

POSITION PAPER

On the Charter of Mission Ocean and Waters

19 September 2022

Background

In September 2021 the European Commission published its Communication on the European Missions¹ launching the implementation of five European Union Missions. These EU Missions are a new approach to searching for concrete solutions to some of the EU's greatest challenges. They have ambitious goals and are expected to deliver results by 2030. The Communication includes the Mission *Restore our Ocean and Waters*. This Mission states that man-made climate-driven changes are putting oceans and waters at serious risk. The Mission is expected to bring all relevant actors around the table through implementation charters. The charters will commit the partners to the setting up of basin-scale lighthouses to resolve common, transboundary problems such as marine and freshwater ecosystems restoration, and pollution and to support a climate-neutral blue economy across the EU.

Previously, in September 2020, the Mission Board *Healthy Oceans, Seas, Coastal and Inland Waters* had published the independent expert report named *Mission Starfish 2030 Restore our Ocean and Waters*².

And in June 2022 the European Commission issued the Charter³ of its Mission *Restore our Ocean and Waters by 2030*⁴. This Mission Charter is a call for action that requests joining efforts to achieve three objectives: (1) protect and restore marine and freshwater ecosystems and biodiversity, (2) prevent and eliminate pollution of EU ocean, seas, and waters, and (3) make the sustainable blue economy carbon-neutral and circular. With this Mission Charter, the European Commission intends to establish a simple, inclusive and inspirational framework to enhance cooperation, align intents with other partners, mobilise resources and develop activities to deliver on the Mission objectives. The European Commission is expecting adherence to the Charter and proposals contributing to the Mission's objectives.

The FEAP perspective

The Federation of European Aquaculture Producers is deeply concerned with the evolution of the aquaculture sector in the European Union. Since the year 2000 growth has been non-existent and

¹ EC Communication to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the European Missions <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021DC0609&from=EN>

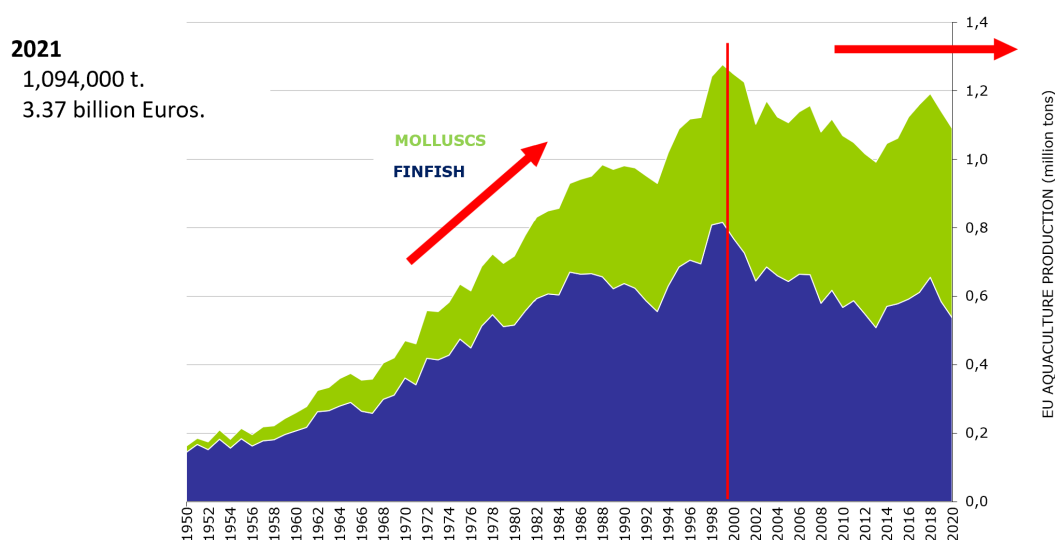
² Mission Starfish 2030: Restore our Ocean and Waters https://research-and-innovation.ec.europa.eu/document/download/b0060d16-b825-48e0-88eb-44baece738c4_en

³ Mission Charter of the Mission Restore our Ocean and Waters by 2030 https://research-and-innovation.ec.europa.eu/document/download/9f6c2045-4ca3-4448-84c4-ed8c7a074c4f_en

⁴ More information on Mission Restore our Ocean and waters and on its Implementation Plan are available at: <https://ec.europa.eu/mission-ocean>

this condition is occurring in both finfish and shellfish production. The frailty of EU aquaculture is in deep contrast, firstly, with the booming situation of aquaculture in other countries of Europe and worldwide where aquaculture continues to be the fastest growing food production sector. And secondly, it is disconnected from the exceptionally good reputation of fish as nutritious and healthy food, the good environmental performance of EU aquaculture undertakings, the outstanding scientific production on aquaculture of EU research institutions, the innovation capability of the suppliers to European aquaculture, and with the education and training opportunities for aquaculture professionals in the EU.

