



Recommendation on achieving greater sustainability standards of imported aquaculture products and a level-playing field

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Introduction

The EU aquaculture sector must be profitable to set up a solid foundation for the future, grow and participate in the green transition. Profitability is only possible if the products are competitive, among other things, with imports from third countries. EU producers do not wish for lowered EU standards; however, to meet the objectives of an equitable, level playing field, the basic production, social and environmental standards adhered to in the EU should be met equally by aquaculture products imported to the EU market. EU operators should take advantage of the high-quality standards met by EU aquaculture products¹.

The AAC has specifically called on the EU Commission to take all necessary steps with the Turkish government to find a lasting mutually agreeable solution to grant the EU trout farmers a level playing field and competitive environment².

The European Parliament states that imported aquaculture products arrive on the EU market at low prices due to practices that are unsustainable from an environmental, social and labour point of view, and whose production has been accompanied by poor animal welfare and health standards, and therefore calls for imported products to meet the same standards that EU operators must meet³.

The EU Commission's recent strategic guidelines for more sustainable and competitive EU aquaculture aim to ensure a level playing field for aquaculture products marketed in the EU and to list several initiatives⁴.

An evaluation of the implementation of the common market organisation concluded that the existing marketing standards do not sufficiently contribute to a level playing field on environmental and social aspects and have not been equipped to achieve the objective of providing the EU market with sustainable products⁵.

According to EUMOFA, imports of aquaculture products are dominated by salmonids, crustaceans, freshwater fish, bivalves and other marine fish⁶. The report does not include details on the species, the exporting countries, the most relevant import duties and preferential import regimes.

Extracting trade figures on imported aquaculture products is challenging because the Combined Nomenclature codes do not systematically distinguish between aquaculture and fishery products. The common organisation of the markets in fishery and aquaculture product regulations sets an obligation to indicate that the product is farmed⁷.

Environmental, animal health, animal welfare and consumer protection rules and standards are quality indicators that are invisible to the European consumer at purchase. Labelling and consumer information can contribute to strengthening informed consumer choices. The AAC has recently issued

¹ Level playing field, AAC position paper, August 2018

² Import of subsidized portion sized rainbow trout from Turkey, AAC Recommendation, July 2019

³ Towards a sustainable and competitive European aquaculture sector, (2017/2118(INI))

⁴ Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030, COM(2021) 236 final

⁵ Criteria and indicators to incorporate sustainability aspects for seafood products in the marketing standards under the Common Market Organisation (STECF-20-05)

⁶ The EU Fish market, 2020 edition, EUMOFA

⁷ Common Market Organisation (Regulation (EU) No 1379/2013)



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a recommendation on consumer information⁸.

The farm-to-fork strategy states that imports must comply with relevant EU regulations and standards, and the strategy aims to revise marketing standards to reinforce the role of sustainability criteria. The AAC notes that existing marketing standards do not cover production issues.

The strategy further states that ensuring a sustainable livelihood for primary producers, who still lag in terms of income, is essential for the transition to a sustainable food system. The AAC notes that a level playing field is essential to ensure a sustainable livelihood for aquaculture farmers.

Food fraud prevents consumers from making informed choices and undermines food safety and fair commercial practices.⁹

The Commission's new trade policy includes greater enforcement of the EU's trade policy objectives. This can encourage improvements in aquaculture production conditions in third countries if they export to or intend to export to the EU market¹⁰.

The AAC underlines that the objective of this recommendation is to ensure a level playing field regarding imported seafood products and to ensure that such products are sold at fair and equitable prices in the EU.

Recommendations and positions

1. The AAC asks the Commission for a follow-up on steps taken to find a lasting mutually agreeable solution with the Turkish government to grant EU farmers a level-playing field competition environment.
2. The AAC asks the Commission to provide more detailed statistical information on the imports of aquaculture products (species, countries, import duties, preferential import regimes).
3. The AAC calls for an evaluation of current Combined Nomenclature codes for better monitoring of aquaculture product imports.
4. The AAC supports the Commission's proposal to extend traceability obligations to all aquaculture products, including imports from non-EU countries, backward beyond exporting processing plants.
5. The AAC supports information campaigns about the values of the EU aquaculture sector.
6. The AAC supports further work on the proposal to incorporate sustainability aspects into regulatory marketing standards for domestic and imported aquaculture products in the EU market.
7. The AAC asks the Commission to apply the principles set in the new EU trade policy to aquaculture products.
8. The AAC proposes that European Maritime Fisheries and Aquaculture Fund (EMFAF) funding should not be used to support the processing and promotion of imported seafood.

⁸ Consumer Information, AAC recommendation, March 2021

⁹ A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system, COM(2020) 381 final

¹⁰ https://trade.ec.europa.eu/doclib/docs/2021/february/tradoc_159438.pdf



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