

## On the EC's Communication on Transforming the EU's Blue Economy for a Sustainable Future

### Background

The European Commission published on 17-May-2021 a Communication on a new approach for a sustainable blue economy in the EU under the title of Transforming the EU's Blue Economy for a Sustainable Future<sup>1</sup>.

This communication sets out an agenda for the blue economy to play a major role to achieve the European Green Deal's objectives. It acknowledges that due to its dynamism and innovation potential, the sector is well placed to drive the green transition, replacing unchecked expansion with clean, climate-proof and sustainable activities that tread lightly on the marine environment.

The Communication sets a focus shift from 'blue growth' to a sustainable 'blue economy'.

This Position paper states the Federation of European Aquaculture Producers' opinion on the new Communication from the European Commission.

### 1. On making the transition from 'Blue Growth' to a 'Sustainable Blue Economy'

The Communication states that Europe's blue economy provides 4.5 million direct jobs, many in regions where there are few alternatives. It encompasses all industries and sectors related to oceans, seas and coasts, whether they are based in the marine environment or on land. The Commission will reach out to all maritime stakeholders to engage with them in this action.

1. The FEAP welcomes this Communication and highlights the central role of aquaculture in the sustainable blue economy. This federation will actively cooperate with the Commission and the Member States to pursue the shaping of a sustainable blue economy in a fair and equitable way.
2. The FEAP agrees with the Commission that a sustainable blue economy will create tangible opportunities for new jobs and businesses. These will be created to work mitigating the impacts on oceans and coasts and building a resilient economic model based on innovation, a circular economy, and a respectful attitude to the ocean.
3. The federation supports the conceptual shift from 'blue growth' to a sustainable 'blue economy' but strongly emphasizes that, in the case of aquaculture, growth is an objective by itself and that without expansion there will be no sustainable future for EU aquaculture. This need for growth in aquaculture is clearly stated by the Commission in its Strategic guidelines

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<sup>1</sup> Transforming the EU's Blue Economy for a Sustainable Future. COM(2021) 240 final: <https://bit.ly/3bNoaJH>

for a more sustainable and competitive EU aquaculture for the period 2021 to 2030<sup>2</sup>. Aquaculture production in the European Union has stagnated for the last twenty years while it has been the fastest growing food sector globally to match food security needs.

4. The FEAP flags that aquaculture is one of the activities that takes place in the marine environment and that it has its own identity, different from fisheries. For this reason, it should be cited as such in several points of the Communication.
5. The FEAP requests the Commission to include freshwater aquaculture as an integral part of the blue economy, alongside marine aquaculture as it is a relevant part of the aquaculture production at EU and global level.
6. Additionally, algae production is part of the aquaculture sector even if having its own characteristics, challenges, and potential. However, when discussing about algae the Communication should differentiate between algae production (farming) from the collection of wild algae (seaweed) washed ashore.
7. The FEAP agrees that the different human activities have a cumulative impact on the marine environment, from visible pollution, such as plastic litter and oil spills, to invisible pollution such as microplastics, underwater noise, chemicals and nutrients.
8. The federation recognises that the effects of climate change and greenhouse gas emissions are very damaging on the ocean, coasts and people living in those areas, ranging from changes in water temperature, to acidification, rising sea levels and more frequent and intense flooding and erosion.
9. The FEAP concurs that Europe's seas and oceans are natural and essential allies in tackling the climate and biodiversity crises. For this reason, marine protection in the European Union must be scaled up. However, the federation stresses that the coastal protection objectives should not hinder the contribution that aquaculture is expected to provide to the EU's food supply and food security by rebalancing its needs to import 70% of all the aquatic food it consumes, opening an annual EUR 21 billion (2019) trade deficit<sup>3</sup>. This aquaculture contribution can only occur under a predictable, streamlined and business-friendly siting legal framework.
10. The FEAP points out the leverage capacity of public procurement on achieving the objectives of the Blue Economy by supporting the consumption of sustainable and healthy food and encouraging sustainable marine and maritime practices.

