

POSITION PAPER

On the implementation of the FARM TO FORK Strategy

31 August 2020

Background

The European Commission published on 20 May 2020 its Farm to Fork Strategy¹ for a fair, healthy and environmentally friendly food system. This initiative will set out regulatory and non-regulatory measures to deliver more sustainable food systems and help achieve the EU's Green Deal ambitions towards climate-neutrality in Europe.

The European Green Deal² had set the path for a new, sustainable and inclusive growth strategy to boost the economy, improve people's health and quality of life, care for nature, and leave no one behind. The Farm to Fork Strategy ambitiously addresses the challenges of sustainable food systems and recognises the links between healthy people, healthy societies and a healthy planet. The strategy is also central to the European Commission's agenda to reach the United Nations' Sustainable Development Goals.

General comments

The Federation of European Aquaculture Producers (FEAP) welcomes the ambitions of the European Commission's Farm to Fork strategy for a fair, healthy and environmentally friendly food system.

FEAP completely shares with the European Commission the view that a sustainable food system should deliver affordable foods, improve the incomes of primary producers, and reinforce EU's competitiveness.

FEAP appreciates that in the strategy aquaculture producers are specifically mentioned, alongside farmers and fishers. This reference in the strategy will make aquaculture more visible.

The relevance of primary producers

- a) FEAP agrees with the strategy on the acknowledgement that European primary producers lag behind in terms of income and that its implementation should aim to ensure the possibility of a sustainable livelihood for them.
- b) This federation stresses the European Commission to also pursue its assessment of the rest of the value chain (manufacturing, processing, retailing, packaging and

¹ Farm to Fork Strategy Communication: https://ec.europa.eu/info/sites/info/files/communication-annex-farm-fork-green-deal_en.pdf

² The European Green Deal: https://ec.europa.eu/info/sites/info/files/european-green-deal-communication_en.pdf

transportation of food) on each of their contributions to air, soil and water pollution, carbon footprint and impact on biodiversity, and not only focus on the farmers.

- c) FEAP welcomes the strategy's intention to take occupational health and safety into consideration.

Food security and consumers

- d) The Covid-19 pandemic has underlined the importance of a robust and resilient food system that functions in all circumstances and is capable of ensuring a sufficient supply of affordable food for citizens. FEAP supports this view of the European Commission and underlines that this new perspective on the importance of food security should be long-lasting.
- e) FEAP shares the view that consumers should be empowered to be able to choose sustainable food.

The Level playing field

- f) It is a fact the EU is the largest import seafood market in the world. FEAP shares the European Commission's concern that production of commodities can have negative environmental and social impacts in the countries where they are produced. Therefore, FEAP agrees that efforts to tighten sustainability requirements in the EU food system should be accompanied by policies that help raise standards globally, in order to avoid the externalisation and export of unsustainable practices. FEAP will be vigilant that the European Commission will work to ensure that all foods placed on the EU market become increasingly sustainable (including imports). Sustainability standards should become the norm for all food products placed on the EU market, not only for those produced in the EU.

Climate change

- g) Following the Farm to Fork strategy, FEAP acknowledges that farmed fish, and seafood in general, generate a lower carbon footprint than land-based animal production.

Research and innovation

- h) Research and innovation are key drivers in accelerating the transition to sustainable, healthy, and inclusive food systems from primary production to consumption. FEAP completely agrees with the European Commission that R&I can help develop solutions, overcome barriers and uncover new market opportunities.

Antimicrobials and chemicals

- i) FEAP acknowledges that antimicrobial resistance (AMR) is a global problem linked to the excessive and inappropriate use of antimicrobials. The strategy is intense in the need to reduce dependency on pesticides and antimicrobials. The Commission will work to reduce overall EU sales of antimicrobials for farmed animals and in aquaculture by 50% by 2030.
- j) The excess of nutrients (especially nitrogen and phosphorus) in the environment are in the limelight. The Commission will act to reduce nutrient losses by at least 50%.

