

CODEX ALIMENTARIUS COMMISSION



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



**World Health
Organization**

E

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: codex@fao.org - www.codexalimentarius.net

AGENDA ITEM NO. 5(c)

CX/FL 11/39/10-ADD.2

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

Thirty-ninth Session

Quebec City, Canada, May 9 - 13, 2011

**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:

AUSTRALIA

AUSTRALIA

Australia welcomes the opportunity to provide comments regarding the proposal to include **aquatic** animals and seaweed in the *Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods* (GL 32-1999).

General Comments

Australia supports the inclusion of aquaculture requirements in the *Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods* (GL 32-1999). We note however that there are several areas that may be the subject of requirements under the World Organisation for Animal Health (OIE) *Aquatic Animal Health Code*. The OIE *Aquatic Animal Health Code* is a reference document for use by Competent Authorities, import/export services, epidemiologists and all those involved in international trade of aquatic animals and their products. Australia would propose that a reference to the OIE *Aquatic Animal Health Code* be included in the Forward.

Australia finds that some of the use of the terms aquatic and aquaculture may be used in the wrong context (this may be a translation issue in the English version) as we understand it aquatic animals are animals that come from aquaculture establishments or have been removed from the wild, for farming purposes, for release into the environment, for human consumption or for ornamental purposes. Therefore where appropriate we have made corrections to the use of the terms aquatic and or aquaculture.

Australia has provided specific changes to the text below with additional text in bold underline and deleted text with strikethrough.

Specific Comments - Foreword, Section 1 and Section 2

First dot point: Foreword, Paragraph 6, last phrase: Add “and aquatic” after “soil”.

Australia supports the proposed rewording as follows; “The primary goal of organic agriculture is to optimise the health and productivity of independent communities of soil **and aquatic** life, plants, animals and people”.

Second dot point: Section 1.1: Reference to aquaculture animals and seaweed to be added (note that not all seaweeds are plants), possibly through a footnote.

Comment: Australia supports the referencing of **aquatic** animals and seaweed in Section 1.1 Scope as either an inclusion under point a) where it could be added after the words ‘unprocessed plants and plant products’ point a) would read as follows:

- a) unprocessed plants and plant products, **aquatic animals and seaweed**, livestock and livestock products etc..

This could also include a footnote to indicate that “not all seaweeds are plants” but may require additional wording to clarify the statement.

Third dot point: Section 2.1 – Description: add a sentence at the end of the section: “The basis for organic husbandry of aquaculture animals is the harmonious relationship between water, seaweed and aquaculture animals and respect for their characteristic physiological and behavioural needs.”

Comment: Australia notes that the language proposed is the same as that contained in the sentence relating to livestock husbandry and can support the inclusion of reference to the aquatic environment. However we are not sure that it needs a separate sentence as the last sentence of this paragraph describes how to achieve the harmonious relationship. We would propose that the word “aquatic” be inserted before the word “livestock” in both the last 2 sentences. This part of the paragraph would read as follows:

“The basis for organic **aquatic and** livestock husbandry is the development of a harmonious relationship between land, plants, **water, seaweed, aquaculture animals** and livestock, and respect for their physiological and behavioural needs. ~~and livestock~~. This is achieved by a combination of providing good quality organically grown feedstuff, appropriate stocking rates, **aquatic and** livestock husbandry systems appropriate to behavioural needs, and animal management practices that minimise stress and seek to promote animal health and welfare, prevent disease and avoid the use of chemical allopathic veterinary drugs (including antibiotics).

Fourth dot point: Section 2.2 – Definitions: Australia considers that while the proposed definition is acceptable that it would be more appropriate to align the definition with the World Organisation for Animal Health (OIE) definition contained in the Aquatic Animal Health Code which reads as follows:

Aquaculture means the farming of aquatic animals with some sort of intervention in the rearing process to enhance production, such as regular stocking, feeding, protection from predators, etc

It may also be appropriate to include the OIE definition of aquatic animals which is as follows:

Aquatic animals means all life stages (including eggs and gametes) of fish, molluscs, crustaceans and amphibians originating from aquaculture establishments or removed from the wild, for farming purposes, for release into the environment, for human consumption or for ornamental purposes.

Specific Comments - Changes in Annex I; add a section B1: Aquaculture animals

Australia is of the view that the section title should read **Aquatic** Animals in line with our earlier comments.

Paragraph 1: *Comment/rationale* Australia considers that the statements relating to exploitation and nutritional benefits of fish do not have a place in these Guidelines therefore we propose the following amendments:

Aquaculture is an important activity that contributes to the **general** supply of fish and other seafood species **globally**, ~~in a world where fisheries are highly exploited. Seafood is beneficial for human health because it contains nutrients, particularly 'essential fatty acids' for which fish is an extremely important source, together with protein, trace elements, vitamins and minerals~~

Paragraph 2: In the first sentence “aquaculture animals” should read “**aquatic** animals”.

Paragraph 3: Aquaculture operators should **develop and implement** ~~maintain~~ an Organic Management Plan **to help manage** ~~guide~~ the **aquatic** operation. **This Organic Management Plan should document how monitoring is done to ensure there is minimal impact to the surrounding environment.** ~~of the farm and to keep the impact on the environment low and setting out monitoring to be done to ensure that that this aim is achieved each year.~~

Paragraph 7: Products of aquaculture animals can be sold as organically produced when these Guidelines have been complied with for at least one year. ~~In cases where the water can be drained and the facility cleaned and disinfected a shorter period of six months may apply. In the case of non-enclosed marine locations a period of three months may apply. During the conversion period the stock should not be subject to treatments or exposed to products which are not permitted for the production of organic foods.~~

Paragraph 10: Containment systems, including cages (net pens) should be designed, constructed, located and operated to minimize the risk of escapes, **prevent the entry of predatory species,** and **have no** ~~other~~ negative environmental impacts.

Paragraph 11: Closed recirculation systems are prohibited **unless the water re-entering the unit has been treated to remove all unwanted substances.** **Closed recirculation systems** ~~except when~~ **may be** used for ~~as~~ hatcheries or nurseries or for production of species used as organic feed.

Specific Comments - Changes in Annex I; add a section B2: Seaweeds

Paragraph 18: ~~Farmed Harvested seaweed and wild seaweed collected on the shore can be sold as organically produced when these Guidelines have been complied with. The criteria for siting and conversion of aquaculture animal units in these guidelines should be applied as appropriate to seaweed farming units.~~

Observation: It is not clear what aquatic animal a seaweed operation would base their conversion period on. Therefore Australia considers it is important that all aquatic operations have a 12-month conversion period.

Paragraph 19: Both farming and collection of seaweed should be carried out in areas with very good water quality which are not ~~directly~~ subject to contamination from human ~~or~~ industrial ~~or~~ geological sources. ~~The An Organic Management Plan to be used for farming of aquaculture animals should be developed and maintained~~ implemented by all organic seaweed producers.

Paragraph 21: Farming should be carried out in a sustainable manner at all stages from collection of juvenile seaweed to harvesting. Fertilization should be restricted to pond cultivation. Ropes and other equipment used for growing seaweed should be re-used or re-cycled where possible. Removal of bio-fouling organisms should ~~by preference~~ be by physical means.