FEDERATION OF EUROPEAN AQUACULTURE PRODUCERS

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Subject: The role of fish farming in the European Ocean Pact

On 5-June, the European Commission unveiled the European Ocean Pact, a flagship strategic initiative that lays the foundation for a renewed approach to the maritime sectors, including aquaculture, across the European Union. The European Ocean Pact is a framework that builds on existing legislation and is expected to drive a holistic approach across all policy areas.

FEAP welcomes this initiative and the acknowledgement of aquaculture's role in the governance of ocean resources. This federation commits to contributing constructively to the development of its different actions.

FEAP acknowledges several positive elements in the European Ocean Pact that align with the sector's objectives. Notably, the Pact recognises aquaculture's contribution to food security and proposes the launch of an EU initiative on Sustainable Aquaculture to enhance coordination across Member States and stakeholders. The introduction of the Ocean Act and its intention to improve maritime spatial planning could offer a clearer framework for the sector's development. The Pact's support for increased investment, including through BlueInvest and InvestEU, is welcome, as is the commitment to a dedicated EU-wide campaign promoting Aquatic food. FEAP also appreciates the gradual shift in terminology toward "aquatic food," which better reflects the sector's diversity. The announcement of the Vision 2040 for fisheries and aquaculture presents a valuable opportunity to consolidate the strategic importance of fish farming within Europe's food system and blue economy.

However, **the Ocean Pact has a critical omission: freshwater aquaculture has been completely ignored**. FEAP draws attention to this glaring omission. While it might seem reasonable to its readers that a document focused on oceans and maritime issues should not necessarily cover inland aquaculture, this absence reveals a deeper, long-standing problem. One that has repeatedly hampered the development of fish farming in the Union. At the same time, measures similar to the ones outlined in the Ocean Pact would prove valuable for developing sustainable freshwater fish farming in the European Union, in which rainbow trout farming is the main fish species farmed in the Union, while carp is essential in many central European countries.

By sidelining freshwater aquaculture from this core strategy, the European Commission inadvertently exposes a fundamental mismatch between this sector and its current position in the European legal framework. Although since its beginnings aquaculture has been placed alongside capture fisheries, now that it has come of age, fish farming does not comfortably align with the scope of the Common Fisheries Policy, nor does it fit well enough under the competences of the Directorate-General for Maritime Affairs and Fisheries of the European Commission. This misalignment is not just a technicality, it is a significant reason of why the European Union's aquaculture has stagnated for the past 25 years. At the same time, the failure of European policy to unleash the sector's full potential also stems from a lack of strategic coherence: environmental objectives are prioritised at the expense of sustainable food production goals and socioeconomic development in rural areas, well beyond the reasonable protection and restoration of the natural environment; and aquaculture remains politically marginalised compared to agriculture and marine fisheries. The root cause is clear: **the existing European Union policy framework for aquaculture is simply not fit for purpose.** The Ocean Pact is just another example, as it does not propose any structural reform to address the legal and institutional misalignment that continues to hinder aquaculture's development

While aquaculture may conceptually align more closely with the Common Agricultural Policy, it doesn't quite belong there either. This is why FEAP, along with the Aquaculture Advisory Council (AAC), has consistently advocated for a dedicated Common Aquaculture Policy^{1 2}, a policy that recognises the unique nature and potential of fish farming, both freshwater and marine, and position it as a strategic pillar for EU food security, healthier diets for citizens, and a more balanced international trade position on aquatic food.

Only by acknowledging aquaculture's distinct identity and needs can the European Union definitively move it out of the current legal orphanhood situation that asphyxiates it, unlock this vital sector's sustainable growth potential, and align itself with the FAO's Blue Transformation strategy.

Nevertheless, and obviating the grave aforementioned failure, FEAP appreciates the following actions set in the Ocean Pact, and shares some comments on them:

- FEAP welcomes the commitment to establish an EU initiative on Sustainable Aquaculture involving Member States' authorities, representatives of the sector, other interest groups, research and innovation institutions, business accelerators, and financial institutions. However, <u>FEAP stresses the need to</u> include other Commission departments. The Pact does not sufficiently address the need for cross-departmental alignment to support Member States in implementing aquaculture-related legislation, which typically involves multiple national authorities. For the Pact to succeed, Commission services must act in a coherent and supportive manner, ensuring that aquaculture policy is not undermined by conflicting objectives across DGs, and that implementation at national level is facilitated, not fragmented.
- FEAP approves of the commitment of the Commission to produce a guidance document on managing farmed fish predators, in the frame of the implementation of the Strategic Aquaculture Guidelines. However, <u>this federation</u> insists that in the case of some predators like the Great Cormorant a key element of any management plan has to be a pan-European scope due to the migratory habits of these birds, as actions carried out at the local level have proven ineffective in the long run to protect wild fish stocks, endangered species (like European eels), and the livelihoods of fishers and fish farmers.
- The Ocean Pact aims to establish a strong governance framework to align actions at the Union, regional, national, and local levels. <u>FEAP considers this</u> <u>framework essential for achieving coherence between different legislations,</u> <u>especially at the national and regional levels</u>.

