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

Agenda Item 4

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

**Forty-Second Session
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**Organic Aquaculture
(Revision of the Guidelines for the Production, Processing, Labelling and Marketing
of Organically Produced Foods)**

COMMENTS FROM:

ARGENTINA
BRAZIL
COSTA RICA
KENYA
NICARAGUA

ARGENTINA

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Foreword:

Paragraph 4

The following wording is proposed to replace "farms" with "agricultural and aquatic production systems".

4. These guidelines set out the principles of organic production at ~~farm,~~ the agricultural and aquatic production system, preparation, storage, transport, labelling and marketing stages, and provides an indication of accepted permitted inputs for soil fertilizing and conditioning, ~~plant~~ pest and disease control and, food additives and processing aids. For labelling purposes, the use of terms inferring that organic production methods have been used are restricted to products derived from operators under the supervision of a certification body or authority.

Rationale: Aquaculture can be carried out at farms, in suspended cages or in natural environments, all of which are encompassed by the term "aquatic production systems". The current concept of "pest" is broader, and does not refer to plant pests exclusively.

Paragraph 6

We propose that "agriculture" be replaced with "production", with the resulting text reading as follows:

6. ..."Organic ~~agriculture~~-production practices cannot ensure that products are completely free of residues, due to general environmental pollution..."

Rationale: This allows for the inclusion of aquatic systems.

Paragraph 7

We propose that the wording be modified as follows:

7. Organic food production is a holistic production management system which promotes and enhances agro and aquatic ecosystem health, including biodiversity, and biological cycles, and ~~soil or water~~ increases biological activity within the production ecosystems. It emphasizes the use of management practices in preference to the ~~use~~ incorporation and use of inputs ~~farm~~ from outside of production-systems, taking into account that regional conditions require locally adapted systems. This is accomplished by using, where possible, cultural, biological and mechanical methods, as opposed to using synthetic substances, to fulfil any specific function within the system. An organic production system is designed to:

- a) enhance biological diversity within the whole system;*
- b) increase ~~soil or water~~ biological activity in the production ecosystems;*
- c) maintain long-term soil fertility or quality of the aquatic environment;*
- d) recycle wastes of plant and animal origin in order to return nutrients to the land, thus minimizing the use of non-renewable resources;*
- e) rely on renewable resources in locally organized ~~agricultural~~-food production systems;*
- f) promote the healthy use of soil, water and air as well as minimize all forms of pollution thereto that may result from food production practices;*
- g) handle ~~food~~-~~agricultural~~ products with emphasis on careful processing methods in order to maintain the organic integrity and intrinsic-~~vital~~ qualities of the product at all stages;*
- h) preserve natural aquatic resources;*
- i) maintain the marine or freshwater environment in the case of aquaculture by keeping the impact on the environment low;*
- j) become established on any existing production system-~~farm~~ through a period of conversion, the appropriate length of which is determined by site-specific factors such as the history of the actual specific land or aquatic medium, ~~land and the~~ and type of crops, and livestock, or aquatic organism to be produced.*

Note: The crossed out words "concreto la tierra y del" seem to appear only in the Spanish version, and not the English version.

Rationale: The purpose of the modifications is to use the term "production system" to refer to terrestrial and aquatic systems, and to use the term "food system" to refer to those foods that have the ability to feed.

Section 1. Scope

The following wording is proposed:

1.1 These guidelines apply to the following products which carry, or are intended to carry, descriptive labelling referring to organic production methods:

a) unprocessed plants and plant products, algae and their products, livestock and livestock products and aquaculture animals and ~~their-aquaculture-animal~~ products to the extent that the principles of production and specific inspection rules for them are introduced in Annexes 1 and 3;

Rationale: To simplify the wording.

Section 2. Description and definitions

The following wording is proposed:

2.1. Description:

Foods should only refer to organic production methods if they come from an organic production system employing management practices which seek to nurture ecosystems which achieve sustainable productivity, and provide weed, pest and disease control through a diverse mix of mutually dependent life forms, recycling plant and animal residues, crop selection and rotation, water handling and management, tillage and cultivation."

Rationale: Water handling is one of the management practices.

2.2 Definitions

"Algae"

It is proposed that the definition of algae be replaced with the following definition:

Algae: Plants in the unicellular or multicellular thallophyte group that prefer to live in a freshwater or saltwater aquatic medium and that generally contain chlorophyll, which is sometimes masked by other multi colored pigments. The multicellular thallus takes the form of a filament, a tape that may have branches.

Rationale: This definition is comprehensive, because it includes both microalgae and macroalgae living in freshwater and saltwater, without specifying any particular type of algae.

2.2 Definitions

"Agricultural product/product of agricultural origin"

It is proposed that this definition be deleted

~~*Agricultural product/product of agricultural origin means any product or commodity, raw or processed, that is marketed for human consumption (excluding water, salt and additives) or animal feed.*~~

Rationale: It overlaps with the definition of "Food product/product of agricultural or aquatic origin".

"Aquaculture"

We propose that the following terms be added to the proposed definition:

***Aquaculture** means the farming of aquatic organisms in continental or maritime areas involving intervention in the rearing process to enhance production and the individual or corporate ownership of the stock being cultivated.*

Rationale: Completes the definition, clarifying the environment in which the activity can be developed.

