



International Federation of  
Organic Agriculture Movements –  
EU Regional Group

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## ***Working for organic farming in Europe***

Mr. Jean-Francois Hulot  
Head of Unit, Organic Farming  
DG AGRI  
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1049 Brussels  
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Brussels 27.02.2009

### **Aquaculture implementing rules**

Dear Mr Hulot,

Thank you for giving us the opportunity to comment on the latest draft of the aquaculture implementing rules (version 27/01/2009). The IFOAM EU aquaculture experts have revised the document and we have a number of major concerns for the present version of the proposal.

We wish to emphasise that the proposal is NOT acceptable in the present state; if published like this it would cause harm to the existing organic aquaculture industry and market – and cause the organic aquaculture sector to fall far behind the otherwise state of art organic aquaculture standards that have developed in Europe over the past 15 years.

#### **General:**

Our most important concern is that the requirements do not reflect the principles of organic farming and aquaculture as laid down in Capture II of the EC regulation 834/2007. We see the risk to have a weak regulation permitting aquaculture practices that are typical for the conventional aquaculture industry.

We have five major issues where changes are needed:

#### **Feeds:**

- A clear requirement for certified organic feed material, non organic feed should only be permitted with strict limitations
- Percentage of additional feeding to be restricted for each species
- The permitted amount of fishmeal and oil in feed to be defined for each species, such clearly separating between carni-, omni- and herbivores.
- Prohibition of synthetic pigments (astaxanthin)
- Defining permitted sources of fishmeal and oil, such as fishmeal and oil made from organic aquaculture, independently certified sustainable fisheries for human consumption, and inevitable by-catch from sustainable fisheries for human consumption.
- Last resort for a transition period: limited amounts (for example 20%) of fishmeal made from whole fish from sustainable fisheries.
- Criteria for certified sustainable fishery have to be fixed, clearly stipulating verifiable criteria for permitted sources.

#### **Containment systems:**

- The draft excludes “*Closed recirculation aquaculture facilities*” for grow-out. This is not excluding e.g. indoor flow-through systems (such as typical e.g. for turbot), which are clearly rejected by the

majority of organic stakeholders. Furthermore, a number of existing organic models (e.g. pond farms recirculating water) seem affected by this prohibition, which is not acceptable.

**Stocking densities:**

- For a part of the species much too high and typical for conventional aquaculture, for other parts too unspecific. It is not acceptable that even higher densities can be permitted by member states (after notification).

**Minimum distances:**

- Unacceptable as much too high for reality of inland (e.g. carp) fish farmers, other measures are required in order to separate the conventional and organic units and to avoid contamination.
- Instead of imposing minimum distance (which was, for good reason, not considered in agriculture regulation), there must be strict requirements for holdings with parallel production in aquaculture, as in organic agriculture.

**List of products for cleaning and disinfection for aquaculture:**

- An in depth evaluation of permitted substances reflecting the objectives, principles and criteria of regulation 834/2007 is needed.
- Revision of problematic substances such as formaldehyde, glutaraldehyde, quaternary ammonium compounds, copper sulphate (= conventional anti-foulant), and iodophores.

**Processing:**

- Revision of the proposed additives and processing aids following our proposal of 12/01/09, particularly with respect to sulphur dioxide and sodium metabisulfite.

We strongly recommend an in-depth revision of the proposal in order to secure a concept of sustainable aquaculture that fulfils the requirements of Capture II regulation 834/2007 and which is in line with consumers' perception towards organic foods and aquaculture.

We will provide precise recommendations for the draft proposal in the near future and we continue to stand by with further input and assistance that you may need.

With best regards,

A handwritten signature in black ink, appearing to read "S. Bergleiter".

Stefan Bergleiter  
Chair, IFOAM EU  
Aquaculture expert group

A handwritten signature in black ink, appearing to read "Marco Schlüter".

Marco Schlüter,  
Director

(cc Maria Fladl, Richard Bates, SCOF)