

CODEX ALIMENTARIUS COMMISSION

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Food and Agriculture
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Agenda Item 5 (b)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

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**Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods
(CAC/GL 32-1999) to include Aquaculture and Seaweed**

COMMENTS AT STEP 3

COMMENTS FROM:

ARGENTINA
BRAZIL
COSTA RICA
INDIA
JAPAN
KENYA
NORWAY
PERU

ARGENTINA**Argentina's reply to the final document of the Electronic Working Group
(CX/FL 13/41/6)****Revision of the Guidelines for the Production, Processing, Labelling and Marketing of Organically
Produced Foods (CAC/GL 32-1999) to include Aquaculture and Seaweed****General Comment:**

Argentina would like to thank the European Union for coordinating the electronic working group and for providing the opportunity to present comments.

Argentina understands that the inclusion of aquaculture in the organic production Guidelines allows expanding its scope and address activities that have great development potential.

In general terms, Argentina shares the concepts expressed in the final report of the electronic working group (CX/FL 13/41/6).

At the same time, Argentina would like to have some subjects reviewed to allow not only to expand the scope of the Guidelines but also to establish criteria adapted to the production systems in a manner that would allow them to become operational while respecting the principles of organic production.

Although at the present time aquaculture is engaged in the production of fish and algae, we can foresee in the near future commercial enterprises destined to the organic production of aquatic plants, amphibians and reptiles, among others. Therefore the urgency of expanding the scope of the Guidelines.

Regarding the maximum stock densities for aquaculture animals, we suggest that the national competent authorities be the ones in charge of determining the maximum values by specie for the different environmental and production conditions, while ensuring animal welfare.

Regarding the prohibition of hormonal treatments as part of the reproductive management, Argentina suggests that a proviso be included regarding its use for native migratory species that do not breed in captivity. Regarding this issue we propose that special cases may be considered for relevant commercial species such as *Pseudoplatystoma sp* (Surubí) or *Piaractus mesopotamicus* (Pacú).

We also propose to allow the use of closed recirculation systems not only for the hatchery stages but in all stages of the animals' production cycle. This is based on the scarce availability of quality superficial waters and to comply with the organic production principles regarding the need for a rational use of natural resources. Although these systems require a higher investment, they permit the activity to take place in areas where abundant water is not permanently available allowing the development of organic enterprises under these conditions, thus expanding the range of activities of the operators.

Specific comments

Argentina does not comment regarding those points about which there is agreement with what has been proposed in the final document of the electronic working group, but we do offer comments regarding those points over which there is disagreement.

Table of Contents**Annex 1.Principles of Organic Production****A1 Plants and plant products****A2 ~~Seaweeds, other algae and their products~~**

It is proposed:

A2 Algae, aquatic plants and their products

Rationale: Argentina proposes to simplify the title as mentioned above with the wider interpretation of the meaning of algae in all their habitats. We also suggest the inclusion of aquatic plants in the title to allow coverage of those aquatic plants that may be of interest for human or animal consumption.

Section 1

Scope. Point 1.1

- a) unprocessed plants and plant products, ~~seaweed and other algae and their products~~ , **algae, aquatic plants and their products**, livestock and livestock products, aquaculture animals 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 same given for point A2.

Definitions

~~“Aquaculture” means the farming of aquatic organisms (fish, molluscs, crustaceans, seaweed and other algae) involving intervention in the rearing process to enhance production and the individual or corporate ownership of the stock being cultivated~~

We propose substituting the definition of “aquaculture” for the one that follows and to add the definition of “aquatic organisms”.

“Aquaculture: productive management of aquatic organisms in a restricted environment”.

“Aquatic organisms” includes fish, reptiles, amphibians, crustaceans, molluscs, echinoderms, tunicates, sponges, algae and aquatic plants that have a partial or complete cycle in direct relation to the water, originated in wild or produced by culture. It also applies to zooplankton, rotifers, annelids and other organisms to feed.”

Definitions

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

Rationale: The substitution of the terms “~~aquaculture animal or seaweed~~” by the term “aquatic organisms” has the purpose to cover all species included in the scope.

Definitions

~~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.

We propose substituting the given definition by the following one:

“Containment system: facilities for the production and/or harvest of aquatic organisms in a restricted environment.”

Rationale: The same given for point A2.

Definitions

[Conversion period means the transition from conventional to organic farming within a given period of time, during which the guidelines concerning the organic production have been **fully and continuously** applied.

Or

Conversion means the time of transition from non-organic to organic farming

Rationale: We accept the inclusion of the definition given for “conversion period”. It is added to the definition that those guidelines must be complied **fully and continuously**.