"Production cycle"

The following wording is proposed:

(Aquaculture) production cycle means the lifespan of aquaculture ~~animal or seaweed~~ aquatic organisms, from the earliest life stage to harvesting.

Rationale: By including "aquatic organisms", the definition refers to those organisms that are included within the scope of the guidelines.

"Aquatic organisms"

It is proposed that "Aquatic organisms" be included as a definition and that its scope be expanded to include fish, reptiles, amphibians, crustaceans, shellfish, algae and aquatic plants, along with zooplankton and other organisms used to feed animals.

"Aquatic organisms" include fish, reptiles, amphibians, crustaceans, shellfish, algae, aquatic plants and other aquatic organisms whose partial or full life cycle is directly related to water, originating from wild harvesting or farming. Aquatic organisms used to feed animals are also included.

Rationale: These concepts are important enough that they should be defined in detail rather than as part of a footer. The inclusion of the aforementioned organisms allows for the generation of food products from a wider range of organisms. This broader definition not only allows for existing conventional production units to become organic, but it also opens the door to new investments used for farming such organisms in order to create a wider range of organic aquaculture products for consumers.

The use of aquatic systems to meet global human food demands is constantly increasing. Due to factors such as the shortage of farmland in certain areas and soil degradation, aquatic systems have become more important in terms of obtaining food.

World Bank Report No. 83177-GLB, entitled "Fish to 2030: Prospects for Fisheries and Aquaculture", states that global population is expected to reach 9 billion by 2050, and the world agriculture and food-producing sector must secure food and nutrition for the growing population through increased production and reduced waste. It also analyzes the evolution of fisheries and aquaculture, indicating that global capture fisheries production has increased from 63 million to 93 million tons (47%) in recent decades, while aquaculture production has increased from 5 to 65 million tons (1,300%) over the same period. In this scenario, aquaculture has undertaken an important role as a food source, and this trend is expected to continue in light of the environmental pollution problems that limit fishing.

With respect to the global food demand over the medium term, the inclusion of more organisms in the Codex guidelines as a source of food generation is considered necessary and expedient.

"Clean water"

We propose that a reference to "aquatic organisms" be included, and that the wording be changed as follows:

["Clean water" means water from any source where harmful microbiological contamination that does not create additional biological and/or chemical pollution, ~~substances and/or toxic plankton are not present~~ in such quantities that may affect the safety of fish, shellfish aquatic organisms and their products intended for human consumption or animal feed]

Rationale: Use broader terms when referring to sources of pollution. It also states that it is intended for animal consumption, in accordance with the amended section 1.1.b) of Section 1. Scope.

"Closed recirculation system"

The inclusion of a definition of such a system is considered necessary in order to avoid confusing it with a confinement system.

Option 2 is supported, with the following modifications:

[Option 2: Closed recirculation system means ~~a type of an~~ enclosed unit (on land or in a vessel) containment system, with very limited and managed barrier-connection to open waters, with recirculation depending on ~~permanent~~ external energy input, preferably from renewable sources, to pump/circulate the water, ~~and a system to treat the effluent water to enable its reuse~~. These systems include treatment of water for recirculation and composting of effluents to be used for other purposes.]

Rationale: It is important to clarify the specific type of treatment that the water in recirculation systems must be subjected to, and therefore, we propose that these concepts be described in a definition that is distinct from the definition of a "containment system". Furthermore, these systems would allow us to use less water than an open system, which is consistent with the principles of organic production, and would facilitate the involvement of more operators to manage organic systems. The last sentence of the paragraph specifies that recirculated water should be subjected to one treatment and effluent should be subjected to a different treatment.

"Containment system"

The following wording is proposed

Containment system means ~~equipment for growing aquaculture animals or algae~~ facilities for growing aquatic organisms that minimizes the risk of dispersal of the aquatic organism concerned such organisms; – examples are, cages (net pens), ponds and tanks, ~~long-lines fishing lines~~ and rafts holding suspended ropes with the organisms attached and net bags for ~~shellfish bivalve organisms~~.

Rationale: The term "facilities" is more appropriate than "equipment". Fishing lines are part of fishing gear, as opposed to breeding equipment.

"Food product/product of agricultural or aquatic origin"

The following wording is proposed:

"Food product/product of agricultural or aquatic origin means any product or commodity, raw or processed, that is marketed for human consumption (excluding water, and salt ~~and additives~~) or animal feed."

Rationale: The suggested modification allows for clarification that, for the purposes of food, a "food product" is not synonymous with a "product of agricultural or aquatic origin", which may refer to a textile fibre (wool, jute). In addition, "and additives" is removed in order to make the definition consistent with the provisions stated in paragraph 3.6 b) of Section 3. Labelling.

"Veterinary drug"

The following wording is proposed:

"Veterinary drug" means any substance applied or administered to any food-producing animal, such as meat or milk-producing animals, poultry, ~~fish~~ aquatic organisms or bees, whether used for therapeutic, prophylactic or diagnostic purposes or for modification of physiological functions or behavior.

Rationale: In order to be consistent with the scope.

