mt in 2000. Ecuador is leading the organic prawn market in US. Many countries including that of EU have formulated standards for organic fish a la organic farm produce.

Why organic ?

The expansion of organic food market may be attributed to a number of factors. The most important is the purchasing power of the consumer getting increasingly empowered by health and environmental concerns many of which embrace elements of safety, naturalness, trustworthiness, and green values of the food product.

Their heightened awareness is shaped more by scary events like mad cow disease, pesticide and antibiotic residues, apprehensions about the Genetically Modified (GM) crops etc rather than anything teleological. The realization that there are 'limits to growth" especially the one riveted on the use of petroleum resources and the issues of sustainability getting wider attention beyond the rhetoric have also played a role. Another factor is the ability of modern science to develop more and more sophisticated devices that can detect even very minute quantities of contamination-chemical or microbiological- in our food. (On the flip side, those who accuse the real motive of developed countries for supporting organic farming as a cleverly doctored market facade to tide over the "subsidy imbroglio" are also not rare).

The aquaculture industry the world over is facing brickbats from the eco-lobby for the alleged use of antibiotics and many chemicals which cause serious ecological as well as health hazards. Farmed shrimp has now a very negative image in Europe mainly due to the detection of an antibiotic Chloramphenicol in imported shrimp. There have been many cases where residue of antibiotic and similar chemicals in the sample has exceeded the standards set by World Health Organisation (WHO).

It is a well-known "secret" that the Indian prawn farmer like any of his counterparts in other parts of the world also compromises his ecological concerns over the lucre of the pink gold. But it can no longer be so. If you want to survive, your pink gold has to be green too. This is the market mantra for the future.

Organic Aquaproduction- Developments

a) Organic certifications and eco-labelling

With changes in shopping patterns and in particular the growth of supermarkets, substantive changes have occurred in the market for fish and the way in which it is brought. To ensure that production methods are able to protect the environment the market is taking up new approaches. Labeling is one of them. It is being increasingly used as a marketing tool.

The idea of adopting an eco-labeling system for marine capture fisheries was first promoted by the Marine Stewardship Council (MSC), a non profit organization funded by Unilever and the World Wide Fund for Nature in 1996. Sustainability as well as avoiding over- fishing and by catches –the two most important aspects of modern fishing that cause considerable environmental damage-must be inspected and certified by a third party.

The first attempt in drafting organic aquaculture standards was made by the Soil Association in UK in 1989. The International Federation of Organic Agriculture Movements (IFOAM) in its capacity as global umbrella body for organic food and farming came out with basic standards for organic aquaculture, which were approved in its 1998 General Assembly. The EU Organic Livestock Regulation came into force in August 2000. It recognizes fish farming as being eligible for organic status but the EU has not yet defined its own rules for organic production system. The UK Register of Organic Food Standards (UKROFS) 'recognised ' the UK organic aquaculture standards in July 2000.

There are now a number of organizations/agencies that give certification of organic aquaculture products. Leading among them are *Naturland* of Germany , *KRAV* of Sweden and *Soil Association* of UK. The Soil association, founded by pioneering organic philosophers Rudolf Steiner and lady Eve Balfour in 1940, licenses about 70% of organic production in UK. According to the standards set by them-which they call as interim- organic fish management aims to produce healthy stock by positive means, including good stockman ship, careful siting, appropriate nutrition, minimizing stress, encouraging a high level of resistance to disease and appropriate preventive measures. The well being of the stock and surrounding environment are paramount. The standards also make it clear that if the health of the fish is at risk, the appropriate treatment must be given even if it is a product that is not permitted under organic standards and which therefore results in the stock losing its organic status. Failure to treat could lead to the fish farm losing its organic certification entirely. These agencies are yet to make their presence felt as much as in the case of organic agriculture in India.

b) Organic Aquafarming-the concept

Organic fish farming is a new concept and is still in the early stages of development. It aims to reestablish a proper balance in aquaculture systems, for the benefit of the fish, the environment, and the consumers. Organic fish farming systems and standards that define them are likely to require considerable evolution and refinement in the years to come.

In organic fish farming many of the pesticides, dyes, and antibiotics widely used in conventional fish farming are not permitted and so these fish products are generally accepted to be credible "organic 'products. However from the animal welfare point of view, there is a controversy about allowing farmed fish to be labeled as organic. Organic principles demand that livestock (which includes fish) should be able to express its natural behavior pattern and kept as close to natural stocking densities as possible. This requirement can be satisfied for mussels without difficulty, and trout and many other fresh water fish are reared in large ponds / reservoirs at low stocking densities. Organic Salmon and trout first went on to sale in the UK in 1999.

