

Brussels , 12 November 2014

Mr Ernesto Bianchi
Head of Unit, A2
DG Maritime Affairs and Fisheries
European Commission
Brussels

CC: Mr João Onofre
Head of Unit, B4
DG Agriculture and Rural Development
European Commission
Brussels

CC: Mr Dario Dubolino
Unit A2
DG Maritime Affairs and Fisheries
European Commission
Brussels

Dear Mr Ernesto Bianchi,

Organic aquaculture is still a young sector and its development depends on the stability of the legal basis and on the continuity of its principles. To make this possible, with this letter we urge the Commission to follow the recommendations of the Report on Aquaculture ([part A](#)) produced by the Expert Group for Technical Advice on Organic Production (EGTOP).

As for 1 January 2015 all aquaculture production units producing under nationally accepted organic rules will be obliged to operate under the Regulation (EU) No 834/2007. This change will affect most of the organic aquaculture production units operating in the EU and outside the EU and will not be an easy transition.

IFOAM EU shares the aim to encourage the use of common EU rules, nevertheless feasible requirements have to be established on the EU regulation. For both operations certified under the EU regulation and ones certified under nationally accepted rules, a number of challenges will arise in implementing requirements of the aquaculture rules that come into force in 2015. The greatest of these relates to the requirements for the use of organically grown juveniles. For some species organic juveniles are available only in some countries, for other species there is no availability of organic material at all. This situation is mainly caused by the requirements for organic breeding being very stringent or not tested in practice, and for organic larvae rearing being not elaborated enough.

We can compare this situation with the one of terrestrial animals, where e.g. the lack of production requirements for pullets make it difficult the fading out of the exceptional rule of Art. 42(a) of Regulation (EC) No 889/2008 (allowing to bring non-organic chicks less than three days old in the production unit when organically reared poultry are not available). In organic, aquaculture is much younger sector compared to terrestrial animal production, and organic aquaculture still represents a small market. Further the movement of organic juveniles all over Europe is restricted by the Council Directive (EC) No 88/2006 on "animal health requirements for aquaculture animals and products thereof, and on the prevention and control of certain diseases in aquatic animals".

IFOAM EU urges the Commission to adopt solutions for this issue that are in line with the [EGTOP report on Aquaculture \(part A\)](#) which states that:

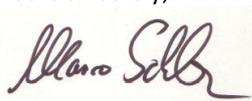
- *Organic juveniles should be used when available*
- *At least the latter two thirds of the duration of the production cycle shall be managed under organic management*
- *After the approval of specific organic rules for the life cycle stage between hatching and weaning of juveniles, a transitional period may be established to allow farmers to comply with the new rules*
- *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 use of non-organic juveniles should be ensured in such a database.*

Furthermore we strongly recommend that - to comply with the first point - authorisation to use non-organic aquaculture juveniles shall be granted by Competent Authorities on a case by case basis only where it has been demonstrated to the satisfaction of the Competent Authority that organic aquaculture juveniles are not available. After a proper sound evaluation, a possible second step could be to develop practical and clear requirements for juveniles, also based on the ongoing ORAQUA¹ project, in order to get rid of the exceptional rule in the medium- long-term.

In the meantime, IFOAM EU is of the opinion that the requirements for production of organic juveniles should stay for all aquaculture species as they are today in the Regulation (EC) No 889/2008. They should not be changed or further developed until robust science based standards are proposed to the Commission for consideration. We believe that this approach will guarantee that when organic juveniles are available and suitable to the geographical conditions of the consignee's region, these will be used. For this purpose, the creation of National databases or an obligation to provide documentary justification would help in ensuring the effectiveness of these provisions. We strongly believe that this option is fair to those producing juveniles, as it ensures that they will find a market.

We welcome that in the draft text on organic aquaculture currently discussed in the Regulatory Committee on Organic Production (RCOP) some of the EGTOP recommendations were taken on board, but we wonder why the most important and impacting aspect - juveniles - has not been considered. We finally noticed that also some of the recommendations of the EGTOP report on aquaculture ([Part B](#)), published on 12 September 2013, were taken up in the draft discussed in the RCOP and we regret that no time was given to the sector for reacting on this.

Yours sincerely,



Marco Schlüter
IFOAM EU director

¹ <http://www.oraqua.eu/>