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Agenda item No. 5(d)

CX/FL 12/40/10-ADD.1

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

**Fortieth Session**

**Ottawa city, Ontario, Canada, 15 – 18 May 2012**

**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  
BRAZIL  
IRAN  
KENYA  
MAURITIUS  
MEXICO  
NEW ZEALAND  
NORWAY

## AUSTRALIA

Australia is pleased to provide the following comments in relation to the proposal to include aquaculture animals and seaweed in the *General Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods* (GL 32-1999).

### General Comments

**Section 2.1** - We previously suggested changes to the sentence at the end the section as follows and would like this wording reconsidered as we believe our wording further clarifies the intent of the sentence:

“The basis of organic husbandry of ~~aquaculture animals~~ **aquatic organisms** is the harmonious relationship between the water, seaweed and ~~aquaculture animals~~ and ~~respect~~ **an understanding of** for their ~~characteristic~~ physiological and behavioural needs.”

We suggest that requirements relating to the time required for the transition to ‘organic’ production should be scientifically or technically justified—for example, in Section 2.2 the proposition for the definition of “locally grown aquatic species” to include organisms which, though outside their natural range, have been grown for a minimum of ten years following the completion of two production cycles, without adverse effects on habitats or on native species. The ten year requirement does not appear to have been justified on any scientific or technical grounds.

There are several uses of the word ‘sustainable’ in the document. Since it is unlikely that there is a single agreed definition of the word in Codex or FAO literature, we suggest removing reference to the concept of ‘sustainability’.

### Specific Comments

#### **SECTION B: Changes in Annex 1**

**Paragraph 1** – We believe that this is a political statement and is beyond the scope of these guidelines. It does not provide guidance to Codex member countries and should be deleted. As a fallback, the reference to fisheries being highly exploited should be removed or modified to remove the implication that it is true of all fisheries. We suggest the following changes:

“Aquaculture is an important activity that contributes to the **general** supply of fish and **other aquatic organisms** seafood **globally**. ~~species in a world where fisheries are highly exploited. Fishery products are important in terms of world trade and the aquaculture component is becoming increasingly important as time goes on.~~”

**Paragraph 2** – Australia considers that, in some instances, the use of the terms aquatic and aquaculture may be used in the wrong context. As we understand, 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. We suggest the following wording to amend paragraph 2.

“The ~~operations and~~ management of aquaculture **aquatic** animals and seaweed production, whether in containment systems or not, should ~~respect~~ **incorporate** the principles of organic farming. The biodiversity of aquatic environment and the quality of the surrounding water should be maintained.”

**Paragraph 3:** the goal of keeping “the impact on the environment low” is difficult to assess/measure. We suggest this concept is removed from paragraph 3. We suggest the following amended wording:

“Aquaculture operators **should develop and implement** ~~maintain~~ an Organic Management Plan **to help manage** guide the **aquatic** operation of the farm. ~~particularly regarding environmental issues, so as to keep the impact on the environment low and set out a monitoring program to ensure that this aim is achieve each year.~~ **This Organic Management**”

**Plan should document how monitoring is done to ensure there is minimal impact to the surrounding environment.** The plan should **also** cover nutrient discharge, if applicable, and the repair and surveillance of technical equipment. ~~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 4:** It is not clear in this paragraph what type(s) of contamination should be minimised. More guidance would be useful. We suggest the following amendment:

~~“The nature of the production area should have characteristics which allow~~ **for** the production **and harvesting** of safe, ~~products of high quality~~ **products** without adverse impacts on surrounding natural ecosystems. Production facilities should be located in areas where the risk of **contamination is minimized (further guidance required as to the type of contamination)** and where sources of pollution are unlikely ~~and~~ **or** can be controlled or mitigated.”

**Rational:** If pollution can be controlled, then it is not also necessary that facilities be located in areas where it is unlikely. As a basic risk management principle, hazards that can't be avoided should be controlled. But if they can be avoided, then control is unnecessary.

**Paragraph 5:** We suggest that this paragraph could be replaced by reference to the Recommended International Code of Practice General Principles of Food Hygiene (CAC/RCP 1), which provides guidance for primary production, to ensure that food is safe and suitable for its intended use, and to reduce the likelihood of introducing a hazard which may adversely affect the safety of food or its suitability for consumption.

**Paragraph 7:** We consider that products from aquaculture operations should be subjected to at least one year under a certification system before any products can be labelled as 'organic'. This time period is consistent with terrestrial-based farming operations. We suggest deleting reference to “6 months” and “three months” in this paragraph. As per our previous statement under General Comments, requirements relating to the time required for the transition to 'organic' production should be scientifically or technically justified

**Paragraph 8:** We suggest the heading for this section should be amended to “Origin ~~of~~ **of** stock”. We also suggest deleting the final sentence relating to genetically modified organisms, since it is repetitive of section 1.5 in the parent document (CAC/GL 32).

**Paragraph 9:** We suggest amending this paragraph by deleting of the remainder of the first sentence, after the word 'density', as it includes irrelevant detail. In addition, the guidance in Paragraph 13 provides extra detail on stocking density – it could be brought into paragraph 9 if that made the document more easily understood. Hence:

~~“The production unit should provide sufficient space for the animals' needs in terms of stocking density, in numbers per cubic metre, or per square metre of surface area, as most appropriate for the species concerned.~~ **Competent authorities or other recognised bodies shall develop and publicise guide values for maximum densities for the species grown under their authority, which are reflective of the natural behaviour of the species involved and in keeping with good welfare.**

**Paragraph 11:** We consider that the prohibition on closed recirculation systems in this paragraph seems out of step with principles inherent in the parent document (CAC/GL 32), especially those in subparas 7d, 7e and 7f of the Foreword. We suggest that the para is reworked to allow such schemes, dependent on them meeting other guidance on the use of external inputs and energy consumption.