Section 3. Labelling

Paragraph 3.6

The inclusion of the word "between" is proposed in order to clarify the wording:

"...in particular for products containing between 95% and 70% of organic ingredients"

Section 5. Requirements for inclusion of substances in Annex 2 and criteria for the development of lists of substances by countries

5.1 d We propose that the following be included at the end of the first sentence:

"...d) if they are used for the purpose of cleaning and disinfection of ponds, cages, buildings and installations used for aquaculture production, provided that:

- *they are essential for the control of a harmful organism or a particular disease for which other biological, physical or breeding alternatives and/or effective management practices are not available; and*
- *their use takes into account the potential harmful impact on the environment, the ecology (in particular non-target organisms), aquatic organisms and the health of consumers; and*
- ~~substances are of plant, animal, microbial, or mineral origin and may undergo the following processes: physical (e.g. mechanical, thermal), enzymatic, microbial (e.g. composting, digestion);~~
- *their use can be restricted to specific conditions, specific regions or specific commodities."*

Rationale: It is understood that the fourth item only applies to substances that are used for cleaning and disinfection.

Section 6. Inspection and certification systems

It is proposed that the wording be enhanced as follows:

"6.8 During registration of the aquaculture unit or algae collection unit by the ~~accredited certifying control/certification~~ agency, the producer must present an organic management plan to the ~~accredited certifying~~ agency for verification during the inspection. The plan must be updated annually."

Annex 1. Principles of Organic Production

A1 Plants and Plant Products

A2 ~~Algae and Their Products~~

We propose that the title be modified as follows:

A2 Algae, aquatic plants and their products

Rationale: Argentina proposes that, in addition to algae and their products (nonvascular plants), vascular plants that grow in aquatic environments should also be included, so that such plants that are or may be of interest for human or animal consumption in the future are also included.

It is important to understand that every reference to "algae and their products" throughout the document should be replaced by "algae, aquatic plants and their products".

Paragraph 2

2. Harvested algae, aquatic plants and their products can be sold as organic products ~~algae~~ when these Guidelines have been complied with. The criteria for site selection of aquaculture animal units in Section ~~B2 B2~~, paragraph 4 of these guidelines should be applied as appropriate to production units for algae and aquatic plants. ~~The criteria for conversion of plant and plant products in these guidelines (Annex I.A, 1-4) should be applied as appropriate to algae production units. If a competent authority agrees to a conversion period shorter than 12 months, it should be at least the length of a production cycle.~~

We suggest that the third sentence of the paragraph regarding the conversion period be replaced with the following text:

"The following criteria for conversion should be applied to algae and aquatic plant production units:

- a) for collection systems: 6 months
- b) for farming systems: 6 months or a full production cycle, whichever is longer."

Rationale: The conversion periods relating to plants and plant products contained in Annex I, A 1, Paragraphs 1 to 4 are excessive for the production of algae and aquatic plants (two years is mentioned there), as in the case of brown algae (*Undaria* sp.), whose maximum biomass is obtained at 5.5 months (for the 1st generation) and at 3.5 months (for the 3rd generation and subsequent generations). After those periods, there is a stagnation of sizes and a decrease in weight or a loss of biomass. These periods indicate the production cycles.

On the other hand, it is understood that a period of 6 months is enough for the operators to understand the principles of organic production and implement the practices and procedures required for such production systems.

Paragraph 3

Paragraph B2 6 makes no reference to aquaculture farming and collection areas, and therefore, we propose that it be removed.

3. ~~Both farming and collection of algae should be carried out in areas which meet the criteria of paragraph 4 and 6 of Section B2. An...~~

Paragraphs 3 to 7

Any reference to "algae" should be read as "algae and aquatic plants".

Paragraph 4

The following wording is proposed:

4. The collection of edible seaweed and aquatic plants and/or their parts growing naturally in the sea an aquatic environment is considered an organic production method provided that the four conditions of Annex 1.A. Paragraph 9 are met.

Rationale: The amendment is consistent with the proposed scope (ANNEX I, A2 Algae, Aquatic Plants and Their Products).

Paragraph 7

The following wording is proposed:

7. The operator should maintain detailed and up-to-date records, as set out in Annex 3, paragraphs 7-15, where the terms livestock should be taken to read algae and aquatic plants.

B2 AQUACULTURE ANIMALS AND THEIR PRODUCTS

General principles

Paragraph 3

The following wording is proposed:

3. Aquaculture operators must maintain on an organic management plan an ongoing basis in order to guide the operation of the production unit. This should be developed and implemented and subjected to an annual update by all producers in order to guide the operation of the production unit, keeping the impact on the environment low and setting out a monitoring programme to ensure that this aim is achieved each year. The plan ~~should~~must cover effluent and nutrient discharge, if applicable, and the repair and surveillance of equipment and facilities~~technical equipment~~. The Organic Management Plan ~~should~~must document how monitoring is carried out in order to ensure that there is minimal impact on the surrounding environment. The organic management plan ~~may~~must also include a water quality monitoring scheme for early detection of potential contaminants~~from unlikely events such as an oil spill~~ or other potential contamination of the harvesting and/or farming area.

Rationale: We believe that the requirement for water quality monitoring should be mandatory.

