

On the EC's Communication on the Strategic guidelines for a more sustainable and competitive EU aquaculture

Background

The European Commission published on 17-May-2021 a Communication on the *Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030*¹.

This communication reviews the Commission's Strategic Guidelines for the sustainable development of EU aquaculture adopted in 2013². Those guidelines have been the main pillar of the strategic coordination of aquaculture policy in the EU. By 2015, on the basis of these guidelines, EU Member States adopted Multi-annual National Strategic Plans (MNSPs) for aquaculture. The implementation of these MNSPs was supported by the exchange of good practices among EU Member States facilitated by the Commission and funding through the European Maritime and Fisheries Fund (EMFF) and other EU funds.

This Position paper states the Federation of European Aquaculture Producers' opinion on the new Communication from the European Commission on the *Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030*.

1. ON THE NEED FOR A NEW EU STRATEGY FOR AQUACULTURE

The European Green Deal and the Farm to Fork Strategy underline the potential of farmed seafood as a source of protein for food and feed with a low-carbon footprint which has an important role to play in helping to build a sustainable food system. Aquaculture creates jobs and economic development opportunities in the EU's coastal and rural communities. This sector can also help decarbonise the economy, fight climate change and mitigate its impact, reduce pollution, contribute to better preserving ecosystems, and to be part of a more circular management of resources.

1. The FEAP welcomes this bold and well-focused Communication and rates it as highly valuable for the EU aquaculture industry, both in the way it is structured and because of the quality its objectives, tools and messages. This federation takes good note of those issues in which it is requested to take direct action and will actively cooperate with the Commission, the Member States and the Aquaculture Advisory Council to pursue its Green Deal goals.
2. The FEAP is satisfied to notice that the European Commission has clearly taken on board that besides the importance of continuing to refine the environmental performance of European aquaculture, there is an urgent need to improve the economic competitiveness of EU fish farmers. Hence the title of the Communication.
3. The federation greatly agrees with the European Commission that a strategic and long-term approach for the sustainable growth of EU aquaculture is more relevant today than ever.

¹ Strategic guidelines for a more sustainable and competitive EU aquaculture. COM(2021) 236 final: <https://bit.ly/2RH0lp5>

² Strategic Guidelines for the sustainable development of EU aquaculture. COM(2013) 229 final <https://bit.ly/3hZXd7v>

4. The FEAP concurs with the Commission that the EU aquaculture sector is still far from reaching its full potential in terms of growth and meeting the increasing demand for more sustainable seafood.
5. The FEAP recalls that the Common Fisheries Policy Regulation, and now this Communication, call for growth of the EU aquaculture sector while ensuring its economic, environmental and social sustainability. Aquaculture is expected to contribute to food supply and food security by rebalancing the EU need to import 70% of all the aquatic food it consumes and that causes an annual EUR 21 billion (2019) trade deficit³. The FEAP insists that this aquaculture contribution can only occur under a predictable, streamlined and business-friendly siting legal framework.
6. Being true that EU aquaculture production remains highly concentrated in terms of both EU Member States and species farmed, the FEAP wishes to comment on the remark from the Commission that there is still significant potential for diversification as reality is that there is plenty scope for increasing the production of the currently farmed species. These fish species still prove sufficient zootechnical and favourable market favourable conditions, even if improvements are possible.
7. The FEAP suggests the Commission to reflect about the use of the word 'seafood' and replace it with the more comprehensive term 'aquatic food'. Freshwater aquaculture is very important in many rural regions of Europe. It provides not only high-quality food and employment but also interesting ecosystem services. Even though the term 'seafood' officially encompasses freshwater fish, a more inclusive expression, like 'aquatic food', not leaving freshwater farmers behind, would be appreciated.
8. The federation acknowledges the contribution that the European Maritime and Fisheries Fund (EMFF) has provided to support aquaculture in the past and looks forwards to the future European Maritime Fisheries and Aquaculture Fund (EMFAF) for continuing to offer support to EU Member States to implement the strategic vision for the sector, as reflected in their MNSPs and their Operational Programmes.
9. Contrary with the last EMFF, the European Maritime Fisheries and Aquaculture Fund (EMFAF) should be timely introduced as the EMFF gets phased out.

