

IS EUROPEAN AQUACULTURE LOOSING THE ADMINISTRATIVE BATTLE?



FEAP calls for simplification, realism, science-based governance, and the launch of a coherent EU food production policy.

29 March 2024

We, as the Federation of European Aquaculture Producers (FEAP), have been alerting stakeholders that while aquaculture production in the European Union has been stagnating since the turn of the century, it has grown exponentially around the world. Difficulties in obtaining licenses for new fish farms and excessive red tape make fish farming in the EU extremely burdensome and challenging. In addition to being dependent on natural factors, fish farming is today practically impossible to overcome bureaucratic ordeal.

FEAP is fully aware that the problem affects not only the aquaculture sector but is weighing down the food production sectors in general. At this time of relocation of strategic industries, with food security high on the agenda, such a restrictive legal framework is counterintuitive and counterproductive, to say the least. The pandemic, the war in Ukraine, the Red Sea crisis, inflation, and climate change are stark reminders that Europe must now act to create the proper conditions for its key sectors to be able to develop in a stable and fair administrative playing field.

The protests of the agriculture farmers should come as no surprise, given that this sector has historically been the most vocal in the face of this common problem. This movement, unfortunately, plagued by unnecessary violence and political opportunism, is nothing but a manifestation of the collective frustration of Europe's primary producers: fishers, fish farmers, livestock or crop producers, on whom everybody else relies.

⚡ Despite being essential to our society, these activities remain under-appreciated and are administratively penalised.

Both on the EU and global scale, aquaculture is considered the most promising sector to feed the population in the coming decades. No other sector achieves more favourable protein conversion ratios, nor it is more environmentally sustainable than aquaculture. The UN FAO Blue Economy principles, the European Commission's numerous communications demanding the member countries of the Union promote the development of aquaculture, and the various favourable opinions of the European Economic and Social Committee, are just a few examples of the recognition the aquaculture sector receives from the main institutions at a global and continental level.

💡 FEAP is convinced that aquaculture in the EU has great potential to provide healthy aquatic food, economic development, and employment opportunities just like this same activity does in other parts of the world.

Furthermore, the long-standing stagnation of aquaculture in the EU can be solved if the right actions are taken.

However, this potential surprisingly contrasts with the position of several bodies of the European Commission and environmental authorities of the member states of the European Union which seem to be engaged in a logic of overregulation and additive layering of administrative constraints, turning the development, growth, and diversification of EU aquaculture, already one of the most monitored and environmentally sustainable practices, into an administrative nightmare.

FEAP considers that the European Commission, especially DG MARE, understands the situation, challenges, and administrative shortcomings of aquaculture development in the EU. However, the Commission does not recognise, nor provide solutions, to the real underlying reasons that are holding back the potential of aquaculture in the EU.

Ineffective spatial planning for aquaculture and complicated licensing procedures are mere symptoms of deeper problems and not the actual causes behind the situation.

⚡ These excessive administrative burdens are caused by overzealous implementation of environmental regulations, an unlevel playing field with imports, and confusing information to consumers.

FEAP stresses that if the EU truly wishes to put aquaculture back on track for significant growth those fundamental issues must be addressed, both by and beyond the European Commission.

FEAP has identified two central domains of action to unlock the situation.

First, **food production in the EU must become an objective with a 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. However, 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. Furthermore, 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, even if the impact of fish farming in those areas can be considered negligible. It occurs that the current single objective for MS environmental authorities is nature protection and fulfilling their legal obligations on this matter. The result is that food production in the natural environment is unimportant for those authorities that 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 for the Union, Member State by Member State. FEAP is convinced that both objectives are compatible and stresses that the EC should look at FAO's Blue Transformation¹, to fully address the issues pointed out by European Court of Auditors in its special report². Improving the current legal framework and the efficient and effective use of the EMFF/EMFAF are second-level elements for solving the stagnation of aquaculture production in the EU. The main lesson to be learned from FAO is that environmental policies can be balanced with food production targets.

Secondly, 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 the creation of a Common Aquaculture 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.

