



Press Release

Brussels, November 20th, 2023.
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Subject: FEAP’s opinion about the ECA special report on the EU aquaculture policy

“European aquaculture holds a key to sustainable food safety, but its stagnating status must be solved within the decade.”

The European Court of Auditors (ECA) released last week a special report on the EU aquaculture policy titled ‘Stagnating production and unclear results despite increased EU funding’¹. Simultaneously, the European Commission published a reply² to that document.

In its report, the ECA examined whether the European Commission (EC) and the Member States (MS) have promoted the sustainable development of EU aquaculture effectively. It concluded that while the EU’s strategic framework for aquaculture has improved in the recent years, EU aquaculture has seen little growth, and there are no reliable indicators to track the sector’s sustainability and the contribution of the increased EU funding to the development of EU aquaculture.

ECA recommends supporting MS in addressing the obstacles to the sustainable development of EU aquaculture, improving the targeting of EU funds, and enhancing the monitoring of both EU funding’s performance and environmental sustainability.

In the EC’s reply to ECA, released at the same time, the Commission details the work it carries out on aquaculture, including the 2021 Strategic Guidelines, the Open Method for Coordination, the Aquaculture Assistance Mechanism, and its partial monitoring of the European Maritime and Fisheries Fund (EMFF) and the European Maritime, Fisheries and Aquaculture Fund (EMFAF). However, the EC recognises that under shared management it cannot monitor, on a continuous basis, the effectiveness of the use of EU funds nor, even more broadly, the environmental sustainability of EU aquaculture altogether. The Commission believes that there is a solid basis to allow the EU aquaculture sector to grow and reach its full potential in terms of contributing to the objectives of the European Green Deal. However, the EC considers that it is still early to

¹ https://www.eca.europa.eu/ECAPublications/SR-2023-25/SR-2023-25_EN.pdf

² https://www.eca.europa.eu/Lists/ECARepplies/COM-Replies-SR-2023-25/COM-Replies-SR-2023-25_EN.pdf

evaluate the results of the new strategy.

With respect to the funding to support aquaculture, the Commission agrees on the need for sound monitoring. At the same time, it considers that the checking system of EMFAF has been improved and simplified, based on the experience with EMFF.

The FEAP is convinced that aquaculture in the EU has great potential to provide aquatic food, economic development, and employment opportunities just like this same activity does in other parts of the world. Furthermore, **the current stagnation situation of aquaculture in the EU can be solved if the right actions are taken.**

Aside a few gaps identified by FEAP in ECA's special report*, FEAP considers that ECA has delivered in general terms a thorough report describing the situation, challenges, and administrative shortcomings of aquaculture development in the EU. However, and to our greatest concern, FEAP considers the EC's reply short-sighted.

The Commission does not recognise, nor provide solutions, to the real underlying reasons that are holding back the potential of aquaculture in the EU.

The ECA has pointed out **ineffective spatial planning** for aquaculture and **complicated licensing procedures** as the reasons, just like the EC does in its 2021 Strategic guidelines. However, in reality, these are mere symptoms of a problem and not the actual causes behind the situation.

FEAP addresses in this press release its views on the ECA special report and on the EU aquaculture policies in general.

FEAP agrees with ECA that the EU's strategic framework for aquaculture has improved in recent years. However, being true that it is still early to evaluate the results of such new strategy, this federation stresses that **the EC's 2021 Strategy will not be enough to drive the same growth of the sector as is being seen in other countries** like Norway, the UK, Turkey, or in many other parts of the world.

ECA has rightly noticed that **very few new aquaculture farms have been set up** in the EU during the 2014-2020 period despite the availability of public funding. FEAP can understand that ECA might not have sufficient oversight to fully explain this situation, but the Commission should be knowledgeable about it. The EC is aware that aquaculture growth is held back by **excessive administrative burden** caused by overzealous implementation of environmental regulations, an **unequal playing field** with imports, and confusing information to consumers.

If the EU truly wishes to put aquaculture back on track for significant growth, and ensure its significant role in a Sustainable European Food System, Blue Economy, and Strategic food autonomy, **fundamental issues must be addressed**, both by and beyond the European Commission.

FEAP has identified two domains of action to unlock the situation: ambition and cohesion.

