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**Comments on the draft Commission Regulation Amending Commission Regulation 889/2008 on detailed rules for organic production labelling and control with regard to organic aquaculture and seaweed**

Organic livestock farming claims to apply higher animal welfare standards than applied in traditional farming. Eurogroup is, however, concerned that animal welfare doesn't appear to be a priority in setting organic livestock standards for fish. In addition no EU minimum legal standards currently exist for fish welfare.

The organic standards presented in this draft regulation include provisions on the slaughter of fish. Eurogroup is working on this topic in the framework of the revision of the slaughter Directive. In Eurogroup's view, the draft standards proposed by the European Commission are not strict enough to guarantee the welfare of the farmed fish.

Eurogroup would like to submit the following comments to Member State representatives in the standing committee on organic farming. We urge you to support these amendments to the draft proposed by the Commission which would ensure that fish welfare is safeguarded in EU organic aquaculture systems.

**Main demands:**

- The collection of wild juvenile fish for aquaculture must be prohibited
- The need to respect the welfare requirements of fish must be clearly stated
- Clear and precise conditions must be included concerning the grading of fish to ensure that their welfare is safeguarded
- Artificial light must not be used where there is the risk of compromising the welfare of the fish
- Transport times must be reduced to the minimum and transport conditions must be specified in a more detailed way
- Slaughter by ice and bleeding without previous anesthesia must be prohibited
- Stunning/killing by asphyxia, thermal shock, salt/ammonia and carbon dioxide must be banned
- The proposed stocking densities for Atlantic salmon, rainbow trout and cod must be reduced and additional research is needed to determine the best stocking densities for other species.

**Specific comments****Article 11 - Origin of organic animals**

Eurogroup is opposed to the catching of wild juveniles as breeding (or production) stock. We believe the use of wild-caught fish should not be allowed for the following main reasons:

- the method of catching can be detrimental to the welfare of the fish.
- it further reduces severely depleted wild stocks such as cod and threatens endangered species such as glass eel. European eel stocks are greatly depleted because of eel farming practices such as catching juveniles. This seems to contradict the organic philosophy.

It thus seems contradictory that the draft Regulation says (Art.11 (4)): "Species shall be chosen which can be farmed with minimum harm to wild stocks." If eel farming is allowed, it will continue harming wild stocks and Eurogroup is subsequently calling on a prohibition of eel farming.

Eurogroup believes that the Regulation should also prohibit the use of triploid stock, all female stock and genetically engineered stock.

## Comments on organic fish farming

### Article 13 - General husbandry rules

The need to respect the welfare requirements of the fish must be added to this article.

In addition, under point 5 concerning the appropriate action to be taken to reduce the impact of escapes on the ecosystem, there should be an Environmental Impact Management Plan which will document these actions.

### Article 14 – Containment systems – specific rules

#### 14.1 (1): closed aquaculture facilities on land

Eurogroup believes that the prohibition of closed aquaculture facilities on land for the whole live cycle of fish is not right. This would mean that recirculation aquaculture systems would be prohibited. Provided the stocking density and other welfare measurements in recirculation systems are the same as in other systems, they should be permitted for organic aquaculture.

### Article 15: Management of the animals

Eurogroup believes that husbandry procedures require staff with appropriate management skills or specific training. Staff shall be able to undertake close monitoring of animals and rapidly respond and solve problems related to the animals or relevant equipment.

#### Article 15 (1): handling

“Grading shall be reduced to a minimum level except in hatcheries.”: This is a wholly inadequate reference to grading. In order to make a valid contribution to welfare a more detailed procedure should be added to the Regulation. Eurogroup would like to see the following aspects included:

- Grading of fish has to be restricted to a minimum and, if possible, should be combined with other necessary handling procedures such as vaccination.
- The grading devices should be wet, flexible and designed so as not to harm the fish. Fish must not be taken out of the water for grading. Active grading systems such as vacuum pumps should be rejected, only passive in-pond grading systems should be used.
- The necessary crowding time should be reduced to a maximum of two hours, and the new compartment the fishes are brought into after sizing must have the same water conditions as the original compartment.

#### Article 15 (2): use of artificial light

This provision is not sufficiently clear as to the conditions under which artificial light may be used. Eurogroup believes that any use of light which may cause welfare problems must be prohibited.

The maximum of 16 hours per day will, in some areas, when combined with natural daylight, mean 24 hours lighting a day. This is unacceptable.

