

POSITION PAPER

On the implementation of the European Union's BIODIVERSITY 2030 strategy

31 August 2020

Background

The European Commission published on 20 May 2020 its EU Biodiversity Strategy for 2030: Bringing nature back into our lives¹. This policy is part of the European Green Deal² that sets 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.

As stated by the President of the European Commission, making nature healthy again is key to our physical and mental wellbeing and is an ally in the fight against climate change and disease outbreaks. It is at the heart of the growth strategy, the European Green Deal, and is part of a European recovery that gives more back to the planet than it takes away.

1. General comments

The Federation of European Aquaculture Producers has proven over the years our commitment to move towards more sustainable aquaculture systems and contribute to preserve biodiversity, as stated in our Code of Conduct.

FEAP sees the Biodiversity Strategy as an opportunity to contribute to a more holistic and systematic approach to EU food policy bringing together the most relevant issues relating to food production, trade and consumption. It also places sustainability in the centre of food legislation.

- In this context, we support the Commission's ambition to develop new measures to safeguard biodiversity in Europe and beyond.
- Nevertheless, FEAP calls for the Biodiversity strategy to be consistent with other key elements of the European Green Deal (like the Farm to Fork strategy) and with the Common Fisheries Policy, the EU Research policy, the EU trade policy and other existing frameworks.
- However, we stress that any decisions should be based on reliable scientific data, constructive consultation and comprehensive impact assessments

¹ EU Biodiversity Strategy Communication: https://ec.europa.eu/info/sites/info/files/communication-annex-eu-biodiversity-strategy-2030_en.pdf

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

(especially considering the impacts on SMEs) considering economic impacts alongside effects on food security and food safety.

2. Protecting and restoring nature in the EU

The Biodiversity strategy aims to protect more nature. In this sense, it proposes that by 2030 at least 30% of the land and 30% of the sea in the EU should be protected.

- FEAP shares the need to increase the protected areas in the EU. However, this protection must be made compatible with economic activities developed within them as long as they do not compromise the values of those protected areas.
- We highlight the need for the simplification of administrative procedures on aquaculture activities, especially when in Natura 2000 areas, and we ask the European Commission to update the guidance on 'Aquaculture and Natura 2000 areas'.
- We stress the importance of spacial planning for the sustainable development of aquaculture, pointing to the need for allocating space to new and existing aquaculture farms.
- We believe that ecosystem services provided by aquaculture, of which the maintenance of biodiversity is an important one, must be taken into consideration and supported.

The sustainability of the aquaculture industry relies on the long-term economic, environmental and social performance of the sector.

- FEAP welcomes proposals to reduce and limit the use of pesticides and other chemicals to protect biodiversity. However, we strongly believe that such measures should be pre-assessed diligently, including cumulative impact assessments.
- Any new strategical targets must contribute to the aquaculture value chain's long-term resilience and our ability to provide consumers with a secure supply of high quality, safe fish at affordable prices. These impact assessments must go alongside analysis of the accomplishments achieved to date and the availability of alternative products while guaranteeing the competitiveness of the value chain.
- Furthermore, EU related policies, like the Common Fisheries Policy, research and food safety should support the quest for viable alternatives, including the facilitation of research and innovation, to promote their uptake by fish farmers and the improvement of market access.
- European fish farmers play an essential role in the EU's future and must continue being the social and economic support for many communities across our Union, both coastal and inland.

The Biodiversity strategy insists on the protection and sustainable management of all types of water resources.

- In this context, FEAP embraces the ambitions of the Water Framework Directive and the Marine Strategy Framework Directive. These Directive are key to protect

and improve the status of water quality in areas in which fish farming takes place and to promote sustainable water use across Europe.

- We highlight that aquaculture can play a role in restoring degraded marine and freshwater ecosystems as has been proven in many areas of the European Union.
- We stress the importance for biodiversity of the restocking with indigenous species produced in fish farms and its contribution to the recovery of highly endangered species (like eels and sturgeons).

3. Enabling transformative change

The new governance framework proposed in the strategy will ensure co-responsibility and co-ownership by all relevant actors in meeting the EU's biodiversity commitments.

- FEAP subscribes to the highest standards of environmental and social sustainability throughout the entire value chain, including labour rights and animal health and welfare.
- We support the Commission's intentions to develop EU-harmonised methods, criteria and standards to describe, assess (including Product Environmental Footprint methodologies) and evaluate the characteristics of biodiversity such as services, values, and sustainable use.
- The objectives of the Biodiversity strategy should be achieved in the most effective and least burdensome way for the economic operators.

4. An ambitious global agenda

- FEAP stresses the importance of working for a level playing field with seafood imports from developing third countries. The EU's new 'Green Deal diplomacy' should be used to provide fair terms of competition.
- We call for policy coherence between EU trade policy and other EU policies to uphold the integrity of the Single Market and the competitiveness of the aquaculture sector.
- FEAP agrees with the use of the 'Green Deal diplomacy' to raise sustainability standards globally.

This FEAP Position Paper is to be delivered to DG MARE and to DG ENV.