**Paragraph 12:** We do not agree with the use of the word 'situation' in paragraph 12. To clarify the intent of this paragraph we suggest the following amendment:

~~“Breeding~~ **conditions** should simulate the natural ~~situation~~ **surroundings** as closely as possible, in terms of ambient conditions, using appropriate strains for the type of farming.”

**Paragraph 13:** We suggest a minor edit: “...which are reflective ~~of~~ **of** the natural behaviour...” and if considered appropriate move the information in this paragraph to paragraph 9 as detailed above.

**Paragraph 16:** We suggest the deletion of reference to 'cleaner fish' in paragraph 16 point 2, as cleaner fish may not be present in some countries. We suggest the paragraph could be amended as follows:

"To control ectoparasites such as sealice, ~~cleaner fish~~ **natural processes, such as the use of predatory species of ectoparasites**, should be used where possible, rather than parasiticides..."

**Paragraph 18:** We suggest a minor edit: "Live fish should be ~~fish should be~~ transported in suitable tanks..."

## BRAZIL

### (i) General Comments:

The Brazilian Delegation thanks for the opportunity to comment on CX/FL 12/40/10. We recognize the relevance of this work and would like to suggest placing the amendments in square brackets. Additionally, we have comments on specific points.

### (ii) Specific Comments:

#### - 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~~, livestock, **aquatic organism** and **their** ~~livestock~~ products to the extent that the principles of production and specific inspection rules for them are introduced in Annexes 1 and 3; and

b) processed agricultural crop ~~and~~, livestock **and aquatic organism** products intended for human consumption derived from (a) above.]

*Rationale: Brazil understands that the term 'aquatic organism' should be used instead of 'aquaculture animals and seaweed' as this term is broader and aligned with the proposed definition of aquaculture.*

#### - Section 2.1 Description

##### 2.1 Description

[...The basis for organic livestock **and aquaculture animals** husbandry is the development of a harmonious relationship between land, plants and livestock **or water and aquatic organisms** and respect for the **their** physiological and behavioural needs of ~~livestock~~. This is achieved by a combination of providing good quality organically grown feedstuffs, appropriate stocking rates, ~~livestock~~ husbandry systems appropriate to behavioural 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).]

*Rationale: We believe that the proposed amendments could improve the clarity of the text and avoid unnecessary repetition of terms. Furthermore, we understand that the combination of activities that are important to promote animal health and welfare and to prevent diseases should be extent to aquaculture animals.*

## - Section 2.2 Definitions

**[containment system** means equipment for growing **aquatic organisms** aquaculture animals or seaweed which prevents **their** dispersal of the aquatic organism concerned - examples are, cages (net pens), ponds and tanks, long-line and rafts holding suspended ropes with the organisms attached and net bags on trestle tables;]

**[production cycle** means the lifespan of an **aquatic organism** aquaculture animal or seaweed from the earliest life stage to harvesting].

*Rationale: For reasons of consistency and clarity, we believe that the term 'aquatic organism' should be used instead of 'aquaculture animals and seaweed'.*

~~**[locally grown aquatic species** means both aquatic organisms which are grown within their natural range and those aquatic organisms which though outside their natural range, have been grown for a minimum of ten years following the completion of two production cycles, without adverse effects on habitats or on native species and]~~

*Rationale: Brazil does not support the inclusion of this definition because the rationale used for establishing the criteria for considering aquatic organisms which are outside of their natural range as locally grown is not clear. Additionally, we have suggested amendments in paragraph 8 that eliminate the use of the term 'locally grown aquatic species'.*

**[Seaweed** for the purpose of these guidelines means macroalgae and does not include microalgae.]

*Rationale: For purpose of clarity, we suggest the inclusion of a definition of seaweed.*

## - Changes in Annex 1

Annex 1 - Principles of Organic Production

A. Plants and plant products

B. Livestock and livestock products

**C. Aquatic organism**

**C1. Aquaculture animals and their products**

**C2. Seaweed and their products**

~~C. **D.** Handling, storage, transportation, processing and packaging~~

*Rationale: Brazil suggests reorganizing the annex 1 to place the aquatic organism principles in a different section from livestock and livestock products. We believe that this proposal could improve clarity and would be aligned with the understanding that livestock refers to terrestrial animals.*

## **[Conversion period**

**7. The conversion period is variable and should be established by the competent authority according to the characteristics of the production area and aquatic organisms, taking into consideration environmental and social issues.** Aquaculture products 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 shorter 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.]~~

*Rationale: Brazil understands that conversion periods are variable due to the characteristics of the production area and aquatic organisms. Thus, predefined conversion periods would not contemplate the different needs worldwide.*

### [Origin or stock

8. It is preferable that **aquatic organism adapted to the local environmental and management conditions** ~~locally grown aquatic species~~ be used for organic farming ~~where possible~~. Following the conversion period if organic aquaculture animals are not available, young non-organic aquaculture stock may be introduced for on-growing provided that the latter **90%** ~~two thirds~~ of their **biomass** production cycle 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. Genetically modified organisms (GMOs) must not be used.]

*Rationale: The criteria used in the definition of locally grown aquatic species are not clear. Additionally, the origin of the aquatic organism might not matter for organic production. We suggest replacing criteria of “two thirds of their production cycle” by “90% of their biomass production cycle” as we understand that the latter would guarantee that the weight acquired during the cycle was in the organic aquaculture system.*

### [Nutrition

15... Plant material used in aquaculture feed must be organically grown and should always meet the requirements of these guidelines. **In cases of scarceness or other special conditions, non-organic plant materials might be used in aquaculture feed...**]

*Rationale: Organic aquaculture production would be impracticable in certain locations where appropriate organic material for use in aquaculture feed is not available.*

### [Health and welfare

• the use of allopathic treatments should be limited to ~~two~~ **one** courses of treatment per **production cycle** year, with the exception of vaccines and compulsory eradication schemes.]