Animal welfare

- k) FEAP agrees with the European Commission that better animal welfare will improve animal health and food quality, reduce the need for medication and can help preserve biodiversity.
- l) The Commission will revise the animal welfare legislation, including on animal transport and the slaughter of animals, to align it with the latest scientific evidence, broaden its scope, make it easier to enforce and ultimately ensure a higher level of animal welfare.

Organic production

- m) FEAP welcomes an action plan for organic aquaculture involving promotion campaigns and green public procurement. The market for organic food is set to continue growing and organic farming needs to be further promoted.

Position of FEAP

On general sustainability issues

- 1) FEAP stresses that the Farm to fork strategy is a growth strategy. Its objective is to boost the economy and employment, improve people's health and quality of life, care for nature, and leave no one behind. However, FEAP alerts that public authorities have the tendency to cherry-pick in strategies like the Farm to fork and take on board the more attractive environmental targets while neglecting the need to set the ground to sustain the competitiveness of the sector and its growth targets through robust legal frameworks.
- 2) To reach its objectives in aquaculture, the strategy must recognise the need for the assignment of space for growth through spatial planning. Aquaculture development requires a robust, reliable, and clear legal framework for the use of space and licenses, certainty, and predictability for investments.
- 3) FEAP strongly disagrees with the indication of the European Commission that aquaculture producers need to *transform* their production methods. This reference ignores the merits of European aquaculture, especially but not only, from an environmental point of view. After decades of constant scientific research and managerial improvements, paired with an extremely stringent legal regulatory framework, place European aquaculture today at a level that must be considered sustainable. Certainly, current practices can still improve, but the way aquaculture is performed in Europe today is set to be mainstream aquaculture in the decades to come. In this sense, FEAP calls on the Commission to substantiate the claim that human and financial investments in new solutions for aquaculture promise higher returns by creating added value and by reducing costs.
- 4) The Farm to Fork strategy must also aim to improve the integration of the primary production with the rest of the value chain. This way the European aquaculture sector will become a strong and important part of a robust and resilient future food system in Europe.
- 5) The frequent use throughout the text of the concept "Sustainable aquaculture" requires a precise definition. FEAP insists the European Commission about the need for this definition.

On the level playing field

- 6) FEAP emphasizes that all foods placed on the EU market must fulfil the same sustainability requirements, even if those requirements leave no trace on the product itself as it passes the border check: social issues, environmental issues, animal welfare issues, etc.

On research and innovation

- 7) FEAP is deeply convinced that research and innovation are key drivers for the sustainable development of aquaculture. We highlight the importance of R&I both in the freshwater aquaculture subsector and the marine one.

On consumer information

- 8) FEAP wishes to underline that improving consumer information is a priority and should be on the working board since the beginning, including for better consumer choices in Horeca outlets.
- 9) FEAP stresses the European Commission to highlight the importance of increasing social awareness and acceptability of the sector, since this is a key matter for the growth of EU aquaculture.

On fish health and chemicals

- 10) FEAP supports that policy targets should aim at ensuring responsible use of veterinary antibiotics. Targeting a 50% reduction in antimicrobial sales by 2030 is a worthy aspiration, but given the background of already having strongly reduced antimicrobial sales for use in aquaculture in Europe FEAP strongly questions the ability to meet that target without severely negatively impacting fish welfare. As such, FEAP proposes that the target should be to reduce the need to use antibiotics, as well as to reduce antimicrobial resistance. Protecting fish health through other means and using antibiotics only when necessary, is the best way to reduce the need for antibiotic treatment.
- 11) FEAP stresses that access to authorised, safe and effective medicines is essential to aquaculture and that the sector is concerned about the future availability of medicines, and points to the need for more effective vaccines.
- 12) FEAP insists that the production of new regulations must be based on sound scientific evidence, pre-assessments (especially considering the impact on SMEs), and constructive consultation with the industry.
- 13) As established in the strategy for agriculture, quantitative objectives should be set to be achieved also for aquaculture (e.g. reduction of the use of drugs or biocides in percentage with respect to current use) and the appropriate criteria (e.g. reduction, growth, etc).

On organic production

- 14) FEAP emphasizes that organic aquaculture production is important in the EU, but the strategy is perhaps placing too large expectations on its possibilities while ignoring the sustainability of conventional aquaculture (in its different forms).