Paragraph 4

The last sentence of the paragraph should read as follows:

"The boundaries of the production unit ~~should~~must be clearly defined and marked appropriately."

Rationale: We believe that this condition should be mandatory.

Paragraph 5

The following wording is proposed:

5. The conditions listed for the ~~growing~~production ecosystem water quality in Section 6.1.2 of the Codex Code of practice for fish and fishery products should apply.

Rationale: Water is the medium in which the farming takes place, not the object of the growth.

Paragraph 6

We propose that (fish and shellfish) be deleted, because Argentina proposes to extend the scope of aquaculture animals.

"Substances permitted for use as fertilizers and conditioners in the cultivation of ~~aquaculture animals (fish and shellfish)~~aquatic organisms are listed in Annex 2, Table 1."

Conversion period for operations

Paragraph 8

The following wording is proposed:

8. The conversion period should generally be at least one production cycle for the affected aquatic species. ~~In cases where the water has been drained and the facility cleaned and disinfected with permitted cleaning materials a conversion period is not required. In the case of non-enclosed aquatic locations a shorter period of three months may apply provided that cages (not pens) have not been treated with prohibited antifoulants and there are no other sources of exposure to prohibited substances.~~ During the conversion period, the stock should not be subject to treatments or exposed to products that are not permitted in these organic guidelines~~for the production of organic foods~~.

Rationale: We consider that there must be a conversion period that allows the operator to develop knowledge related to the organic management and understand the principles of organic production in order to apply them correctly.

Origin of stock

Paragraph 9

We propose that the sentences pertaining to the subject of Reproduction be separated from this paragraph and included in a new Paragraph 10 BIS.

~~9. Breeds Organisms adapted to local conditions shall be chosen. Selection criteria should include their vitality performance in the environment and resistance to pests and diseases. Following the conversion period, if organic aquaculture animals are not available, juvenile non-organic aquaculture stock may be introduced for on-growing in the farm in the production unit, provided that the stock is healthy and the latter two-thirds of their production cycle or 90% of their final biomass is under organic management, and providing the stock is healthy. Breeding stock should come from organic production units, where the parent stock have been under organic management for at least three months prior to breeding. For crustaceans, in cases where organic breeding stock is not available, wild caught parent stock may be used, provided that they are kept under organic management before breeding.~~

Paragraph 10

We propose that the sentences pertaining to the subject of Reproduction be separated from this paragraph and included in a new Paragraph 10 BIS.

~~10. [When organic juveniles are not available, the Competent Authority may prescribe a time limit and percentage of non-organic juveniles [including wild sources] for use in according to the organic production of the species. For bivalve shellfish, juveniles may be wild-harvested from outside of the production area, provided that such harvesting is permitted by the competent authority, and records are kept to allow it be tracked for their traceability back to the origin of the seed in the collection area. For species that cannot spawn naturally in captivity spawning may be induced using exogenous releasing hormones only if other methods are not available. Brood stock treated with releasing hormone shall lose organic status when slaughtered, the offspring will be organic if they have been raised according to this guideline. Genetically modified organisms (GMOs) and stock treated using hormones must not be used.~~

Paragraph 10 BIS Reproduction

The new paragraph contains modified information from Paragraphs 9 and 10.

Breeding stock should come from organic production units. In cases where organic breeding stock is not available, wild-caught parent stock may be used, provided that it is kept under organic management for a period of 3 months before breeding.

For species that cannot spawn naturally in captivity, spawning may be introduced induced using exogenous releasing hormones, only if other methods are not available. Brood stock treated with releasing hormones shall lose organic status when slaughtered, the offspring will be organic if they have been raised in accordance with this guideline.

Breeding of single-sex strains is permitted, provided that the selection is carried out mechanically or manually.

Artificial hybridization is permitted as a reproductive practice.

Rationale:

It is understood that the three-month period allows for a "purification" of the organisms, because they are in an organic environment, and therefore, their spawning can be considered organic after this period.

It is also understood that artificial hybridization and breeding of single-sex strains should be allowed.

Mono-sex culture is a common practice for those species that have a higher productive performance by sex (e.g.: trout), and it is a necessary practice for those species that have an early sexual maturity (e.g.: tilapia) and that create an overpopulation in the culture areas, thus making it difficult to reach a suitable size for commercial purposes. As a result, single-sex selection and hybridization are required.

Production rules for husbandry and breeding

Paragraph 11

We propose that "should" be replaced with "must", with the resulting text reading as follows:

11. The production unit ~~should~~must provide sufficient space for the animals' needs in terms of stocking density. Aquatic animals ~~should~~must be provided with [clean water] with a flow rate and temperature which meets to the physiological requirements of the species with sufficient oxygen and, in the case of filter feeding animals, other nutritional factors for their needs. The temperature and light conditions ~~should~~must be suitable for the species in the geographic region concerned. ~~in the particular geographic location of the production unit~~. When netting is used, it should be kept clean by physical means.

Rationale: It is understood that these actions are mandatory.

Paragraph 12

We agree with the inclusion of the text in brackets. The following wording is proposed:

12. Maximum ~~stocking~~ density of the species to be bred should be reflective of the natural behavior of the species and in keeping with good welfare [and in general, be lower than that used in conventional breeding].