2. ON THE NEW STRATEGIC GUIDELINES

The Strategic guidelines established in this Communication aim to offer a common vision for EU Member States and all relevant stakeholders for the further development of EU aquaculture in a way that contributes to the European Green Deal.

10. The FEAP greatly agrees with the objectives that the Commission has selected to be reached by the EU aquaculture sector: (i) competitive and resilient; (ii) ensuring the supply of nutritious and healthy food; (iii) reducing the EU's dependency on aquatic food imports; (iv) creating economic opportunities and jobs; and (v) becoming a global reference for sustainability.
11. The FEAP stresses that insufficient consumer information is hindering the development of aquaculture production in the EU. The federation welcomes the intention of the Communication to aid EU consumers make more informed choices on sustainable aquaculture products.
12. In the same sense, the federation appreciates the Commission's recognition that the inexistence of a level playing field for aquaculture products marketed in the EU is another of the reasons that hinder the competitiveness of EU aquaculture farmers.

³ EUMOFA. The EU Fish Market. 2020 Edition: <https://bit.ly/3ywEmZz>

13. The FEAP welcomes the steering that the Strategic guidelines will offer to guide the use of the many instruments and funds available to support EU aquaculture, as well as to support the implementation of applicable EU legislation.
14. The FEAP concurs with the Commission's clear and comprehensive classification of inter-related broad objectives to be reached by the Strategic guidelines: (a) building resilience and competitiveness; (b) participating in the green transition; (c) ensuring social acceptance and consumer information; and (d) increasing knowledge and innovation.
15. The inclusion in the Strategic guidelines of specific actions to be taken by the Commission, the EU Member States and the Aquaculture Advisory Council, to make progress in all the areas identified, similarly as in the 2013 Guidelines, is appreciated by FEAP and considered essential.
16. The FEAP approves the references in the Strategic guidelines to specific challenges and opportunities in certain aquaculture subsectors, like inland aquaculture, due to their particular characteristics.
17. The federation appreciates the lengthy consultation that the Commission has maintained with the Aquaculture Advisory Council (AAC) to develop these Strategic guidelines. The FEAP is a very active member of the AAC and has greatly contributed to its recommendations for the Strategic guidelines.
18. The FEAP expects the EU Member States to swiftly review their Multi-annual National Strategic Plans taking into consideration these new European Guidelines; and the Commission to encourage the MS on their implementation.
19. The federation insists on the importance of the implementation of these Strategic guidelines by second level public authorities (not directly engaged on aquaculture but that decide on matters that affect aquaculture) to make them reach their objectives.
20. The FEAP believes that the EU Aquaculture Assistance Mechanism can be useful to support the implementation of these guidelines by all stakeholders. But its effectiveness will have to be proven.
21. The federation finds useful and well-intended the Commission's goal to perform an assessment, not later than four years after the publication of this Communication, of: (i) the progress made in developing the recommended actions in the annex; and (ii) the efficiency of these actions in helping achieve the objectives laid down in these new strategic guidelines, with the possibility of adapting actions accordingly. Also, that by 2029, an evaluation of the new Strategic Guidelines will be carried out, which will assess their efficiency, effectiveness, coherence, relevance and EU added value, to provide the evidence base and support the decision on the next steps after 2030.
22. The FEAP will assess the recommended actions for the Commission, for the EU Member states and for the Aquaculture Advisory Council (AAC) in a separate document.

3. BUILDING RESILIENCE AND COMPETITIVENESS

The two key enabling conditions for the EU aquaculture to grow as a resilient and competitive sector are access to space and water, and a regulatory and administrative framework that is efficient.