Definitions

[Locally grown aquatic species means both aquatic species which are grown within their natural range and those aquatic species which though outside their natural range, have been grown in commercial practice in an area and have adapted **well** to the local environment and management conditions **without adverse effects on habitats or on native species**]

Rationale: It is considered convenient to maintain the last sentence of the paragraph to ensure that locally adapted species do not produce harmful effects on the ecosystem.

Definitions

~~**Seaweed** means large marine algae occurring both naturally and under cultivation, but specifically excluding phytoplanktonic algae and microalgae.~~

We propose eliminating the definition of “Seaweed” and adding the one for “Algae”.

“Algae”: A diverse group of heterogeneous non vascular organisms that covers both microalgae as well as macroalgae, with different levels of organization of the thallus, generally photosynthetic but also presenting a diversity of nutritional models and that live in sea and fresh water habitats and even in extreme environmental conditions.

Rationale: Argentina shares the position of Greece and New Zealand in the sense that the term algae should have a wide scope and cover sea weeds as well as those of other habitats, may they be microalgae or macroalgae.

This concept expands the production alternatives of organic algae producers and promotes multitrophic production systems in which the production of microalgae is used as feed for the cultivated species (i.e. bivalve molluscs).

A.2 SEaweeds and seaweed other algae and their products**A2 Algae, aquatic plants and their products**

Both the title as well as paragraphs 1 to 8 each time that “*seaweed and other algae*” are mentioned should be replaced by **Algae, aquatic plants and their products**.

Rationale: The same given for point A2.

B.2 AQUACULTURE ANIMALS AND THEIR PRODUCTS**Paragraph 9)**

..... The aquatic animals should be provided with good quality ~~clean~~ water with a flow rate and temperature which ~~is suitable~~ ~~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.

Rationale: Our understanding is that the term “clean” is not appropriate, given that the production and/or harvest of fish growing in waters with clays in suspension also exists.

B.2 AQUACULTURE ANIMALS AND THEIR PRODUCTS**Paragraph 9) The last sentence**

.....The temperature and light conditions should be suitable for the species concerned in the particular geographic location of the production unit. ~~When netting is used it should be kept clean by physical means or by hand.~~

Rationale: We propose changing the placement of the last sentence of the paragraph as those concepts refer to paragraph 16, which is specific for “Cleaning and Disinfection” of the equipment used.

B.2 AQUACULTURE ANIMALS AND THEIR PRODUCTS

Paragraph 10. ~~Maximum stocking density should be lower than that used in conventional farming. [Competent authorities, or other recognised bodies (AR), shall (may (JP)) 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.]~~

Argentina proposes to substitute this paragraph by the following:

Paragraph 10. **Maximum stocking density should be lower than that used in conventional farming. Competent authorities should define values for maximum densities for the species grown taking into account the different habitats and productive systems and to ensure good animal welfare conditions.**

Rationale: We understand that the definition of maximum stock densities should be in the hands of the competent authorities and that those values are conditioned by the above mentioned parameters.

B.2 AQUACULTURE ANIMALS AND THEIR PRODUCTS

Paragraph 12)

~~12. [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.]~~

Argentina proposes substituting the previous paragraph by the following:

12. Closed recirculation systems are allowed when its use is consistent with the general principles of organic aquaculture, including the feeding and stock density requirements. Such systems will preferably be supplied with renewable energies from natural sources. Waste waters should be treated and the equipment will be maintained registering and ensuring a minimum impact over the environment.

Rationale:

We propose these systems be accepted as a production method all along the production cycle of the animals. These are systems that facilitate water quality control, something of great importance as there is increased contamination of superficial waters. The mentioned characteristics are shared (reduction of waste discharges and prevention of escapes) and the importance of closed recirculation systems in quarantine isolation is mentioned, as well as permitting a better disease control.

It is believed that the use of these systems would allow to increase the number of organic aquacultural enterprises (May it be through conversion of existing enterprises or through the installation of new ones) in areas in which a high permanent availability of water does not exist, thus offering a larger range of productive alternatives for organic producers.

B.2 AQUACULTURE ANIMALS AND THEIR PRODUCTS

Paragraph 14)

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

We propose the following:

*“14. Competent authorities or other recognised bodies, **when those don't exist**, shall also develop and publicise criteria for aquaculture production systems, with particular reference to type of system, water flow, oxygen saturation and effluent elimination and if necessary, following.”*

Rationale: As presented during the second round of the electronic working group, we propose the possibility that certifying entities develop the criteria for organic production systems only “when those don't exist”, that is to say the competent authorities do not exist (not all countries have the competent authorities in organic production).