Key principles for setting standards

There are mainly three key issues to be considered while setting up standards.

1) Nutrient cycling/closed systems

Nutrient cycling within (as far as possible) closed systems, following "*the law of return*", is a central organic principle. This in fact remains as the major stumbling block in setting up standards since most of the species suitable for aquaculture are carnivorous fish and their diet is fishmeal, which is derived from the sea. More research efforts are required to develop better cyclical systems.

2) Water

Since water is both air and soil for the fish the quality of water plays a very important role in deciding the quality of the produce. So maintenance/ enhancement of its health status means cleanliness and freedom from pollution. So the Standards must define the quality parameters for the incoming (in terms of its purity as an input) as well as the outgoing water (in terms of the environmental impact).

3) Feed

A major portion i.e. 60-70 % of the fish feed for the farmed fish is composed of fish meal and fish oil and the rest being cereal based products, vitamins, minerals etc. The agricultural component must be organic in origin and the other non-fish derived components must come from the by-products of wild –caught fish for human consumption (that is the waste from filleting etc). The reminder must come from sources that are independently certified as sustainably managed. While harvesting fishmeal sustainably is important it does not make the fish meal or fish oil organic. This is another "head ache" especially for the developed countries as the level of dioxins and organo-chlorine pollutants in the marine fish being caught there from which fish meal is manufactured is above safe/ acceptable levels.

Some of the other basic principles of organic fish production system are

1. Intensive monitoring of environmental impact
2. Integration of natural plant communities in farm management
3. Processing according to organic principles
4. Natural breeding procedures without use of hormones and antibiotics
5. Absence of GMOs in stocks and feed
6. Limitation of stock density
7. Feed and fertilizer from certified organic agriculture
8. Criteria for fish meal sources.
9. No inorganic fertilizers
10. No synthetic pesticides and herbicides
11. Restriction of energy consumption
12. Preference for natural medicines.

Organic farming- more of an attitude than a technology?

Organic farming is not merely abandoning synthetic chemicals. A commitment to human rights and social justice are already an integral part of the principles, which inform organic farming and processing, and are recognized as such in international organic standards (Ramchandran,1997). Recently the Soil Association in association with *Fairtrade Foundation* has launched a trial to ensure that the organic products demonstrate that they are making a real contribution to social, cultural and environmental development in the countries of their origin. The *FAIRTRADE* mark is the only independent consumer label that ensures farmers and workers in the developing world get a better deal. Under the project, companies selling products from UK farms as well as from developing countries and elsewhere can apply to carry the

FAIRTRADE and Soil Association marks.

Under *Fairtrade* standards the price paid to farmers must cover the sustainable cost of production, which includes a margin for profit and investment. In addition , buyers should commit to long-term relationships that enable growers to plan future production with confidence. Similar initiatives are now available in other countries like Denmark, which has the highest percapita organic spending in the world-around 5% of food sales are on organic products, compared with around 1% in the UK.

The Soil Association is also involved in clearing misconceptions on organic fish farming. When the BBC reported that the farmed fish contained higher levels of chemicals like PCBs or dioxins and organisms like sea lice the Association came out calling the reports baseless. In a clarification they mentioned the lack of research studies to support the allegation and that hydrogen peroxide is permitted to treat sea lice under their certification scheme.

Prospects in India

India has a huge potential for organic fish production and the trade/market prospects are very bright. The organic production prospects can be analyzed under culture and capture fisheries sectors.

a) Culture fisheries

The aquaculture industry in India has been identified as a sunrise area. With 2 million ha under reservoirs, 2.85 million ha under ponds /tanks and 1.4 million ha under the brackish water system , the potential are for aquaculture is impressive. Though carp spp. occupies the major place in the fresh water system, shrimp leads the position in the brackish water areas. Out of the total potential brackish water area of 1.4 million ha only 1.6 lakh ha (hardly 10%) is being used for shrimp culture. Still it leads the export market contributing 58% by quantity and 85% by value.

Shrimp is being cultivated in five different types of aquaculture systems in the country viz. Traditional, Extensive, Modified Extensive, Semi-intensive and Intensive. Based on Alagarsami (1995) and James (1999) it is estimated that currently about 50, 000 ha of brackish water area is under traditional system. (Table 2).

Table 2.. Brackish water Shrimp area under different systems

No.	Type	Area (ha)
1.	Traditional	50,000
2.	Extensive	90,000
3	Semi-intensive	20,000
4	Intensive	1000

A comparison of these systems on selected parameters would reveal that the traditional system of shrimp farming is nothing but organic *by default.* (Table 3).

