



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,  
MARE.A.2/MS

Dear Mr Skau Fisher,

Dear Ms Bermudez,

Dear Mr Thomsen,

Dear Mr Farias,

The Commission appreciates the joint Advisory Councils advice submitted by the Executive Committees of NSAC, MAC, AAC, and CCRUP

Please find below Commission's reflection on your specific advice points

## **1. FORESIGHT APPROACH AND ANTICIPATING SOCIETAL AND TECHNOLOGICAL DEVELOPMENTS**

We welcome the call to maintain a foresight-driven approach, which aligns with the European Commission's commitment to prepare for future challenges. The EU is already leveraging foresight mechanisms to ensure that policies anticipate trends such as technological advancements and societal needs. This is evident in key strategies like the European Green Deal and the Digital Strategy, both of which incorporate foresight tools. The EU will continue strengthening these approaches, ensuring that regulation fosters innovation while maintaining high levels of consumer safety and confidence.

Considering climate change and an increased use of the ocean, which is expected over the next decades, I believe that it is essential to explore its possible impact on the safety of future food and feed from the ocean. In this regard, I would like to note DG MARE's collaboration with the European Food Safety Authority (EFSA) in the finalisation of a foresight study to anticipate possible future risk assessment needs to face these potential emerging risks for food and feed safety<sup>1</sup>.

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<sup>1</sup> <https://www.efsa.europa.eu/en/supporting/pub/en-9058>

## **2. SOUND SCIENTIFIC ADVICE FROM EFSA**

The role of sound scientific advice is crucial, and EFSA in its role as risk assessor, remains central in providing independent and evidence-based advice to support the Commission and members states in their role as risk managers to undertake legislative modifications. EFSA's expertise is pivotal for any amendments to the regulatory framework, particularly in fast-evolving sectors such as food safety, safety of animal by-products, nutrition, and organic farming. This aligns with the EU's precautionary principle, ensuring that any legislative changes are informed by the best available science to protect public health and the environment.

I would like to assure you that DG MARE is engaging with EFSA through its current foresight studies to ensure that its ongoing work programmes and future risk assessments take into account the needs of the blue bioeconomy.

## **3. ADDITIVES AND PROCESSING METHODS IN ORGANIC FARMING**

Ensuring clarity on acceptable additives and processing methods in organic farming is a priority for the EU, particularly in promoting organic aquaculture under the Farm to Fork Strategy. This requires close collaboration with stakeholders, including EFSA and the organic certification bodies, to develop clearer guidelines that support the growth of the organic sector while maintaining high standards for organic fertilizers. This is in line with the EU's broader commitment to expand organic farming to 25% of EU agricultural land by 2030.

## **4. MAXIMIZING AQUATIC RESOURCES AND REVISITING THE 2009 ANIMAL BY-PRODUCT REGULATION**

In line with our commitments to the EU's Circular Economy Action Plan, the Commission is currently exploring the possibilities towards valorising fish sludge as fertilisers with the potential to enter the market of EU Fertilising products subject to Regulation (EU) 2019/1009<sup>2</sup> and in this regard, DG MARE is liaising with our counterparts in DG GROW. You are right in stating that there are a number of risks and regulatory challenges to assess. There is a clear legal procedure provided for in Regulation (EC) No 1069/2009<sup>3</sup> on Animal By-products to explore and ensure safety of organic fertilisers and soil improvers, and it might be possible to do that even without revisiting the basic principles and text of that Regulation. Indeed, that Regulation already caters for a great number of valorisation possibilities for other products, and EFSA plays a fundamental role, as explained above. In conclusion, I would like to reassure you that a clear alignment and coherence with the EU's wider policy objectives is also the priority within the animal by-products policy area and rules.

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<sup>2</sup> Regulation (EU) 2019/1009 of the European Parliament and of the Council of 5 June 2019 laying down rules on the making available on the market of EU fertilising products and amending Regulations (EC) No 1069/2009 and (EC) No 1107/2009 and repealing Regulation (EC) No 2003/2003.

<sup>3</sup> Regulation (EC) No 1069/2009 of the European Parliament and of the Council of 21 October 2009 laying down health rules as regards animal by-products and derived products not intended for human consumption and repealing Regulation (EC) No 1774/2002 (Animal by-products Regulation).

In this regard I can confirm the following roadmap to address the inclusion of fish sludge as a fertilizer. The Commission will start preparing a dossier for EFSA concerning a biological risk assessment of fish sludge for use in fertilising products. In addition, and in parallel, discussions will be initiated with the relevant Commission services regarding the essential inclusion of fish sludge under the animal by-products Regulation – Regulation (EU) 1069/2009.