*Rationale: We understand that the proposed criteria would be more compatible with the different production cycle periods of aquatic organisms worldwide.*

### [Transport

Live fish ~~should be fish~~ should be transported in suitable tanks with clean water, which meets their physiological needs in terms of temperature and dissolved oxygen. Before use, tanks should be thoroughly cleaned, disinfected and rinsed. Precautions should be taken to reduce stress during transport, in particular regarding the density.]

*Rationale: Small correction in the text for clarity.*

### **- Seaweed**

[20. Harvested seaweed can be sold as organically produced when these Guidelines have been complied with. The criteria for siting of aquaculture animal units in these guidelines should be applied as appropriate to seaweed production units. The criteria for conversion of plant and plant products in these guidelines (Annex I.A, 1-4) should be applied as appropriate to seaweed production units. ~~If a competent authority agrees to a conversion period shorter than 12 months, it should be at least six months.]~~

*Rationale: Brazil understands that conversion periods are variable due to the characteristics of the production area and aquatic organisms. Thus, predefined conversion periods would not contemplate the different needs worldwide.*

### **- Changes in Annex 2**

Brazil understands that the list of substances for cleaning and disinfection of equipment and facilities does not fit in Table 2 that is intended for substances for plant pest and disease control. Thus, we suggest the creation of a new table for these substances.

## **IRAN**

We would like to inform you, Iran agrees with Proposed draft revision of the guidelines for the production ,processing, labelling and marketing of organically produced foods to include aquaculture and seaweed (at step3) for proposed changes of guidelines has been made. Best regards.

## **KENYA**

### **Forward to PARA 6 [proposal to be added to the guideline]**

“Organic” is a labelling term that denotes products that have been produced in accordance with organic production standards and certified by a duly constituted certification body or authority. Organic agriculture is based on minimizing the use of external inputs, avoiding the use of synthetic fertilizers and pesticides. Organic agriculture practices cannot ensure that products are completely free of residues, due to general environmental pollution. However, methods are used to minimize pollution of air, soil and water. Organic food handlers, processors and retailers adhere to standards to maintain the integrity of organic agriculture products.

The primary goal of organic agriculture is to optimize the health and productivity of interdependent communities of soil **and aquatic** life, plants, animals and people.

#### Comment:

We support the addition because the Aquatic population, which was left out in the guideline, would now be covered.

#### Justification:

The addition of the word **Aquatic** will expand the scope of this guideline.

**Forward to PARA 6 [proposal to be added to the guideline GL 32]**

Section 1.1 – Scope: Reference to aquaculture animals and seaweed to be added (note that not all Seaweeds are plants), possibly through a footnote.

**GL 32 - scope of current Standard**

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, livestock and livestock products to the extent that the principles of production and specific inspection rules for them are introduced in Annexes 1 and 3; and

**Comment:**

We support the addition of “aquaculture ” to the current scope.

**Justification:**

The definition given in the current standards does not include aquaculture.

**2.1 Description[proposal to be added to the guideline]**

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**

We propose to make amendments on the fifth statements in capital letter after deleting the seventh statement in the paragraph to avoid repetition/ambiguity as indicated below

The basis for organic livestock husbandry AND AQUACULTURE is the development of a harmonious relationship between land AND WATER, plants, AQUACULTURE, and livestock, and respect for the physiological and behavioural needs of livestock.

~~"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 behavioral needs"~~

**Justification:**

We proposed the modification of the existing statement on the above to cover aquatic relationship.

**Section 2.2 definition**

Section 2.2 – Definitions: clarify that livestock refers to terrestrial animals. Insert a definition of aquaculture: "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." (Definition of Aquaculture in the FAO Technical Guidelines on Aquaculture Certification, document agreed by the Sub-Committee on Aquaculture in 2010 and approved by FAO Committee on Fisheries February 2011).

**Comment:**

We support the addition of the FAO definition as stated herein: "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:

It as a requirement as per CAC 20th Edition. procedural manual.

**B) Changes in Annex I****Add a section B.1: Aquaculture animals****General principles****B General Principles [proposal to be added to the guideline]**

1. Where livestock for organic production are maintained, they should be an integral part of the organic farm unit and should be raised and held according to these guidelines.

~~1. Aquaculture is an important activity that contributes to the supply of fish and other seafood species 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.~~

Justification:

this is a general information that does not add value to this guideline

2. The operation and management of aquaculture animals and seaweed, whether in containment systems or not, should respect the principles of organic farming. The biodiversity of the aquatic environment and the quality of the surrounding water should be maintained.

3. Aquaculture operators should maintain an Organic Management Plan to guide the operation of the farm 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.

Comment :

We support the addition of number two and three of the general principles as indicated above, however, We do not support the inclusion of number one ( deleted) because it is a general information that does not add value to this guideline.

**Siting [new] [proposal to be added to the guideline]**

4. The nature of the growing area should have characteristics which allow the production of safe products of high quality without unacceptable negative environmental impact. Aquaculture facilities should be located in areas where the risk of contamination is minimized and where sources of pollution can be controlled or mitigated.

Justification:

The addition of the topic "siting" will assist farmers in making claims and traceability of the products.

5. 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 be used.

6. The certification body or authority must confirm at the outset that the location of the farm is not unsuitable due to potential sources of contamination with prohibited substances or environmental contaminants. It may also set up minimum distances to separate organic and non-organic production units based on factors such as upstream or downstream location and water or tidal flow.

Comment:

We support the addition of the topic “siting” mentioned above to the guidelines.

