



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,
MARE/A2/LBS (2021)

Subject: AAC recommendations on Food security, Consumer information and the EU Data Collection Framework

Dear Mr. Ojeda,

I would like to thank you for your letter of 16 March 2021 including the three recommendations of the Aquaculture Advisory Council on Food security, Consumer information and the EU Data Collection Framework. Let me react to various aspects of those recommendations in this letter.

Concerning the recommendation on **Food security**, I would like to note that most of your suggestions on how to ensure that EU aquaculture contributes to food security are recognized in the new Communication from the Commission on the Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030¹ (the Guidelines). Furthermore, as you rightly pointed out, the Commission is working on developing a contingency plan for ensuring food supply and food security to be put in place in times of crisis. The Commission plans to adopt the Communication on the contingency plan before the end of 2021. The Communication will be accompanied by a more detailed staff working paper that will provide the findings of the analysis of the situation, including an assessment of the resilience of the food system. The AAC has made a significant contribution to both documents.

I agree that the potential of EU aquaculture to provide food security in the EU has not been fully exploited. You have rightly pointed out that EU aquaculture products represent only 10% of EU consumption, according to the recent analysis of the economic performance of the sector by STECF² (Scientific, Technical and Economic Committee for Fisheries). Furthermore, EU aquaculture is highly concentrated in terms of both EU Member States and species farmed.

EU aquaculture indeed has the potential to bring a sustainable fresh, local, safe and healthy source of protein to citizens across the Union, provide a fair income to producers,

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021DC0236&qid=1623998826294>

² <https://stecf.jrc.ec.europa.eu/reports/economic>

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and help mitigate climate change. The Guidelines have addressed this potential from different angles. Let me refer to some of those aspects mentioned in your recommendation.

Access to space and water and transparent as well as efficient regulatory and administrative framework have been recognized as two key enabling conditions for the EU aquaculture to grow as a resilient and competitive sector. The Guidelines recognize that a special attention should be given to the development of aquaculture with a lower environmental impact, to integration of suitable aquaculture areas into protected areas (notably those offering ecosystem services), and that spatial planning should make available special areas for organic aquaculture and the production of molluscs.

As indicated in the Annex to the Commission Communication, the Commission will therefore develop a more detailed guidance document on the planning for space and access to water for all types of aquaculture, provide Member States' administrations with technical support in the implementation of that guidance, monitor the implementation of the Maritime Spatial Planning Directive and coordinate the exchange of good practices on non-maritime spatial planning. We have invited Member States to designate areas suitable for aquaculture according to the principles described in the new Strategic guidelines and the future guidance document.

The Commission has also recommended actions related to administrative procedures, recognizing that national licensing systems remain complex and do not offer the necessary predictability. Therefore, we have invited Member States to review the regulatory and administrative system on aquaculture according to the principles from the Strategic guidelines, as well as a guidance document that the Commission will prepare on good practices for administrative procedures.

However, as you are well aware, the Guidelines are non-binding. The Commission has tried to get the commitment of EU Member States by involving closely their experts on aquaculture in the process of the preparation of the Guidelines, but EU Member States are not legally obliged to put the Guidelines into practice or prioritize as suggested recommended actions, and support certain types of aquaculture that should particularly be taken into account, as well as some challenges for small and medium enterprises. We will continue to follow up on actions by EU Member States and offer support and coordination, as well as facilitate the exchange of good practices. The future Assistance Mechanism on EU aquaculture should be particularly helpful in this respect. We also rely on your support in this process, as foreseen in the recommended actions to the Aquaculture Advisory Council.

Regarding consumer information, we agree that providing information on high standards of animal welfare, environmental protection, and other information would allow consumers to make informed choices about food. On this issue, we have provided comments that are more detailed in our replies to other recommendations, one of them being part of this letter as well (see below). As you know, the Commission has proposed, among other tools to improve communication to consumers about EU aquaculture and to develop an EU-wide Communication campaign. Many EU Member States have already confirmed their commitment to disseminate such a campaign and the Commission expects this campaign to be ready sometime in the second half of 2022.