#### Article 15 (6) and Article 23: transport of fish

Eurogroup believes that:

- Any kind of transport results in stress for the fish, and the time and the number of times a fish is transported must be restricted to a minimum. Aquaculture farms should be planned and built in such a way that most transports can be avoided and that the transporting time can be reduced. This can for example be done by slaughtering the animals on the farm.
- The water quality has to be monitored at frequent intervals and appropriate oxygen levels have to be assured. Sudden temperature changes have to be avoided. Transport and holding tanks should be large enough to allow complete freedom of movement for the fish and must not have any sharp corners or edges that might injure the fish. They must also allow the easy offloading of the fish when they reach their destination.
- To avoid injuries because of the pressure, no more than 30 kg of fish should be transported in a single transportation tank. The stocking densities during transport should be kept low, and species-specific needs and biology have to be considered. Research on optimum stocking densities for transport as well as research into the issue of housing is badly needed.
- Fish should never be transported outside of water.
- Different species of fish must not be transported together.
- The animals should be regularly monitored.

## Comments on organic fish farming

### Article 15 (7) and (9): slaughter

- Starvation periods of longer than 72 hours should not be permitted. Fat reduction of the flesh should be achieved through a pre-harvest diet containing a lower oil level than the diet fed throughout the rest of the production cycle.
- Slaughter by ice and bleeding without previous anesthesia must be prohibited.
- Stunning/killing by asphyxia, thermal shock, salt/ammonia and carbon dioxide are not acceptable from an animal welfare point of view and should be banned
- It is totally unacceptable to allow the ice slurry slaughter method for sea bass and sea bream, as it does not render fish immediately unconscious and is not a humane method of slaughter.
- Electrical stunning can be considered to be a humane slaughter method if proper attention is given to the use of correct voltage at the right frequency for the correct duration; fish should not regain consciousness after stunning and prior to death.
- Percussion stunning should be performed with accuracy and a percussive priest should always be available. Automated percussive stunning should only be used on batches of fish of consistent size.
- Only trained and competent personnel are to be allowed to dispatch fish using any of the above methods.

### Article 21 - General rules on disease prevention

(2) Veterinary management plan: Eurogroup believes that visits to the farm by the veterinarian should be far more frequent than once a year. We propose a frequency of at least once a month.

### Article 22 - Veterinary treatments

Eurogroup is concerned that many of the substances in Art 22 (1) a) b) and c) are unproven and unlicensed and may not work. This may affect the animals' welfare.

## Technical annexes

### Annex 1: Salmonids in fresh water

We believe that the permitted maximum stocking density of 30 kg/m<sup>3</sup> for rainbow trout and Atlantic salmon is too high. Welfare would benefit from a maximum stocking density of 20-25 kg/m<sup>3</sup>.

For Atlantic salmon this position is supported by the recently published opinion of EFSA, which states that: "Although the welfare of cage salmon has been observed to vary widely (from poor to good) at densities between 10 and 30 kg/m<sup>3</sup>, there are indications that above some higher stocking densities, e.g. 22-23 kg/m<sup>3</sup>, the risks of poor welfare increase"<sup>1</sup>.

### Annex 2: salmonids in sea water

Salmonids in sea water: We believe that the permitted maximum stocking density should be reduced from 18 kg/m<sup>3</sup> to 15 kg/m<sup>3</sup>

### Annex 3: cod

The permitted maximum stocking density of 25 kg/m<sup>3</sup> (offshore) and 35 kg/m<sup>3</sup> (onshore) is far too high. High stocking densities may impair the welfare of cod. Feed intake and growth are significantly lower among cod stocked at 30 and 40kg/m<sup>3</sup> than in those stocked at 10kg/m<sup>3</sup> (Lambert & Dutil, 2001). Reduced feed intake and growth in fish are often seen as indicative of poor welfare. Eurogroup believes that the maximum stocking density for cod should be 15kg/m<sup>3</sup>.

Eurogroup believes that further research is needed to assess the impact of stocking densities on health and behaviour, and to determine acceptable densities for other farmed species.

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<sup>1</sup> (Animal welfare aspects of husbandry systems for farmed Atlantic salmon, Scientific Opinion of the EFSA Panel on Animal Health and Welfare, 2008)

[http://www.efsa.europa.eu/cs/BlobServer/Scientific\\_Opinion/ahaw\\_op\\_ei736\\_salmonwelfare\\_en.1.pdf?ssbinary=true](http://www.efsa.europa.eu/cs/BlobServer/Scientific_Opinion/ahaw_op_ei736_salmonwelfare_en.1.pdf?ssbinary=true)