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To
IMO Institute for Market Ecology
and Bio-Foundation Switzerland
Weinfelden
Switzerland

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Comments on the first draft of AquaGAP standard for Good Aquaculture Practices

Dear colleagues

We thank you for your invitation to comment the first draft of your AquaGAP standard.

1. General objections

1.1. What is the role of IMO control?

Officially, IMO which has developed the AquaGAP Standard says that Bio-Stiftung Schweiz is the standards holder. To adepts however it seems quite obvious that in practice, IMO acts the role of the holder because the Bio-Foundation is personally and structurally not independant from IMO.

Already in recent years, IMO control has shown a tendency to create certification schemes (labels) of its own.

It is most widly accepted that no holder of a certification scheme should be identical with the body of certification or control. This logic should be followed reciprocally by a company which offers its services for certification and control.

1.2. Is there a true need for another certification scheme?

There exist already quite a variety of certification schemes for aquaculture:

- Friend of the Sea (FOS) with a total of certified production of about 350 tons per year
- several bio (eco) labels with a total production of less than FOS

Besides that, there are

- the privately built body GlobalGap setting voluntary standards for good practices in agriculture (including aquaculture) and
- GAA founded by shrimp aquaculture companies which is not a third party certification scheme.

Thus, the problem in aquaculture is not a lack but an oversupply of labels which confuses consumers, producers and vendors. Is there a true need for new certification schemes like the ones proposed by WWF or IMO?

As a matter of fact there is a need for a new scheme which yields additional values.

The already existing schemes are of poor performance in 2 critical fields:

- fish in/fish out ratio above 1.00 is not sustainable
- fish welfare is no criterium at all (or, with eco-labels, not a very strong one)

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New schemes make sense only if they demand strong achievement in the 2 fields named above.

2. Technical objections

See also the attached documents:

- [fair-fish Comments on the WWF Draft of Tilapia Standards](#)
- [fair-fish Recommendations for Good Husbandry and the Painless Killing of Farmed Fish](#)

2.1. Fish in/fish out ratio (FFER)

We agree with the calculation, with one exception: The use of trimmings can only be excluded from the calculation if deriving from the same production circle.

We severely do NOT agree with the FFER limit proposed (goal to be reached within three years = "below 4") which allows to feed on for times the fish mass the plant provides.

If aquaculture really shall become an alternative to the depletion of the seas, the goal to reach in few years cannot be different from FFER considerably below 1.

There are 2 ways to reach this goal:

- by predominantly farming herbivores (and omnivores which can be fed without fish)
- by replacing fish protein by terrestrial slaughterhouse wastes or eventually by adding artificial amino acids to vegetable feed components.

2.2. Fish welfare

We acknowledge that the drafted standards address the issue of animal welfare. Yet the underlying concept of animal welfare is too narrow as it aims at prevention from pain, stress, injury and disease solely. Of course such prevention is crucial, but rather than on a reduction of stressors, the welfare of farmed animals depends on the suitability of a given artificial habitat to the needs of a species.

2.2.1. Stocking density

Stocking density should no longer be looked at as limited by water parameters only, but by animal welfare criteria as well. The artificial habitat has to provide all essential characteristics of the natural habitat of the species concerned, like e.g. space for withdrawal. This provision may be hindered or even inhibited by too high stocking density.

Whereas it is questionable to define a general maximum as the adequate density depends on the species, we could agree with 15 kg per cubic meter and 20 kg in case of proven adequateness for the fish.

We are however strongly opposed to higher (even doubled) density maxima for recirculation systems which are merely motivated by considering water parameters, and to increasing the density of flatfish if they do not make use of the whole surface. Generally the appropriate density can only be defined on the basis of the biology and needs of the species in question.

2.2.2. Habitat

Design, construction, operation and maintenance of the artificial habitat of the fish must meet the needs of the species according to the most recent state of scientific and practical knowledge. Special attention has to be paid to

- provide structures in the bassins, ponds a.s.o. that allow the fish to act out his typical patterns of behavior, including sufficient and adequate space for withdrawal of subdominant individuals.

- provide structure which arrange for distinct stream velocities, especially in raceways, according to the needs of the species.
- provide structures above the bassins a.s.o. which arrange for sufficient shadowy spots the fish can frequent.
- provide structures in the surroundings of the bassins a.s.o. which prevent the fish from external effects by vibration, noise or light, be it caused during operation or visits.

2.2.3. Handling

Handling is the most direct intrusion in the life of a fish and therefore an important source of fear, pain, injury and stress.

- Handling the fish for sorting it by size during its lifetime must be restricted. Zero handling for sorting purposes should be fostered by stipulating built-in self sorting structures (grids) in at least new constructed or rebuilt artificial bassins a.s.o.
- Restriction of live transport to eggs and fingerlings as far as inevitable, while stipulating on-site reproduction as the normal case.
- Limit the times per season a fish may be handled in order to gain its sexual products under mandatory anesthesia.
- Limit any time out of water (according to the species, e.g. less than one minute) and compensate it by ensuring that the fish is kept sufficiently wet.

2.2.4. Harvesting and slaughtering

Harvesting and slaughtering are the extreme case of handling. The whole process has to be organized in order to reduce fear, pain, stress and injuries to a minimum in time and in extent.

- Limit pre-harvest fasting according to the characteristics of the species in the season in question.
- Limit pre-harvest crowding according to the characteristics of the species in the season in question.
- Stun each fish as soon as it has been taken off the water. Sole stunning methods to be accepted are:
 - percussion by one blow on the head (above the brain)
 - electrical stunning
 - immersion of Eugenol in the pre-slaughter bassin
- Kill each fish directly after stunning through bleeding

3. Conclusion

The AquaGAP Standard in its drafted form does not yield additional values compared with other aquaculture certification schemes. Moreover, the holder of the standard is not independent from a certification and controlling body (et vice versa).

We suggest to eliminate these two defects or to abandon the AquaGAP Standard.

As holder of a label which embraces animal welfare, sustainability and social concerns and is willing to cope with the feed issue, the fair-fish association signals interest in cooperation with the aim of establishing a higher standard for aquaculture.

Thank you for considering our comments and taking corresponding action.

Kind regards,

fair-fish association


Heinzpeter Studer, Director