



Working for organic farming in Europe

International Federation of
Organic Agriculture Movements –
EU Regional Group

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The new implementing rules draft for organic aquaculture, version June 5th, 2009

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Dear Jean-François,

The IFOAM EU Group appreciates the fact that numerous IFOAM EU suggestions, expressed in its positions and letters communicated previously, have been adopted in the final draft. Nevertheless, still some issues should be modified to allow implementing rules on organic aquaculture to contribute to the development of organic aquaculture sector in line with **principles of organic farming** as outlined in the organic regulation (EC) 834/2007.

The IFOAM EU Group suggests approving the draft under the conditions that the following issues are modified:

- 1. Stocking densities** The IFOAM EU Group has consulted widely and a proportion of stakeholders firmly believe that a density of not more than 15kg/m³ is appropriate for finfish and meets genuine organic production principles whilst ensuring a significant difference from conventional production and stocking densities. However, we recognize the complexity of the issue and the diversity of national and stakeholder positions amongst Member States.

Consequently, we propose the following:

- Transitional periods, as proposed in art. 79d(20), amending art. 95 (11) of Regulation 889/2008 for existing operators to continue with production systems and stocking densities for should be allowed to 2013. However, we do not support a different transitional period based on size of the production unit. Aquaculture holdings producing 200 t per year are not small farms in Europe. IFOAM EU group do not see the need for a transitional period of an additional 2 years for such large farms. The production limit is set at a too high level.

- The stocking densities shall be reviewed by 2014 in the context of the results of EU research project (FP7, from 2010 on) and revised if appropriate thereafter. This may be particularly relevant for the organic culture of charr (*Salvelinus sp.*) and all species of shrimp/prawns.

2. Eyestalk ablation. Currently, it is not possible to produce shrimp larvae (particularly Black Tiger shrimp) completely without female eyestalk ablation. Therefore, we insist that the requirement for a non-ablated breeding program (as in the previous draft) must be kept.

To be inserted: "Eyestalk ablation of female Penaeid shrimp is permitted on a maximum of 75% of breeding stock until 2013. A minimum of 25% are to be spawned without ablation as part of a breeding programme."

3. Fishmeal from conventional aquaculture is not acceptable as a feedstuff in organic aquaculture for both principal/systematic reasons as well as for the associated risk of residues and must be clearly prohibited.

4. The current draft only mentions "trimmings" from food-grade fisheries as **allowable sources of fishmeal/-oil**.

We recommend **widening this to include "trimmings and by-products"**, in order to include also e.g. down-graded fishery products. Ideally this should be from sustainable fishing sources.

5. The prohibition for fishmeal/-oil for shrimp and tropical fresh/brackish water fish (Art. 25 I point 1 on sections 7 and 9) is technically not realistic and, furthermore puts undue burden particularly on aquaculture in developing countries. As the draft is now, it permits fishmeal for most "Northern" species, but prohibits it for all relevant "Southern" species.

We suggest allowing a maximum of 20% for the species of section 7 and 9 and recommend a future revision based on further research.

6. The **restriction of conventional stock (Art. 25 e.3)** must be continuously reviewed in the light of further technical development in the sector, particularly regarding species that are difficult to breed (e.g. Black Tiger Shrimp, flatfish, tuna, eel).

The Article 25e point 3 to be changed to: "The maximum percentage of non-organic aquaculture juveniles introduced to the farm shall be: ~~80% by 2011~~, 50% by 2013 and 0% by 2015. The availability of organic juveniles should be reviewed in 2011 and the maximum percentage of non-organic aquaculture juveniles permitted revised as appropriate."

7. The current draft requires a "once-off" seaweed biomass estimate at the outset of operation for **seaweed harvesting**. For sustainable management, however, a "yearly follow-up estimate" is also essential to ensure that there is no depletion.

The Article 6b point 6 to be changed to: *"For seaweed harvesting an initial biomass estimate must be followed up by an annual biomass estimate to ensure that there is no depletion.*

8. Copper sulfate (the anti-fouling agent most commonly used in conventional aquaculture, but prohibited by most organic certification programs) is still allowed until 2015. This appears inadequate and therefore we urge to ***delete "copper sulfate" from the lists in 2.1 and 2.3.***

Non aquaculture issues

We have previously expressed our concerns about putting non-aquaculture issues into the aquaculture implementing rules in our letter of may 12th, 2009. **We insist that non-aquaculture issues, which we found as being of high importance, should be discussed widely with stakeholders and should be voted separately:**

- a) issue mentioned in previous letter:
 - article 6e, 3.a) amending the 20% rule 889/21(2)
 - annex, 1 b: indoor area for pigs: amending Ann III of 889

- b) new issues introduced in the latest draft:
 - article 43: changing the headline: What consequences does this change have if there are any?
 - annex I, table: correction of the headline of the table is acceptable, but the change regarding farmyard manure, taking out the restriction for factory farming sources, is not comprehensible
 - annex I, line 11, change in the maximum concentration of chromium

Kind regards



Marco Schlüter
Director

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