

Organic fish farming demands coherence between EU policies

Background

EU policies for organic fish farming. The advancement of organic production in general, and organic fish farming in particular (as a subsector of organic aquaculture), is encouraged by the European Union policies. The Farm to Fork strategy¹ established in 2020, which aims to increase food production in the EU while making food systems fair, healthy and environmentally friendly, targets 25% of the EU's agricultural land under organic farming by 2030 and a significant increase in organic aquaculture. The EU Biodiversity Strategy² of 2020 states that organic farming holds great potential for farmers and consumers. In 2021, the EU Action Plan for the Development of Organic Production³ identified organic aquaculture as a sector with potential development. Moreover, in 2021 the *EU Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030*⁴ defined the promotion of organic aquaculture as a key food production procedure. The organic production and labelling rules are set in Regulation (EU) 2018/848 of the European Parliament and the Council⁵.

The situation of organic fish farming production in the EU. As identified by EUMOFA⁶ and the AAC⁷, several significant technical and regulatory barriers exist that inhibit the growth of the organic fish farming sector in the EU and are currently causing its decline. Fish farming in general in the EU is indeed underperforming when compared to its situation in Third countries, but organic fish farming production in the EU is actually falling even before taking off. EUMOFA has estimated that the total organic aquaculture production at the EU 27 level was 74,032 tonnes in 2020, accounting for 6.4% of the total EU aquaculture production. Organic aquaculture production has increased by 60% compared to 2015 due to a growth in organic mussel production that masks the regrettable situation of organic finfish farming. EUMOFA has identified a decrease in organic Atlantic salmon production (12,870 tonnes in 2020 compared to a peak of 16,481 tonnes in 2017), stability of organic rainbow trout production (4,590 tonnes in 2020 compared to 4,700 tonnes in 2015) but in severe decline since 2020, a decrease in organic carp production (estimated at 3,562 tonnes in 2020 but 7,000 tonnes in 2015), and European seabass/Gilthead seabream was the only finfish group on a slightly increasing trend (2,750 tonnes in 2020 and 2,000 tonnes in 2015) but showing a worrying decline from 2022 onwards.

¹ European Commission Communication on the Farm Strategy for a fair, healthy and environmentally-friendly food system. COM(2020) 381 final. [Link](#).

² European Commission Communication on the Biodiversity Strategy for 2030. COM(2020) 380 final. [Link](#).

³ European Commission Communication on and Action Plan for the Development of Organic Production. COM(2021) 141 final. [Link](#).

⁴ European Commission Communication on the EU Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030 (COM(2021)236 final). [Link](#).

⁵ Regulation (EU) 2018/848 of the European Parliament and of the Council on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007. [Link](#).

⁶ EUMOFA report on Organic Aquaculture in the EU. May 2022. [Link](#).

⁷ AAC recommendation on Organic Aquaculture. July 2023. [Link](#).

The view of FEAP on the unsurmountable challenges faced by organic fish farming

The future of organic farmed fish. FEAP is convinced that organic fish farming has a role to play in the future of aquaculture in the EU. It will probably not become as relevant as the European Commission claims, but it is still a valuable niche from which many fish farmers and society could benefit. However, the organic fish farming sector in the EU faces increasing challenges that could lead to its disappearance as a production system for species like Gilthead seabream, European seabass, rainbow trout and carp. Economic viability is essential for the sustainability of any production practice.

Reasons for the dead-end faced by organic finfish production in the EU. The dire situation of organic finfish farming is directly related to the difficulties complying with the production rules established in Regulation (EU) 2018/848 on organic production and labelling. These difficulties have been perfectly identified by EUMOFA in its report, by the AAC in its recommendation, and by this federation in a 2023 Position paper⁸. Technical difficulties occur in producing under the organic scheme because of the insufficient availability of organic feed, the unavailability of organic fish juveniles in the required quantities and quality, the mismatch with traditional extensive pond polyculture, the difficulties in licensing larger sites for producing at lower stocking densities, and the challenge of multiple organic certifications. Meanwhile, organic fish is becoming less attractive to consumers on the market side. There is limited consumer demand for organic fish, which is falling further due, inter alia, to the inflation in consumer sales prices, making them unattractive compared to other foodstuffs.

However, both the European Commission and the Member States understand the situation but have declared that the phase-out of possible derogations has already been completed, and they do not have the competencies to change the implementation situation of Regulation (EU) 2018/848 on organic production. Moreover, IFOAM Organics Europe, the European umbrella organisation for organic food and farming, has declared that organic principles should not be adapted to fish farming-specific requirements.

On 18 July 2022, the Council of the European Union stressed the need to fully analyse the current situation and assess the barriers hindering the development of organic aquaculture, many of which are explored in these recommendations. The Council goes further and invites the Commission to consider amendments to Regulation (EU) 2018/848 on organic production and the labelling of organic products to address these challenges.

Nonexistence of Better regulation principles for organic fish farming production rules. According to the European Commission *Better regulation*⁹ is about creating legislation that achieves its objectives while being targeted, effective, easy to comply with and with the least burden possible. *Better regulation* relies on key concepts and principles, such as efficiency, effectiveness, relevance, coherence and added value. In this sense, FEAP stresses that the Organic production regulation on its articles for fish farming is neither effective for meeting its objectives nor efficient, notably in terms of cost-effectiveness and proportionality of actual costs to benefits, nor coherent with other EU policies and regulations.

⁸ FEAP Position paper on Organic Fish farming. 2023. [Link](#).

⁹ European Commission. Better Regulation: why and how [Link](#).

FEAP specifically highlights that EU laws and regulations cannot be adopted in isolation. The *Better Regulation* framework helps check consistency with high-level and long-term policy objectives. In this sense, organic fish farming strongly needs coherence between the high-level strategies (Farm to Fork and Biodiversity) and Regulation (EU) 2018/848 on organic production.

The FEAP Position

- (1) Under the current legislative framework, the organic production of Gilthead seabream, European seabass, rainbow trout and carp is not viable in the European Union. The situation has worsened significantly since the publication of the 2022 EUMOFA report.
- (2) The European Commission should apply the principles of *Better regulation* to reform Regulation (EU) 2018/848. This organic regulation should be coherent with the targets of the Farm to Fork strategy and Biodiversity strategies' targets.
- (3) FEAP highlights that the production of aquatic species has different basic requirements because of their biology than those of terrestrial animals. Fish farming organic production rules should not be established following the same patterns as those set for terrestrial animals. At the same time, they should consider the wide range of biological and ecological attributes of the produced fish and the existing differences in their habits and connections to the environment. A new approach is needed in the EU legislation on the organic production of fish that focuses on the biological particularities of each fish species and sets realistic production targets for them in the frame of the organic production policies.
- (4) FEAP strongly stresses the need to adjust the rules for organic fish farming to release the current bottlenecks to the economic viability of this production system. An in-depth review of organic aquaculture rules in the framework of the EU legislation on organic production (Regulation (EU) 2018/848) is imperative.

FEAP, 6 July 2024

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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