

24<sup>th</sup> June 2013

Mr Christian Rambaud  
Head of Unit, B2  
DG Maritime Affairs and Fisheries  
European Commission  
Brussels

CC: Mr João Onofre,  
Head of unit, H3  
DG Agriculture and Rural Development  
European Commission  
Brussels

Dear Mr Rambaud,

We would like to express our opinion about the imminent further implementation of the organic aquaculture regulation (EC) No 710/2009.

Following discussion amongst our members, which includes both certifiers and operators, it is clear that there are several areas of the regulation for which parts of the sector will be unable to fully comply. There will therefore need to be a provision for derogations to be prolonged in these areas.

Aquaculture is complex and covers many more species than agriculture. The 3 years allowed to implement the regulation have given strong boost to development of the organic sector to a stage where derogations are not required. However, for some Member States, for some species and for some areas this will not be possible. We ask that you compare the current situation in aquaculture with that in organic agriculture where derogations for feed and young animals are still in place despite the organic agriculture rules having been in place since many years. In general we would appreciate a more differentiated approach with regards to species and topics.

More specifically the areas of the regulations that cause immediate concern include:

- restrictions on sourcing non-organic juveniles,
- limitations on sourcing and availability of fish meal and oil,
- clarification on the list of raw material allowed as feed and inappropriate feeding rules according to different species' physiological needs,
- inadequate consideration of fish welfare and slaughter.

We are aware that the Expert Group for Technical Advice on Organic Production has tabled organic aquaculture for discussion and that a Commission Working document is being prepared.

We therefore welcome that the subject is under discussion and request urgent movement towards a solution for the abovementioned issues, provided that this solution will not frustrate the achievements already made by the aquaculture sector in several areas.

We finally request ongoing stakeholder involvement in this process to ensure that their views are taken into account.

Yours faithfully,

A handwritten signature in black ink on a light-colored background. The signature is cursive and reads "Marco Schlüter".

Marco Schlüter

IFOAM EU Group Director