

Aquaculture Advisory Council

Working Group 1 - Finfish meeting

15 October 2024 (09:00-12:45)

Thon Hotel EU – Rue de la Loi 75 – 1000 Brussels – Interpretation available in EN - FR – ES – IT

Minutes

PARTICIPATION LIST

WG1 MEMBERS

Andrea Fabris (API, Chair)	Douglas Waley (Eurogroup for Animals)	Nathalie Gamain (OFI)
Phil Brooke (CIWF, Vice-Chair)	James Hinchcliffe (EFFOP)	Ola Öberg (RECIRKFISK)
Leo Kirchmaier (ALFAA)	Catherine Pons (FEAP)	Paul Denekamp (Stichting Vissenbescherming)
Antonio Correia (APA)	Szilvia Mihálffy (FEAP)	Stefan Meyer (BVFfi)
Giulia Malerbi (Aquatic Life institute)	Javier Ojeda (FEAP)	Brian Thomsen (Danish Aquaculture Organisation)
Marine Levadoux (CIPA)	Maria Luisa Alvarez Blanco (FEDEPESCA)	Ana Granados (EFFAB)
Florian Guillou (CNP MEM)	Yannis Pelekanakis (HAPO)	Ole Christensen (FEFAC)
Pier Salvador (COGECA)	Teresa Morrissey (IFA)	Alain Schonbrodt (FVE)
David Bassett (EATIP)	Anna Pyć (Polish Trout Breeders Association)	

OTHER PARTICIPANTS

Invited: Jordi López Ramón (Aquatic Health Solutions), Rudolf Wilmes (DG SANTE), Pedro Rosado Martin (DG SANTE), Niall Gerlitz (DG MARE), Alfons Vazquez Obiols (DG SANTE).

Observers: Wasseem Emam (Ethical Seafood Research), Valentin Rosca (Moldovan Ministry of Agriculture and Food Industry), Dumitru Cocieru (Moldovan Ministry of Agriculture and Food Industry), Viorica Turcanu (Moldovan Ministry of Agriculture and Food Industry), Vasile Capatina (Moldovan Bureau for European Integration), Lone Flyholm (Norwegian Seafood Association – FEAP).

Member States Experts: Julián García Baena (Spanish Ministry for Agriculture – General Secretariat of Fisheries), Maria Vittoria Briscolini (Italian Ministry for Agriculture), Ilaria Gerraro (Italian Ministry for Agriculture), Irene Adelaide Forcella (Italian Ministry of Agriculture), Rui Oliveira (Portuguese Directorate-General for Natural Resources, Safety and Maritime Services), Bence Dániel Kovács (Hungarian Ministry of Agriculture).

Secretariat: Cynthia Benites (AAC Secretariat), Cécile Fouquet (AAC Secretariat), Charlotte Musquar (AAC Secretariat), Justine Marrot (AAC Secretariat).



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MEETING MINUTES

Welcome words by the Chair

Andrea Fabris (Chair) welcomed the present participants.

1. Adoption of the agenda and approval of the Minutes of the last meeting

The agenda was approved with two changes:

- Point 2: **Jordi López Ramón (Aquatic Health Solutions)** will present his report and not his work timeline
- Point 3: Change in the name of the point to "Industrial contaminants in fish and climate change"

An AOB was added by the **Chair** concerning the impacts of the reuse targets under the new Packaging Waste Recycling regulation.

The minutes of the last meeting were approved by written procedure.

2. Fish Health

i. Development of codes of good practice on the management of aquatic diseases

- o Presentation of the report by **WG1 expert Jordi López Ramón (Aquatic Health Solutions)**¹
- o **Exchange of views** with the Working Group members and approval of report

The **Chair and Pier Salvador (COGECA)** mentioned the technical and intelligible language used in the report,

¹ <http://aac-europe.org/wp-content/uploads/2024/11/2024.10.14-AAC-Jordi-Lopez-Ramon.pdf>



which is important for the farmers. **Pier Salvador (COGECA)** also added that the case studies presented proved that communication and knowing how to manage an outbreak is crucial for a proper management of diseases. Genetic selection should also be talked about to select local species.