B.2 AQUACULTURE ANIMALS AND THEIR PRODUCTS

Paragraph 15) Nutrition

Regarding paragraph 15 and the alternative text proposed by Argentina we propose combining concepts from both paragraphs in just one, as follows:

Operators should design a feeding plan that takes into account that:

- a) **feedstuffs should cover the nutritional needs of the animals at the different stages of their development with organic and/or natural feeds**
- b) **feedstuffs should contribute to good health and animal welfare,**
- c) **the quality and the nutritional composition if the feed should contribute to reach a high level of quality for the final edible product,**
- d) **additional feeding should have a minimal environmental impact,**
- e) **no use of growth factors or synthetic amino acids is permitted**

Regarding feeds for carnivorous aquaculture animals:

- a) **They should be provided according to the following priority order:**
 - a.1) **feeds from organic agriculture**
 - a.2) **fish meal and fish oil and ingredients derived from organic aquaculture by-products**
 - a.3) **fish meal and fish oil and ingredients derived from trimmings of fish caught for human consumption in sustainable fisheries**
 - a.4) **raw materials from plant and/or animal origin. When the above mentioned feeds are not available, fish meal and fish oil derived from conventional aquaculture by-products may be used or, only for a specified period, conventional fish by-products from fish caught for human consumption in sustainable fisheries.**
- b) **the ration may include up to 60 % of organic plant material,**
- c) **dead animals from any aquaculture production system should not be used when their death was due to disease or unknown causes,**
- d) **feedstuffs produced from animals of the same specie shall not be used as feed.**

Regarding paragraph 15' it is suggested a better wording as the mention of “**an absence of organic feed materials**” would be understood as referring to materials for animal feeding. Argentina is in agreement that the restriction of a maximum 2% be applied to additives.

B.2 AQUACULTURE ANIMALS AND THEIR PRODUCTS

Paragraph 16) Health and welfare

Argentina keeps the term “*shall*” in the first line as it corresponds to the principles for the organic production of animals.

Regarding homeopathic treatments we propose the following text:

~~“Homeopathic medicines~~ **Alternative natural** treatments shall be used in preference to chemical allopathic veterinary drugs or antibiotics provided that their therapeutic effect is effective for the animal species”.

Rationale: Argentina has no knowledge about the use of homeopathic treatments in aquaculture and suggests incorporating a wider reference to alternative natural treatments that may be developed in the future.

B.2 AQUACULTURE ANIMALS AND THEIR PRODUCTS

Paragraph 17)

17. ~~Hormonal treatments should not be used.~~ See final sentence of 8 above.

We propose keeping paragraph 17 with the following text:

17. Hormonal treatments shall not be used, **but in the case of native migratory species that do not breed naturally when raised in captivity, hormones or similar synthetic substances may be used.**

Rationale: The addition at the end of the paragraph allows that economically significant migratory species that are produced conventionally may also be produced organically, thus expanding the productive alternatives for operators.

B.2 AQUACULTURE ANIMALS AND THEIR PRODUCTS

Paragraph 17) Transport

In the first line of the paragraph the term “should”.is kept as they are internationally recognized standards.

...Live fish ~~fish~~ **aquatic animals** (TH) should be transported in suitable containers with ~~clean~~ water, which meets their physiological needs in terms of temperature and dissolved oxygen...

Rationale: Rationale: Our understanding is that the term “clean” is not appropriate, given that the production and/or harvest of fish that grow in waters with clays in suspension also exists, as was explained in paragraph 9.

B.2 AQUACULTURE ANIMALS AND THEIR PRODUCTS

Paragraph 18) Slaughter

Argentina agrees to keep the term “*should*” as it responds to an organic production principle.

Annex 2 Permitted substances for the production of organic foods

Table 1'. Agricultural inputs used for fertilizers and conditioners of aquaculture ponds.

Regarding the items mentioned:

1.1 Fertilizers... We propose to add in the details: **Proceeding from non resinous woods not treated with preservation products.**

1.2. Manure... We propose to add in the details: **Only composted**

1.4. Leftover products from We propose to add in the details: **Expand to other agrifood industries and exclude ammonium stillage**

Annex 2 Permitted substances for the production of organic foods

Table 2' Cleaning and Disinfectant treatments approved for organic aquaculture

Regarding the inclusion of Table 2' suggested by Thailand “Substances for pest and disease control for aquaculture in the absence of animals (AA) or in the presence of animals (PA)” Argentina suggests it be revised with further input from the countries.