If no transparent dialogue and collaboration happens fast between legislators and aquaculture farmers, this continuous and growing obstruction will continue causing the ever-growing percentage of imported fish to feed Europeans, leading to a loss of value created, unfavourable carbon footprint of imports, loss of European industrial expertise, knowledge, qualitative and equal opportunity jobs for youth.

At FEAP we invite national administrations and European institutions to collectively reconsider the social costs, realism of implementation and the scope of some environmental policies as unjustifiably restrictive as those that prevent us from developing this fantastic, sustainable, and excellence-driven sector, supplying society with the healthy and tasty food that is farmed fish.

¹ [Blue Transformation Roadmap 2022–2030 A vision for FAO's work on aquatic food systems](#)

² [Special report 25/2023: EU aquaculture policy – Stagnating production and unclear results despite increased EU funding](#)

💡 To identify concrete actions, FEAP has developed a series of proposals, developed in consultation with its member associations across Europe:

Regulatory reforms. Fish farmers, which are mainly micro and small enterprises, request regulatory reforms to streamline bureaucracy, reduce administrative burdens, and ensure that regulations are practical and conducive to improvements in aquaculture productivity and production growth:

- Urgent need for balancing environmental laws with the primary production of food.
- Establishment of a legal principle setting '*no prohibition if no solution is available*', meaning that viable alternatives must exist for a substance or technique before being phased out.
- Adaptation of legal rules to the specificities of aquaculture (for example, on organic production, by-products, feed raw materials, etc.).
- Better training of public officers that deal with farmed fish on the particularities of fish farming (for example, on veterinarian, environmental, or food safety matters).

A Common EU Policy for Aquaculture. The lack of such Common policy has been identified as one of the main barriers to unlocking the potential of EU fish farming:

- A shared policy between the Member States and the European Commission is needed. This Common policy should converge towards a Common Food Policy involving the whole food chain and with a holistic view and responsibilities distributed along the value chain.
- Establishment of compulsory farmed fish production targets per Member state as the only possible way to ensure the efficient alignment of public aquaculture policies.
- Specific support should be provided for young fish farmers and generational renewal.

Spatial planning and licensing.

- Licensing processes for fish farms must be simplified and shortened timewise.
- Fish farm licensing terms should have similar conditions as agriculture fields that produce food.

Environmental sustainability. Currently, there is an unbearable pressure on the fish farming sector to adopt even more stringent environmental practices:

- Rationalisation of environmental obligations and matching with food production goals.
- Establishment of effective tools for the control of predators in extensive and semi-intensive fish farming, including European-wide actions (for example, on cormorants).
- Providing financial compensation to fish farmers for carrying out environmental measures and for rewarding the provision of ecosystem services.

- Promotion of a circular economy, i.e. through the rationalisation of the use of temporary fish transporting containers along the value chain as a way to reduce waste, including the authorisation for importing to the EU fish for processing in reusable bulk bins alternatively to single-use polystyrene boxes.

International market trade. The EU lacks a level-playing field international trade policy protecting EU fish farmers against unfair competition and providing a sufficient level of food sovereignty for such nutritious food as fish:

- Establishment of marketing standards on environmental, social, and animal welfare issues compulsory also for imported food products.
- The international trade agreements with Third countries need to be periodically updated.

Consumer information. Aquatic products sold on the EU market on far too many occasions do not carry sufficient information to allow consumers to make responsible choices. This mainly happens in the Horeca channel, but also in retail:

- Creation of specific rules for caviar labelling.
- Processed fish products should list the countries of origine and avoid the 'multiple origine' wording.

Research. The EU is a fish farming research powerhouse, but its results do not percolate to the sector:

- The results of publicly funded scientific projects should be available in all EU languages, and dissemination better coordinated at the EU level.
- Fish farmer's associations should be better involved in the decision over EU aquaculture-related research topics and in the selection process of supported projects to better align them with the sectorial needs.

Our team remains committed to provide all possible support to policy makers and society stakeholders to support a sustainable, profitable and fair development of the European aquaculture sector. We defend farmers and their role in ensuring European food security, quality and resilience.

We will be happy to provide you with more information on our work or our members' activities.

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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.

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