**Conversion period [new] [proposal to be added to the guideline]**

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 food.

Justification:

The addition of this proposed ‘conversion period’ will take care of the aquatic animals which were omitted in the guideline.

Comment:

We support the addition of this proposed ‘conversion period’ to the guideline.

**Conversion [in the std] [proposal to be added to the guideline]**

10. The conversion of the land intended for feeding crops or pasture must comply with the rules set out in Part A paragraphs 1, 2, and 3 of this Annex

Comment

We have no objection adding the statement mentioned above to the guideline.

**Origin [new] [proposal to be added to the guideline]**

8. It is preferable that locally grown species be used for organic farming where possible. Aquaculture stock can be converted to organic production by farming under organic management for the latter two thirds of their production cycle. Following the conversion period stock should come from organic production units where the parent stock have been under organic management for at least three months before being used for breeding.

Justification:

To ensure Good practice for organic production.

This is to also ensure that the parental farm is produced and maintain under organic management.

Comment:

We support the inclusion of this new statement as part of the guideline.

**Husbandry [proposal to be added to the guideline]**

9. The farm should provide sufficient space for the animals needs and they should be provided with good quality water ~~with sufficient oxygen and, in the case of filter feeding animals,~~ and other nutritional factors for their needs. The temperature and light conditions should be suitable for the species concerned in the particular geographic location of the farming operation.

Justification:

The inclusion of this new heading in the guideline will provide useful guidance on husbandry.

Comment:

We agree to add the proposal under ‘animal husbandry’ with some modification as stated below:

The farm should provide sufficient space, good quality water and nutritional factors for animal needs. The temperature and light conditions should be suitable for the species concerned in the particular geographic location of the farming operation.

Also we proposed that the statement 'with sufficient oxygen and, in the case of filter feeding animals' be deleted because, in Aquaculture, it is implied that in good quality water, oxygen should be sufficient

We would like to request the committee to make clarification regarding the reason for prohibition of closed recirculation systems statement on number 11 mentioned above.

#### **Breeding [proposal to be added to the guideline]**

12. Breeding conditions should reflect the natural situation as closely as possible using appropriate strains for the type of farming.

Artificial polyploidy, cloning, artificial hybridization and use of single sex strains should be avoided.

13. The maximum stocking density should 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.

14. Competent authorities should also develop criteria for production systems, with particular reference to type of system, water flow, oxygen saturation and effluent elimination and whether fallowing is necessary.

#### Comment:

We support the inclusion of the three paragraphs under breeding to be included in the guideline because breeding conditions, maximum stocking densities and criteria for production systems are key to organic aquaculture and should be determine.

#### **Nutrition [proposal to be added to the guideline]**

15. Where feed is used, the feed should meet the animal's nutritional requirements at the various stages of its development. Plant material used in feed should always meet the requirements of these guidelines. Carnivorous fish should not be fed a totally plant based diet so as to ensure their physiological needs and to ensure that consumers are not deprived of the essential fatty acids. The aquatic animal based portion of the feed should be made from fish meal and fish oil or ingredients of fish origin derived from the following sources:

- trimmings of organically grown aquatic animals, or
- trimmings of fish caught for human consumption in sustainable fisheries, or
- fish caught in sustainable fisheries.

#### Justification:

The inclusion of the nutrition clause in the guidelines is necessary to ensure the physiological needs of aquaculture and also to ensure that consumers are not deprived of the essential fatty acids.

#### Comments:

We support the inclusion of the nutrition clause in the guidelines.

#### **Health care [proposal to be added to the guideline]**

16. Disease prevention in organic aquaculture shall be based on the principles and practices for health care of livestock (terrestrial animals) in these guidelines and on the following additional points:

- ensuring that the siting and design of the production unit is optimal and that there is regular cleaning and disinfection of premises 'WITH ORGANIC DISINFECTANT' where appropriate.
- to control ectoparasites such as sea lice, cleaner-fish should be used rather than parasiticides where possible.

Justification:

it should be clear to farmers that only organic disinfectants are to be used.

Comment:

In bullet one, we recommend that the phrase 'with organic disinfectant' be added after the word premises, to make it clear that only organic disinfectants are allowed.

**(Health care proposal continue)**

17. Hormonal treatment should not be used. Annex 2, Table 2 of the guidelines to also list substances permitted for aquaculture; products for cleaning and disinfection should distinguish between those permitted in the presence and absence of aquaculture animals.

Justification:

Most of the hormones used for treatment are synthetic.

Comment:

We support the exclusion of the hormones in this guideline.

**Add a section B.2: Seaweeds [proposal to be added to the guideline]**

18. Farmed 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.

Justification:

The inclusion of the farmed and wild seaweeds is important for the sake of food safety and trade of the same.

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, industrial or geological sources. The REP 11/FL Appendix V 47

Organic Management Plan to be used for farming of aquaculture animals should be maintained by all organic seaweed producers.

20. Collection in the wild should be restricted to areas which have been surveyed to determine the baseline biomass present. Subsequent collection levels should allow regeneration and not affect the long term stability of the natural habitat.

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.

Comment:

We support the addition of the above section B:2 to take care of the seaweed which was just introduced in the guideline.

