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CC: Members of the **Regulatory Committee on Organic Production (RCOP)**

## **RE: Use on non-organic juveniles in organic aquaculture**

IFOAM EU had already written a number of letters and a position paper<sup>1</sup> presenting and restating the sector's approach on the use of non-organic juvenile aquaculture animals in organic aquaculture.

We write now to request urgent **feedback** from the Commission on what their intentions are on this topic, in view of the "100% organic" requirement that will be in place from 1<sup>st</sup> January 2016.

It is clear that this provision will create huge obstacles to the development of this specific sector, as many aquaculture operations will be obliged to quit organic production and many species will not be available on the market.

The continued reluctance of the Commission to heed the calls from experts and the sector is particularly difficult to understand in light of the guidelines given by the Council and the Parliament which are quite clear regarding the future approach in the new organic regulation (see annex I to this letter).

Our position is to support the recommendations of the Expert Group for Technical Advice on Organic Production in their report on Aquaculture (part A)<sup>2</sup>:

- *Organic juveniles should be used when available*
- *At least the latter two thirds of the duration of the production cycle shall be managed under organic management*
- *The Group supports the creation of a database on the availability of organic juveniles and of the organic aquaculture species grown in each country, comparable to the seed database stressing the transparency of the*

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<sup>1</sup> [http://www.ifoam-eu.org/sites/default/files/ifoameu\\_reg\\_aquaculturejuveniles\\_positionpaper\\_20150514.pdf](http://www.ifoam-eu.org/sites/default/files/ifoameu_reg_aquaculturejuveniles_positionpaper_20150514.pdf)

<sup>2</sup> [http://ec.europa.eu/agriculture/organic/eu-policy/expert-advice/documents/final-reports/final\\_report\\_egtop\\_on\\_aquaculture\\_part-a\\_en.pdf](http://ec.europa.eu/agriculture/organic/eu-policy/expert-advice/documents/final-reports/final_report_egtop_on_aquaculture_part-a_en.pdf)

*use of non-organic juveniles should be ensured in such a database.* (According to IFOAM EU, production capacity on existing juvenile farms should also become part of the database, as juveniles are only produced on request).

Following the EU Council adoption of the general approach<sup>3</sup> on the new organic regulation and the adoption of the organic dossier report<sup>4</sup> in the Committee on Agriculture of the EU Parliament, it is now clear that all of the individual approaches proposed by EU institutions, independent expert bodies (EGTOP) and the organic sector on the origin of aquaculture animals in the organic regulation all go in the same direction.

Therefore we expect that the final text of the new organic regulation that will be adopted after trilogue negotiations will be in line with the original EGTOP recommendation and the often repeated request from the organic sector.

The most probable scenario is a system where authorisations to allow the introduction of non-organic juveniles can be granted at National level when organic juveniles are not available and, possibly, national databases listing organic juveniles available and production capacity on existing juvenile farms are established.

We trust that the Commission and the Member States will now respond to this situation by amending the current organic regulation to allow the authorisation of the use of non-organic juveniles so as to assure certainty to organic aquaculture operations in the EU, and allow a smooth transition from the current legal framework to the future new organic regulation.

Organic Regards,



Marco Schlüter  
IFOAM EU Director

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<sup>3</sup> <http://data.consilium.europa.eu/doc/document/ST-9750-2015-REV-1/en/pdf>

<sup>4</sup> <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+REPORT+A8-2015-0311+0+DOC+PDF+V0//EN>

## Annex I

The EU Council general approach on this topic reads:

*“for on-growing purposes and when organic aquaculture juvenile animals are not available, Member States may authorize the use of non-organic juveniles, provided that at least the latter two thirds of the duration of the production cycle is managed under organic management.”*

Annex II – Part III – point 4.1.2.1 –point (db).

The EU Parliament Committee of Agriculture adopted report reads on the same point:

*“Where it is impracticable to obtain animals under the conditions specified in 4.1.2.1 a), they may be caught in the wild. Such animals shall be kept under organic management for at least three months before they may be used.*

*Wild caught or non-organic aquaculture animals may be brought into a holding only in duly justified cases where no organic breed is available or where new genetic stock for breeding purposes is brought into the production unit after the authorisation has been granted by the competent authority, with a view to improving the suitability of genetic stock. Such animals shall be kept under organic management for at least three months before they may be used for breeding. Each Member State shall ensure that a computerised database is established for listing the aquaculture species for which organic juveniles are available on its territory and the production capacity among certified aquaculture farms”*

Annex II – Part III – point 4.1.2.1 –points aa (new) and (d).