The members have until 21 October to add comments in the document. Then, Jordi López Ramón (Aquatic Health Solutions) will have 10 days to finish it before 31 October.

ii. Fish parasites

- State of play on the matter by **Andrea Fabris (Chair)**
- Exchange of views with the Working Group members on how each country deals with the derogations and next steps

The Chair explained that according to Paolo Caricato (DG SANTE), the second part of the EFSA report, assessing "parasite-free" wild fish species, is expected before December. Preliminary results indicate no parasite-free zones except Antarctica. The publication is likely by the end of October as data remain unchanged. Member States await this part to decide on measures to be taken. The EFSA will present its findings at the next WG meeting (end of this year or early next year). They will discuss excluding some farmed fish species based on EFSA conclusions. Caricato suggests no major changes, as there might be no blanket exclusion. The Chair is not satisfied with these kinds of conclusions. **Javier Ojeda (FEAP)** mentioned that EFSA should promote having more research studies.

It was decided to wait for the second part of the report and the reactions from the Member States before drafting a letter.

iii. Animal Health Law

- Presentation of the results of the animal health control audits by **Rudolf Wilmes (DG SANTE)**²
- Exchange of views with the Working Group members on the implementation of the Animal Health Law in the presence of **Pedro Rosado Martin (DG SANTE)**

Many WG members reacted to this presentation. **Pedro Rosado Martin (DG SANTE)** and **Rudolf Wilmes (DG SANTE)** welcomed the comments and invited the members to send information.

Information about local interpretation and difficulties will be collected and sent to the Commission.

iv. Others

- Exchange of view with **Niall Gerlitz (DG MARE)** and **Alfons Vazquez Obiols (DG SANTE)** on several matters:
 - **the use of iodine as disinfectant**

Niall Gerlitz (DG MARE) mentioned that the main issue for iodine is to determine whether it falls under the biocides legislation or the veterinary medicine legislation, which would not have the same implications. As regard iodine as a biocide, it has now been recognized as an endocrine disruptor. The discussions with DG SANTE are ongoing and they need to know the specific products that are used with the specific circumstances in which they are used. He mentioned that iodine can be used to disinfect eggs.

² http://aac-europe.org/wp-content/uploads/2024/11/241016_AAC_WG_151024_RW_upd_II.pdf



The Chair mentioned the issue for eggs and their status, if they are live animals or not. **Ola Öberg (RECIRKFISH)** said that there is also a difference if they produce the eggs themselves or if they catch the eggs from a wild fish, which should also be discussed.

- **fish products and the maximum contaminant levels file (link to agenda point 3)**

Niall Gerlitz (DG MARE) reported no updates since the last Working Group meeting. They are still looking at all the data to bring forward new proposals for maximum levels of arsenic, especially for shellfish and mussels. Should there be any development, his DG SANTE colleagues will present it at the next meeting. Concerning the Regulation 2023/915, new maximum levels for mercury in farmed fish and PFAS are also foreseen. He noted that mercury is not a significant issue for aquaculture as species rarely reach current limits. Arsenic and contaminants in seaweed and algae are rising concerns, backed by an EFSA report. Data issues persist due to complications in determining the origin of products (imports/EU) and limited data availability.

The Chair mentioned that on PFAS, a survey was made last year where they were detected in drinking water, but not in freshwater fish at the moment. He also asked if this new regulation will also cover the feed contamination levels. **Niall Gerlitz (DG MARE)** mentioned that it will apply to feed also, but he needs to verify if it is relevant for feed or not concerning PFAS. **Ola Öberg (RECIRKFISH)** explained that PFAS could also be a problem about the materials and plastics from outside the farms. **Niall Gerlitz (DG MARE)** replied that larger fish like tuna or sharks are more likely to be contaminated but the farmers can control the feed in fish farms.

- **the medicated feed regulation exemption for fish farms**

Alfons Vazquez Obiols (DG SANTE) presented the medicated feed regulation exemption for fish farms³.

The Chair wanted to know how much is in the hands of Member States to not allow these derogations. There is a risk of having issues on the level playing field inside the EU. **Alfons Vazquez Obiols (DG SANTE)** mentioned that Article 6 of Delegated Regulation (EU) 2024/1159 establishes the conditions for the prescriptions and the possible derogations. The relevant derogation for aquaculture is Article 6(3). Member States cannot prohibit the use of this derogation concerning the group treatment of aquaculture species.

3. Industrial contaminants in fish and climate change

- Introduction of the topic by Chair **Andrea Fabris (API)**
- Exchange of views with the Working Group members and next steps

The Chair introduced the topic, with the problem of contaminants in the fish without responsibilities from the farmers coming from industrial pollution or the environmental pollution. This is the first recommendation that WG1 has committed to provide by October 2025.

