

NOTE - EATiP Feedback to Farm to Fork

EATiP welcomes the Farm to fork strategy, which points at several issues that are critical if to achieve the transition to a truly sustainable food chain, in line with the goals of the European Green Deal.

The existence of a competitive primary production is a necessary condition if Europe wishes to become less dependent upon food and feed from import. The current lack of common aquaculture regulations that ensure a predictable licensing system is a serious bottleneck for growth. Therefore, it is encouraged to adopt a holistic and ecosystem approach to governance, taking advantage of existing data sets and models. This will encourage an evidence-based aquaculture licensing system across European countries and the competitiveness of the sector.

The demand for seafood products among consumers is increasing. Wild catches are at their maximum and overfishing of some stocks limit the fisheries sector to cover this demand. Therefore, the consumers depend on aquaculture for the delivery of increasing amounts of seafood. The "Food from the oceans" report also concluded that "the greatest and most feasible potential identified for expansion globally lies in mariculture" (SAPEA, Evidence Review Report No. 1, 2017).

A diet shift to more seafood may contribute to several goals in the Green Deal. As one of the few sectors in the Bioeconomy, aquaculture has the potential to be a global contributor to climate change mitigation, as seafood has a far smaller carbon footprint compared to other animal proteins. It may also relieve the pressure on land areas. Of course, on a local level, it is important to have correct regulations taking into account the carrying capacity of the surrounding ecosystem. When producing low trophic species, such as shellfish or seaweed, aquaculture may even have a positive environmental impact as a restorer of eutrophicated or polluted waters. In these cases, aquaculture should be recognised as an ecosystem service.

Animal welfare is a key element in sustainable fish farming, important for a positive public perception and for consumers' confidence in fish products. Therefore, the strategy should promote high animal welfare standards. This can be achieved through improved physiological biosensors, better tools for behavioural monitoring and high-precision breeding. An improved understanding of multivariate factors affecting livestock health and welfare is critical. Through anticipatory measures such as vaccines and sanitary measures, adverse health conditions can be prevented, thus limiting the use of chemicals and antibiotics.

In the processing part of the food chain, new technologies and methods have shown to enable the recovery of high-value seafood waste products (both proteins and oils). In order to increase the profitability of this process, it is recommended to open the regulatory framework for a wider use of these products as feed products in aquaculture. There is also a need for processing protocols to convert food/biological waste and by-products from other Bioeconomy sectors into feed or additives ingredients. If successful, the aquaculture can become a substantial contributor to the circular economy, and at the same time less dependent upon resources that could be used as human food. Treatment and reutilization of effluents and sludge from aquaculture recirculation systems can also contribute to a more efficient use of freshwater resources.

The adoption of a food system approach is strongly encouraged. As this transformation is highly complex, an open and inclusive dialogue between industry, scientists and policy makers is



required. Equally, a de-risking of innovations that can implement the Farm to Fork goals is needed, by making available funding mechanisms, public-private partnerships and collaborative research and innovation actions.

Sent as feedback by EATiP to https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12183-Farm-to-Fork-Strategy-/addFeedback?p_id=6381425 on March 16, 2020