Annex 3

MINIMUM INSPECTION REQUIREMENTS AND PRECAUTIONARY MEASURES UNDER THE INSPECTION OR CERTIFICATION SYSTEM

Production according to these guidelines should take place in an unit where the land parcels, production areas, farm buildings and storage facilities for crop, ~~and~~ livestock ~~and aquaculture and seaweed/other algae, algae~~ **and aquatic plant sites** are clearly separate from those of any other unit which does not produce according to these guidelines; preparation and/or packaging workshops may form part of the unit, where its activity is limited to preparation and packaging of its own agricultural produce.

Rationale: The same given for point A2.

Annex 3

MINIMUM INSPECTION REQUIREMENTS AND PRECAUTIONARY MEASURES UNDER THE INSPECTION OR CERTIFICATION SYSTEM

4. - When the inspection arrangements are first implemented, the operator and the official or officially recognized certification body or authority should draw up and sign a document which includes:

- a) a full description of the unit and/or collection areas, showing the storage and production premises, **and** land parcels, **aquaculture and seaweed/other algae algae and aquatic plant sites** and, where applicable, premises where certain preparation and/or packaging operations take place;
- b) and, in the case of collection of wild plants **and wild seaweeds or other algae algae and aquatic plants**, the guarantees given by third parties, if appropriate, which the producer can provide to ensure that the provisions of Annex 1, **A.1** para **10 9** are satisfied;

Rationale: The same given for point A2.

Annex 3

MINIMUM INSPECTION REQUIREMENTS AND PRECAUTIONARY MEASURES UNDER THE INSPECTION OR CERTIFICATION SYSTEM

12.- Where an operator runs several production units in the same area (parallel cropping), units in the area producing crop, crop products, **algae, aquatic plants seaweed/other algae or their products** not covered by Section 1 should also be subject to the inspection arrangements as regards the dash points of paragraph 4 and paragraphs 6 and 8 above. Plants of indistinguishable varieties as those produced at the unit referred to in paragraph 3 above should not be produced at these units:

Rationale: The same given for point A2.

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. We would like to thank the European Union on the work as a coordinator of the electronic working group on organic aquaculture.

We understand that this revision should focus on the development of general criteria for organic aquaculture. It would be premature and difficult to set specific production criteria (for example, maximum stocking density, water flow and oxygen saturation) for all species and taking into considerations the differences in the production and environmental conditions worldwide.

Brazil believes that it is not necessary to define 'organic aquaculture' as the Foreword describes adequately the principles on organic production which covers appropriately organic agriculture and aquaculture.

Brazil does not agree with the development of a specific section for seaweeds and other algae (section A.2 in Annex 1). Most of the proposed principles for these products are repetitive and already contemplate in other sections of the Guidelines. The few specific requirements for siting, conversion period and collection of edible seaweeds growing naturally are cross references from other sections and could be adequately covered by small amendments in these sections. Additionally, the inclusion of 'other algae' in this section is not consistent with the proposed definition of 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:**

6. ...The primary goal of organic production is to optimize the health and productivity of interdependent communities of soil or aquatic life ~~life~~, plants, animals and people.

Rationale: *The word 'life' is repeated and should be deleted.*

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, seaweed and other algae and their products, livestock and~~ **aquatic organism and their** ~~livestock products, 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: *Brazil understands that the term 'aquatic organism' should be used instead of 'aquaculture animal, seaweed and other algae'. This amendment avoids being too restrictive in relation to the scope of the guidelines. Furthermore, this approach is aligned with the need of regular improvement and updating of the guidelines and facilitates its revision.*

Section 2. Description and Definitions:**2.2 Definitions**

Aquaculture means the farming of aquatic organisms ~~(fish, molluscs, crustaceans, seaweed and other algae)~~ **in inland and coastal areas**, involving intervention in the rearing process to enhance production and the individual or corporate ownership of the stock being cultivated¹.

Rationale: *Brazil suggests the adoption of the aquaculture definition from the FAO Glossary of Aquaculture. We do not support restricting the concept of aquatic organisms to fish, mollusks, crustaceans, seaweed and other algae. It exempts from aquaculture some species that could be farmed in this type of system and safely consumed by humans.*

~~(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.*

~~[Closed recirculation system means a type of enclosed unit (on land or a vessel), 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 deleting this definition as we do not support the prohibition of closed recirculation systems for organic production at the present time.*

Containment system means equipment for growing ~~aquaculture animals or seaweed~~ **aquatic organisms** which ~~prevents~~ **minimizes the risk of 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;