Paragraph 14

We agree with OPTION 2 for Recirculation systems.

[OPTION 2: The Competent Authority should decide whether or not to approve closed recirculation systems after a thorough examination and evaluation of the total environmental viability and compatibility with organic production]

Rationale: This falls within the jurisdiction of the competent authorities.

Paragraph 15

We propose that the wording be enhanced as follows:

15. Breeding should reflect the natural situation as closely as possible, in terms of ambient conditions, using appropriate ~~strains for the type of farming organisms for the production system~~. Manual sorting or selection, manual collection ~~stripping~~ of gametes and artificial incubation of eggs ~~is~~are allowed. Artificial polyploidy, ~~cloning, [artificial hybridization and use of single sex strains~~ and cloning are prohibited.

Rationale: It is understood that both practices (artificial hybridization and use of single-sex strains) should be allowed, so they are deleted from the phrase referring to what is prohibited. The rationale for allowing these practices is detailed in the proposed Paragraph 10 BIS.

Nutrition

Paragraph 16

The following wording is proposed:

"...b) The feedstuffs should meet the animal's nutritional requirements at the various stages of its development with organic ~~or natural~~ feeds;..."

Rationale: The term "natural feeds" is not defined in the Codex Alimentarius, and therefore, its use in this sentence would be confusing.

Paragraph 16

Regarding feeds for carnivorous aquaculture animals

We suggest that item a) a1) be replaced by the following wording:

~~"...a) a1) organic feed products of aquaculture origin...."~~

"...a) a1) organic aquaculture products used to produce animal feed...."

Paragraph 21

Health and welfare

We propose that the phrase pertaining to the use of hormones be completed as follows:

21. Hormonal treatment should not be used for production and/or growth.

ANNEX 2

Table 1B

Substances and organisms used as fertilizers and conditioners of aquaculture ponds in farming enclosures for aquatic organisms

Substance	Description; compositional requirements; conditions of use
1.5 Bacteria, molds, and enzymes	If substances are not from organic sources, they must be recognized by a certification body or competent authority.
<u>1.5 Bioremediation organisms</u>	

Rationale: The word "organisms" is added to the title because the table includes organisms (bacteria, molds). We propose that "~~1.5. Bacteria, molds and enzymes~~" be replaced by "1.5. Bioremediation organisms". The term is broad, and includes microorganisms, fungi and plants or enzymes derived from them, which are used to clean polluted environments and return them to their natural condition.

ANNEX 3

A. PRODUCTION UNITS

Paragraph 3

The following wording is proposed for the paragraph:

"Production according to these guidelines should take place in a unit where the land parcels, production areas, farm buildings and storage facilities for crop, livestock and aquaculture ~~and algae~~ sites are clearly separate from those of any other unit which does not produce according to these guidelines; preparation and/or packaging workshops..."

Rationale: It is understood that "aquaculture sites" is a broad term that includes the sites used for algae production.

Paragraph 4

We suggest that "and algae" be removed, because it is included in aquaculture.

The following wording is proposed for this paragraph:

"4. a) a full description of the unit and/or collection areas, showing the storage and production premises, and land parcels, aquaculture ~~and algae~~ sites and, where applicable, premises where certain preparation and/or packaging operations take place;..."

Rationale: It is understood that "aquaculture sites" is a broad term that includes the sites used for algae production.

Paragraph 7 BIS

We propose that a new Paragraph 7 BIS be created that refers to the identification of aquatic plants and algae by lots, along with their records.

The following wording is proposed:

7. BIS Every lot of aquatic plants and algae for collection and/or farming purposes must be identified by lot. Written records and/or documentation must be kept in order to keep track of aquatic plants and algae within the system at all times and to enable adequate tracking for auditing purposes.

Rationale: Identification and records are required in order to control the organic production of aquatic plants and algae.

Paragraph 12

We propose that "aquatic plants" be added, with the resulting text reading as follows:

"Where an operator runs several production units in the same area (parallel cropping), units in the area producing crop, crop products or aquatic plants and algae and their products not covered by Section 1 should also be subject to the inspection arrangements...."

Rationale: This allows for the inclusion of aquatic plants, in accordance with the scope proposed for these guidelines.

BRAZIL

(i) General Comments:

Brazil supports the revision of the Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods to include aquaculture and seaweed.

Although Brazil supports the intention to develop lists for substances allowed in organic aquaculture, we understand that the inclusion of these substances should follow the structured process for review of the Guidelines established by CCFL. This approach would guarantee an adequate assessment of these substances in relation to the general criteria outlined in Section 5 of the Guidelines.

(ii) Specific Comments:

Foreword:

5. ... Organic production systems are based on specific and precise standards of production which aim at achieving optimal ~~agro and aquatic~~ ecosystems which are socially, ecologically and economically sustainable.

7. Organic food production is a holistic production management system which promotes and enhances ~~agro and aquatic~~ ecosystem health, including biodiversity, biological cycles, and soil or water biological activity.

Rationale: We suggest deleting the terms 'agro and aquatic' because they do not include the livestock ecosystems.