Aquaculture in the EU



The reasons for the situation being suffered by EU aquaculture have been accurately identified by the European Commission’s DG MARE in its 2021 *Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030*⁵; just as they had already been underlined in its 2013 *Strategic Guidelines for the sustainable development of EU aquaculture*⁶.

The precise bottlenecks for aquaculture development in the European Union can be identified as the very complicated legal access to space and water for production, and the complexity of the administrative procedures related to aquaculture production. Both are related to the highly restrictive implementation of the EU environmental laws at the national and regional levels, which provides no additional environmental benefits but acts as a barrier to aquaculture development.

⁵ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030. COM(2021) 236 final. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021DC0236&from=EN>

⁶ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Strategic Guidelines for the sustainable development of EU aquaculture Brussels. COM(2013) 229 final. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52013DC0229&from=EN>

During the Covid-19 and the Ukraine war crisis, the relevance of food production in the European Union and the importance of strengthening food security have been heightened. Moreover, aquaculture production in the European Union has been recognised as having a potential leading role in both. Moreover, the environmental sustainability of aquaculture, the low carbon footprint of this production, its contribution to a circular economy, even its provision in some cases of ecosystem services, and the role of aquaculture in the Blue Economy, have been widely recognised. However, the FEAP feels that even after Covid and during the war in Ukraine, food production in the EU continues to be a second-level political target, well behind environmental protection.

The Mission *Restore our Ocean and Waters by 2030* is expected to achieve the objectives of protecting 30% of the EU's sea area as well as restoring marine eco-systems and 25.000 km of free flowing rivers, prevent and eliminate pollution by reducing plastic litter at sea, nutrient losses and use of chemical pesticides by 50% following the Biodiversity strategy, and make the blue economy climate-neutral and circular with net-zero maritime emissions. But no social, or economic, targets are pegged to it. This uncoupling between environmental objectives and socio-economic targets is similar to the one observed in the European Commission's recent proposal for a Regulation on nature restoration⁷.

The FEAP points out that the approach of the European Commission laying down rules for the recovery of biodiversity and protection of ecosystems across the Union's land and seas, and placing environmental protection ahead of food production, is in deep contrast with the policies of the Food and Agriculture Organization (FAO) that is promoting its *Blue Transformation* paradigm⁸. This *Blue Transformation* is a roadmap that recognizes the importance of aquatic food systems as drivers of employment, economic growth, social development, and environmental recovery, all underpinning the Sustainable Development Goals of the United Nations. This showcases that the FAO is convinced of the relevance of facing at the same level the twin challenges of food security and environmental sustainability; in particular, in the case of aquaculture, by seeking to promote sustainable aquaculture expansion and intensification to meet the growing demand for aquatic food and enhance inclusive livelihoods.

The FEAP position

1. The FEAP welcomes the European Commission's drive to explore innovative ways to solve European Union's complex societal challenges. However, the federation considers that, besides environmental and climate issues, current top-level EU challenges should also include food security, employment, and economic development, especially in rural areas where employment and economic opportunities are scarce.
2. The FEAP supports the European Commission's view that continuing with the status quo is not an option for addressing the main challenges of the EU and that there is an urgency to act. The FEAP agrees that good science is essential to finding solutions to the former, but stresses that science and technological innovation alone will not provide the solutions to all complex societal challenges.

⁷ Proposal for a Regulation of the European Parliament and of the Council on nature restoration. COM(2022) 304 final. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022PC0304&from=EN>

⁸ Blue Transformation. FAO's work on aquatic food systems. <https://www.fao.org/3/cc0458en/cc0458en.pdf>

