

About the European Commission's communications on the CFP and the CMO

On February 21st 2023, ten years after the reform of the common fisheries policy, the European Commission (EC) has presented a package of measures to improve the sustainability and resilience of the European Union's fishing and aquaculture sector. At the same time, the European Commission has taken the opportunity to set its vision for the future. It includes, amongst others, a report on the functioning of the Common Fisheries Policy (CFP) regulation as well as a report on the Common Organisation of the Markets in fishery and aquaculture products (CMO). Both are relevant elements for the European Green Deal.

The FEAP welcomes, and values positively, the effort of the European Commission to make aquatic food as sustainable as possible from its environmental, social, and economic perspectives. The goal of the CFP should continue to be ensuring long-term sustainability for the fishing and aquaculture sectors, the availability of aquatic food supplies to the EU, and a fair standard of living for fishing and aquaculture communities.

However, this federation believes that the Commission has once again missed the opportunity to place aquaculture at the centre of its vision for the future of sustainable aquatic food in the European Union.

Wild fish stocks are a European common good that must be managed at the European level. On the other hand, aquaculture management is under the shared responsibility of the Member States and the European Commission. The positioning of aquaculture at the EU level as a strategic source of sustainable aquatic food is clearly missed by the CFP. Under the current legal framework, and without the need to touch upon the Member States' responsibility to manage aquaculture, **the CFP should set an inspirational target for the development of aquaculture in the EU.** This would have direct impacts on both European food security and the trade balance on aquatic food of the EU with respect to Third countries.

“Aquaculture must be at the centre of the European Commission's vision for the future of sustainable aquatic food”

The FEAP is deeply concerned with the frustrating evolution of the aquaculture sector in the European Union. Since the year 2000 growth has been virtually non-existent and this situation is occurring in both finfish and shellfish production, while algae and crustacean productions are almost negligible. The frailty of EU aquaculture is in deep contrast, firstly, with the thriving situation of aquaculture in other countries of Europe and worldwide, and secondly, with the exceptional properties of fish as nutritious and healthy food, the good environmental performance of EU aquaculture, the outstanding scientific production on aquaculture of EU research institutions, the innovation capabilities of the suppliers to European aquaculture, and with the education and training opportunities for aquaculture professionals in the EU.

It has been disappointing for FEAP to find out that the single new initiative, regarding aquaculture, introduced by the EC in its report on the CFP has been the promotion of low-trophic aquaculture production, such as mollusc and algae farming, and integrated multitrophic aquaculture systems. The rest of the proposals of the Commission (use of sustainable protein sources for feed, feed efficiency, energy efficiency and the use of renewable resources) are relevant but not groundbreaking for EU aquaculture as they will only mean tweaking what is currently already pursued by EU fish farming.

Aquaculture in the rest of the world has positioned itself as a key element for food security from both a quantitative point of view (amount of food) and from a nutritional perspective (nutritive values). An example to follow, the United Nations' Food and Agriculture Organisation (FAO) is pursuing its Blue Transformation 2022-2030 roadmap with a vision on aquatic food systems¹ that continues fuelling aquaculture development to remain the fastest-growing global food production system. **The FAO considers that all types of sustainable aquaculture production must be promoted, including finfish and this includes the sustainable intensification of production.** Neighbouring countries to the EU, like Norway and Turkey, continue to bet strongly on increasing their finfish farming production and taking advantage of exporting to the EU Single Market where local fish farmers are unable to produce the required amount of finfish and consumers continue demanding them for nutritional and gastronomic reasons.

“It’s not only about mussels and seaweed: according to the FAO, sustainable finfish aquaculture will also be needed to cover global food needs”

Furthermore, **by placing its emphasis on low-trophic, multi-trophic and organic aquaculture, and not providing a single mention of the importance of conventional finfish farming, the EC is placing the latter on the negative side of an artificial reputational divide that hinders achieving the needed social acceptance for the development of aquaculture in the EU.**

In the EU the CFP continues to be weighed down by two factors. First, the inertia of the past: the management of wild fish stocks continues to take the limelight in the CFP, not only regarding its contents but also in the language used. This is a bias that continues to be seen in the title of the policy (Common *Fisheries* Policy, without any reference to aquaculture) and in the motto (a Fisheries and Oceans Pact towards sustainable, science-based, innovative and inclusive *fisheries management*). And second, by the aforementioned vision of the Commission that the future of EU aquaculture lies in low-trophic, multi-trophic and organic aquaculture. Finfish farming, both intensive and extensive, including the raising of omnivorous and piscivorous species fed low-trophic raw materials, is not only today's mainstream aquaculture in the EU but an essential element of the EU long-term sustainable food system.

In the context of the package published by the European Commission to improve the sustainability and resilience of the European Union's fishing and aquaculture sector, FEAP has listed the following observations and comments:

¹ FAO 2022 Blue Transformation: <https://www.fao.org/3/cc0459en/cc0459en.pdf>

FEAP REVIEW OF THE COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL [COM(2023) 103 final]: *The common fisheries policy today and tomorrow: a Fisheries and Oceans Pact towards sustainable, science-based, innovative and inclusive fisheries management*

(1) In this Communication the European Commission continues to miss, or to highlight, the **extraordinary potential of sustainable finfish farming in the European Union**. Human health authorities recommend, with insistence, the consumption of two or three finfish-based plates per week because of their content of long-chain polyunsaturated fatty acids (Omega-3: EPA and DHA). Furthermore, the production of farmed finfish has the lowest carbon footprint of any major protein source when compared to terrestrial livestock production and requires the least use of natural resources, like freshwater or agricultural land. In the Communication, the Commission recommends the promotion of low-trophic aquaculture production when it should be aiming for the growth of low environmental-impact aquaculture in general, including not only mollusc and algae farming, but also freshwater finfish farming and marine finfish farming, both extensive and intensive. The Commission should be concerned about the fact that non-EU countries, like Norway and Turkey, continue promoting the growth of their finfish farming sector with the EU market as their export target. The EU should make use of its favourable natural conditions for finfish farming and promote its sustainable development as FAO does for other parts of the world.

