

POSITION PAPER

On the intermediate report of the MISSION BOARD Healthy Oceans, Seas, Coastal and Inland Water

31 August 2020

Background

The European Commission launched in July 2019 five major European research and innovation Missions as part of Horizon Europe, the next EU research and innovation programme (2021-2027). These Missions aimed to deliver solutions to some of the greatest global challenges, contribute for reaching the European Green Deal objectives and for the implementation of the UN Agenda 2030 for Sustainable Development.

One of these Missions covers the area of healthy oceans, seas, coastal and inland waters. Its objective is to regenerate European ocean and waters by 2030 by reducing human pressures on marine and freshwater environments, restoring degraded ecosystems, and sustainably exploiting the essential goods and services they provide. The Mission Board¹ responsible for this area published in June 2020 an interim report of its progress under the title of *Regenerating our Ocean and Waters by 2030*². This draft Mission outline will soon be open for consultation, resulting in adjustments and refinements for the Mission Board's final advice.

FEAP feels that at this moment it is imperative to highlight the opinion of European fish farmers on the interim report presented by the Ocean and Waters Mission Board.

General comments

The Federation of European Aquaculture Producers shares the opinion that the creation of the Missions by the European Commission is conceptually a smart way to analyse complex challenges and propose objectives and solutions.

FEAP supports the fact that healthy oceans, seas, coastal and inland waters are vital for Europe, for its economy, for the environment and for the future of the world. Oceans and fresh waters hold solutions to food, power and human wellbeing.

It is a reality that the health of European ocean and waters is under pressure. Decades of pollution and damaging uses, including urban sewage, have degraded the condition of European aquatic ecosystems. FEAP highlights that because fish farming is performed

¹ Members of the Mission Board for Healthy Oceans, Seas, Coastal and Inland Waters
https://ec.europa.eu/info/sites/info/files/research_and_innovation/groups/members_of_the_mission_board_f_or_healthy_oceans_seas_coastal_and_inland_waters_191016.pdf

² Interim report of the Mission Board Healthy Oceans, Seas, Coastal and Inland Water
<https://op.europa.eu/en/web/eu-law-and-publications/publication-detail/-/publication/d0246783-b68a-11ea-bb7a-01aa75ed71a1>

integrated in the natural environment it depends on water quality condition and, at the same time, aquaculture is a good water condition sentinel.

Closing the knowledge gaps through better scientific understanding will be key to protect, manage, and reach the potentialities of the oceans and waters. Furthermore, communicating this knowledge to the European citizens will be of paramount importance. FEAP agrees with the importance of empowering and inspiring citizens to become ocean/water literate.

Position of FEAP

- 1) In the report of the Mission Board, FEAP misses seeing the establishment of a link between its proposals and the need to feed a growing global population while assuring a sufficient level of food security in the European Union.
- 2) The frequent use throughout the text of the concept “Sustainable aquaculture” requires a precise definition. Neither the European Commission, nor the Mission Board, have proposed one.
- 3) FEAP shares the view that solving the challenges of the oceans and waters lies beyond the capacity of individual regions or countries alone, requiring a concerted effort and strong cooperation at European level to improve governance. Nevertheless, FEAP points out that reports like this Mission paper have a strong impact on how national and regional administrations implement European regulatory and non-regulatory measures.
- 4) The reference to current European aquaculture practices as unsustainable 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 at a level that can be considered sustainable.
- 5) FEAP can agree that new farming technologies, new cultivation methods and new species could improve the future of European aquaculture, but current farming technologies, present cultivation methods and the species farmed today should be openly backed by the Mission Board. Current practices can still improve, certainly, but the way aquaculture is performed in Europe today is set to be mainstream aquaculture in the decades to come, and definitely until 2025 and 2030. By not expressing this evidence, the Mission will mislead European citizens on the types of aquaculture they should approve and will doubtlessly tighten social acceptance of aquaculture.
- 6) FEAP finds that many of the expressions used by the Mission Board in its report are attractive but misleading for average citizens. This will result in empowering them in the wrong direction and not contributing to make them ocean/water literate, like pursuing the impossible “Zero pollution” concept.
- 7) FEAP considers inviable the proposal to increase 50% by 2025 the consumption of EU food produced from low-trophic aquaculture. This proposal, set for such a short term, implies that the Mission Board ignores the basics of consumer behaviour inertia and overlooks the vast red tape associated with opening aquaculture farms in the European Union. Furthermore, the repeated use of the term “low-trophic aquaculture” suggests unfamiliarity with the science behind the formulation of modern compound feeds and the use of alternative sources raw materials.

- 8) Nevertheless, FEAP highlights the insufficiently explored opportunities of freshwater pond fish farming. This type of aquaculture carries out low-trophic aquaculture producing fish feeding low on the food chain in natural-like fishponds. The development of freshwater Integrated multi-trophic aquaculture (IMTA) and Combined Intensive Extensive (CIE) systems can contribute to the exploitation of opportunities offered by sustainable intensification and also for the improvement of environmental services.
- 9) Despite the opportunities offered by low tropic aquaculture FEAP believes that the majority of aquatic products will be originated from high capacity, modern, sustainable intensive systems. However, there is a need for more efficient transfer of results of research and innovation programs to the industry and the elimination of barriers to growth.
- 10) FEAP suggests the Mission Board to focus on market-oriented proposals and not on production-oriented ones, such as its plan to increase 100% by 2025 EU algae production, or to increase 70% the consumption of alternative sources of proteins. Algae production and other alternative food sources are highly interesting activities, but if they have not yet taken off it has not been because of production challenges but because of market limitations.
- 11) FEAP is convinced that the sustainable use of coastal areas will require pursuing synergies between different sectors. For example: renewable energy and aquaculture (both offshore and inland). Furthermore, flood protection, hydro-power generation, recreation or irrigation can be combined well with aquaculture in freshwater areas as demonstrated in some inland regions of Europe. FEAP has missed seeing references to these types of opportunities in the report.
- 12) Considering that 65% of all aquatic products consumed in the European Union have been imported from Third countries, FEAP suggests the Mission Board to assess the role that an unlevel playing field plays in this sustainability obligation.
- 13) FEAP misses in the report statements on the use of modern aquaculture concepts like Integrated multi-trophic aquaculture (IMTA), Recirculation aquaculture (RAS), Offshore aquaculture, Combined Intensive Extensive (CIE) systems, Aquaculture environmental services or Sustainable intensification.
- 14) Considering the disruptive proposals of the Mission Board for aquaculture, FEAP has missed finding sufficient expertise on aquaculture in the curricula of the Board team.

FEAP is openly available for discussing this position paper in detail with the Mission Board. The European Union needs more aquaculture and not less, as the implementation of this Oceans & waters report will lead to if unchanged.