



Brussels,
MARE.A.2/BVT

Subject: AAC Recommendation on circularity of fish feed

Dear Mr Brian Thomsen,

I would like to thank you for your mail of 3rd July 2023 including the “*Recommendation on circularity of fish feed*”.

The “*Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030*”¹ refer to sustainable fish feed and this will be addressed in the upcoming guidance document on environmental performance that the Commission is developing.

In its Recommendation, the Aquaculture Advisory Council specifically recommends the EU:

1. *to design a political framework that favours the maximisation of use as feed for food-producing animals of such resources of the bioeconomy as are not used directly for food; this entails giving priority to usage as feed over any other usage (particularly bioenergy production), in line with the EU waste hierarchy.*

As noted in the recommendation, the Waste Framework Directive already requires Member States to adopt measures giving priority to waste prevention over waste recycling (e.g. via biogas). To support Member States and actors in the food supply chain in defining measures and identifying solutions needed to prevent food waste and to facilitate the sharing of best practices, the Commission has established the “EU Platform of Food Losses and Food Waste”, which brings together EU institutions, experts from the EU countries, international organisations and relevant stakeholders selected through an open call for applications. In addition to the plenary meetings, the Platform also operates in sub-groups to examine specific aspects and/or questions related to food waste prevention. One of these subgroups is the “Action and Implementation” sub-group, which is tasked – amongst others – to

¹ COM(2021)236 final

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assess how food loss and waste prevention can be strengthened through its integration with other relevant policy areas, such as feed. In that context, the subgroup supports all members in identifying and implementing appropriate actions to facilitate safe use of co-products and former foodstuffs for animal feed purposes while overcoming identified barriers. Currently, the sub-group is reflecting on the practical implementation of the waste hierarchy and on the possible competition between different non-waste uses for biomass (e.g. feed use vs fuel use), taking into account all the relevant considerations.

2. *to select an indicator to measure feed circularity from the indicators that measure progress in sustainability development as part of the future dashboard for the announced legislative framework proposal on sustainable food systems.*

As announced in the Farm to Fork Strategy, the Commission, through its Joint Research Centre, is developing a framework to monitor the transition to a sustainable food system. This is a process which is ongoing independently from the legislative proposal on a framework for a sustainable EU food system. While work on this monitoring framework is currently in progress, it has already resulted in the identification of thematic areas, and more granular domains within them, that should be prioritised for the identification or creation of indicators. In that context, under the environmental dimension of sustainability, and the overarching thematic area of Sustainable use and management of resources, there is currently a “Blue food domain” being considered, which covers fishing and aquaculture. An indicator on feed circularity, as you suggest, could fit well under this domain. In terms of the process for developing the monitoring framework, a first round of stakeholder consultations took place on 19 September 2023, by means of a meeting of the Advisory Group on the Sustainability of Food Systems, where some of your members are also included. On this occasion, and in the period following the meeting, we would welcome specific proposals on indicators that you would recommend to be considered in the monitoring framework.

3. *to establish, when needed to preserve the safety of the feed and food chain, specific requirements for operations that might be required to ensure fitness for use as feed, such as the approval of establishments, especially those using specific processes or resources for a certain stream of raw material.*

Rules applying to feed business operators are provided for in Regulation (EC) No 1831/2003. The Commission stands ready to examine any relevant and proportionate adjustment of the conditions laid down in the annexes to this Act.

4. *to identify bottlenecks, including legal standards, that restrict circularity (e.g., prohibitions on the use of certain products as feed) so as to establish conditions for possible use in feed of nutrients recovered from waste streams (currently prohibited). Public authorities must then ensure that the relevant business establish a solution. They should pay particular attention to the use of former foodstuffs or catering waste containing fish and meat for insect or polychaetes farming, which would allow about a third of the food waste generated in the EU to be transformed into highly nutritious protein animal feed, including fish and aquaculture feed.*

The current prohibitions of use of certain materials in feed mainly stem from the legislative frameworks regarding animal by-products (Regulation (EC) No 1069/2009) and transmissible spongiform encephalopathies (Regulation (EC) No 999/2001), which address serious risks as a matter of priority. Where appropriate, discussions on these prohibitions may be held in these frameworks, keeping in mind the remaining sensitivity of the Bovine Spongiform Encephalitis (BSE) question.

5. *to help to secure more feed and food for a growing global population by establishing appropriate scientific, legal and industrial frameworks to ensure that we can benefit safely from the results of existing and upcoming gene editing technologies.*

A precondition of the use as feed of materials derived from genetically modified organisms is that they meet all the specific requirements of the EU GMO legislation to be put on the market. The Commission adopted on 5 July 2023 a legal proposal on plants obtained by certain new genomic techniques (NGTs) which aims at an appropriate regulatory oversight for the deliberate release into the environment, including the placing on the market, of plants obtained by certain NGTs and food and feed produced from such plants, ensuring a high level of protection of human and animal health and the environment, and enabling innovation and the contribution of safe NGTs to the objectives of the European Green Deal and the Farm to Fork Strategy.

Regarding research, the Aquaculture Advisory Council specifically recommends that:

1. *EU policy should support research into proposed definitions, characterisations and a preferred methodology for quantification of the level of circularity of feed, thus ensuring a level playing field among operators and avoiding unjustified and fake claims.*

Horizon Europe, the EU programme for research and innovation, supports open research and innovation that contributes to EU policies. Research on methodology to quantify the level of circularity of feed is, potentially, within the scope of the Cluster 6 on food, bioeconomy, natural resources, agriculture and environment. Horizon Europe topics are wide in scope and non-prescriptive, encouraging consortia to propose their own innovative ideas to address challenges, such as the need to enhance feed circularity. Such research can advise policy development on a level playing field in feed circularity but an explicit requirement for development of a preferred methodology is, typically, too prescriptive for Horizon Europe topics.

2. *Public authorities should support research into the use of underused or unused resources of the bioeconomy as feed and into new resources with low land use (e.g., marine resources), particularly proteins and omega 3 sources. The utilisation of the new resources should take the necessary care regarding environmental impact.*

The bioeconomy strategy stipulates that to be successful, the European bioeconomy needs to have sustainability and circularity at its heart. One of its actions aims to mobilise public and private stakeholders, in research, demonstration and deployment of sustainable, inclusive and circular bio-based solutions. Additionally, the “Mission to Restore our Ocean and Waters by 2030” has the objective to decarbonise the blue economy and the aim to achieve zero-carbon and circular aquaculture. Projects like DiscardLess and MINOUW worked in the past on underused marine resources while ongoing projects such as FutureEUAqua and NewTechAqua are focusing particularly on developing circular fish feeds with minimum environmental impact. The EU framework programme represents only 10-15% of total investment in research and innovation in Europe but is powerful in framing the common European priorities and, typically, national and regional programmes follow with more locally focused projects.

Regarding communication, we take note of your recommendations regarding communication on the circularity of fish feed. As already mentioned, the Commission is currently working on a guidance document on environmental performance of aquaculture which will also cover good practices on the use of feed, as well as applying a circular-

economy approach. In the course of this work, we aim to identify examples that will provide guidance for both public authorities and industry on circularity in feed production. We hope that this will facilitate the implementation of this concept and its promotion by public authorities in the Member States.

I am looking forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Julia RUBECK, coordinator of the Advisory Councils (Julia.rubeck@ec.europa.eu; +32.2.296.88.89), who will forward them to relevant colleagues.

Yours sincerely,

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