Concerning the recommendation on **Consumer information**, as you have rightly mentioned, transparency and consumer information is something that is very much stressed in the “Farm to Fork” strategy (the Strategy). In this context, there is an action envisaging front-of-pack labelling where information is provided to enable consumers to make health-conscious food choices. By establishing harmonised mandatory front-of-pack nutrition labelling, the Strategy seeks a higher consumers’ understanding of the nutritional value of foods when purchasing them. Besides this, the setting of nutrient profiles seeks to avoid situations where nutrition and health claims would mask the overall nutritional status of the food, misleading the consumers when trying to make healthy choices. This action will be complemented by an action for a sustainable food labelling that would integrate nutritional, environmental, climate and social aspects of food production. Finally yet importantly, a key action of the Farm to Fork strategy will aim at the adoption of a framework regulation on sustainable food systems that would put in place an integrated approach to accelerate and facilitate the transition and ensure that all foods placed on the EU market become increasingly sustainable.

With regards to your support to the proposed revision of the EU’s fisheries control system to fight fraud through an enhanced traceability system, I completely concur with you that the traceability system for fishery and aquaculture products in the EU must be enhanced. This is the reason why the Commission proposal for a new Control Regulation foresees a digital traceability system that covers all fishery and aquaculture products and includes in addition to marine fishery products, freshwater and marine aquaculture products, imported products and processed products. The proposal also provides for a more complete traceability information set, e.g. information about the aquaculture products facility, the production area and the date of harvest.

Regarding inadequate and misleading consumer information in the HoReCa segment, we confirm that this segment is not exempted from consumer information requirements as defined in the Common Market Organisation Regulation (Regulation (EU) No1379/2013) and Regulation (EU) No 1169/2011. Indeed, the requirements defined in those two regulations apply to the point of sale or delivery to the final consumer, including restaurant and catering segment. It is the responsibility of Member States to ensure that these provisions are correctly applied and enforced.

Finally, I would like to thank you for the references in your recommendations to relevant documents such as previous AAC Recommendations, and the Commission’s guidance on the Food information (FIC) Regulation. I would like to reassure you that those documents as well as all other information my services have access to are being taken into account during our work in the different initiatives.

Concerning the recommendation on the **EU Data Collection Framework**, we have analysed the underlying report and we will share it with the stakeholders involved in the DCF implementation: the Scientific, Technical and Economic Committee for Fisheries (STECF), the Joint Research Committee (JRC) and the Regional Coordination Group for Economic Issues (RCG ECON from 2021, PGECON before).

RCG ECON gathers experts and managers responsible for socioeconomic data collection and analysis from all Member States and works closely with major end users on upcoming data needs, appropriate methods and other topical issues. RCG ECON provides non-binding recommendations to Member States and other stakeholders, and its annual meeting creates opportunities for exchanging best practices and knowledge. All end users are welcome to participate in the annual meetings. The previous (PGECON)

meeting reports are available on the EU DCF website:
www.datacollection.jrc.ec.europa.eu/docs/pgecon

Also for your information, RCG ECON will organize a workshop on aquaculture data collection in late autumn 2021, and the report will be available on the EU DCF website.

As you rightly point out, the DCF should not duplicate data collection under other frameworks, and to this end the new EU multiannual programme for data collection from 2022 will not include the environmental variables that are covered by the EU Fish Health Directive (2066/88/EC). Synergies are also sought with Eurostat fisheries and aquaculture data collection in the ongoing revision of the Eurostat Regulation on the European fisheries statistics.

The Commission supports also the regional coordination of data collection, including the socioeconomic data on aquaculture, through the structural funds (EMFF until 2020, EMFAF from 2021). Member States are encouraged to seize every opportunity to harmonize their efforts and make data more accessible to end users.

Let me thank for your recommendations and commitment. I am looking forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Pascale COLSON, coordinator of the Advisory Councils (Pascale.COLSON@ec.europa.eu; +32.2.295.62.73), who will forward it to relevant colleagues.

Yours sincerely,

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