

On the situation of organic aquaculture in the EU and an outlook for the future

Background

The Farm to Fork Strategy¹ is at the heart of the Green Deal². It faces the challenges of sustainable food systems and recognises the inextricable links between healthy people, healthy societies and a healthy planet. This strategy, and also the Biodiversity strategy³, address organic production and consider that the market for organic food is to continue growing and that organic farming needs to be further promoted. An EU Action Plan on organic farming⁴ has been proposed by the European Commission in 2021 to help Member States stimulate both supply and demand for organic products. Commission Regulation (EC) 889/2008 laid down detailed rules for the implementation of Council Regulation (EC) 834/2007 on organic production and labelling. A more recent regulation was then adopted (Regulation (EU) 2018/848)⁵ addressing mismatches.

“Can 25% of European agricultural land be organic in 2030? What about waters?”

A growth objective for organic production has been set by the European Commission. It aims *to dedicate at least 25% of EU's agricultural land to organic farming by 2030 and a significant increase in organic aquaculture*. The European Commission's 2021 aquaculture strategic guidelines⁶ also encourage Member States and stakeholders to support increases in organic aquaculture production.

By 2020 organic farming in general accounted for 9,1% of agricultural land at EU 27 level. Consumption of organic products is slowly on the increase, having reached EUR 44,8 billion at EU 27 level, accounting for 4,7% of EU food consumption (including aquatic food). The total organic aquaculture production at EU 27 level in 2020 was estimated at 74.032 tonnes, representing only 6,4% of the total EU aquaculture production. Based on data collected by a EUMOFA study⁷, the main aquatic species produced as organic in the EU in 2020 were mussels (41.936 tonnes, 10 % of total

¹ The Farm to Fork strategy for a fair, healthy and environmentally-friendly food system: https://food.ec.europa.eu/horizontal-topics/farm-fork-strategy_en#Strategy

² The European Green Deal. Striving to be the first climate-neutral continent: https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en

³ EU Biodiversity Strategy for 2030: Bringing nature back into our lives: https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030_en

⁴ Action plan for organic production in the EU: https://agriculture.ec.europa.eu/farming/organic-farming/organic-action-plan_en

⁵ Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R0848&from=en>

⁶ Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030: https://oceans-and-fisheries.ec.europa.eu/ocean/blue-economy/aquaculture/aquaculture-guidelines_en

⁷ EUMOFA 2022. Organic aquaculture in the EU: https://www.eumofa.eu/documents/20178/432372/Organic+aquaculture+in+the+EU_final+report_ONLINE.pdf

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EU mussel production), followed by salmon (12.870 tonnes, 75 % of total EU salmon production), trout (4.590 tonnes, 2 %), carp (3.562 tonnes, 4 %), oysters (3.228 tonnes, 3 %) and European seabass/gilthead seabream (2.750 tonnes, 2 %). The main Member States producing organic aquaculture were Ireland (salmon and mussel), Italy (mussel and finfish), France (oyster, mussel and trout), the Netherlands (mussel), Spain (mussel and sturgeon), Germany, Denmark and Bulgaria (mussel).

Justification

Producing animals and plants in the water (aquaculture) is technically far more complex than producing them on land. EU aquaculture is a very diverse activity that farms numerous species through different production systems, and taking place in a variety of freshwater and marine environments. Furthermore, it requires achieving a more complicated and critical social license due to the fact that most of the aquaculture production occurs in public domain spaces, and in many occasions in nature-protected areas, in which more denizens and/or entities have a say on it taking place.

“Small percentages, big bottlenecks”

FEAP acknowledges that organic production is a valuable option for food production and marketing in the EU, including for fish farming. However, the very small percentage of EU aquaculture currently being produced as organic should be seen as a symptom that the legal for organic aquaculture is inappropriate and that too many bottlenecks remain, as pointed out in the 2022 EUMOFA report, because of insufficient profitability, a too complex regulation, consumer confusion on different sustainability schemes, and more reasons.

Furthermore, the political target of the European Commission for organic production growth is of reaching at least 25% of the EU's agricultural land under organic farming by 2030, but for aquaculture it just sets '*a significant increase*'. The Commission here differentiates a quantitative growth target for agricultural organic farming but a mere inspirational target for organic aquaculture growth, recognising implicitly that organic aquaculture cannot follow the growth pace desired for terrestrial organic farming.

Additionally, FEAP stresses that pursuing more organic aquaculture should not be considered the single path for environmentally sustainable aquaculture. Other aquaculture environmental practices can achieve comparable results, or even better in certain aspects (efficient use of natural resources, reduction of the carbon footprint, etc.), for attaining the broader EU environmental goals. Besides, organic products not necessarily provide higher nutritional value^{8 9}, increased food safety¹⁰, or better taste.