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. Additionally, we suggest to replace the term 'prevents' by 'minimize the risk', because some of the containment systems (for example, long-line and suspended ropes) do not contain the aquatic organisms in a manner which avoids their dispersal.*

[Conversion period means the transition from conventional to organic farming within a given period of time, during which the guidelines concerning the organic production have been applied ~~Or~~
Conversion means the time of transition from non-organic to organic farming]

***Rationale:** Brazil agrees with the first definition. The second definition is incomplete as it does not take into consideration the need to apply the organic production practices during this period.*

~~[Locally grown aquatic species means both aquatic species which are grown within their natural range and those aquatic species which though outside their natural range, have been grown in commercial practice in an area and have adapted well to the local environment and management conditions without adverse effects on habitats or on native species]~~

***Rationale:** Brazil understands that this definition is unnecessary and should be deleted. Trying to define locally grown aquatic species can be difficult, especially for countries that have a mega biodiversity. Additionally, we have suggested further amendments that eliminate the need for the use of this term.*

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

~~6.7' During [registration] of the aquaculture farm/ seaweed or other algae collection unit by the accredited certifying [agency], the **organic** producer has to present an annual 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

Siting

~~4. 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. **The siting, design and construction of aquaculture farms should follow principles of best aquaculture practice, appropriate to species. The physical environment with regard to temperature, current, salinity and depth should also be considered as different species have different environmental requirements.** The production area should have characteristics which allow the production of products while minimizing negative environmental 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. **Ponds should have separated inlets and discharge canals so that water supplies and effluent are not mixed. Adequate facilities for the treatment of effluent should be provided to allow sufficient time for sediments and organic load settlement before used water is discharged into the public water body. Water inlets and outlets to ponds should be screened to prevent the entrance of unwanted species.** The boundaries of the production unit should be clearly defined and marked appropriately.~~

Rationale: Brazil understands that part of the text from section 6.1.1 from the [Code of Practice for Fish and Fishery Products](#) could be used as a reference for this paragraph. The first sentence about the growing water quality should be moved to paragraph 5.

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 in accordance with the FAO Technical Guidelines for Aquaculture Certification, 2014.

Rationale: Brazil suggests deleting the reference to the FAO Guidelines as this document states in paragraph 31 that if wastewater is used, the WHO guidelines for the safe use of wastewater and excreta in aquaculture should be followed.

Origin of stock

8. ~~It is preferable that locally grown aquatic species be used for organic production where possible.~~ The species should be able to adapt to local conditions and selection criteria should include their vitality and resistance to pests and diseases. 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 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 bivalve shellfish, seed may be wild-harvested from outside of the production area, provided such harvesting is permitted by competent authority, and records are kept to allow it be tracked back to the collection area. Genetically modified organisms (GMOs) ~~and stock produced using hormones,~~ **artificial polyploidy, cloning, artificial hybridization, artificial sterilized and single sex strains** must not be used~~].~~

Rationale: Brazil understands that the first sentence is not necessary. Organic aquatic organisms must be able to adapt to local conditions and this is already reflected in the paragraph. Besides, we believe that defining locally grown aquatic species can be difficult, especially for countries that have a mega biodiversity. Finally, we propose an amendment in the last sentence to clarify that stocks produced by artificial polyploidy, cloning, artificial hybridization, artificial sterilized and single sex strains must not be used in organic aquaculture.

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 aquatic animals should be provided with clean water with a flow rate and temperature which meets 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 be suitable for the species concerned in the particular geographic location of the production unit. When netting is used it should be kept clean by physical means or by hand.

Rationale: Brazil understands that it is not necessary to specify how stocking density should be regulated.

10. ~~Maximum stocking density should be lower than that used in conventional farming. [Competent authorities, or other recognised bodies, shall (may) 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.]~~

Rationale: Brazil does not support the proposed paragraph as it does not provide enough guidance for countries on how to set maximum stocking density. Besides, other parameters could be more relevant to guarantee the natural behavior and welfare of the species involved.

12. ~~[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.]~~

Rationale: *Brazil understands that the use of recirculation systems in organic production should not be prohibited. As mentioned in the paragraph this type of systems has positive features that could be compatible with the principles of organic production in certain conditions. Thus, Brazil suggests deleting this paragraph.*

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, [except under conditions of para 15' below]. [Carnivorous fish should not be fed material from the same species/family,] 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, or from organic feed material of non-aquatic origin, derived from the following sources in priority order:

- 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, or
- organic feed material of non-aquatic origin as allowed by national legislation.