With a modest assumption of 25% of the shrimp production as "organic' we estimate that an additional of about Rs. 1800 cores can be realized from its organic export market.

(The price advantage at present is 3-4 times for the organic shrimp in the international market). It is evident that the potential for organic shrimp production (both in terms of area and value added production) from the brackish water system is substantial.

b) Capture fisheries

In the case of capture fisheries shrimp catches has increased from one lakh tones during 1983 to about 2 lakh tones in 2000. The mechanised fleet in our coastal waters is concentrating more on shrimp trawling and the catch rate of shrimp from marine fisheries is declining (Sathiadhas and Biradar, 2000). However the export value for shrimp at present is to the tune of Rs 3500 crores from about 74800 tones. If the marine shrimp exporters can get a mere 25% of their produce labeled as organic (for e.g.: by utilizing the provisions of the recent US congress decision of labeling wild seafood as organic) an additional Rs 3000 crores can be realized. The possibility of exporting the entire marine shrimp as organic is not a farfetched one.

The major strengths that enable us to make a transition to organic production systems are

- The traditional systems of aqua farming qualify as the best candidate for organic by any standards. Making transition to organic system especially in Extensive systems of shrimp farming is easy.
- Technology for the production of low cost organic feeds is available. (For e.g.. *Mahima* shrimp feed developed by CMFRI, Kochi.)
- Comparatively clean and pollution-free water bodies are available.
- The emerging organic market for agriculture products in the country will give a boost to organic fish production systems as well.
- The natural seed availability is not in peril.
- Institutional support system in the fisheries sector, for research and trade in general, is capable to tackle the transition challenges.

Table 3. Comparison of shrimp culture systems				
Character	Traditional	Extensive	Semi-intensive	Intensive
Pond size	Less than 5ha	1-5 ha	0.2-0.5 ha	0.03 –0.1ha
Stocking density	Natural, under 10,000/ha 10000/ha	Natural and artificial	Artificial 1-3 lakh /ha	Artificial 5-20 lakh /ha
Feed source	Natural	Natural and formulated	Formulated	Formulated
Seed source	Natural/wild	Hatchery/wild	Hatchery	Hatchery
Fertilizers	None	Organic and biodegradable	Organic and biodegradable	Organic and biodegradable
Diversity of crop	Poly culture	Mainly monoculture	Mono culture	Monoculture
Diseases	Very rare	Rare	Moderate	Frequent
Management	Minimal	Minimal with some skilled	Skilled	Highly skilled
Employment	No figure, but 30-40% of operating cost for labour	Up to 7 persons / ha 45 days per working cycle	1-3 persons per ha for 26 days	1 person /ha , only 6% of operating cost is for labour
Effluent treatment	Not required	Not required	required	required
Environmental and organic implications	*Self-sustaining *Ecologically benign *High sustainability due to fish-paddy rotation * Products (fishes, rice etc) organic by default	*self sustaining with inputs *Sustainability and ecological benign ness moderate *Produces only shrimp * transition to organic is easy	*External input dependent *Self polluting *transition time more *less sustainable *only shrimp	*High dependence on external inputs *Least sustainable *Pollutes environment transition difficult
Source: Shiva and Karir(1997) (modified).				

Suggested Measures

In this context some of the steps, which demand immediate attention and concerted action, to tap the stupendous potential of organic fish production in India are suggested below:

1. Those water bodies, which are comparatively far away from pollution hotspots, should be demarcated for organic fish farming as '**Organic Fish Farming Reserve Zones**". The government should promulgate necessary regulations in addition to making amendments in the CRZ rules in order to keep these areas eco-protected.

2. Organic fish production in isolated ponds may not be feasible in many places. The best option is to do it on a **group-farming** basis. This can not only ensure better control over ecological standards but also reduce the cost of cultivation. Agencies like MPEDA should come forward to assist such collectives of organic fish farmers to get organic certification. Going organic is a sure way of value addition, which is ecologically and economically correct.

3. The need of the hour is to **develop indigenous standards** taking into consideration the geopolitical peculiarities of our region. Though

many agencies including APEDA have come out with organic standards for agriculture much progress needs to be made in the case of aquaculture.

4 The **research system** has to take a proactive position in evaluating **the revival of traditional systems of aquaculture** (like the *pokkali-chemmenkettu* system of Kerala, *Bheries* system in West Bengal, *Gheri* system of Orissa, *Khar* lands of Karnataka etc. as viable ways of producing organic fish.

Different systems of traditional aquaculture may be compared and evaluated in well-laid control experiments to find out the maneuverability of various biotic and abiotic factors that determine the transition period required while making a switch to the organic production systems. The efficacy of biological alternatives to chemical inputs also need to be studied in terms of economic advantage and local resource endowments.