(1) Food production in the EU must become an objective with similar level of importance as environmental protection

The European aquaculture sector is committed to restoring and protecting the natural environment. Moreover, aquaculture can only take place in waters with a good ecological status. Aquaculture takes place in public waters, directly in the

natural environment, for this reason the implementation of environmental laws has a decisive impact on aquaculture development. However, most Member States (and their regions) are overwhelmed by the implementation of EU environmental policies, leaving very little space for aquaculture development in those ecosystems. It occurs that the current single objective for MS environmental authorities is nature protection and fulfilling their legal obligations. The result is that food production in the natural environment is unimportant for those authorities while at the same time hold the key for approving the planning and licensing of new aquaculture farms. For this reason, the future of aquaculture in the EU is bleak.

The potential of aquaculture in the EU will only be unlocked when food production in the EU becomes an objective with a similar level of importance as environmental protection, including the setting of quantitative production targets. FEAP is convinced that both objectives are compatible and stresses that the EC should look at FAO's Blue Transformation³ to fully address the issues pointed out by ECA in its special report. Improving the current legal framework and the efficient and effective use of the EMFF/EMFAF are very minor elements for solving the stagnation of aquaculture production in the EU. The main lesson to be learned from FAO is that environmental policies should be balanced with food production targets.

(2) As for Agriculture, Aquaculture needs a Common Policy

The Treaties of the European Union do not consider aquaculture as a shared competence on an equal footing with other primary food production sectors such as agriculture and fisheries. For this reason, the Union does not define nor implement a specific and effective Common Policy for aquaculture. The main EU instruments today to facilitate aquaculture development are the non-binding Strategic guidelines, Member States' multiannual national strategic plans, the exchange of information and best practices among Member States, and the European Maritime, Fisheries and Aquaculture Fund. In this sense, FEAP flags that, in its view, the lack of growth in the EU aquaculture sector is a direct consequence of missing a Common Aquaculture Policy.

FEAP boldly proposes changing the political and legal position of aquaculture within the EU and creating a Common Aquaculture Policy. FEAP reckons that this could also be achieved through a specific segment for aquaculture in the Common Fisheries Policy on equal footing with capture fisheries, or a dedicated section in the Common Agriculture Policy. A Common Aquaculture Policy could exercise the required pressure to align public administrations and solve the technical bottlenecks of spatial planning and licensing procedures, amongst others.

*** FEAP's opinion on the shortcomings of the ECA report**

One of the shortcomings of the ECA special report is that it focuses on potential negatives of aquaculture but fails to balance those possibilities with its positives: efficiency in the use of natural resources, low carbon footprint, little use of space and fresh water, and the provision of highly nutritious food. FEAP agrees with the EC that such negative impacts are currently unlikely to occur on a sufficient scale to significantly

³ <https://www.fao.org/3/cc0459en/cc0459en.pdf>

affect the good environmental status of relatively large sea areas.

FEAP shares with ECA and the Commission the same concerns on the relevance of transparency and accountability in the use of EU funds for aquaculture. However, this federation does not understand why ECA is surprised that almost all eligible projects are selected for EMFF funding. For FEAP it would be surprising that projects that pursue the targets of the Common Fisheries Policy were left out.

Finally, regarding indicators, FEAP agrees with ECA and the EC that currently there are no official indicators to check if the sector is developing sustainably. In this regard, FEAP, alongside the ASC, has provided the EC with a list of environmental sustainability indicators⁴. These indicators could complement those proposed by the Joint Research Centre in its 'Indicators for Sustainable Aquaculture in the European Union'⁵. However, when considering socioeconomic indicators on the development of the aquaculture sector, ECA and the EC should consider that due to the usual delays in the approval of aquaculture farms and the fact that for biological reasons fish production cycles are years long, there is always a substantial delay of years between having a project approved and when its products are sold on the market. Leading indicators on aquaculture growth should be defined and used to foresee in the short term the effectiveness of aquaculture policies and funding.

About the Federation of European Aquaculture Producers

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.

Learn more about the Federation of European Aquaculture Producers' projects and positions



<https://feap.info/>

<https://twitter.com/feapinfo>

<https://www.linkedin.com/company/feapinfo/>

⁴ <https://www.dropbox.com/scl/fi/owvvy3t1ulb52toefmto/221208-FEAP-Fishfarming-Technical-screening-criteria.pdf?rlkey=xpq6ycmoh9srhpoy5sqjm2p82&dl=0>

⁵ <https://publications.jrc.ec.europa.eu/repository/handle/JRC75891>