~~• [Alternative text suggested by Argentina:~~

~~• When designing the diet plan the operator must consider:~~

~~• a) foods that contribute to good health and animal welfare~~

~~• b) that the animals are fed in sufficient quantity and with organic feed and / or natural quality, according to production systems that meet their nutritional needs for different stages of development.~~

~~• c) that the quality of food and their nutritional composition contribute to high end product quality and edibility;~~

~~• d) to minimize the environmental impact • The animals are fed with natural feed in the production environment.~~

~~If this is not available in sufficient quantity and quality, feed may be used, provided they are organic, which may include ingredients of plant, animal and / or mineral origin. • No use of growth factors or synthetic amino acids is permitted. • No use of any dead animals from aquaculture production system feed, when his death was due to disease or unknown causes.]~~

Rationale: *Brazil prefers the first option on nutrition.*

16. For an implementation period to be set by the competent authority, aquaculture products will maintain their organic status providing feed, consisting of at least 80% and calculated on a dry matter basis, is from organic sources produced in compliance with these Guidelines.

Rationale: *Brazil suggests the inclusion of a new paragraph with a similar exception contemplated in paragraph 14, section B.1, Annex 1.*

~~15 ' If substances are used as feedstuffs or in the preparation of feedstuffs for aquaculture animals, the competent authority shall establish a positive list of substances in compliance with the criteria of Section B1, para. 18. (IR, GR). [Where feed additives or, only where there is an absence of organic feed materials an amount of non-organic feed ingredients below 2% of the dry matter of the feed, are needed in order to meet aquaculture animal's nutritional requirements and in order to ensure good animal welfare these should by preference originate from natural ingredients. Only in the absence of suitable natural additives may chemically synthesized additives be permitted. All additives or non-organic feed ingredients may only be used with the permission of the certification body or authority and evidence of their need should be provided.] (UK & FR).~~

15"[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 15 above are not available, as a result of, for example, unforeseen severe natural or manmade events or extreme climatic 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] (TH, BR & UK).

Rationale: Brazil supports the second option as it is coherent with an existing exception already covered in the Guidelines. Additionally, it is not clear the rationale for the first option.

Health and welfare

16. ...

• ~~[Homeopathic treatments should be used by preference shall 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 modifying the second bullet of paragraph 16 to leave the text in accordance with the existing principle in paragraph 22.b, section B.1, Annex 1.

COSTA RICA

Costa Rica would like to express its appreciation for the opportunity to present its comments and ratifies its support for the inclusion of aquaculture and seaweed in the Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods.

INDIA

Comments on Annex 2

Table 1' - Agricultural inputs used for fertilizers and conditioners of aquaculture pond (suggested by Thailand)

1. List of permitted Substances ---Details/specific conditions

Point 1.1 in the second column should be modified as under:

If substances are not from organic sources, they need to be recognized by certification body or competent authority. ~~Inorganic substances added to provide plant nutrients such as phosphate rock shall be permitted substances.~~

Rationale: This substance in the mineral form is allowed under 2.1 in the same table.

Point 1.2 Manure

The following text should be inserted:

'Manures made from fresh crop residues produced on the organic farm'

Rationale: To give clarity to the source of manure.

Point 1.3 and 1.4 should be deleted as they these substances are used for preparation of manures.

Point 2 List of permitted inorganic substances

The term List of Permitted Inorganic Substances may be replaced with "Water /Soil reformers/Conditioners."

Rationale: These substances listed fall under the same category for use as water sanitizers or disinfectants.

Point 2.3 to Point 2.13

The suggested substances at 2.3 to 2.13 already exist in annex 2.

JAPAN

First of all, Japan thanks the EU, the e-WG chair, for preparing a final report of e-WG and is pleased to provide the following comments on the revised guidelines for organically produced foods. Our comments are presented in **bold and underlined font** (addition) and ~~bold and strikethrough font~~ (deletion).

GENERAL COMMENTS:

As we repeatedly have expressed our deep concerns, Japan proposes that the guideline should clearly state what organic production is and what it includes.

With regard to Para 5 of ANNEX 1 “A.2 Seaweeds other algae and their products,” para 17 of CX/FL 13/41/6 describes “Wild harvest of aquatic animals is in any case of scope of organic production.” If organic production includes wild harvest as para 17 describes, the guideline should stipulate this aspect in its foreword. In this sense, we acknowledge that organic aquaculture products should be harvested under the condition as natural as possible.

In our specific comments, Japan proposes wild harvest to be included in the concept of organic production although a production process of wild harvest in fishery does not meet one of organic aquaculture. .

SPECIFIC COMMENTS:

FOREWORD

1.Proposal: include concept of wild caught into paragraph 6.