Section 1. Scope:

1.1 These guidelines apply to the following products which carry, or are intended to carry, descriptive labelling referring to organic production methods:

a) unprocessed plants and plant products, algae and ~~their~~ **algae** products, livestock and livestock products, and aquaculture animal and aquaculture animal products to the extent that the principles of production and specific inspection rules for them are introduced in Annexes 1 and 3; and

Rationale: The amendment aims to maintain the text consistency.

Section 2. Description and Definitions:

2.2 Definitions

~~(Aquaculture) production cycle means the lifespan of an aquaculture animal or seaweed from the earliest life stage to harvesting.~~

Rationale: Brazil understands that it is not necessary to define production cycle.

~~**[Option1: Closed recirculation system means a type of containment system, with very limited and managed barrier-connection to open waters, and a system to treat the effluent water to enable its reuse.]**~~

~~**[Option2: Closed recirculation system means a type of enclosed unit (on land or a vessel) containment system, with very limited and managed barrier-connection to open waters, with recirculation depending on permanent external energy input to pump/circulate the water, and a system to treat the effluent water to enable its reuse.]**~~

Rationale: Brazil suggests the adoption of Option 1 because it would be closer to the definition from the FAO Glossary of Aquaculture for recirculation system.

Section 5. Requirements for inclusion of substances in Annex 2 and criteria for the development of lists of substances by countries

~~5.2 ... [If these substances mentioned above are not available from such methods and technologies in sufficient quantities, then those substances that have been chemically synthesized may be considered for inclusion in exceptional circumstances.]~~

Rationale: Brazil does not support the inclusion of this section. It is not consistent with principles of organic production. This proposal would apply to all types of substances mentioned in section 5 and the exceptional circumstances are not clearly defined. Besides, this amendment is outside the scope of the inclusion of aquaculture in the Guidelines.

Section 6. Inspection and certification systems

6.8 ~~During registration of the aquaculture unit or algae collection unit by the accredited certifying agency, the organic producer has to present an organic management plan to the official and/or officially recognized certification bodies or authority accredited certifying agency, for verification during the inspection. The plan is required to be updated annually.~~

Rationale: Brazil understands that this requirement should be applied not only to organic aquaculture production, but to all forms of organic production. This requirement should be placed in Annex 3.

B.2 Aquaculture animals and their products

Origin of stock

9. Breeds adapted to local conditions shall be chosen. ~~selection~~ Selection criteria should include their vitality and resistance to pests and diseases...

Rationale: The word selection is repeated and should be deleted.

~~14. [OPTION1: Closed recirculation systems are prohibited except when used as hatcheries or nurseries or for production of species used as organic feed on account of the fact that such systems depend on external energy inputs and are high in energy consumption. As they have some positive features, such as reduction of waste discharges and prevention of escapes, this prohibition may be reviewed at a future date [alternative: in five years], as greater knowledge becomes available on their environmental viability and compatibility with organic production.]~~

{OPTION2: The Competent Authority should decide whether or not to approve closed recirculation systems after a thorough examination and evaluation of the total environmental viability and compatibility with organic production}

Rationale: Brazil understands that the use of recirculation systems in organic production should not be explicitly prohibited. This type of systems has positive features that could be compatible with the principles of organic production in certain conditions. Thus, Brazil suggests adopting Option 2.

Health and welfare

20. ...

~~Alternative natural and homeopathic treatments should be used in preference to chemical veterinary drugs or antibiotics provided that their therapeutic effect is effective for the species of animal and the condition for which the treatment is intended. Phytotherapeutic (excluding antibiotics), homeopathic or ayurvedic products and trace elements shall be used in preference to chemical allopathic veterinary drugs or antibiotics, provided that their therapeutic effect is effective for the species of animal and the condition for which the treatment is intended...~~

Rationale: Brazil suggests this amendment to leave the text in accordance with the existing principle in paragraph 22.b, section B.1, Annex 1.

COSTA RICA

Costa Rica wishes to ratify its support for the Proposed Draft Standards and related texts in Steps 8 and 5/8 of the Procedure for the following documents:

- Draft Amendments to the Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997) concerning the non-addition of sodium (Para. 41 and Appendix II).
- Proposed Draft Amendment to the Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods: Use of Ethylene as Sprouting Inhibitor for Onions and Potatoes (Para. 69 and Appendix IV).

Other amendments

- Consequential Editorial Amendments to the Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997) concerning clarifying Section 6.3 on Comparative Claims (Para. 45 and Appendix III, Part B).
- Amendments to the Guidelines on Nutrition Labelling (CAC/GL 2-1985) concerning definitions and replacing the existing annex with the new Annex: General Principles for Establishing Nutrient Reference Values for the General Population (Para. 59 and Appendix III, Part A).

KENYA**Preface****Comment:**

An organic production system is designed to:

7. i) maintain the marine or freshwater environment in the case of aquaculture **by ensuring low impact on the environment** ~~keeping impact on the environment low;~~

Section 2: Description and definitions.**Comment:**

Kenya have noted that clause 2.1 for '**Description and definitions**' is too wordy and confusing so we proposes to **bulleted clause 2.1** for ease of understanding and flow, as indicated below.