⁸ The Nutritional Quality of Organic and Conventional Food Products Sold in Italy: Results from the Food Labelling of Italian Products (FLIP) Study <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7282013/>

⁹ Are organic foods safer or healthier than conventional alternatives?: a systematic review <https://pubmed.ncbi.nlm.nih.gov/22944875/>

¹⁰ Organic versus conventional food: A comparison regarding food safety https://www.researchgate.net/publication/303853669_Organic_versus_conventional_food_A_comparison_regarding_food_safety

FEAP and COPA-COGECA published on July 2021 a Position paper about achieving the expectations set by the Green Deal on organic aquaculture production¹¹. This document promoted the development of organic aquaculture and other aquaculture systems with low environmental impact. Both organisations believed that the reasons for the underperformance of EU organic aquaculture were double: First, that the stagnation situation of the aquaculture sector in the EU hinders innovation; and second, the severe complications that aquaculture producers face to comply with the organic rules.

It is relevant to point out that the only subsector of EU organic aquaculture that has seen any significant growth in the latest years has been organic shellfish farming, mainly on mussels but also on oysters. This growth of EU shellfish organic farming has occurred only thanks to the adaptation of the general organic rules to the specificities of shellfish farming (open production environments, polyculture, low human intervention, etc.), and making water microbiological quality the only decisive factor.

A key issue, not addressed by EUMOFa, which is also hindering the growth of organic aquaculture is that when consumers look out for what they consider more 'natural' aquatic farmed food they move towards wild-caught fish instead of towards organic farmed fish, and this impacts on market development. Furthermore, organic fish produced through pond farming is not considered by consumers of higher quality than non-organic farmed pond fish because both are considered as traditional, and pond farming in general is seen as the natural and controlled way of producing them. On the contrary, this does not happen with land-based organic animal production where the belief is that organic livestock is more 'natural' than non-organic farmed animals.

"Assess, adjust, action!"

Proposals

- (1) FEAP requests the European Commission to launch a strong initiative aiming to **lift the barriers** hindering organic aquaculture development that were identified by EUMOFa in its 2022 report on Organic aquaculture in the EU.
- (2) The federation calls on the European Commission to **solve the technical issues** hindering organic fish farming that were pointed out by FEAP and COPA-COGECA in their 2021 Position paper.
- (3) European fish farmers request the Commission the establishment of a **structured communication procedure** for providing input and proposals aiming at potential adjustments in the organic regulation. The current feedback scenario is dominated by public administrations and non-industry stakeholders.

¹¹ FEAP Position paper: Achieving the expectations set by the Green Deal on organic aquaculture production https://feap.info/wp-content/uploads/2021/07/210715-feap-position-paper_organic.pdf

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- (4) FEAP stresses that the poor progress of organic fish farming in the EU is greatly affected by the same reasons that are holding back non-organic aquaculture growth in the EU. To unlock this situation the European Commission's Strategic guidelines for a more sustainable and competitive EU aquaculture should be **fully implemented and their objectives attained**.
- (5) FEAP points out to the European Commission that it can contribute in an indirect way to improve the image of EU aquaculture by **scaling down the growth expectations** set for organic aquaculture. Organic standards tend to be used by many non-industry stakeholders as 'golden' standards for benchmarking non-organic aquaculture, even for low-impact aquaculture. Given the unsurmountable existing barriers to achieving significant growth of EU organic aquaculture, the Commission should redirect part of the efforts it dedicates to this organic path, which cannot fulfil the expectations, to promoting increases in conventional (non-organic) sustainable low-impact aquaculture. This would require, of course, a definition by the European Commission of low-impact aquaculture and the establishment of sustainability technical screening criteria for it. This refocusing of the Commission's vision for the development of sustainable aquaculture would clearly contribute to minimising the existing negative reputation of aquaculture in some parts of the EU, even for low-impact aquaculture. This is especially relevant when understanding that social acceptance is one of the main challenges to the development of aquaculture in the EU.
- (6) It is essential to **adjust the rules for organic pond aquaculture** in a way that releases the current bottlenecks to the growth of this production system. There is a need for a detailed review of organic pond aquaculture rules in the framework of EU legislation on organic production. The rules should reflect the fact that production in these artificially created fish pond ecosystems is based on natural ecological processes. The fish in them feed to a great extent on the elements of the natural food web and only supplementary cereals are added.

FEAP, 24 February 2023

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.

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