**MAURITIUS**

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

- Foreword, Paragraph 6, last phrase: Add "and aquatic" after "soil".
- Section 1.1 – Scope: Reference to aquaculture animals and seaweed to be added (note that not all seaweeds are plants), either by inserting in 1.1 a) following livestock products: “aquaculture animals and seaweed” and in 1.1. b) following livestock products: “ and aquaculture animal and seaweed products”  
.Via a footnote reference should be made to FAO work on the separate and broader issue of Sustainable aquaculture, of which note should be taken (<http://www.fao.org/focus/e/fisheries/sustaq.htm>).
- 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."
- Section 2.2 – Definitions: clarify that livestock refers to terrestrial animals. Insert the following definitions:  
"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." (definition of Aquaculture in the FAO Technical Guidelines on Aquaculture Certification, document agreed by the Sub- Committee on Aquaculture in 2010 and approved by FAO Committee on Fisheries February 2011;  
"closed recirculation system" means a type of unit which does not connect in any way, including via effluent, to open waters, having a system to treat the effluent water to enable its reuse";  
"containment system" means equipment for growing aquaculture animals or seaweed which prevents dispersal of the aquatic organism concerned -examples are, cages (net pens), ponds and tanks, long-line and rafts holding suspended ropes with the organisms attached and net bags on trestle tables; "locally grown aquatic species" means both aquatic organisms which are grown within their natural range and those aquatic organisms which though outside their natural range, have been grown for a minimum of ten years following the completion of two production cycles, without adverse effects on habitats or on native species and "production cycle" means the lifespan of an aquaculture animal or seaweed from the earliest life stage to harvesting.

**B) Changes in Annex 1****Add a section B.1: Aquaculture animals****General principles**

1. Aquaculture is an important activity that contributes to the supply of fish and other seafood species in a world where fisheries are highly exploited. Fishery products are important in terms of world trade and the aquaculture component is becoming increasingly important as time goes on.
2. The operation and management of aquaculture animals and seaweed production, whether in containment systems or not, should respect the principles of organic farming. The biodiversity of the aquatic environment and the quality of the surrounding water should be maintained **and if possible improved, on the basis of pre-established indicators.**

3. Aquaculture operators should maintain on an ongoing basis an Organic Management Plan, to guide the operation of the farm, particularly regarding environmental issues, so as to keep the impact on the environment low and set out a monitoring programme to ensure that this aim is achieved each year. The plan should cover **the quality and quantity of** nutrient discharge, if applicable, and the repair and surveillance of technical equipment.

### **Siting**

4. The nature of the production area should have characteristics which allow the production of safe products of high quality without adverse impacts on surrounding natural ecosystems. Production facilities should be located in areas where the risk of contamination is minimized and where sources of pollution are unlikely and can be controlled or mitigated.

5. Water used for aquaculture should be of a quality suitable for the production of food which is safe for human consumption and therefore waste water from domestic or industrial sources should not be used in accordance with the FAO Technical Guidelines for Aquaculture Certification, 2011.

6. The certification body or authority must ensure at the outset that the location of the production unit is suitable by conducting a risk analysis of potential sources of contamination with contaminants or substances unacceptable to organic production systems. Buffer zones within or between farms should be established, where necessary, to separate organic and non-organic production units. Suitable criteria for such separation may be drawn up by competent authorities.

### **Conversion period**

7. Aquaculture products 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 shorter 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.

### **Origin or stock**

8. It is preferable that locally grown aquatic species be used for organic farming where possible. Following the conversion period if organic aquaculture animals are not available, young non-organic aquaculture stock may be introduced for on-growing provided that the latter two thirds of their production cycle is under organic management and providing the stock is healthy. Breeding stock should come from organic production units, where the parent stock **has** been under organic management for at least three months prior to breeding. Genetically modified organisms (GMOs) must not be used.

### **Production rules for husbandry and breeding**

9. The production unit should provide sufficient space for the animals' needs in terms of stocking density, in numbers per cubic metre, or per square metre of surface area, as most appropriate for the species concerned. They should be provided with good quality water which is suitable to the 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 be suitable for the species concerned in the particular geographic location of the production unit.

10. Containment systems, when used, including cages (net pens) should be designed, constructed, located and operated to minimize the risk of escapes and other negative environmental impacts and prevent the entry of predatory species.

11. 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 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, as greater knowledge becomes available on their compatibility with organic production.

12. Breeding should simulate the natural situation as closely as possible, in terms of ambient conditions, using appropriate strains for the type of farming.

Artificial polyploidy, cloning, artificial hybridization and use of single sex strains except where produced by hand-sorting, should be avoided.

13. Competent authorities, or other recognised bodies, shall develop and publicise guide values for maximum densities for the species grown under their authority, which are reflective of the natural behaviour of the species involved and in keeping with good welfare.

14. Competent authorities or other recognised bodies shall also develop and publicise criteria for aquaculture production systems, with particular reference to type of system, water flow, **water quality**, oxygen saturation and effluent elimination and if necessary, following.

### **Nutrition**

15. Where feed is used, aquaculture operations should include procedures for avoiding feed contamination in compliance with national regulations or as determined by internationally agreed standards. The feed should meet the animal's nutritional requirements at the various stages of its development. Plant material used in aquaculture feed must be organically grown and should always meet the requirements of these guidelines. Carnivorous fish should not be fed material from the same species, nor a totally plant-based diet to ensure their physiological needs are met and to ensure good welfare. The aquatic animal based portion of the feed should be made from fish meal and fish oil, or ingredients of fish origin, derived from the following sources:

- organically grown aquatic animals and their trimmings, or
- trimmings of fish caught for human consumption in sustainable fisheries, or
- fish and invertebrates caught in sustainable fisheries.

