



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  
Rue de la Loi 130  
1049 Brussels  
Belgium

Brussels 30.03.2009

### **Aquaculture implementing rules**

Dear Mr Hulot,

Thank you once again for giving us the opportunity to comment on the aquaculture implementing rules (version 29/01/2009).

Needless to say, we are not happy with the short time consultation frame of the last draft (as indicated in the advisory group on organic farming at March 17). As it is the first time that implementing rules for organic aquaculture are decided on EU level it is obvious that a certain time frame is needed to ensure a democratic process in the different organisations

We send you herewith our comments on the major points we have agreed on. It has not been possible to elaborate in more detail in the given time frame. These points reflect clear majority opinions decided by the IFOAM EU Group.

We want to point out that the rules on aquaculture will have an impact on the whole organic sector. Therefore we still have major concerns for the status of this document and the consequences it would have for the European organic sector. We are especially concerned about the aspects of the regulation that does not comply with the principles of organic farming and aquaculture as laid down in Capture II of the EC regulation 834/2007.

We consider it as outmost important that the implementing rules of organic aquaculture strengthen the credibility of organic farming as total. We fear that weak regulations will cause harm to the existing organic aquaculture and organic sector and market in total.

We further want to point out that the EU agreed to the process of harmonisation of standards and should therefore not fall behind the new US NOP standards.

The annexes of this letter contains precise proposals for the areas that we find most critical, but we would like to emphasize that we still feel that the draft implementing rules ought to undergo a thorough revision to make it at level with the rest of the organic regulation.

With best regards,

A handwritten signature in black ink, appearing to read 'Marco Schlüter', on a light-colored rectangular background.

Marco Schlüter,  
Director