



Recommendation on the legal classification of farmed fish waste as manure

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Background

Recirculating aquaculture systems (RAS) are land-based fish farming facilities wherein water use is minimised through water reconditioning measurements and water reuse. Unlike in open water aquaculture, the water recirculation process in RAS makes it possible to control the culture conditions and to collect fish waste¹.

In the European Union (EU), the development of fish farm production involving RAS, along with the other aquaculture systems that allow for the settlement, separation and filtering of effluents as well as the collection of organic materials, increases the collection of the solid fraction of aquaculture effluents. The Federation of European Aquaculture Producers (FEAP) estimates that 55 tons of solid fraction of effluents are produced by RAS and non-RAS farms per year, and this figure is expected to increase in the coming years.

Effluents mainly consist of faeces, urine and water. Effluents do not differ from the manure of other farmed animals in terms of their risk of spreading diseases to humans or to other animals. Meanwhile, similar to feeds given to other farmed animals, fish feeds are regulated by the same strict EU legislation on animal feed. Fish digestion does not add anything to the faeces, just as in the case of terrestrial animals; in this sense, the solid fraction of fish farm effluents may be classified as 'manure'.

However, the use of the above organic material as fertiliser and soil improver has been prohibited in some member states because of the exception in the definition of manure set in the Animal By-Products Regulation (EC) 1069/2009, as follows: 'manure' refers to any excrement and/or urine of farmed animals other than farmed fish, with or without litter. Not being considered manure, this material has been classified by some member states as sludge and thus is managed according to the Regulation Sludge Directive (86/278). The AAC is unaware of the underlying reasons for such an exception.

AAC position

- The AAC supports the European Green Deal and the principles of circular economy. Valuable wastes should not be disposed of, as doing so leads to unsustainable practices. Provided the risks they pose to public and animal health are minimised; these materials should be safely used for various sustainable applications. For example, they may be applied as fertiliser or soil improver in agricultural fields.
- The AAC points out that even if the definition of manure in the Animal By-Products Regulation does not cover the solid fraction of fish farm effluents, this material should not be automatically classified as sludge.
- The AAC clarifies that the solid fraction of fish farm effluents is different from the organic materials derived from fish processing plants.

AAC recommendation

The solid fraction of aquaculture effluents should be classified as manure under the Animal By-Products Regulation, and the AAC calls for an amendment of this regulation.

¹ EUMOFA report on recirculation aquaculture systems (RAS). December 2020.



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The AAC acknowledges that amending a regulation is a lengthy procedure, which involves various stakeholders. Thus, the AAC encourages the European Commission, in cooperation with the AAC and member states, to also explore short-term/temporary solutions.



Aquaculture Advisory Council (AAC)

Rue Montoyer 31, 1000 Brussels, Belgium

Tel: +32 (0) 2 720 00 73

E-mail: secretariat@aac-europe.org

Twitter: @aac_europe

www.aac-europe.org