### **Health and welfare**

16. Disease prevention in organic aquaculture shall be based on guidelines and standards set by the OIE and the principles and practices for health care of livestock (terrestrial animals) in these guidelines, specifically Annex I, paragraphs, 20, 21, 22 and 24 and on the following additional points:

- ensuring that the siting and design of the production unit is optimal and that there is regular cleaning and disinfection of premises where appropriate.
- to control ectoparasites such as sea lice, cleaner-fish should be used where possible, rather than parasiticides. Parasite treatments should be limited to twice per year, with the exception of compulsory control schemes.
- the use of allopathic treatments should be limited to two courses of treatment per year, with the exception of vaccines and compulsory eradication schemes.
- If the specified limits are exceeded the aquaculture animals concerned should not be sold as organic.
- **Natural control measures, e.g. biological control, should be used wherever possible, to control pests, parasites and disease organisms.**
- **Wherever possible, cultivars of aquaculture animals that are resistant/tolerant to pests, parasites and diseases must be used.**

17. Hormonal treatment should not be used.

## Transport

18. Guidelines and standards set by the OIE should be the specific normative basis. The provisions on holding and transport in aquaculture production of the Codex Code of Practice for Fish and Fishery Products (Section 6.3.5 of CAC/RCP 52-2003) should also apply.

Live fish should be ~~fish should be~~ transported in suitable tanks with clean water, which meets their physiological needs in terms of temperature and dissolved oxygen. Before use, tanks should be thoroughly cleaned, disinfected and rinsed. Precautions should be taken to reduce stress during transport, in particular regarding the density.

## Slaughter

19. Aquaculture animals should be handled in such a way as to avoid unnecessary stress. Slaughter techniques should render fish immediately unconscious and insensible to pain.

## Add a section B.2: Seaweeds

20. Harvested seaweed can be sold as organically produced when these Guidelines have been complied with. The criteria for siting of aquaculture animal units in these guidelines should be applied as appropriate to seaweed production units. The criteria for conversion of plant and plant products in these guidelines (Annex I.A, 1-4) should be applied as appropriate to seaweed production units. If a competent authority agrees to a conversion period shorter than 12 months, it should be at least six months.

21. Both farming and collection of seaweed should be carried out in areas which meet the criteria of paragraphs 4 **and 6 above**. An Organic Management Plan should be developed and implemented by all organic seaweed producers to guide the operation of the production unit in keeping the impact on the environment low and setting out monitoring to be done to ensure that this aim is achieved each year.

22. The collection of edible seaweeds and parts thereof, growing naturally in the sea is considered an organic production method provided that the four conditions of Annex 1.A.9 are met.

23. Farming should be carried out in a sustainable manner at all stages from collection of juvenile seaweed to harvesting. The application of supplementary fertiliser to the growing area should be restricted to pond cultivation. **The fertiliser used must be one that is approved for organic production.** Ropes and other equipment used for growing seaweed should be re-used or recycled where possible. Removal of bio-fouling organisms should be by physical means.

- **24. Natural control measures, e.g. biological control, should be used wherever possible, to control pests, parasites and disease organisms.**

## C) Changes in Annex 2

A list of substances for cleaning and disinfection of equipment and facilities to be developed and added to Annex 2, Table 2, of the guidelines.

## MEXICO

### GENERAL COMMENT:

Mexico recognises the important work being conducted by the working group for the purpose of including those subjects related to organic aquaculture (seaweed and animals) and is grateful to have the opportunity to present the following comments to the document for the inclusion of "Organic Aquaculture and seaweed" of the CX/FL 12/40/10: *Proposed Draft Revision of the*



*Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods (GL 32-1999)*” which were not covered before in these guidelines.

The principles established for its production, management and marketing are basic and go hand in hand with other types of production, such as stockbreeding or agriculture.

We only suggest developing, within Annex 2, a specific or separate table to include a list of substances for cleaning and disinfection of the equipment and the aquaculture and seaweed installations, as table 2 includes a table for plant pests and disease control. The list of substances for the “cleaning and disinfection of the equipment and the aquaculture and seaweed installations” is closer related to those that apply to food processing installations.

Given the fact that organic aquaculture is an activity not much developed in Mexico, these Guidelines will contribute to its growth in our country, so we have no specific comments for the document.

## **NEW ZEALAND**

New Zealand welcomes the opportunity to offer the following comments on this 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.

Where we have recommended changes to the draft text, we have marked deletions with ~~strikethrough~~ and additions in **bold**.

### **Specific comments:**

#### **Foreword**

General comment: to ensure clarity throughout the documents, and to incorporate the new draft annexes, we recommend that the term “organic agriculture” is replaced with the term “organic production”. “Organic agriculture” is used in the Foreword in following places:

- Paragraph 5 (1<sup>st</sup> sentence)
- Paragraph 6 (2<sup>nd</sup> sentence, 3<sup>rd</sup> sentence, 5<sup>th</sup> sentence, 6<sup>th</sup> sentence)
- Paragraph 7 (1<sup>st</sup> sentence)

#### **Section 1 Scope**

##### **Section 1.1:**

New Zealand supports the inclusion of reference to aquaculture animals and seaweed in 1.1 a) and 1.1 b).

#### **Section 2 Description and Definitions**

##### Section 2.1:

New Zealand recommends changing “organic farm system” to “organic production system”. This would help clarify that this guideline applies to more than land-based farming systems. This sentence would read: “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...”

We recommend changing the second to last sentence in section 2.1 to read: “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 ~~the physiological and behavioural needs of livestock~~ **their characteristic physiological and behavioural needs.**” This is preferable to adding a somewhat repetitive sentence to the end of the section.

New Zealand recommends removing “livestock” from the last sentence in section 2.1 so it reads: “This is achieved by a combination of providing good quality organically grown feedstuffs, appropriate stocking rates, ~~livestock~~ husbandry systems appropriate to behavioural needs, and ...”

**Section 2.2:**

New Zealand supports clarifying that livestock refers to terrestrial animals.

New Zealand supports the inclusion of a definition of aquaculture.

New Zealand supports inclusion of a definition for closed reticulation systems.