3. The Missions are an opportunity to work together towards a healthy, green and digital future. The FEAP finds this path laudable but insufficient to support a climate-neutral blue economy across the EU. The FEAP stresses that a healthy, green and digital future that obviates the relevance of economic growth and employment is condemned to fail.
4. The Green Deal, and previous European Union policies, have spined-off numerous legal initiatives to protect and restore the natural environment. The European Commission's recent proposal for a Regulation on nature restoration is the latest example. The FEAP supports and emphasizes their relevance because fish farmers are environmentally conscious denizens, since they carry out their daily work within nature. Furthermore, aquaculture requires clean and good-quality waters to be viable. However, the FEAP stresses that too few initiatives have been set in place at the European Union level to back the livelihoods of people that farm directly in coastal or riverine public areas. This call for support should not be understood exclusively in the form of financial aid but through the establishment of a friendlier business environment.
5. The FEAP points out that it is a fact that the EU environmental approach has driven EU aquaculture to a standstill, while the FAO strategy continues to fuel the fastest-growing global food sector. At the same time, the EU food system is failing to deliver enough aquatic food to its population causing the aquatic food not produced in the EU to be imported, estimated at almost 70% of the demand for this healthy and nutritious food, while in the rest of the world aquatic food is becoming a more and more important part of human diets. The FEAP insists that this further growth of fish farming in the EU can take place with no significant increase in its environmental footprint.
6. The FEAP wishes to send a clear and unambiguous signal of its commitment to protecting the ocean, seas, and freshwaters and its engagement with the European Commission, and other stakeholders, to take concrete actions on this matter. This includes the federation's involvement in major Mission fora and events. However, for this to occur in a fruitful way, the European Commission should find ways to set targets for sustainable aquaculture production growth, in line with the principles of the European Green Deal and the aquaculture *Strategic Guidelines for a more sustainable and competitive EU aquaculture*.
7. The FEAP strongly calls on the European Commission to find ways to link environmental objectives to social and economic targets. Given the recognised importance for the EU of increasing aquaculture production, the FEAP requests the inclusion of binding quantitative targets on farmed aquatic food production in the Union. The underlying justification for this need is the fact that under the current framework national and regional public authorities responsible for environmental matters in their work exclusively pursue the environmental targets assigned to them regardless of the possible negative economic and social impacts that their decisions can bring. It is a fact that the setting of official quantitative targets is how the European Commission faces the crucial challenges of the Union. This can be witnessed in the case of the aforementioned environmental matters, and more recently on energy supply. The third great challenge already looming in the EU is food security for its strategic autonomy. A clear growth path for fish farming should now be set with quantitative milestones per Member State.

8. The FEAP welcomes the Missions' acknowledgment that societal challenges need a comprehensive, all-in approach that cuts across the boundaries of policies, programmes, and different levels of governance, working across policy areas. The FEAP encourages the European Commission to pool the necessary resources for assuring that policies and regulations timely achieve their objectives. The FEAP stresses that this is particularly critical for the development of aquaculture, as acknowledged in the *Strategic guidelines for a more sustainable and competitive EU aquaculture*.
9. The FEAP supports the Mission's objective to develop zero-carbon and low-impact aquaculture. However, it is relevant to note that in *Mission Starfish 2030* the independent experts working for the European Commission's DG RESEARCH & INNOVATION promoted the production and consumption of low trophic aquaculture (e.g. algae, shellfish, and other invertebrates) while not making a single reference to the environmental values of extensive and intensive finfish farming. Unfortunately, this initial stance has marked the views of many and is still today influencing the way aquaculture is governed and perceived. The FEAP strongly disagrees with that position. The FEAP stresses that not only the FAO in its Blue Transformation but numerous top-level scientific research papers⁹ identify that both extensive and intensive finfish farming can be highly environmentally sustainable and outperform on this score all terrestrial livestock production species. Because fin fish takes place in most cases directly within the natural environment the type of production system to be applied and the selection of fish species are dependent on the local conditions. But in all cases (extensive and intensive, freshwater and marine) finfish farming scores top-level marks in the use of natural resources, has a lower carbon footprint and requires minimal space use. Furthermore, fed aquaculture carries the advantage of full traceability of its products and total control of food safety. For these reasons, finfish farming is expected to play a leading role in the European transition to a Sustainable Food System. The FEAP genuinely welcomes the adjustment done in the Mission Charter to promote zero-carbon and low-impact aquaculture. However, the FEAP would like the European Commission to follow the FAO approach and explicitly promote all types of aquaculture production, including the concept of sustainable intensification. Nevertheless, the term "low-impact aquaculture" used by the European Commission in its Mission's objective has not yet been defined but has been described in the Commissions Communication on *a new approach for a sustainable blue economy in the EU Transforming the EU's Blue Economy for a Sustainable Future*¹⁰ as low-trophic, multi-trophic and organic aquaculture. The FEAP requests the European Commission to set a clear definition of "low-impact aquaculture" and to do it under scientific criteria.
10. As a corollary to all the aforementioned points, the FEAP expresses its adherence to the Charter of the Mission *Restore our Ocean and Waters by 2030*. However, the Federation of European Aquaculture Producers stresses that the objectives of this Mission will only be achieved if a more focused approach to finfish growth in the European Union is taken by the European Commission.

⁹ Nature. Environmental performance of blue foods. Sept-2021 <https://www.nature.com/articles/s41586-021-03889-2>

¹⁰ Communication from the Commission to the European Parliament, the Council, the EESC and the CoR on a new approach for a sustainable blue economy in the EU Transforming the EU's Blue Economy for a Sustainable Future COM/2021/240 final <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021DC0240&from=EN>



11. The FEAP commits to contribute with the following proposals:

- a. Contribute to the definition of 'low-impact aquaculture' and implement its development throughout the Union.
- b. Provide the European Commission with specific indicators and criteria for 'low-impact aquaculture'.
- c. Provide ideas and means to contribute to an aquaculture literate European society.

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.