¹ AAC Recommendation for an Aquaculture Policy Reform <u>https://aac-europe.org/en/publication/aac-recommendation-for-an-aquaculture-policy-reform/</u>

² AAC Recommendation on the evaluation of the Common Fisheries Policy <u>https://aac-</u> europe.org/en/publication/aac-recommendation-on-the-common-fisheries-policy/

- The strategy sets out an Ocean Act that expands on the current Maritime Spatial Planning Directive, aiming to tap into the ocean's potential to strengthen Europe's resilience, food security, energy independence, and economic competitiveness. <u>The fish farming sector views this as a relevant step towards</u> <u>unleashing the potential of fish farming in the European Union</u>.
- The creation of the Ocean Act will include relevant targets so that they are identifiable under one roof. <u>FEAP stresses the need to establish such targets to</u> <u>facilitate coherent and effective implementation, but considers that some of</u> <u>them, like food production targets, should be quantitative and compulsory for</u> <u>Member States</u>.
- The Ocean Act is expected to build upon the EU Mission "Restore our Ocean and Waters" basin-scale lighthouses. <u>FEAP insists to the Commission that the almost</u> <u>exclusive focus of the Mission on the farming of low-trophic aquaculture is short-</u> <u>sighted, overlooking the virtues of fed finfish intensive farming</u>, clearly diverging from the FAO Blue Transformation.
- The EU-wide campaign on the benefits and the value added of EU-produced and sustainable Aquatic food is very relevant. <u>This federation considers this a vital</u> <u>step in promoting sustainable food and reconnecting consumers with healthy</u> <u>aquatic products</u>. Moreover, <u>FEAP welcomes the European Commission's move to</u> <u>replace the obsolete term 'seafood' with the more inclusive term 'aquatic food'</u> <u>as it encompasses freshwater food products</u>.
- Complementing the Vision for Agriculture and Food, the European Commission will produce a Vision 2040 for fisheries and aquaculture to help secure a competitive and resilient sector that contributes to food security and sovereignty. <u>FEAP places high expectations in the Vision 2040 for fisheries and aquaculture document</u>.
- FEAP appreciates the Commission's acknowledgement that the initiatives set in the Ocean Pact will need investments and funding from private and public sources. This aligns with FEAP's advocacy for a dedicated budget in the next Multiannual Financial Framework (MFF) post-2027 and against the dissolution of funds like EMFAF into a Single Fund.
- The CMO Regulation will be evaluated to assess the effectiveness of the current labelling rules, including the scope of the products covered, their origin, and the channels through which they are sold, such as supermarkets, fishmongers, and restaurants. <u>FEAP sustains that any aquatic food product should be accompanied</u> by the same information for consumers, regardless of the outlet through which they are placed on the market.
- A new Blue Generational Renewal Strategy planned for 2027 will foster a skilled next-generation workforce in marine research, ocean tech, and sustainable fisheries. <u>This federation misses seeing this strategy also cover aquaculture,</u> where generational renewal is also an issue.
- The Ocean Pact acknowledges the need to reduce administrative burden, yet it lacks concrete measures to tackle the excessive red tape that hampers aquaculture. Licensing remains overly complex and fragmented across Member States. <u>FEAP calls for coordinated Commission action to simplify procedures, harmonise requirements, and support Member States in delivering a more enabling framework for sustainable fish farming.
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Finally, as a side comment but also relevant, FEAP disagrees with the Commission's messianic impression set in the Ocean Pact that the health of European seas and ocean is deteriorating. This might be true in other parts of the world, but not in the European Union. In Europe, although the water quality targets set by the Marine Strategy Framework Directive have unfortunately not yet been met, an objective improvement has been achieved in the environmental quality of EU waters over the last decades. Nevertheless, **given the need for high-quality waters to ensure healthy finfish**

farming, FEAP will continue to advocate for and support the timely achievement of the objectives set out in the Marine Strategy Framework Directive.

Access to official information on the European Ocean Pact: <u>https://oceans-and-fisheries.ec.europa.eu/european-ocean-pact_en</u>

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.