23. The FEAP greatly agrees with the Commission that despite the progress made in some Member States since the adoption of the 2013 Strategic guidelines, further efforts are necessary still today in both of those areas.
24. On resilience, besides the two issues signalled by the Commission that pose a particular challenge to aquaculture (the management of risks related to animal health and the impact of

climate change) the FEAP points out a third one: market instability. However, some tools to face this issue are already pointed out by the Commission: producer and market organisation, as well as controlling and combatting fraud.

25. The federation completely agrees that for freshwater aquaculture in particular, predators and drought, pose strong challenges in terms of profitability.

3.1 Access to space and water

Freshwater is becoming scarce due to climate change. There is also increasing competition for both space and access to water among different economic activities, including aquaculture.

26. The FEAP greatly agrees with the Commission that coordinated spatial planning, with the early involvement of relevant stakeholders, is essential to access space and water.
27. The FEAP encourages the taking of forward-looking approaches to management and planning. The opposite approach (rear-looking) allows the inertia of old activities to hinder the development of new activities like aquaculture.
28. The FEAP points out that the development of organic aquaculture will require much more than just providing special areas for it. Nevertheless, pursuing more organic aquaculture should not be considered the single path to sustainable aquaculture as other aquaculture best practices and certification schemes can achieve similar results to attain the EU environmental goals.
29. The FEAP agrees that spatial planning should be based on the designation of areas suitable for aquaculture through a process involving coordination among relevant authorities at different levels. The proposal by the Commission to restore abandoned aquaculture facilities, or convert existing industrial facilities to aquaculture, can offer untapped opportunities.

3.2 Regulatory and administrative framework

The complexity of national licensing systems and the lack of predictability of the timeline and outcome of licensing procedures are still flagged by the EU aquaculture sector as important barriers to growth.

30. The FEAP greatly agrees with the Commission that streamlining and harmonising legislation are essential to simplify the aquaculture's complex regulatory framework.
31. The federation endorses the rest of elements identified by the Commission to improve the regulatory and administrative framework, but adapted to the national or regional differences. These are: single aquaculture entity, setting up a 'one-stop-shop' system for aquaculture licences, designating areas suitable for aquaculture, and providing for longer-term licensing, with regular monitoring and sanctions for non-compliance.
32. The FEAP concurs that Europe's waters are natural and essential allies in tackling the climate and biodiversity crises. For this reason, environmental protection in the European Union must be scaled up. However, the federation stresses that climate adaptation objectives and biodiversity objectives should be achieved without hindering the contribution that aquaculture is expected to provide to EU's food supply and food security.

3.3 Animal health and public health

Infectious diseases remain a significant constraint on aquaculture productivity. These diseases also pose a problem for animal wellbeing.

33. The FEAP agrees with the list of challenges that need to be addressed to improve aquaculture animal health. Especially with the low availability of specific veterinary medicines (including vaccines) for use in aquatic animals.
34. However, the federation finds inappropriate to bring together animal health issues and public health issues in the same chapter of the Strategic guidelines. Finfish health issues are unrelated to public health issues. Matters on both related to other subsectors of aquaculture should be dealt in a separate chapter.

3.4 Climate-change adaptation and mitigation

The aquaculture sector will need to adapt to the disruptive impacts of climate change and improve its resilience.

35. The FEAP agrees with the Commission that dedicated sectoral adaptation strategies should address the aquaculture sector specifically, and the potential negative contributions made by aquaculture to climate change need to be minimised. The federation accepts its responsibility on them.
36. The federation concurs with the Commission that aquaculture has a great potential to mitigate climate change because the production of aquatic animals has a lower carbon footprint than land-based livestock production. Furthermore, certain types of aquaculture can provide climate-mitigation services or climate-adaptation services. While other types of aquaculture, such as fresh and marine water ponds or wetlands can help preserve ecosystems and protect ecosystems against floods and sea-level rise.

3.5 Producer and market organisations

Producer organisations and farmers associations are important for an industry that is mainly comprised of micro and small enterprises. The situation faced by the aquaculture sector due to the outbreak of COVID-19 has demonstrated their value, in particular for small-scale producers.