(2) The ambiguous use by the European Commission of the term “Fisheries” creates legal uncertainty and implementation confusion at the Member State level. In the CFP (and related legislation), this word is sometimes supposed to comprise aquaculture but in other it clearly doesn't. This basic issue should be immediately solved and **European legal texts made clearer and unambiguous**. The FEAP would propose the policy to be re-named to the ‘Common Aquaculture and Fisheries Policy (CAFP)’.

(3) The European Commission should **add to the CFP that freshwater aquaculture is an integral part of the Common Fisheries Policy**. This ought to be adopted from a production perspective (freshwater fish and not only marine species), a market orientation (aquatic food and not only seafood), and from a societal point of view (development of aquaculture in riverine communities and not only in coastal communities).

(4) Generational renewal is important and it is understood as a challenge for both aquaculture and capture fisheries. But the focus should not only be on attracting younger generations to these sectors but to **attract employees of any age and condition**. The EC misses mentioning in its Communication that one of the key points to make jobs attractive is having them offer attractive salaries. And to offer good payments companies have to be sufficiently profitable.

(5) The strong bias of the CFP towards capture fisheries **conceals the potentiality of European aquaculture both from a production and employment point of view**. For example, why does the EC propose the organisation of a ‘Fishers of the Future’ project and not a ‘Fish farmers and Fishers of the Future’ project?

(6) The EU is mainly able to maintain a high level of aquatic food consumption by importing it from other regions of the world. Self-sufficiency on aquatic food in the EU, which is the capacity to meet demand from domestic production, in 2020 was estimated² at 38,9%. This EU self-sufficiency has been following a negative trend since 2018, which reflects both the downward trend of EU production and the increase of imports. **FEAP suggests the inclusion, in the resilience dimension of the CFP, of an indicator of self-sufficiency on aquatic food**, as well as a quantitative objective for 2030.

(7) Finally, and following the European Parliament's request to the EC on the establishment of quantitative objectives for the growth of the EU aquaculture sector, **FEAP stresses the great importance of setting quantitative objectives for the growth of the sector and indicators for its follow-up**. These indicators could include the number of new licenses, EMFAF funds allocated to productive investments, or tons of feed used.

FEAP REVIEW OF THE REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL [COM(2023) 101 final]: *Implementation of Regulation (EU) No 1379/2013 on the common organisation of the markets in fishery and aquaculture products*

(1) Producer Organisations are recognised by the CFP as key elements for achieving its objectives. However, the latest available figures prove a **low uptake of this associative instrument in aquaculture**. FEAP considers that this is due to their complex set-up and operation. Member States should provide digital tools for the running of POs and for their exchange of information with the competent authorities. Furthermore, there are considerable differences between Member States on financial support, eligibility criteria, and other procedures. Finally, there is no defined framework for the creation and funding of transnational associations of Producer Organisations.

(2) Common marketing standards are supposed to lay down uniform characteristics for aquatic food sold in the EU, whatever their origin, and help ensure a transparent internal market to supply high-quality products. However, currently very few aquatic food products dispose of marketing standards (only canned tuna and sardines), even if the value of this tool for the levelling of the playing field, both within the EU and with imports, remains high. FEAP considers that **marketing standards should not be restricted to production-related technical issues but should be expanded to environmental or social aspects**, in line with the new Sustainable Food System initiative.

(3) On consumer information, and despite the mandatory general food labelling regulations to provide consumers with information for responsible purchases, **very often inadequate and misleading consumer information on aquatic food products takes place**. Especially in the hotel, restaurant, and catering segment (HoReCa). Moreover, insufficient or misleading information to

² EUMOFA report 'The EU Fish Market 2022 Edition: https://eumofa.eu/documents/20178/521182/EFM2022_EN.pdf/5dbc9b7d-b87c-a897-5a3f-723b369fab08?t=1669739251587

consumers continues to happen in direct retail sales to consumers. The key issues continue to be that the country of origin is false, not listed, or multiple; defrosted products are frequently sold as fresh; the name of the fish species is missing or false; farmed fish are sold as captured fish; and the date of capture or harvest should be compulsory for all fish placed on the EU market.

(4) Regarding competition rules, 75% of the aquatic food that is consumed in the EU is imported from third countries. **The existing trade policy of the EU does not always allow today for a level playing field.** Specifically, there are still in place outdated bilateral agreements that do not reflect the current conditions (supply and demand); and the existing trade defense instruments do not provide a permanent solution as competitors make use of legal tricks to avoid correction measures.

(5) Finally, on market intelligence **there is a need for improvements in the availability of statistical data that will allow for more detailed processing and analysis.** For example, the Combined Nomenclature codes currently do not allow the distinction between farmed or wild-caught products even for the main species, the monitoring of emerging aquaculture products, or the monitoring of imported products (e.g. fish fillets) that are imported in smaller quantities.

FEAP, 20 March 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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