

CODEX ALIMENTARIUS COMMISSION



**Food and Agriculture
Organization of
the United Nations**



**World Health
Organization**

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING

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**PROPOSED DRAFT REVISION OF THE GUIDELINES FOR THE PRODUCTION,
PROCESSING, LABELLING AND MARKETING OF ORGANICALLY
PRODUCED FOODS (GL 32-1999) - (TO INCLUDE AQUACULTURE
ANIMALS AND SEAWEED)**

COMMENTS AT STEP 3

COMMENTS FROM:

NORWAY

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We would like to give compliments to the European Union for preparing a proposed draft revision of *the guidelines for the production, processing, labelling and marketing of organically produced foods* to include aquaculture animals and seaweed.

We appreciate the opportunity to submit our comments to the proposal for consideration under agenda item 5c at the coming CCFL 2011:

General:

- It's important that this Codex work is limited to comprise organic aquaculture, and that the approach will not cover sustainable aquaculture in general.
- However, it is also important that the work of Codex take notice of the work being done by FAO regarding Guidelines for sustainable aquaculture (<http://www.fao.org/focus/e/fisheries/sustaq.htm>).

A) General changes in Foreword, Section 1 and section 2

- The term "agriculture/agricultural" is used in the Guidelines through the entire document. When it is used, it has to reflect if it is meant to include both terms agriculture and aquaculture, or either of them. This can probably be solved with a sentence in the foreword saying: "Agriculture, including aquaculture..." .
- Section 1.1. "With reference to aquaculture animals...": It should be clear that aquaculture animals also includes species as *Bivalve molluscs*, *Echinoderms*, *Tunicates*, *Marine gastropods* and *other species*.

B) Changes in Annex I

- More specific details are needed for production of different species, and should be further elaborated.
- Para 2 last sentence: The biodiversity of the aquatic environment and the quality of the surrounding water ~~should~~ **must** be maintained.
- Para 5: We are of the opinion that it should be possible to utilise cooling water from power plants or other industrial purposes for organic production. This concept also corresponds with the wording of para 6. Therefore we suggest Para 5 to be read as: Water ~~used~~ for aquaculture should be of a quality suitable for the production of food which is safe for human consumption. ~~and~~ **Waste water from domestic or industrial sources should not contain harmful substances.** ~~containing harmful substances not be used.~~
- Para 8, first sentence: We suggest another wording; It is preferable that **indigenous** ~~locally grown~~ species ~~are~~ **be** used for organic farming where possible.
- Para 9, first sentence: We would like to add "water flow" to the quality parameter which should be looked out for. We suggest the wording: "The farm should provide sufficient space for the animals needs and they should be provided with good quality water with sufficient **water flow and** oxygen and, in the case of filter feeding animals, other nutritional factors for their needs."
- Para 9, last sentence: Instead of "species" we suggest the word "organisms" to be used. The temperature and light conditions should be suitable for the **organism** ~~species~~ concerned in the particular geographic location of the farming operation.
- Para 11: We do not agree to this paragraph, as a closed system must by nature have a certain degree of recirculation, otherwise it is not a closed system and we would delete this sentence. ~~"Closed recirculation systems are prohibited except when used as hatcheries or nurseries or for production of species used as organic feed."~~
- Para 12: It is not clear what is meant by "reflect the natural system". No commercially economically viable hatcheries for fish can comply with this requirement, and should be deleted, or rephrased.
- Para 13: We should remember that some fish species occur naturally in flocks with a biomass density exceeding the normal regulated density in conventional fish farming operations. Therefore: The maximum stocking density **for fish** should **take into account the natural behaviour of the species raised** ~~be lower than that used in conventional farming~~ and competent authorities should develop guide values for maximum densities for the species grown under their authority.

- Para 13: Would recommend harmonising the production rules for the same species. Too large variation can cause great difference regarding quality for the same type of species worldwide, and could then give trading problems. We would therefore like this to be further elaborated.
- Para 14: This paragraph should be more specific as it can cause equivalent problems. See comments above to paragraph 13.
- Para 15: Generally this section also needs to be more elaborated, as for example nothing is mentioned regarding contamination through feeding, avoiding cannibalism, measures to prevent contamination, therefore we would also recommend this to be further elaborated.
- Para 15: In addition to ensure good welfare, this section should define the nutritional needs for the aquaculture animals. And it should not be mixed with the consumers demand in this section. If needed, this should be defined in the foreword. Therefore our suggestion for the third sentence is:
 - “Carnivorous fish should not be fed a totally plant based diet so as to ensure their physiological needs **and good welfare**, ~~and to ensure that consumers are not deprived of the essential fatty acids.~~”
- Para 17. This paragraph give reference to Annex 2, Table 2 is not attached to the document. We would therefore like this to be further elaborated.

Comments to Section B.2. Seaweeds

- Seaweeds might need a definition or we might need to define the scope of seaweeds.
- More details seems to be needed, and we would therefore like this section to be further elaborated.