Proposed text:

“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-food production~~ **production** is based on minimizing the use of external inputs, avoiding the use of synthetic fertilizers and pesticides, **especially in fishery, raising aquatic species under the condition as natural as possible, and harvesting wild stock in sustainable manner**. Organic ~~agriculture production~~ 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 **and fishery aquaculture** products. The primary goal of organic ~~agriculture-production~~ is to optimize the health and productivity of interdependent communities of soil or aquatic life ~~life~~, plants, animals and people.

Rationale:

As explained in the general comments, “organic” concept includes wild harvest.

2.Proposals: modify subparagraph h) in paragraph 7

Proposed text:

h) **promote sustainable use of natural aquatic resources** ~~preserve natural aquatic resources~~

Rationale:

Organic production system, which includes wild harvest of aquatic animals, promotes sustainable use of natural resources, not just preservation of them.

3.Question: Japan would like to request clarification of an example of usage of “net bags on trestle tables” as the containment system.

SECTION 2. DESCRIPTION AND DEFINITIONS

4. Comment:

Japan prefers “Conversion” to “Conversion period” with modification in 2.2 Definitions.

Proposed text:

Conversion means the ~~time of~~ transition from non-organic to organic farming.

Rationale:

“Conversion” does not include the sense of time frame. Concrete time frame of conversion is explained at later section, paragraph 7 on B.2 AQUACULTURE ANIMALS AND THEIR PRODUCTS of ANNEX 1.

ANNEX 1. PRINCIPLES OF ORGANIC PRODUCTION

5.Proposals: delete several words from the paragraph 8 on B.2 AQUACULTURE ANIMALS AND THEIR PRODUCTS.

Proposed text:

Origin of stock

8. It is preferable that locally grown aquatic species be used for organic ~~farming production~~ (AR) where possible. The species should be able to adapt to local conditions and selection criteria should include their vitality and resistance to pests and diseases. 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 or 90% of their final biomass is under organic management and providing the stock is healthy. ~~[alternative suggestion for consideration by eWG: When organic juveniles are not available, the certifying body would prescribe a time limit and percentage of non-organic juveniles for use according to the production of the species]~~ 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 bivalve shellfish,~~ Seed may be wild-harvested from outside of the production area, provided such harvesting is permitted by ~~legislation~~ the competent authority (BR), and records are kept to allow it be tracked back to the collection area. Genetically modified organisms (GMOs) must not be used. ~~[and stock produced using hormones must not be used].~~

Rationale:

Not only bivalve shellfish but also fin fish aquaculture, such as yellow tail (*Seriola quinqueradiata*), use wild seeds. As far as wild seed is caught in sustainable manner, wild seed should be allowed to be used.

Hormonal treatment for enhancing growth should be restricted for organic aquaculture. However, maturation inducing hormone should be permitted. In some cases, seed production without hormonal treatment is difficult.

6. Proporsals: modify paragraph 10 on B.2 AQUACULTURE ANIMALS AND THEIR PRODUCTS.

Proposed text:

~~[Competent authorities or other recognised bodies (AR), shall~~(may (JP)) 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.]

Rationale:

Japan understands the rational of this paragraph. However, it would be very difficult to decide appropriate density for a species. Therefore, this guide value should be optional, not mandatory.

7. Proposals: delete the last sentence in paragraph 12 on B.2 AQUACULTURE ANIMALS AND THEIR PRODUCTS.

Proposed text:

[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.]~~

Rationale:

Although closed recirculation systems are useful method to minimize negative impacts to environment, this system is far from natural condition. Therefore, use of the system should be limited.

8. Proposals: Japan deletes a part of fifth line in paragraph 15 on B.2 AQUACULTURE ANIMALS AND THEIR PRODUCTS and adds only last sentence by the proposal of Argentina with modification.

Proposed text:

...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, or from organic feed material of non-aquatic origin, derived from the following sources in priority order:...

Rationale:

In natural condition, eating same fish species (cannibalism) often occurs.

Proposed text:

In order to avoid unexpected adverse effects, such as spread of diseases, to both farmed fish and wild aquatic animals living around the farming area, any dead animals should be avoided from aquaculture production system feed, when their death was due to disease or unknown causes.

Rationale:

Both farmed fish and wild aquatic species should be protected from adverse effects from feeding dead animals.

5. Proposal: delete second bullet regarding Homeopathic treatments in paragraph 16 on B.2 AQUACULTURE ANIMALS AND THEIR PRODUCTS

Proposed text:

~~[Homeopathic medicinestreatments should be used by preference shall be used in preference to chemical allopathic veterinary drugs or antibiotics] [provided that their therapeutic effect if effective for the species of animal and the condition for which the treatment is intended] (NO)~~

Rationale:

Homeopathy is not scientifically supported treatment.