5. **Eco-Production incentives** (promoting the concept of Total Quality Management) need to be given to traditional aqua stakeholders. The revival of traditional aquaculture systems as sustainable ecological models will not only ensure better livelihood security but also redeem the coastal water bodies from the specter of multiple- user conflicts. The **eco-tourism** prospects also will get a boost in these areas.

6. Urgent efforts are needed to trade –protect these unique systems of traditionally sustainable aquaculture systems using the **WTO provisions for Geographic Appellations.**

7. In the case of **capture fisheries** Responsible Fishing Practices (in fishing operations, processing, marketing etc) need to be promoted among marine fisherfolk and the industry.

Use of eco-friendly capture techniques need to be encouraged.

New criteria for sustainability need to be defined. For e.g. Defining value /price of catch by internalizing the externalities like the amount of energy that goes into one kg of fish from catch to dish).

The catch from the artisanal/traditional sector that uses only human labour power thus avoiding the use of petroleum fuels can be traded as organic.

8. The potential of the domestic market for organic fish and related products need to be assessed. **Consumer awareness** programmes can be jointly undertaken by the industry and research/extension agencies. A possible fall out may be the adverse impact it can have on the market for non-organic fish. But the question is why should the domestic consumer be discriminated against access to safer fish foods? In fact the ecological as well as health consciousness of the domestic consumer has grown up so much that it is gullible enough to be goaded into a market opportunity.

Conclusion

The organic seafood market all over the world is gaining prominence. India with its vast aquaculture and marine fisheries potential has tremendous prospects in the emerging market opportunities for organic fish production and its trade. The need of the hour is to make earnest efforts (research, policy and political) to develop strategies that enable us to utilize the opportunity thus raking very valuable benefits to the economy. What are required are synergetic interventions by the Government, Fisheries Industry and the Research system.

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Quality control:

3:1. Harmonised standards for the testing for certain residues in products of animal origin (EU Decision 2005/34/EC)

The European Commission Directive 2005/34/EC of 11th January, 2005 laying down harmonized standards for the testing for certain residues in products of animal origin imported from third countries has come into force with effect from 19th February, 2005. This is in the context of the Commission Regulation (EEC) No.2377/90, which did not prescribe MRPLs for those substances whose use is prohibited or not authorized in the Community, the presence of which may present grounds to reject or destroy the relevant consignment at import.

For the purpose of control of residues of certain substances whose use is prohibited or not authorized in the Community, the Minimum Required Performance Limits (MRPLs) laid down in Annex II to Decision 2003/181/EC shall be used as reference points for action irrespective of the matrix tested.

Where results of analytical tests are at or above the MRPLs laid down in Decision 2002/657/EC, the consignment concerned shall be considered non compliant with Community legislation.

Pending the application of Articles 19 to 22 of Regulation (EC) No882/2004 from 1st January, 2006, the Decision 2005/34/EC lays down that the Competent Authorities of the member states shall place under official detention non compliant consignment from third countries and having heard the food business operators responsible for the consignment, shall take the following measures :

a) Order that the consignment be destroyed or re dispatched

b) If the consignments have already been placed on the market, recall the consignments before destruction or re dispatch

The Competent Authority shall allow re-dispatch only if:

a) the destination has been agreed with the feed or food business operator responsible for the consignment.

b) the food business operator has first informed the Competent Authority of the country of origin or country of destination, the reasons for re dispatch.

c) In the case of country of destination not being the country of origin the preparedness to accept the consignment has to be notified to the Competent Authority.

A re-dispatch shall take place no more than 60 days after the day on which the Competent Authority decided on the destination of the consignment. If re-dispatch does not take place in 60 days the consignment shall be destroyed.

Where the results of analytical tests on products are below the MRPLs laid down in Decision 2003/181/EC, the products will not be prohibited from entering the food chain, but the Competent Authority shall retain a record of the findings in case of recurrence.

The feed or food business operator responsible for the consignment or its representative shall be liable for the costs incurred by the Competent Authorities in re-dispatch / destruction.

Minimum Required Performance Limit

1	Chloramphenicol	0.3 ppb
2	Medroxyprogesterone acetate	1 ppb
3	Nitrofuran metabolites - Furazolidone] - Furaltadone] - Nitrofurntoin] - Nitrofurazone]	1 ppb for all
4	Sum of malachite green and leucomalachite Green (2004/25/EC) in meat of aquaculture products	2 ppb

(Source:MPEDA)

Technologies and other information:

4:1. Cold storages: more of nerve centres of logistics now in USA

Cold storage industry is on the fast track to become logistics nerve centres. In response to customers –importers, exporters and distributors- demand, freezer warehouses in U.S are expanding their mix of services to include blast freezing, custom packing, and even distribution of product. State- of -the- art technologies are revolutionizing supply-inventory management systems and cutting costs by boosting customer's access to inventory and information. Seafood companies are the major customers of such big cold storages.

