



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,
MARE/A2/LBS (2021)

Subject: AAC recommendations for the EU Biodiversity Strategy for 2030

Dear Mr. Ojeda,

I would like to thank you for your letter with recommendations for the EU Biodiversity Strategy for 2030. Aquaculture activities both depend on and benefit from a healthy environment, and you would surely agree that this sector should play an important role in preserving ecosystems and biodiversity.

I am pleased to let you know that the Commission has addressed most aspects of your recommendation in the new Strategic Guidelines for a more sustainable and competitive EU aquaculture for the period 2021-2030¹, adopted in May 2021. At the core of these guidelines is the conviction that aquaculture can play its role in terms of supply of food and creation of employment in the EU while protecting nature.

Regarding your concerns on the effectiveness and potential burden of the initiatives implementing the Biodiversity Strategy, I would like to reassure you that those initiatives will take into account effectiveness and the impact they may cause, in line with the principles of subsidiarity, proportionality and better regulation which govern the work of the Commission.

The recommendation proposes a strategy to avoid “exporting” biodiversity loss to countries outside the EU. This strategy already exists. The Farm to Fork Strategy in particular stresses that *“efforts to tighten sustainability requirements in the EU food system should be accompanied by policies that help raise standards globally, in order to avoid the externalisation and export of unsustainable practices”*. It is for this reason that the Farm to Fork Strategy has a clear international dimension identifying a series of actions to support this global move towards sustainability.

In the specific case of aquaculture, the Strategic Guidelines invite EU Member States to actively promote the objectives and principles stated in the Guidelines, notably the need for aquaculture to develop in a sustainable manner that is respectful of the environment, in the context of: (i) the sea basin strategies; (ii) bilateral agreements; and (iii) participation in international fora (e.g. the FAO). And indeed, the EU and its Member States have been promoting sustainable aquaculture practices and policies in their external relations. In particular, in the context of the FAO, they have been prompting for

¹ [Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030 SWD\(2021\) 102 final](#) – 12.05.2021.

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the adoption of comprehensive and ambitious Guidelines for Sustainable Aquaculture. The FAO guidelines should contribute to ensuring that aquaculture development does not come with the cost of biodiversity loss.

The recommendation rightly indicates that the gap between the consumption and the production of sustainable seafood in the EU must be closed and that the development of EU aquaculture production is part of the solution. The Strategic Guidelines recognize the potential of EU aquaculture sector to grow and bridge that gap. They also provide recommendations and propose concrete actions to support growth of EU aquaculture while ensuring its economic, environmental and social sustainability.

The necessary access to space for aquaculture activities in the EU is one of the issues for further work identified by the Strategic Guidelines and a key enabling condition for the growth of EU aquaculture. The Strategic Guidelines make concrete recommendations on how to plan for suitable space for aquaculture, both marine and inland aquaculture. To support the aquaculture sector and the synergetic use of space with other sectors, the Commission will develop further guidance on the planning for space and access to water for marine, freshwater and land-based aquaculture. The Strategic Guidelines recommend the appropriate integration of suitable aquaculture activities into protected areas such as Natura 2000² and generally highlight the need to give special attention in the spatial planning for certain types of aquaculture, such as those that have the potential to mitigate the impact of climate change or contribute to the preservation of ecosystems.

As already mentioned, growth of aquaculture should not happen at the cost of biodiversity loss. Aquaculture should, on the contrary, contribute to biodiversity whenever possible. There are aquaculture activities that can have positive impact on biodiversity, and as you rightly point out, we need to make use of such opportunities. The Strategic Guidelines recognize that some types of aquaculture, such as pond aquaculture and shellfish farming, can provide ecosystem services. More information on the subject of ecosystem services provided by aquaculture activities is available in our reply to your Recommendation on the provision of ecosystem services by European aquaculture.

