



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

Directorate B – Sustainability

Brussels

Dear [REDACTED],

I would like to thank you for your email of 20 July¹, in which you ask for clarification about the provisions of point 3.1.2.2 of Part III of Annex II to Regulation (EU) No 2018/848² concerning artificial hybridisation in fish and whether this would include stripping eggs/semen of different species/strains by hand and mixing them. Please accept my apologies for the late reply.

I would like to start by recalling the general principles of organic production laid down under Article 5 of Regulation (EU) No 2018/848 and in particular relevant in this case:

(i) the exclusion from the whole organic food chain of animal cloning, of rearing artificially induced polyploid animals and of ionising radiation;

(j) the observance of a high level of animal welfare respecting species-specific needs.

For the sake of clarity, I would also like to recall the provisions to which you refer in your letter, point 1.3.2.2 of Part III of Annex II to Regulation (EU) No 2018/848 as follows:

3.1.2.2. With regard to breeding, the following rules shall apply:

(a) hormones and hormone-derivates shall not be used;

(b) the artificial production of monosex strains, except by hand-sorting, the induction of polyploidy, artificial hybridisation and cloning shall not be used;

(c) appropriate strains shall be chosen.

Moreover, it is also important to underline the provisions of point 3.1.6.2 of Part III of Annex II to Regulation (EU) No 2018/848 concerning animal welfare, which read as follows:

“The handling of aquaculture animals shall be minimised, and shall be undertaken with the greatest care. Proper equipment and protocols shall be used to avoid stress and physical damage associated with handling procedures. Broodstock shall be handled in such a manner as to minimise physical damage and stress, and shall be handled under

¹ Ares(2022)5354428

² [EUR-Lex - 02018R0848-20220101 - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/eli/reg/2018/848/20220101/EN)

anaesthesia where appropriate. Grading operations shall be kept to a minimum and shall only be used where required to ensure fish welfare.”

The Regulation does not provide a definition for artificial hybridisation, but on the basis of the above provisions, and contrary to natural hybridisation, it can be deduced that any technique used to induce hybridisation that would not naturally occur, should be considered artificial, such techniques including e.g. the use of hormones, in-vitro fertilisation.

However, with respect to your question on stripping by hand, such a technique is not prohibited as such in organic aquaculture. Hand stripping is done to facilitate the release of mature sperm and eggs and it should be applied in compliance with the abovementioned provisions, which aim to minimise the handling of animals, and with care for the animal welfare and using anaesthesia where appropriate. Therefore, using stripping in the context of the potential facilitation of natural hybridisation is not prohibited as such, but should be performed in compliance with set requirements.

The present opinion is provided on the basis of the facts as set out in your email of 20 July 2022 and expresses the view of the Commission services and does not commit the European Commission. In the event of a dispute involving Union law it is, under the Treaty on the Functioning of the European Union, ultimately for the European Court of Justice to provide a definitive interpretation of the applicable Union law.

Yours sincerely,