One of the warehouses is implementing the latest product tracking technology called "Radio Frequency Identification" (RFID).

This new technology helps the customers to move the product around with out talking anyone of the staff in the storage. Heralded as a replacement for the traditional barcode technology, RFID removes the scanning for tracking of inventory that

is ubiquitous today in cold storage facilities. It allows customers to automatically determine inventory status, generate shipping-and-receiving documents and even correct product shortages.

Another chain of warehouses is employing a web-based product tracking and wireless technology. It offers a full range of customer services, including flash freezing, packing and product labeling. Its facilities have on-site U.S Department of agriculture inspection for imports.

The motto of the ware houses seems to be "Just In Time" (JIT), a Japanese system of inventory control also known as "Toyota System". JIT essentially means getting product to the customer "just in time" to sell to the customer.

(source: IntraFish).

4:2. Annual per capita consumption of fish and shellfish for human food by select countries (average of 1995-97)

Region and Country	Live weight equivalent in Kg
North America	
Canada	22.2
Green Land	84.1
U.S.A	20.9
Latin America	
Argentina	11.1
Brazil	6.9
Colombia	4.5
Costa Rica	5.2
Ecuador	7.2
Guatemala	1.1
Mexico	10.5
Nicaragua	1.3
Peru	25.4
Venezuela	20.1
Europe	
Austria	1.3
Belgium & Luxembourg	19.6
Czech Republic	8.6
Denmark	23.6
Faeroe Island	86.1
Finland	32.8
France	28.4
Germany	12.4
Greece	25.4
Iceland	91.1
Ireland	16.8
Italy	22.0
Netherlands	15.4
Norway	50.1
Poland	10.5
Portugal	59.8
Russian Federation	19.5
Spain	40.5
Sweden	
Switzerland	26.1
U K	13.8
Yugoslavia	20.1 2.1
Near East	
Bahrain	16.2
Egypt	9.3
Iran	1.6
Israel	22.6
Kuwait	12.5
Oman	24.0
Qatar	12.3
Saudi Arabia	6.5
Turkey	8.3
UAE	27.4
Far East	
Bangladesh	10.1
Burma	16.9
China Hong Kong	24.1
India	56.6
Indonesia	4.6
Japan	17.9
Maldives	69.0
Malaysia	169.8
North Korea	55.7
Pakistan	16.9
Philippines	2.0
Singapore	31.0
South Korea	32.4
Sri Lanka	51.2
Taiwan	18.8
Thailand	37.3
Vietnam	32.4 16.9

4:3. CANADIAN RATALIATION AGAINST U.S' FAILURE TO COMPLY RULING ON BYRD AMENDMENT:

The Government of Canada announced today that it would retaliate against the United States in light of its failure to comply with the World Trade Organization (WTO) ruling on the Byrd Amendment. Following extensive consultations with domestic stakeholders, Canada will impose 15 percent surtax on U.S. live swine, cigarettes, oysters and certain specialty fish, starting May 1, 2005. Today, the Commission of the European Union has proposed imposing retaliatory measures as trade sanctions on certain products from the United States. Canada continues to cooperate closely with all seven WTO Members that have received authorization to retaliate. These countries may also exercise their retaliatory rights over the next few months. "For the last four years, Canada and a number of other countries have repeatedly urged the United States to repeal the Byrd Amendment," said International Trade Minister Jim Peterson. "Retaliation is not our preferred option, but it is a necessary action. International trade rules must be respected." Over two years ago, the Byrd Amendment, which allows U.S. producers to receive antidumping and countervailing duties from foreign competitors, was found by the WTO to be inconsistent with U.S. trade obligations. In November 2004, the WTO gave Canada and the other co-complainants the authority to retaliate. "As large trading nations, let us not forget that the world is watching," said Minister Peterson. "We must send a clear message by way of our actions." The Minister emphasized that the Canada-U.S. overall trade relationship is as strong as ever. "Ninety-six percent of it works and works well and should be celebrated, but both sides lose from such disputes. We must put an end to them," he added. Through consultations, Canada has made efforts to focus on products with alternative supply sources and to avoid products that are inputs to Canadian manufacturing. Canada's current retaliation level is $14 million. The Government will review the products each year against the fluctuating nature of Byrd disbursements.

(Source: EC)