New Zealand supports the inclusion of a definition for containment systems, however we are concerned that the inclusion of the phrase “prevents dispersal of the aquatic organism concerned” in the proposed definition cannot be definitively applied to the use of long-line and suspended ropes. These production systems do not contain the aquatic organisms in a manner which prevents the aquatic organisms from dispersing into the environment.

New Zealand supports the inclusion of a definition for locally grown aquatic species, and the use of this term. However we are concerned that the inclusion of “without adverse effects on habitats or on native species” may not always be measurable and may become restrictive as to the species which may be utilised.

New Zealand supports the inclusion of a definition for production cycle, but we are concerned that this is only being applied to aquaculture animals and seaweed when it could equally apply to other species used in organic production.

New Zealand recommends adding a definition for aquatic organisms. This is to ensure it is clear this guideline covers aquaculture of animals, fish, shellfish, seaweeds and other plants as well as the wild harvest of these.

**Annex 1 Principles of organic production**

**Add Section B.1: Aquaculture animals**

**General comments:**

New Zealand notes that Organic Management Plans are mentioned in this draft aquaculture guideline. We take it that they are covered by the description in Annex 3(A)(4). New Zealand recommends that the guideline either refers to the description throughout the guideline, or specifically calls it an ‘Organic Management Plan’ and defines it.

**General Principles**

**Paragraph 1.**

New Zealand does not believe it is appropriate to include comment on the exploitation of fisheries in this international document. Therefore New Zealand recommends deletion of the reference to exploitation in this paragraph.

**Paragraph 2.**

This part of the annex is for aquaculture animals. Therefore New Zealand recommends the reference in this paragraph to seaweed be removed. We also recommend changing ‘organic farming’ to ‘organic production’. This means that the first sentence reads: “The operation and management of aquaculture animals ~~and seaweed~~, whether in containment systems or not, should respect the principles of organic ~~farming~~ **production**.”

**Paragraph 3.**

In relation to Organic Management Plans, New Zealand recommends changing ‘should’ to ‘must’ as these are the basic management document for any organic operation. We also recommend changing ‘farm’ to ‘production unit’.

**Origin or stock**

New Zealand notes a typographical error in this heading – we believe it should read “Origin of Stock”.

**Paragraph 8.**

We recommend the addition in either this or an additional paragraph, the requirement to select species to be used for organic aquaculture which are able to adapt to local conditions, their vitality and resistance to pests and diseases.

New Zealand strongly recommends the inclusion of a paragraph allowing the use of wild seed from outside the production area for bivalve shellfish production. We propose the following: **“For bivalve shellfish, seed may be wild-harvested from outside of the production area, provided such harvesting is permitted by local legislation, and records are kept to allow it be traced back to the collection area.”**

**Health and Welfare****Paragraph 17**

This statement relating to hormonal treatment is inconsistent with that for livestock. Annex 1 B 23 states “Hormonal treatment may only be used for therapeutic reasons and under veterinary supervision” as opposed to “should not be used”. Some species require hormones to stimulate breeding activity (such as luteinising and gonadotrophic hormones), some invertebrate species require hormones to induce settlement of the larvae for metamorphosis.

New Zealand recommends changing this sentence to read: “Hormonal treatment should not be used **for the purpose of enhancing growth.**”

**Transport**

New Zealand supports the inclusion of this paragraph on transport.

**Slaughter**

New Zealand supports the inclusion of this paragraph on slaughter.

**Add a section B.2: Seaweeds****Paragraph 21**

In relation to Organic Management Plans, New Zealand recommends that the second sentence in this paragraph should be consistent with the approach taken for aquaculture animals.

Changes in Annex 2

New Zealand supports the development of a list of substances for cleaning and disinfection of equipment and facilities to be added to Annex 2, Table 2 of the guideline.

**NORWAY**

General comments

- The inclusion of aquaculture animals and seaweed in the *Guidelines for the production, processing, labelling and marketing of organically produced foods* (GL 32-1999) should be done in accordance with existing Codex and OIE texts on aquaculture. At the same time Codex should avoid duplication of these texts. We find it important to add only additional requirements for production of organic products in the Guidelines for organic production.

Relevant texts are:

- Codex Guidelines for aquaculture production in the *Code of practice for fish and fishery products, CAC/RCP 52-2003* and
- Guidelines for aquatic animal health in the “*Aquatic Animal Health Code* (2011) – OIE”.

- If each competent authority shall decide different standards for stocking densities for the same type of species, this can cause large variation of organic production worldwide. This can then cause great difference regarding quality for the same type of species, and can give trading problems, ref. CX/FL 12/40/10, point 13 and 14. There may therefore be necessary to discuss this point further.
- For consistence in the Guidelines, the equality of aquaculture production and agriculture production should be recognized. In this regard it is our opinion that whenever “agriculture” is mentioned as a general term, the term “aquaculture should be inserted.

Specific comments

## FOREWORD

We support the amendments as proposed in CX/FL 12/40/10.

However, we see the need to change other parts of the foreword to recognize the inclusion of aquaculture production . We therefore propose to amend:

- **Paragraph 2, second phrase:** to protect producers of organic produce against misrepresentation of other agricultural and aquaculture produce as being organic;
- **Paragraph 2, last phrase:** “to maintain and enhance organic agriculture and aquaculture systems in each country...
- **Paragraph 5:**

Organic agriculture and aquaculture is one among the broad spectrum of methodologies which are supportive of the environment. Organic production systems are based on specific and precise standards of production which aim at achieving optimal agroecosystems and aquaecosystems which are socially, ecologically and economically sustainable. Terms such as “biological” and “ecological” are also used in an effort to describe the organic system more clearly. Requirements for organically produced foods differ from those for other agricultural and aquacultural products in that production procedures are an intrinsic part of the identification and labelling of, and claim for, such products.
- **Paragraph 6, second sentence and last sentence:**