## 2. On achieving the objectives of climate neutrality and zero pollution

A sustainable blue economy offers many solutions to achieve the European Green Deal's objectives. Many of the current activities need to reduce their carbon footprint, while new carbon-neutral activities need to take centre stage.

11. This federation highlights the references of the European Green Deal and the Farm to Fork Strategy to the potential of aquaculture in the EU as a source of protein for food and feed with a low-carbon footprint, lower than land-based livestock production.
12. However, the reference of the Communication to the use of the new European Maritime, Fisheries and Aquaculture Fund (EMFAF) to support fishing fleets in adopting cleaner engines and techniques should be extended to aquaculture fleets and equipment.

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<sup>2</sup> Strategic guidelines for a more sustainable and competitive EU aquaculture. COM(2021) 236 final: <https://bit.ly/2RHOlp5>

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

### 3. On Circular economy and preventing waste

Reducing the impacts of human activities on the sea is a collective responsibility. The blue economy can play a vital role in many aspects of the work to combat pollution and can benefit from new opportunities arising from that work.

13. The federation calls the Commission to appreciate the role of aquaculture farmers as environmental sentinels of the seas. The sensitivity of this activity to environmental adverse conditions and its fixed siting makes it a useful early indicator of environmental degradation.
14. The FEAP reminds the Commission to evaluate the impact of public sewage infrastructures as relevant sources of pollution in coastal areas and river mouths.

### 4. Biodiversity and investing in nature

Biodiversity conservation and protection should be considered as foundational principles of maritime economic activity. Marine biodiversity is not only a prerequisite for economic activities but also presents economic opportunities.

15. The FEAP encourages the taking of a forward-looking approach to coastal ecosystem-based management and planning. The opposite approach (rear-looking) allows the inertia of old activities to hinder the development of new activities like aquaculture.
16. The FEAP points out that the commitment of the Biodiversity strategy<sup>4</sup> to dedicate at least 30% of the land, and 30% of the sea, to nature protection should be planned in a way that will not affect aquaculture that provides ecosystem services in such areas.

### 5. On coastal resilience

Protecting European natural and economic assets and infrastructure means adapting to the inevitable consequences of climate change.

17. The FEAP stressed that beyond climate change aquaculture is especially sensitive to extreme weather events in riverbeds and coastal areas (floods, storms, waves, etc.) causing severe damage to aquaculture infrastructures and to the species produced.
18. The federation agrees on the need to close the knowledge gaps and stimulate innovation for increased climate resilience, including through a new comparative analysis of traditional and nature-based solutions.
19. The FEAP supports increasing the capacity for Copernicus and EMODNet observation, modelling and forecasting to better anticipate the effects of extreme weather events to which aquaculture facilities are especially sensitive.

### 6. On responsible food systems

By using marine resources better and by choosing alternative sources of food and feed, the blue economy can help alleviate pressure on natural resources for food production.

20. There is an urgent need to put food systems on a sustainable path. The FEAP agrees that sustainable aquaculture, including algae, can greatly contribute to this, but stresses that aquaculture potential can go well beyond being a mere complement to overcome the natural

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<sup>4</sup>EU Biodiversity Strategy for 2030: Bringing nature back into our lives. COM(2020) 380 final <https://bit.ly/3yAH68g>

limits of wild captures. And reminds that algae production is a type of aquaculture that has many challenges in common to other aquaculture like finfish or shellfish production.

