

IFOAM EU Position Paper on the Use of Non-organic Juveniles in Organic Aquaculture

14 May 2015

Article 25e(3) of Regulation (EC) No 889/2008 restricts the use of non-organic aquaculture juveniles to no more than 50% from January 2015 and completely prohibits their use by the end of 2015.

IFOAM EU recommends urgent revision of this requirement in light of the following issues:

1. there is a lack of commercially available organic juveniles available for most species. For some species this is for technical reasons which require further research and development of the sector;
2. the lack of organic juveniles is already affecting organic aquaculture operators who are unable to meet the 50% requirement and will be unable to move to 100% organic juveniles by the end of this year;
3. the restriction on the movement of live animals between countries and regions based on the Council Directive (EC) No 88/2006¹;
4. the reluctance of farmers to introduce on their farms animals which could be unsuitable for the local (geographical) environment (e.g. genetic or population traits, resistance to different diseases, growth performances, reproductive cycle, behavioural characteristics, etc.);
5. the fact that for several species and regions there is no critical mass yet for making organic hatchery development viable;
6. the fact that several finfish species covered by the organic regulation (e.g. red drum and other sparidae, spinefoot, mullets, sturgeon, milkfish, siamese catfish) currently cannot be reproduced naturally, resulting in no availability of certified organic juveniles until further research is able to address this issue;
7. suitable organic feed is not available for all juveniles or at key life stages.

In accordance with the recommendations of the Expert Group on Technical Advice on Organic Production², IFOAM EU supports the use of non-organic juveniles, for on-growing purposes, when organic aquaculture juvenile animals are not available, subject to the following restrictions/recommendations:

1. organic juveniles should be used when available;
2. at least the latter three quarters of the duration of the production cycle shall be managed under organic management - Article 25e(2) of Regulation (EC) No 889/2008;

¹ Council Directive (EC) No 2006/88 of 24 October 2006 on animal health requirements for aquaculture animals and products thereof, and on the prevention and control of certain diseases in aquatic animals

² http://ec.europa.eu/agriculture/organic/eu-policy/expert-advice/documents/final-reports/final_report_egtop_on_aquaculture_part-a_en.pdf

3. as soon as suitable organic feed is available some species should move to whole lifetime organic;
4. after the approval of rules for the life cycle stage between hatching and weaning of juveniles, a transitional period may be established to allow farmers to comply.

Furthermore, the Group supports the creation of a database on the availability of organic juveniles produced in each country, comparable to the seed database - Article 48 of Regulation (EC) No 889/2008. The database must also contain information about production capacity to support the provision of adequate juveniles to meet industry needs. This will help to ensure transparency about the use of non-organic juveniles.

There is a further opportunity for the new organic regulation to be revised before it is published in 2017 if the database demonstrates a sharp increase in the availability of organic juveniles during the next six months. However industry experts including organic aquaculture operators trying to meet the requirement for 50% organic juveniles in the current regulation consider this very unlikely.