



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,
MARE.A.2/BVT

Subject: AAC recommendation on carbon sequestration by molluscs

Dear Mr. Ojeda,

I would like to thank you for your mail of 29th April 2022 including the “*Recommendation on carbon sequestration by molluscs*” that provides useful information.

The Commission recognises that the potential of mollusc farming in carbon capture needs to be explored further. This potential is recognised in the “*Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030*”¹. These guidelines underline that - when subject to an appropriate framework - the cultivation of molluscs can provide climate-mitigation services such as carbon sequestration and that this type of aquaculture should be promoted.

However, at this stage the Commission estimates that more evidence, data, and peer reviewed scientific knowledge is needed before concrete actions as outlined in the recommendation can be undertaken (e.g., allocate funding to pay carbon credits). For instance, there are some questions about the carbon balance data provided on page 7. It is unclear what exactly is considered in the life cycle, and how GHG-emissions of different aspects of molluscs harvesting are incorporated. It is also hard to evaluate the correct carbon balance, when most shells, after consuming shellfish meat, are not collected specifically, and end up as general waste, transported to waste dumps and/or incinerated (and thereby returning the carbon into the atmosphere). Circular economy approaches to tackle waste shells and produce products from them (as you listed in your recommendation) need to be further developed.

¹ COM(2021)236 final

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In addition, there are quite specific requirements to be thoroughly considered before activities like molluscs harvesting can be acknowledged as carbon sequestering.

I suggest that the AAC and our services continue looking into this issue as part of the implementation of the Strategic Guidelines for a more sustainable and competitive EU aquaculture adopted last year.

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 them to relevant colleagues.

Yours sincerely,

(e-Signed)
Charlina VITCHEVA

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