21. The FEAP shares the Commissions opinion that digitisation and advanced tools (such as remote electronic monitoring systems, reporting using mobile applications, ecosystem modelling and artificial intelligence tools) can optimise operations and at the same time enable data collection and analysis, improve control and monitoring and reduce administrative burden. But the FEAP emphasizes that this is not only applicable in fisheries, as the Communication describes, but that it is relevant just the same for aquaculture.
22. The FEAP greatly concurs that, when managed in a sustainable way, aquaculture is a valuable, low-impact source of food and feed. EU aquaculture meets very high standards in terms of product quality and animal health.
23. The FEAP insists that when dealing with the farming of aquatic animals the concept of trophic levels needs to be reconsidered. First, because in the seas the shape of the trophic levels is not a pyramid, like in on-land ecosystems, but it resembles an inverted pyramid. And second, because when farming fish what is relevant is not the trophic level where that species is positioned in the wild but the trophic level of the raw materials that are used to feed the farmed fish.
24. Organic production is being promoted by the Farm to Fork strategy and its Action Plan. But the FEAP underlines that organic aquaculture farms in the EU face severe practical limitations in its production rules. These limitations need to be addressed.
25. The FEAP encourages the Commission to continue promoting algae farming. But it points out that this should not be done at the expense of shoring the more conventional aquaculture farmed species. Furthermore, it hints the Commission that restoring seaweed populations and better managing them are more effective ways to combat eutrophication and remove the excess carbon, nitrogen and phosphorus from water rather than through the farming of algae.
26. The FEAP can only but agree that the growing efforts made by fishers and fish farmers to achieve product quality and environmental sustainability need to be rewarded by the market. Their efforts must be conveyed through the food supply chain. However, aquatic food marketing standards have still to be proven fit for this purpose.
27. The FEAP greatly emphasises the need to strengthen the position of consumers and help ensure that the EU market for aquaculture products is a level playing field. In this sense the federation stresses the need to improve consumer information of aquatic products in general and of caviar in particular. This specialised aquaculture product is stuck in a so called 'caviar information trap' in which its compulsory information labels to the consumers do not inform the country of origin because caviar is not considered a seafood product but a processed food.

## 7. On research and innovation

Marine and maritime research and innovation are essential for achieving the EU's ambition to become climate-neutral by 2050, for protecting and restoring marine ecosystems and for making the blue economy a font of ideas and action to generate sustainable innovation.

28. The FEAP agrees that innovative technologies such as big data, artificial intelligence, advanced modelling, sophisticated sensors and autonomous systems are likely to transform the blue economy in the immediate future. However, the federation emphasizes that aquaculture should be considered alongside other traditional sectors than can benefit from the former digitalisation technologies. Moreover, more recent types of aquaculture should be cited as emerging sectors, like offshore aquaculture and recirculation aquaculture systems.

## 8. On investments

Meeting the objectives of the European Green Deal will require making big investments.

29. The FEAP raises its doubts about the EU taxonomy reaching its planned classification of the economic activities according to environmental criteria. Leaving outside of its scope whole sectors, like aquaculture, undermines the credibility of sustainable aquaculture and weakens the taxonomy.
30. The FEAP expects the European Maritime, Fisheries and Aquaculture Fund (EMFAF) to continue supporting investments in aquaculture. Besides continuing to offer grants, the Commission should make sure that Member States do create Financial Instruments.

## 9. On blue skills and jobs

It is paramount that companies working on the cutting edge of technology can draw on a qualified workforce. There is also a need to improve the public perception of careers in the blue economy.

31. The FEAP encourages the Commission to pursue its commitment to improve occupational health and safety in the blue economy by working both on the training of workers in blue jobs and on improving the working conditions. But the federation requests the Commission to go beyond training seafarers and fishers and also look out for this improvement in aquaculture farmers.

## 10. On maritime spatial planning

The greater the demand for use of maritime space, the more crucial it is to have spatial planning. Maritime spatial planning is an essential tool to prevent conflict between policy priorities and to reconcile nature conservation with economic development.

32. The FEAP agrees that planning also improves the level of certainty and predictability of private investments and can promote synergies between economic sectors. But, furthermore, the Commission should encourage the necessary works to establish sound knowledge on neutral compatibilities between industries, and the same for incompatibilities.
33. The FEAP subscribes the importance that the Commission gives to preparing guidance on an ecosystem-based approach to maritime spatial planning and promote the multi-use of marine space by combining different activities in the same location.

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.*