2.1 Description

- **Foods should** only refer to organic production methods if they come from an organic farm production system employing management practices which seek to nurture ecosystems which achieve sustainable productivity, and provide weed, pest and disease control through a diverse mix of mutually dependent life forms, recycling plant and animal residues, crop selection and rotation, water management, tillage and cultivation.
- **Soil fertility** is maintained and enhanced by a system which optimizes soil biological activity and the physical and mineral nature of the soil as the means to provide a balanced nutrient supply for plant and animal life as well as to conserve soil resources. Production should be sustainable with the recycling of plant nutrients as an essential part of the fertilizing strategy.
- **Pest and disease** management is attained by means of the encouragement of a balanced host/predator relationship, augmentation of beneficial insect populations, biological and cultural control and mechanical removal of pests and affected plant parts.
- **The basis for organic livestock husbandry** of terrestrial or aquatic animals is the development of a harmonious relationship between land, plants and livestock their environment, flora and fauna, and respect for their characteristic physiological and behavioral needs of livestock. This is achieved by a combination of providing good quality organically grown feedstuffs, appropriate stocking rates, livestock animal husbandry systems appropriate to behavioral needs, and animal management practices that minimize stress and seek to promote animal health and welfare, prevent disease and avoid the use of chemical allopathic veterinary drugs (including antibiotics).

Definitions

- For the purpose of these guidelines:

Kenya would like to delete the last part of the statement below as follows:

Comment:

[Aquaculture means the farming of aquatic organisms involving intervention in the rearing process to enhance production. ~~and the individual or corporate ownership of the stock being cultivated.]~~

Justification:

The process of rearing is being done by individual or the corporate therefore it will be a repetition to include the last part of the definition.

~~**[Clean water** means water from any source where harmful microbiological contamination, substances and/or toxic plankton are not present in such quantities that may affect the safety of fish, shellfish and their products intended for human consumption]~~

Comment on definition of 'clean water':

Kenya accept the definition of 'clean water' as mentioned above and propose to remove the open and close square brackets because in the event the clean water contains substances, the substances are so defined in the annex 2 to the guideline

~~**[Option1: Closed recirculation system means a type of containment system, with very limited and managed barrier connection to open waters, and a system to treat the effluent water to enable its reuse.]**~~

{Option2: Closed recirculation system -means a type of enclosed unit (on land or a vessel) containment system, with very limited and managed barrier-connection to open waters, with recirculation depending on permanent external energy input to pump/circulate the water, and a system to treat the effluent water to enable its reuse.}-

Comment:

Kenya accepts the option 2 and proposes to remove the open and close square brackets because it is more informative.

Section 5. Requirements for inclusion of substances in annex 2 and criteria for the development of lists of substances by countries

5.2 Countries should develop or adopt a list of substances that meet the criteria outlined in Section

5.1. If these substances mentioned above are not available from such methods and technologies **sufficient quantities**, then those substances that have been chemically synthesized may be considered for inclusion in exceptional circumstances.

Comment:

Kenya proposes that the word 'sufficient quantities' is ambiguous and opens a window for misuse and subject to abuse.

B2. AQUACULTURE ANIMALS AND THEIR PRODUCTS

Origin of stock

9. Breeds adapted to local conditions shall be chosen. ~~selection~~-(repetition)Selection criteria should include their vitality and resistance to pests and diseases.

Comment on 'Origin of stock' :

We propose to delete the word 'selection' from the second sentence mentioned above under clause 9 'origin of stock' to avoid repetition.

Comment on clause 10 below

Kenya proposes we remove both open and close brackets and delete, ~~[including wild sources,]~~

10.{ When organic juveniles are not available, the Competent Authority may prescribe a time limit and percentage of non-organic juveniles, ~~[including wild sources,]~~ for use according to the production of the species. For bivalve shellfish, juveniles may be wild-harvested from outside of the production area, provided such harvesting is permitted by the competent authority, and records are kept to allow it be tracked back to the collection area. For species that cannot spawn naturally in captivity spawning may be induced using exogenous releasing hormones only if other methods are not available. Brood stock treated with releasing hormone shall lose organic status when slaughtered; the offspring will be organic if they have been raised according to this guideline. Genetically modified organisms (GMOs) and stock treated using hormones must not be used.}

~~14. [OPTION1: Closed recirculation systems are prohibited except when used as hatcheries or nurseries or for production of species used as organic feed on account of the fact that such systems depend on external energy inputs and are high in energy consumption. As they have some positive features, such as reduction of waste discharges and prevention of escapes, this prohibition may be reviewed at a future date [alternative: in five years], as greater knowledge becomes available on their environmental viability and compatibility with organic production.]~~

{OPTION2: The Competent Authority should decide whether or not to approve closed recirculation systems after a thorough examination and evaluation of the total environmental viability and compatibility with organic production}

Comment:

Kenya proposes 'option 2' mentioned above .The competent authority will make a decision based on local condition

15. Breeding should reflect the natural situation as closely as possible, in terms of ambient conditions, using appropriate strains for the type of farming. Manual sorting or selection, manual stripping of gametes and artificial incubation of eggs is allowed. Artificial polyploidy, cloning, **{artificial hybridization and use of single sex strains are prohibited}**.

Comment:

Kenya accepts the last sentence '{artificial hybridization and use of single sex strains are prohibited}'. And agrees to remove the open and closed square brackets.