37. The FEAP agrees with the Commission that aquaculture producer organisations (POs) and inter-branch organisations provide good advantages for their members. However, challenges still exist for their creation and full development of POs in most Member States. These bottlenecks sit both on the public administration side and on the industry side.
38. The federation highlights that the European aquaculture sector is already structured around farmers' associations but that it faces difficulties and risks in the conversion of these farmers' associations into official producer organisations (POs).

3.6 Control

Adequate control by each Member State of aquaculture products across the supply chain are another important aspect in ensuring the sustainability and profitability of the EU aquaculture.

39. The FEAP agrees that traceability can be a valuable tool to pursue a level playing field on the EU market. But it greatly emphasises the need to extend backwards the traceability obligations of aquaculture products imported from non-EU countries to go beyond the exporting processing plants (where current traceability obligations start today for imported products) down to the hatcheries where the animals had hatched.

3.7 Diversification and adding value

The EU aquaculture sector has great scope for further diversification, not only in the farming of new species but also in production methods and in value-added products.

40. The FEAP recognises the value of diversification in all its facets, but strongly stresses that the efforts to diversify should not distract from working to solve the core challenges of EU aquaculture. The federation signals that diversified forms of aquaculture will sooner or later fall into the same traps that keep current aquaculture from delivering its full potential.

4. PARTICIPATING IN THE GREEN TRANSITION

The EU aquaculture sector must participate in the green transition set by the European Green Deal. This sector has a role to play in contributing to the transition to sustainable food systems, but also to develop the bioeconomy and the circular economy, and reverse biodiversity loss.

4.1 Environmental performance

Aquaculture requires good environmental conditions, such as good water quality. Therefore, the fight against water pollution by EU Member States, in line with the zero-pollution ambition defined in the European Green Deal, is of particular importance to aquaculture. When properly managed, aquaculture can be a method of food production with a lower carbon and environmental footprint than other types of farming.

41. EU environmental legislation and implementing national legislations set the regulatory framework for EU aquaculture. The FEAP agrees with the Strategic guidelines that this framework already ensures the mitigation of the impact that aquaculture activities may have on the environment, and that EU aquaculture activities do not significantly harm ecosystems or biodiversity.
42. The federation accepts that the environmental performance of the EU aquaculture sector can be further improved to tread even more lightly on the ecosystems. However, it flags that this perfection will arrive more effectively if the Environmental Monitoring Plans that each farm has the obligation to follow are designed more fit for purpose, avoiding unnecessary costs that could be spared and dedicated to other innovations.
43. However, the list of issues to be addressed that the Commission mentions is adequate and exhaustive. In particular, promoting forms of aquaculture that offer ecosystem services (including in ponds, wetlands and brackish waters) and ensuring sustainable feed systems already being implemented.
44. The FEAP stresses that the great expectations set for Organic aquaculture in the Farm to Fork strategy require a detailed analysis of the current underperformance of this certification scheme that could hinder any further expansion regardless of the political will. However, the FEAP points out that in addition to organic certified aquaculture, aquaculture holdings which are certified for sustainable farming or that implement environmental best practices also have lower environmental impact and should also be promoted. The goal is to improve the environmental performance of all aquaculture production.

4.2 Animal welfare

More attention should be paid to the welfare of fish. Because of the increasing public interest in high-welfare fish products, and because keeping fish under good welfare conditions also has economic benefits for the industry, through reduced costs and better-quality products.

45. The FEAP highlights that current aquaculture practices in the EU follow existing regulations guaranteeing high levels of fish wellbeing, and that further improvements are possible, but that these will take place with the onset of new science-based sound knowledge.
46. The federation stresses that due to the great diversity of farmed fish, aquaculture systems and production conditions in the EU, farmed fish wellbeing will be better achieved through the implementation of *ad hoc* welfare practical guidelines than through the imposition of rigid EU hard laws.
47. The FEAP concurs with the list of actions proposed by the Commission to improve fish welfare. In particular with setting validated, species-specific and auditable operational indicators, together with further research and personnel training.