Organic agriculture and aquaculture is based on minimizing the use of external inputs, avoiding the use of synthetic fertilizers and pesticides. The primary goal of organic agriculture and aquaculture is to optimize the health and productivity of interdependent communities of soil life, plants, animals and people.
- **Paragraph 7 first sentence:** Organic agriculture and aquaculture are holistic production management systems which promotes and enhances agroecosystem and aquaecosystems health, including biodiversity, biological cycles, soil and aquatic biological activity.
- **Paragraph 7 e:** rely on renewable resources in locally organized agricultural and aquacultural systems;
- **Paragraph 7 f:** promote the healthy use of soil, water and air as well as minimize all forms of pollution thereto that may result from agricultural and aquacultural practices;
- **Paragraph 7 g:** handle agricultural and aquacultural products with emphasis on careful processing methods in order to maintain the organic integrity and vital qualities of the product at all stages;
- **Paragraph 9 second sentence:** Procedures for operator certification are based primarily on a yearly description of the agricultural and aquacultural enterprise as prepared by the operator in cooperation with the inspection body.
- **Paragraph 10, first sentence:** Apart from a small portion of agricultural and aquacultural commodities marketed directly from the farm to consumers, most products find their way to consumers via established trade channels.

## SECTION 1. SCOPE

We would like to support the text in the proposed draft revised document.

## SECTION 2. DESCRIPTION AND DEFINITIONS

### Section 2.2. Definitions

We would like to suggest the following definitions:

#### **Aquaculture:**

“The farming during part or the whole of their life cycle of all aquatic animals, except mammalian species, aquatic reptiles and amphibians, intended for human consumption”. This definition is in line with the existing COP (CAC/RCP 52-2003).

Reason: Repeat the first part of the definition of aquaculture in paragraph 2.2- CAC/RCP 52-2003.

#### **Closed recirculation system:**

” Means a type of unit from which the effluent water does not connect to open waters, having a system to treat the effluent water to enable its reuse.”

Reason: A closed recirculation system can never be 100 % closed as there will always be a need of some water into the system. Therefore we suggest another definition which also is more in line with the text in existing COP paragraph 6.1.1 and 6.2 regarding *closed recirculation system* in CAC/RCP 52-2003.

#### **Preparation:**

“Means the operations of slaughtering, processing, preserving and packaging of agricultural **and aquaculture** products and also alterations made to the labelling concerning the presentation of the organic production method.

## SECTION 3. LABELLING AND CLAIMS

### Section 3.3, 3.4 and 3.5.

Where agriculture/agricultural is mentioned, aquaculture/aquacultural should be included.

The rest of the document should also be read to include aquaculture product/production where this is suitable.

## SECTION 4. RULES OF PRODUCTION AND PREPARATION

To make the text more consistent with the inclusion of of aquaculture production we suggest that 4.1.b is amended to:

**4.1b.** in the case where (a) (above) is not effective, substances listed in Annex 2, Tables 1 and 2 or substances approved by individual countries that meet the criteria established in Section 5.1, may be used as plant protection products, fertilizers, soil conditioners, insofar as the corresponding use is not prohibited in general agriculture **and aquaculture** in the country concerned in accordance with the relevant national provisions.

## ANNEX 1

We would like to suggest that *aquaculture animals* and *seaweeds* should be dealt with in separate sections to continue the classification as used for *plant and plant products* and *livestock and livestock products*. Therefore we suggest the following classification of the sections in Annex 1 Principles of organic production;

- **A1.** Plants and plants products
- **A2. Seaweeds**
- **B1.** Livestock and livestock products
- **B2. Aquaculture animals and aquaculture products.**

## B2. AQUACULTURE ANIMALS AND AQUACULTURE PRODUCTS.

- Paragraph 1 – since this paragraph is more related to trade than to aquaculture production we are of the opinion that this paragraph should be deleted.
- Paragraph 4 and Paragraph 5 reflects what is already covered by CAC/RCP 52-2003, paragraph 6.1.1. and 6.1.2, and can be deleted.
- Paragraph 9: We would like to include sufficient water flow into second sentence. So the second sentence should then be read:
 

They should be provided with good quality water which is suitable to the requirements of the species with sufficient water flow and oxygen and, in the case of filter feeding animals, other nutritional factors for their needs.

In addition we also think that other parameters should be considered as use of wrasse, cleanness of the closing net, temperature/oxygen, biomass etc.
- Paragraph 10: We do not agree that closed recirculation systems should be prohibited as there are many advantages using closed recirculation systems.
- Paragraph 13 and 14: See general comments bullet point two.
- Paragraph 15, fourth sentence: We suggest making it clear what type of feed is preferable regarding organic production. Our proposal for the fourth sentence is then:
 

The aquatic animal based portion of the feed should be made from fish meal and fish oil, or ingredients of fish origin, derived from the following sources in priority order.
- Point 16: As mentioned under “general comments”, OIE references should be in the general part of the Annex B2. We therefore suggest that the first part of the sentence is to be read as;
 

Disease prevention in organic aquaculture shall be applied as for the health care of livestock (terrestrial animals) in these guidelines, specifically Annex I, part B1, paragraphs 20, 21, 24 and on the following additional points.
- Point 17. We agree to this point.
- Point 18: First part can be removed as it shows to general text in the OIE and Codes Code of Practice for fish and Fishery products, CAC/RCP 52-2003. Also the last sentence can be removed as it is already covered by the CAC/RCP 52-2003. Our proposal will then be:
 

18. Live fish should be fish should be transported in suitable tanks with clean water, which meets their physiological needs in terms of temperature and dissolved oxygen.

## B2. SEaweEDS

We agree to this section, but have proposed the heading to be “A2. Seaweeds” as this a sort of plant production but related to water conditions.