16. Nutrition Feeding

Kenya proposes that the heading of clause 16 to be changed from 'nutrition' to 'feeding', then open square brackets and delete para 18 of this sub-section since this para 18 negates the guidelines of organic production.

~~Para 18 states: 18. Notwithstanding the above, where an operator can demonstrate to the satisfaction of the official or officially recognized inspection/certification body that feedstuffs satisfying the requirement outlined in paragraph 16 above are not available, as a result of, for example, unforeseen severe natural or man-made events or extreme weather conditions, the inspection/certification body may allow a restricted percentage of feedstuffs not produced according to these guidelines to be fed for a limited time, providing it does not contain genetically engineered/modified organisms or products thereof. The competent authority shall set both the maximum percentage of non organic feed allowed and any conditions relating to this derogation.~~

NICARAGUA

Name of the Draft or Proposed Draft: PROPOSED DRAFT GUIDELINES FOR THE PRODUCTION, PROCESSING, LABELLING AND MARKETING OF ORGANICALLY PRODUCED FOODS.
CAC/GL 32-1999

- 1.- We support the proposed changes to the Foreword.
- 2.- We support the proposed changes to Section 2.1.
- 3.- We support the addition of definitions for the term **Algae** and the expression **Agricultural product/product of agricultural origin**.
- 4.- Keep [Aquaculture means the farming of aquatic organisms involving intervention in the rearing process to enhance production and the individual or corporate ownership of the stock being cultivated.] in brackets, because it needs further discussion. **Rationale/Comments:** This definition should include terms that can be applied to organic products.
- 5.- Keep [Clean water means water from any source where harmful microbiological contamination, substances and/or toxic plankton are not present in such quantities that may affect the safety of fish, shellfish and their products intended for human consumption] in brackets, because it needs further discussion. **Rationale/Comments:** The term Dissolved solids in suspension or turbidity should be included; A minimum level of treatment should be defined.
- 6.- Keep both options in brackets:

[**Option 1:** Closed recirculation system means a type of containment system, with very limited and managed barrier-connection to open waters, and a system to treat the effluent water to enable its reuse.]

[**Option 2:** Closed recirculation system means a type of enclosed unit (on land or a vessel) containment system, with very limited and managed barrier-connection to open waters, with recirculation depending on permanent external energy input to pump/circulate the water, and a system to treat the effluent water to enable its reuse.]
- 7.- We support the inclusion of the Conversion period.
- 8.- The following text is proposed for Paragraph 6.8: During registration of the aquaculture unit or algae collection unit by the certifying agency accredited by the national entity ~~accredited certifying agency~~ and empowered by the competent authority on the matter, the producer must present an organic management plan to the certifying agency ~~accredited certifying agency~~ for verification during the inspection. The plan must be updated annually; **in addition, the producer must register the production unit with the competent authority.**
- 9.- The following text is proposed for Paragraph A2.1: The operation and management of the production of organic algae, whether in containment systems or not, should be consistent with the principles stated in this guideline. ~~of organic farming aquiculture.~~
- 10.- The following is proposed for Paragraph A2.2: [If a competent authority agrees to a conversion period shorter than 12 months, it should be at least the length of a production cycle. **The application of this paragraph should depend on the species and the succession of species grown in the same area.**]

11.- The following is proposed for Paragraph B.2.3: Aquaculture operators must maintain an organic management plan on an ongoing basis in order to guide the operation of the production unit. This should be developed and implemented and subjected to an annual update **in order to be applied in the production unit that corresponds to the guideline document during the period covering such production activity, in order to keep** ~~by all producers to guide the operation of the production unit~~ the impact on the environment low and ~~set out~~ ensure adequate monitoring to **meet the objective**. ~~ensure that this aim is achieved each year.~~ The plan should cover nutrient discharge, if applicable, and the repair and surveillance of technical equipment. The Organic Management Plan should document how monitoring is carried out and ~~analyze and~~ **identify risks** and **the corresponding corrective actions** in order to ensure there is minimal impact on the surrounding environment. The organic management plan may also include a water quality monitoring scheme for early detection of potential contaminants from unlikely events such as an oil spill or other potential contamination of the harvest area.

12.- We propose that the brackets be left in Paragraph B.2.5: The conditions listed for the growing water quality in Section 6.1.2 of the Codex Code of practice for fish and fishery products should apply. Water used for aquaculture should meet the [physiological requirements of the species] and be of a quality suitable for the production of food which is safe for human consumption. Waste water from domestic or industrial sources should not be used.

13. The following is proposed for Paragraph B.2.7: The certification body or authority must ensure at the outset that the location of the production unit is suitable by conducting an assessment of potential sources of contamination or substances unacceptable to organic production systems. The competent authorities should establish buffer zones between production units within the same farm and **between farms** ~~buffer within farms or between the same farms~~, where necessary, to separate organic and non-organic production units

14. The following is proposed for Paragraph B.2.8 [The conversion period should generally be at least one production cycle for the affected aquatic species]. **Rationale/Comments:** The conversion period should be different for soil ponds and waterproofed ponds, because the cleaning substances used in cleaning activities can affect the conversion process.

We will send a partial proposal and request an extension of the deadline for submitting the final proposal.