

Initial reaction regards the implementing rules on organic aquaculture production of Regulation 834/2007

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This position paper should feed into the setting up of implementing rules on organic aquaculture. Representing the organic sector the IFOAM EU Group wants to contribute constructively to this process. Due to the tight timeline this position paper should be considered as first statement. Further positions will be handed in near future. While the implementing rules will cover many details of aquatic production systems, the group concentrated its efforts on those areas where it was considered that most discussion was needed in order to reach agreement. Additionally, the IFOAM EU Group recommends to make use of the IFOAM Basic Standards (IBS) as worldwide agreed organic standard of the private sector.

1 - Parallel production

Article 11 of EU834/2007 states: 'A holding may be split up into clearly separated units or aquaculture production sites which are not all managed under organic production. As regards animals, different species shall be involved. For aquaculture the same species may be involved'.

The IFOAM EU Group suggested that this 'parallel production' should be permitted for a period of three years from the start of conversion to enable stepwise conversion of a holding. The organic farm management unit must be demonstrably physically, financially and operationally separate. In open water aquaculture sites, production of organic and non-organic animals must not occur at the same location or registered aquaculture 'site'.

2 - Use of wild caught or domesticated broodstock.

The IFOAM EU Group recommend that wild caught broodstock could be used to begin or renew stocks provided that this is in line with national environmental legislation. By derogation, it was suggested that wild broodstock of aquaculture species for which the captive reproductive cycle was not fully closed should be permitted for a fixed time period to encourage the development of domesticated organic broodstock.

3 - Use of artificial lighting

With regard to the use of artificial lighting, the IFOAM Basic Standards (IBS) 5.1.5 states 'The maximum hours of artificial light used to prolong natural day length shall not exceed a maximum that respects the natural behaviour, geographical conditions and general health of the animals.'

It is also suggested that the use of artificial light should be limited to providing a maximum natural day length of 16 hours.

By derogation, the IFOAM EU Group is of the opinion that for the development of organic cod production, the use of longer periods of artificial light (up to 24 hours) should be permitted until 2015.

4 - Use of non-organic stock

Regarding Article 15.1.(a).(ii) the IFOAM EU Group referred to IBS 9.4.1 'If organic animals are not available, brought-in conventional animals shall spend not less than two thirds of their life span in the organic system'.

It is suggested that species-specific deadlines should be drawn up after which non-organic youngstock should not be permitted.

5 - Holding facilities

The IFOAM EU Group propose that holding systems must allow basic species-specific behaviour and require a high level of animal welfare to be demonstrated. The group considered that no holding systems should be ruled out, provided it could be demonstrated that they could satisfy organic principles.

Despite this, holding facilities that keep animals indoors for their whole lives or require high-energy use were not considered suitable. Recirculation systems were not considered to be acceptable for on-growing unless they could demonstrate satisfactory natural behaviour/welfare, minimal chemical use, minimal (or renewable) energy use, and the ability to manage the systems according to organic principles. In the experience of the IFOAM EU Group this was currently not possible for on-growing finfish, but recirculation systems can be acceptable for young-stock (i.e. hatcheries) or for invertebrates.

6 - Distances between organic and non-organic sites/farms

Requirements vary on the type of production system, for example ponds, or open-water net pens. 'Distances between organic and non-organic farms or production sites must be adequate to prevent any interaction'. Nevertheless, this would need to be more accurately defined in the regulation.

7 - All female stock

The group is of the opinion that the use of physical methods to select male or female specific stocks was acceptable. The artificial production of all female fish was not considered acceptable.

8 – Feeds

8-a Hatchery feeds

The IFOAM EU Group suggest that although these feeds represented a tiny fraction of the total lifetime feed ration, microalgae in certified hatcheries should be cultured organically. The use of *Artemia* is acceptable as a natural feed.

8-b General use of fishmeal and oil

The IFOAM EU Group recommends that the use of fishmeal and oil in feeds for organic aquatic animals should be permitted subject to specific criteria on the

sources and sustainability of those sources. The group agreed that aiming for zero fishmeal in feeds for omnivorous fish was appropriate (provided that the nutritional requirements of the animals could be met) but that 'aiming for' was not specific enough.

8-c Sources of fishmeal and oil - e.g. trimmings, by-catches, whole fish

The IFOAM EU Group agrees with the general use of fishmeal from trimmings wastes and from independently certified fisheries in organic feeds.

The IFOAM EU Group want to point out that in principle the ideal scenario is the use of trimmings fishmeal and oil from independently certified sustainable fisheries combined with whole-fish fishmeal and oil certified in the same way. The Group will discuss in due time how this could be achieved, what proportions should be trimmings or whole fish, how it should be stated in the implementing rules, or set a time limit by which it should be achieved.

8-d Definition of 'sustainability' for sources of fishmeal and oil

The IFOAM EU Group highlights that a reputable sustainable fishery certification scheme is essential to safeguard the reputation of organic aquaculture.

8-e Vegetable ingredient minimum or maximum inclusions.

The IFOAM EU Group agrees in principle that the nutritional requirements of the animals should be the top priority. The group recommends that any restrictions on fishmeal or vegetable ingredients inclusion levels should be species-specific.

8-f Pigment sources

The IFOAM EU Group is of the opinion that natural pigment sources are acceptable in organic feeds. A maximum limit of inclusion should be set, but requires further time to recommend the maximum level.

8-g Antioxidants

The implementing rules should only permit natural antioxidants in feeds and feed ingredients

9 - Stocking densities

The IFOAM EU Group recommends that welfare parameters should be species-specific. It needs to be discussed whether stocking densities were an appropriate parameter. In the absence of a suitable suite of welfare parameters for fish species it is likely that species-specific stocking densities will be the best compromise.

10 - Slaughter methods

The IFOAM EU Group will further discuss the issue and will come later with an opinion.

11 - Use of aquatic 'antifoulants'.

The IFOAM EU Group proposes that treatments whose mode of operation is toxicity to fouling aquatic organisms (such as copper) should not be permitted. Treatments which work in a physical or non-toxic manner are acceptable.

12 - Impacts of waste nutrients

The IFOAM EU Group needs more time to discuss the issue. However, methods to treat, or use nutrient wastes from aquaculture animals should be required where they are demonstrably possible, for example wetland or reed beds for pond systems. The impacts of waste nutrients on the farm areas biodiversity is also important.

13 - Transport

The IFOAM EU Group will further discuss the issue and will come later with an opinion.

14 - Predator deterrence

The IFOAM EU Group considered that there may be the exceptional need for harmful deterrence of predators if other non-harmful deterrents proved ineffective. It was proposed that this may be included in article 22.2.4 (exceptional production rules), but that the definition of 'exceptional' in this specific case should appear in the implementing rules.