5. ENSURING SOCIAL ACCEPTANCE AND INFORMATION TO THE CONSUMER

The growth of EU aquaculture and its competitiveness rely largely on social acceptance and the recognition of the benefits and value of aquaculture activities and EU aquaculture products.

48. The FEAP greatly agrees with the Commission that three factors are particularly important for achieving social acceptance: communication on EU aquaculture, integration of EU aquaculture in local communities, and data collection and monitoring.

5.1 Communicating on EU aquaculture

Communication is critically important to ensure more accurate information and transparency about how aquaculture activities are carried out. A negative perception by local stakeholders of aquaculture activities (notably their impact on the environment and other economic activities) is often an obstacle to the establishment of new aquaculture facilities. At the same time, the benefits of aquaculture are largely unknown to the public.

49. The FEAP stresses the great value of European communication campaigns on aquaculture. And points out that these campaigns are better driven through European wide organisations with the capacity to perform them. Unfortunately, European wide organisations cannot access EMFF or EMFAF funds. For this reason, the Commission should find alternative ways for financing these campaigns, for example by improving the position of aquatic food promotion in the EU Agricultural Promotion policy.
50. The federation adds an additional element to improve social acceptance of aquaculture and consumer's information. This has to do with the impact that other stakeholders have on both. The federation accepts that other stakeholders (non-producers) can have different views on how to develop sustainable aquaculture. Furthermore, the FEAP is willing to engage on constructive work with any other stakeholders and build upon this collaboration, but expects those stakeholders to be fair and not divulge opposite damaging statements in other fora or to the media.

5.2 Integration in local communities

Just like any other activity, the expansion of aquaculture also requires social acceptance.

51. The FEAP highlights that acceptance and integration of aquaculture in local communities has an additional notch of relevance than for other economic activities. This is due to the fact that aquaculture development requires the use of public domain waters and public land. This means

requiring the obtention of an additional license for the use of space that is beyond the normal production authorisation obligations of other economic activities.

5.3 Data and monitoring

Collecting accurate data is necessary to ensure appropriate planning of aquaculture activities. Accurate data are also necessary to assess and monitor the social, economic and environmental performance of aquaculture.

52. The FEAP agrees with the Strategic guidelines that transparency and data reporting are also important for maintaining the trust of consumers and other stakeholders in the sector.
53. The federation points out that fish farms are mainly micro and small enterprises, and they currently already undergo intense reporting obligations. For this, the FEAP strongly agrees with the Commission that it is necessary to coordinate between different public authorities services the reporting obligations for the farmers and to streamline reporting procedures.

6. INCREASING KNOWLEDGE AND INNOVATION

Knowledge and innovation are key to achieve other objectives set for the EU aquaculture sector in this Communication. They are especially important for building the resilience and competitiveness of aquaculture and ensuring its green transition.

54. The FEAP acknowledges that the successive EU framework programmes for research and innovation have made EU aquaculture scientific knowledge leap forward. The federation expects the same for the forthcoming Horizon Europe.
55. The FEAP agrees with the Strategic guidelines that decisive action is required to ensure that research and innovation: (i) responds faster to the current and future challenges and opportunities of the sector; (ii) avoids duplication of efforts; and (iii) creates synergies. The federation adds to this list the industry involvement in the design of the projects and, at least, in the dissemination of results.
56. The FEAP finds the areas proposed by the Commission in which further knowledge and innovation efforts are needed to be thorough and complete.
57. The FEAP can only but agree that innovative aquaculture demands the development of appropriate skills. This can be achieved through the promotion of specialised curricula and knowledge on aquaculture as well as life-long training for farmers on innovative approaches for the aquaculture sector. Furthermore, the federation broadens the scope of these skills beyond the basic production jobs to digitalisation, sociology and marketing, amongst other.

FEAP, 9 June 2021

The Federation of European Aquaculture Producers is an organisation that represents the European fish farming profession and is based in Brussels. FEAP is composed of 24 national fish farming associations from 23 countries, both EU and non-EU. The combined yearly production of FEAP members surpasses 2,5 million tonnes of nutritious, safe, delicious and environmentally sustainable fish.