Javier Ojeda (FEAP) and **Marine Levadoux (CIPA)** supported the idea of working with WG2 on this file. **Stefan Meyer (BVF)** strongly suggested looking into the effects that it will have on food safety, marketability and possibility to sell the products. **Ola Öberg (RECIRKFISH)** mentioned the correspondent work on contaminants in the algae sector.

³ <http://aac-europe.org/wp-content/uploads/2024/11/DA-on-oral-administration-slides-for-AAC.pdf>



The Chair will ask Working Group 2 to make a joint Focus Group on this topic. The idea is to draft a recommendation with some case studies.

4. Fish welfare

Fish Welfare Reference Center

- Summary of the August meeting and follow up by **Phil Brooke (CIWF)**
- **Exchange of views** with the Working Group members and next steps

Phil Brooke (CIWF) reported on the August meeting on the Fish Welfare Reference Center with DG MARE and DG SANTE. The Code of Good Practices on Fish Welfare has received a reply from the European Commission. The Aquaculture Assistance Mechanism is working on a first draft on good practices which will be published later in the year.

The importance of the review board of the Fish Welfare Reference Center was highlighted. **Giulia Malerbi (ALI)** asked about the role of the AAC in this review board. **Doug Waley (Eurogroup for Animals)** explained that a first meeting will take place in December 2024, but they have not invited anyone yet. **Phil Brooke (CIWF)** does not think that the AAC plans to do it in common, each organization could do it separately. **Ana Granados (EFFAB)** mentioned the AAC could have a seat in this board but not necessarily each organization. **Javier Ojeda (FEAP)** argued that both options are compatible and the AAC should go that way.

The Secretariat will ask the European Commission about the review board and the application process.

5. Sturgeon

- Update by **Andrea Fabris (Chair)**
- Exchange of views with the Working Group members and next steps

The Chair mentioned that this recommendation needs to be approved by 31 October 2025.

Stefan Meyer (BVF) asked if the Commission had plans to approach the US government concerning the endangered species. **The Chair** acknowledged the issue, stating DG MARE is gathering data on exports to the US from Member States. **Pier Salvador (COGECA)** and **Javier Ojeda (FEAP)** shared concerns on the labelling of caviar, with the lack of information to the consumers. **The Chair** noted that CITES is working on this, considering an identity document for caviar and sturgeon. **Paul Denekamp (Stichting Vissenbescherming)** sees the urgency of the situation but is also concerned about the welfare of the sturgeons and to have an acceptable way of farming them.

A draft recommendation will be circulated for comments around the end of November. A first Focus Group meeting will also be organised.

6. Domestication

- Update on Focus Group activities by FG leader **Ana Granados (EFFAB)**
- Exchange of views with the Working Group members and next steps

Ola Öberg (RECIRKFISH) suggested including diversification in the Focus Group's scope. **Paul Denekamp (Stichting Vissenbescherming)** stressed the importance of welfare and expressed doubts about diversification



and domestication but is open to discussions and meetings. **Nathalie Gamain (OFI)** emphasized the complexity of the issue and the importance of the next meeting. **Javier Ojeda (FEAP)** noted that this topic goes beyond welfare with many considerations to keep in mind. **Ana Granados (EFFAB)** mentioned that if domestication had to be included within a broader topic, she is happy to discuss it.

With the comments received, a webinar with experts will be organized, followed by an exchange of views and a follow-up discussion with the Focus Group members on a draft recommendation.

7. AOB & Conclusions

An AOB was added by the Chair:

- **Impact for aquaculture of the new Packaging Waste Recycling Regulation:**

The Chair mentioned that it will affect plastic materials used for packaging and plastic boxes for production. It is not only related to environmental sustainability but also to food safety. DG MARE could come to the next meeting, or a webinar could be organised on this topic. **Javier Ojeda (FEAP)** mentioned that it is an important topic that many people did not foresee. The MAC discuss it in their last meeting and FEAP has worked on it. He suggested to follow what is going on in the MAC and if there is no strict deadline, it could be possible to have a joint recommendation. The MAC should be the main place where this decision has to occur.

The secretariat will ask the MAC and see whether we will do a joint with the MAC or do it alone.

Andrea Fabris (Chair) thanked the members for their participation and concluded the meeting.

The next meeting of this Working Group will take place online on **18 February (morning)**.

