

Achieving the expectations set by the Green Deal on organic aquaculture production

Background

Commission Regulation (EC) No 889/2008, laid down detailed rules for the implementation of Council Regulation (EC) No 834/2007 on organic production and labelling of organic products with regard to organic production, labelling and control. A new Regulation (EU) 2018/848 on organic production and labelling of organic products has been adopted and will be applicable as from 1 January 2022.

The Farm to Fork Strategy of the European Commission for a fair, healthy and environmentally-friendly food system, published in May 2020, established the objective to increase organic farming in the European Union. This strategy considers the positive impact on biodiversity of organic production, while creating jobs. At the same time, the market for organic food is expected to continue growing. The aim of this strategy is to reach the objective of at least 25% of the EU's agricultural land under organic farming by 2030 and a significant increase in organic aquaculture.

Published at the same moment, the EU Biodiversity Strategy for 2030: Bringing nature back into our lives also places organic production high in its scope.

Both strategies are part of the European Green Deal that aims to transform the European Union into a fair and prosperous society, with a modern, resource-efficient and competitive economy where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use.

In addition to measures to be included in the next Common Agricultural Policy and Common Fisheries Policy, the Commission put forward in March 2021 an Action Plan for the development of Organic Farming for 2021-2026.

In May 2021, the European Commission published its Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030. This document promotes the development of organic aquaculture and other aquaculture systems with low environmental impact.

Situation of organic aquaculture in the European Union

The European Union Market Observatory for Fisheries and Aquaculture (EUMOFA) published a report on Organic Aquaculture in May 2017 that informed that organic aquaculture represented 4,7% of the total aquaculture production, for the six major species covered in the study. This proportion was slightly inferior to the share of organic agriculture in the total agriculture (total organic area made up 6,2% of total EU-28 utilised agricultural area in 2015). Although EU organic agriculture has experienced an increase in recent years for certain species and certain countries (salmon in Ireland, and mussel in Denmark and Ireland), the economic performance of EU organic aquaculture is far from being satisfactory everywhere and all growth percentages start from very low ground.

EUMOFA also published a report on Fresh organic salmon in the EU in March 2020.

European Union aquaculture is a very diverse activity, farming numerous species, in different environments and implementing a great variety of techniques. The FEAP and COPA-COGECA consider that organic aquaculture has an important role to play in the industry but that its performance is well below its potential. However, FEAP and COPA-COGECA point 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.

The FEAP and COPA COGECA believe that the reasons for this underperformance are double. First, the general situation of stagnation of the industry in the European Union, as expressed in the Strategic guidelines for a more sustainable and competitive EU aquaculture, that hinders innovation. And second, because of the severe complications that aquaculture producers face to meet the organic rules established in the regulations.

Promotion of organic aquaculture

To achieve the ambitious target of 25% of agricultural area under organic farming and a significant increase in organic aquaculture by 2030 as outlined in the Farm to Fork and the Biodiversity strategies, the Action Plan for the development of Organic Farming considers necessary to provide the organic sector with tools that will create the conditions that can trigger the change in EU agriculture and aquaculture towards the high-quality standards that EU consumers value.

Furthermore, to reinforce organic aquaculture the Action Plan agreed to identify and address as appropriate any specific obstacles to the growth of EU organic aquaculture. Also, to support research and innovation on alternative sources of nutrients, breeding and animal welfare in aquaculture; the promotion of investments on adapted polyculture and multi-trophic aquaculture systems; and the promotion of hatcheries and nurseries activities for organic juveniles.

Support for organic aquaculture will be granted via the 2021-2027 European Maritime, Fisheries and Aquaculture Fund (EMFAF). In this sense, Member States are encouraged to include the increase of organic aquaculture in their reviewed Multi-annual National Strategic plans for aquaculture, and to make the best use of possibilities offered by the EMFAF 2021-2027 for achieving this purpose. The Commission will also facilitate the exchange of best practices and innovation on organic aquaculture in the context of the Open Method of Coordination.

The FEAP – COPA COGECA Position

The FEAP and COPA COGECA encourage the European Commission to identify and address immediately the specific obstacles for the development of EU organic aquaculture.

These federations have identified the following practical bottlenecks that EU fish farmers are facing in their daily work to develop organic aquaculture:

1. Inconsistencies in the organic rules caused by a direct and non-adapted transposition of terrestrial organic production principles to fish farming.
2. Inconsistencies in the organic rules for fish farming probably related to the writing of the parts of the regulation for organic fish farming by persons mainly competent in organic agriculture.
3. Rules that are not clear enough. This fuzziness leads to interpretations at national level that differ between Member States and even between certification bodies.



4. Some implementing regulations are not yet published by mid-2021. This creates uncertainty for the fish farmers currently producing organic (e.g. the positive list of the cleaning and disinfection substances that can be used in the presence of animals has not yet been published).
5. These constraints lead to higher production costs and to prices that consumers are not willing to pay, even for truly organic products. Retailers then opt to offer imported organic products from third countries with lower prices.

Due to these issues EU fish farmers wonder if there is still a market for expensive European organic fish.

To overcome these obstacles the FEAP and COPA COGECA request the European Commission the following actions:

1. To ease the implementation of organic rules, by maintaining the goals of organic production while coping with the specificities of aquaculture. This should include allowing fish by-products from European fisheries (ruled by the Common Fisheries Policy, and therefore sustainable) to be used in fish feeds (the text published can lead to the obligation for the fishery generating trimmings to be certified for sustainability). Furthermore, the use of trimmings coming from the European fisheries should be promoted as positive circular economy.
2. Due to the fact that fish are grown in a non 100% controlled environment, fish farmers need to use environmentally friendly cleaning and disinfection products to avoid diseases. This prevention strategy should be even further promoted in organic aquaculture since allopathic treatments are limited.
3. The reduction in the number of parasite treatments allowed compared to the previous organic fish farming regulation confronts fish farmers to an unbearable choice: to treat the fish but causing that such fish will not be organic anymore (sometimes after two years of organic production and extra-costs) or decide not to treat the fish following the organic rules but leading to poor welfare and diseases. The number of parasitic treatments should not be reduced compared to the previous regulation. In fact, during earlier communications of the FEAP with the EU Commission this federation argued that even the old legislation was too strict and that organic fish farmers wanted the same rules as other livestock farmers, which meant no restrictions. The FEAP and COPA COGECA recommend a new round of consultation including also more relevant stakeholders and associations e.g., FEAP and FVE representing the organic fish farmers and fish veterinarians.
4. A review analysing how the organic rules are interpreted and implemented in each Member State, and how they are controlled, should be carried out by the European Commission. Its objective being to reduce the heterogeneity in implementation of the organic regulation between Member States. And based on its conclusions the Commission should publish guidelines for the Member States, for the certification bodies and for the fish farmers.

Besides maintaining the positive effects of organic production on consumer health and animal welfare, there is a need to harmonise the rules and introduce better environmental sustainability criteria through the circularity of production.

FEAP and COPA COGECA, 15 July 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.