Furthermore, the Commission is putting dedicated efforts into developing algae production, which can provide an array of ecosystem services, help absorb additional carbon emissions and nutrients from the environment, and generate oxygen while constituting an important source of alternative protein in a sustainable food system. The Commission intends to adopt an initiative aimed to increase the sustainable production, safe consumption and innovative use of algae in the EU by the end of 2022.

When it comes to biodiversity indicators and their inclusion in the existing aquaculture certification schemes, please note that these schemes, apart from the organic certification, are private and therefore the indicators used are not influenced by the Commission or the EU. The Strategic Guidelines provide for the adoption of a guidance document on environmental performance that should include the identification of environmental indicators and voluntary targets for environmental performance, including a reference method to determine the carbon footprint and impact on ecosystems of aquaculture production.

² The Commission issued in 2019 a Guidance document on aquaculture and Natura 2000: <https://op.europa.eu/fr/publication-detail/-/publication/3c04edd0-8e4e-11e9-9369-01aa75ed71a1/language-en/format-PDF>

The recommendation refers to the need to look for innovative feed solutions. This is already acknowledged in the Farm to Fork Strategy. It is a twofold concern in terms of sustainability and EU dependency. Therefore, the strategy calls to foster alternative protein sources, *inter alia*, marine feed stocks (e.g. algae) and by-products from the bio-economy (e.g. fish waste).

Aquaculture can therefore play an important role in providing sustainable feed solutions. Sustainable feed is an important aspect of sustainable aquaculture and as such it is covered in the Strategic Guidelines. The Guidelines call for using feed ingredients that are sourced in the way that is most respectful of ecosystems and biodiversity and which, at the same time, are appropriate for ensuring the health and welfare of the animals. They also call for limiting feed producers' reliance on fish meal and fish oil taken from wild stocks, using alternative protein ingredients such as algae or insects or the waste from other industries. The algae initiative that will be adopted next year will contribute to this objective. In addition, EU funding has supported innovation towards more efficient feed systems and the use of alternative and more sustainable ingredients. Ingredients based on algae or insects seem particularly promising. The Commission will follow these developments closely, and address them in the guidance document on environmental performance of aquaculture.

Concerning your recommendation on simplifying administrative procedures for licencing of aquaculture operations in Natura 2000 areas and the related Commission's guidance document, the Commission considers that the relevant guidance documents are up to date. Together with the recently updated methodological guidance on the application of Articles 6(3) and (4)³ and the general guidance on the management of Natura 2000 sites⁴, the guidance on aquaculture and Natura 2000⁵ provides relevant information to the Member States authorities and stakeholders to ensure effective implementation of relevant provisions. It is for Member States authorities to ensure simple and effective implementation of the EU legislation in their national context. The guidance documents include already many examples of best practice from various Member States. The future work on the guidance documents on both access to space for aquaculture and environmental performance will offer also the opportunity to provide additional guidance and good practices on the integration of aquaculture in Natura 2000 areas.

The Commission takes note of your proposal to include aquaculture habitats in the European Nature Information System (EUNIS) and will explore options in this regard with the European Environmental Agency.

Your recommendation has a reference to welfare of farmed animals. The Commission also recognizes the need to pay more attention to animal welfare and intends to support the development of code of good practice on fish welfare and welfare indicators in the following years, as well as to support and promote research and innovation on animal welfare.

³ https://ec.europa.eu/environment/nature/natura2000/management/pdf/methodological-guidance_2021-10/EN.pdf

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https://ec.europa.eu/environment/nature/natura2000/management/docs/art6/Provisions_Art_6_nov_2018_en.pdf

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https://ec.europa.eu/environment/nature/natura2000/management/pdf/guidance_on_aquaculture_and_natura_2000_en.pdf

I would like to conclude these comments by noting that the Commission has used the opportunity offered by the examination of the EU Member States' new Multiannual National Strategic Plans for aquaculture to stress various aspects already mentioned above.

I hope that with this letter, I have addressed all your areas of interest and I look 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 them to relevant colleagues.

Yours sincerely,

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