



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,
MARE.A.2/BVT

Subject: AAC Recommendation on shellfish farming as a nitrogen sink

Dear Mr Brian Thomsen,

I would like to thank you for your message of 14th July 2023 including the “*Recommendation on shellfish farming as a nitrogen sink*”.

The “*Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030*”¹ refer to the ecosystem services of shellfish farming and promote aquaculture that provides ecosystem services.

In the Recommendation, the Aquaculture Advisory Council specifically recommends the European Commission:

1) *To recognize and qualify the N services provided by shellfish and to include a sentence in the EU law on restoration of Nature, and the law on the sustainable food system, or the secondary regulations based on these main laws.*

I would like to inform you that the Commission is planning to launch a study to assess the environmental benefits of aquaculture and challenges and opportunities in promoting those benefits, which will also include a focus on bivalve molluscs farming. The objective is to identify science-based knowledge on the environmental benefits of aquaculture and challenges they face, as well as to provide recommendations how to address them. Aim is also to identify potential for its growth and opportunities for its promotion.

Concerning the “Nature restoration law”, the Commission adopted its proposal on 22 June 2022. The proposal aims to restore terrestrial and marine habitats and species. In this sense, your suggestion seems too specific regarding the objectives of the proposal. I would however like to underline that, pending the results of the study

¹ COM(2021)236 final

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referred to above, aquaculture may be proven to provide ecosystem services contributing to the objectives of the Nature restoration law.

Concerning the “law on the sustainable food system”, the envisaged regulation will be a framework law for a Union Sustainable Food system. It would aim to foster a common understanding of sustainability for all actors and operations in the food system, by setting out general principles and objectives to underpin future food-related policies, across the food system, from production, distribution to consumption. The decision on the presentation of this precise initiative is pending. However, given that the envisaged proposal would be a framework legislation, it is unlikely that it would qualify a specific food sector as such.

- 2) *To ask its Unit of Scientific Advice Mechanism to define an EU algorithm to quantify the N service provided by bivalve molluscs.*

The Scientific Advice Mechanism (SAM) provides independent scientific advice directly to European Commissioners to inform their decision-making. The SAM typically works on specific policy issues where such advice is critical to the development of EU policies or legislation and does not duplicate advice being provided by existing bodies. For example, in 2017, SAM published their scientific opinion ‘Food from the Oceans - How can more food and biomass be obtained from the oceans in a way that does not deprive future generations of their benefits’ ⁽²⁾. In this advice, the potential of mollusc farming for food and feed is highlighted. Specific tasks, such as the development of algorithms, are not typically in the scope of the SAM. However, the Commission is taking note of this request potentially for future Horizon Europe topics, activities related to the mission on ‘Restore our Ocean and Waters’, and/or tenders under the directly managed part of the European Maritime Fisheries and Aquaculture Fund and/or for the work programme of the Joint Research Centre.

- 3) *To investigate the regulatory way to set up an independent system of certification of this N service provided by bivalve mollusc at the level of the EU sub watershed level as defined in the Water Framework Directive, and the corresponding payment to the farmers.*

The Commission is currently not considering to set up an independent system of certification of N services provided by bivalve molluscs and a corresponding payment to farmers. However, in the course of the study mentioned above, we plan to identify opportunities for the promotion of environmental benefits of certain types of aquaculture, including bivalve mollusc farming, and possibilities to provide incentives.

I am looking forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Julia Rubeck, our Advisory Councils coordinator, via the functional mailbox MARE-AC@ec.europa.eu.

Yours sincerely,

(²) https://research-and-innovation.ec.europa.eu/strategy/support-policy-making/scientific-support-eu-policies/group-chief-scientific-advisors/food-oceans_en

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