KENYA

Kenya supports the inclusion of Aquaculture and Seaweed to the Guidelines. However ,our concern is that the document will be so big and some important topics and sub-topics will be lost or not covered in detail due to unsimilar products lumped together in a code.

NORWAY**(ii) Specific Comments****2.2 Definitions****Closed recirculation system**

[Closed recirculation system means a type of enclosed unit (on land or a vessel), 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.]

We would like to delete the sentence **with recirculation depending on permanent external energy input to pump/circulate the water**

Reason: there is no need to include this technical aspect in the definition. We cannot see what this adds, on the contrary it is confusing and too technical. We would prefer to delete this technical requirement, as there might be systems in the future which will not need permanent external energy input.

We would also like to be more precise in the wording in the parentheses (**on land or a vessel**) as we are of the opinion that it should be (**on land or in water**).

The reason for this is that water is the correct term together with land, (as there is no description of what kind of installation there will be on land) there might be other installations in the water than vessels.

The paragraph with the amendments:

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

This definition is closely linked to paragraph 12. Please find comments below.

ANNEX 1 Principles of organic production**B2. Aquaculture animals and their products****Paragraph 12 Closed recirculation systems**

12. [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.]

We do not agree that closed recirculation systems should be prohibited. National authorities should have the possibility to approve the system after a thorough examination of both the benefits and disadvantages. Therefore this guideline should reflect the elements to be considered **before** the approval or prohibition.

Reason: there are many advantages using closed recirculation systems, such as reduction of waste discharges and prevention of escapes. Also, there are alternatives for example by using renewable energy resources.

In line with this, we would like to put forward for the committee's consideration a possible new paragraph 12:

The competent authority should ~~decide whether or not to approve~~ base their possible approval of closed recirculation systems ~~after a thorough~~ examination and evaluation of the total environmental viability and compatibility with organic production.

Stocking densities and criteria for aquaculture production systems (paragraphs 10 and 14)

10. Maximum stocking density should be lower than that used in conventional farming (IT). [Competent authorities, or other recognised bodies (AR), shall (may (JP)) 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.]

We are still of the opinion that Codex should established criteria for stocking maximum densities, and that these criteria would closely be connected to specific criteria like for example, type of system, water flow and oxygen saturation.

However these criteria should be science based, and as there are currently no such information available, we accept that these criteria are not set by Codex at this point of time. However we would like to come back to this matter in the future.

Consequently we support the wording of the amended text in square brackets in paragraph 10 with the following amendments:

Maximum stocking density should be lower than that used in conventional farming ~~(IT)~~. [Competent authorities, ~~or other recognised bodies (AR)~~, shall ~~(may (JP))~~ 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.]

We also support the wording of the amended text in square brackets in paragraph 14, with the following amendments:

14.

~~[Competent authorities or other recognised bodies (AR) shall also develop and publicise criteria for aquaculture production systems, with particular reference to type of system, water flow, oxygen saturation and effluent elimination and if necessary, following.]~~

Paragraph 15 Nutrition

If substances are used as feedstuffs or in the preparation of feedstuffs for aquaculture animals, the competent authority shall establish a positive list of substances in compliance with the criteria of Section B1, para. 18. (IR, GR).

We support that Competent authorities should establish a positive list of feed additives, antioxidants, pigments and preservatives for use in preparation of feedstuffs for aquaculture animals, based on criteria used for feed additives for agriculture in Section B.1 para 18. However different positive lists among countries may cause great difference regarding quality for the same type of species, and can give trading problems. It might therefore be appropriate for the coming CCFL to consider possible future work on establishing a Codex list for livestock and aquaculture.

15' Feedstuffs

Where feed additives or, only where there is an absence of organic feed materials an amount of non-organic feed ingredients below 2% of the dry matter of the feed, are needed in order to meet aquaculture animal's nutritional requirements and in order to ensure good animal welfare these should by preference originate from natural ingredients. Only in the absence of suitable natural additives may chemically synthesized additives be permitted. All additives or non-organic feed ingredients may only be used with the permission of the certification body or authority and evidence of their need should be provided.] (UK & FR).

We would like to support the proposal from UK and FR, to ensure access to aquaculture feed who meet the animal's nutritional requirements and in order to ensure good animal welfare.

PERU

Peru endorses the text as written in Agenda Item 5(b) – CX/FL 13/41/6: “Revision of the Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods (CAC/GL 32-1999) to include Aquaculture and Seaweed.”