## **5. PROMOTING COLLABORATION BETWEEN STAKEHOLDERS**

We fully support the recommendation to foster collaboration between decision-makers, the research community, and industry. This approach is vital to the development of new strategies, particularly as the EU transitions towards a more sustainable and resilient food system. Collaborative projects, such as those funded under Horizon Europe, have already demonstrated the value of multi-stakeholder involvement, and the EU will continue to promote these synergies to accelerate the green and digital transitions.

## **6. EXPLORING REGULATORY ALTERNATIVES**

The Commission is committed to regulatory efficiency and recognizes that, in some cases, addressing obstacles may not always require legislative amendments. Alternatives, such as adopting guidelines, recommendations, or voluntary frameworks, could provide the necessary flexibility without legislative change. These options will be assessed on a case-by-case basis, ensuring that they contribute to achieving the objectives of EU policies while maintaining regulatory coherence and efficiency.

## **7. HARMONIZATION OF FEED REGULATIONS ACROSS MEMBER STATES**

With the sole exception of Directive 2002/32/EC on undesirable substances in animal feed, the Union legislative framework covering the feed sector is composed of Regulations which apply directly in all Member States: Regulations (EC) No 1831/2003 on feed additives, 1831/2005 on feed hygiene, 767/2009 on feed marketing, and Regulation (EU) 2019/4 on medicated feed. The Commission considers that this framework already ensures a high level of harmonisation and a level playing field for operators throughout the Union. The Commission would welcome examples from affected Member States to understand the concerns that triggered this advice.

As regards your general comments, the Commission would like to make the following remarks

### **1. FACILITATING FUNDING FOR RESEARCH AND INNOVATION IN FISHERIES AND AQUACULTURE**

The European Commission acknowledges the critical role that research and innovation play in advancing sustainability in the fisheries and aquaculture sectors. Through funding programs like Horizon Europe and the European Maritime, Fisheries and Aquaculture Fund (EMFAF), the EU is committed to supporting universities, start-ups, and SMEs. These programs prioritize projects that foster sustainability and circular economy principles in the blue economy, ensuring that innovation continues to drive these sectors forward.

## **2. IMPROVING COMMUNICATION BETWEEN SCIENTIFIC AND REGULATORY FIELDS**

We recognize the importance of facilitating better communication and knowledge exchange between scientific experts and policymakers. Initiatives like the EU Knowledge Centre for Biodiversity and platforms such as the BlueBio Cofund already promote this type of exchange. We will continue to foster these networks by providing funding and creating additional platforms that ensure research is effectively translated into policy solutions. Additionally, the Commission will explore new incentives to enhance this communication, ensuring rapid uptake of scientific advancements in regulatory frameworks.

## **3. ENHANCED COORDINATION IN UPSCALING THE CIRCULAR BLUE ECONOMY**

The EU is committed to scaling up the circular blue economy in line with the European Green Deal and the Circular Economy Action Plan. Coordination between DG MARE, DG SANTE, and other relevant directorates is key to achieving this, especially under the Farm to Fork Strategy. Efforts are already underway to streamline collaboration between directorates and improve synergy in funding allocation. The focus on the circular blue economy will be gradually increased with more dedicated funding, ensuring long-term sustainability and competitiveness of the aquaculture and fisheries sectors across Europe.

## **4. STAKEHOLDER ENGAGEMENT IN POLICY DEVELOPMENT**

The European Commission agrees that early and continuous engagement with relevant stakeholders, particularly through Advisory Councils, is essential for policy success. The Commission values the contributions from these councils and acknowledges the need for high-level policy events with broad stakeholder participation. This practice aligns with our principle of inclusive policy development, which ensures that the realities of the industry are taken into account. We will continue to engage stakeholders at the earliest stages of the policy-making process to ensure that their expertise informs decisions, enhancing both the legitimacy and effectiveness of proposed policies.

## **5. SUPPORTING SMES FOR SUSTAINABILITY AND CARBON REDUCTION**

Supporting small and medium-sized enterprises (SMEs) is a central component of the EU's approach to the blue bioeconomy. Under the SME Instrument and programs like BlueInvest, the Commission provides targeted support to help SMEs reduce their carbon footprint and improve their sustainability practices. Additionally, the Green Transition Fund and the Just Transition Mechanism further assist local companies in aligning with the EU's climate goals, while promoting innovation and competitiveness in the blue economy.

## **6. ENCOURAGING VALORISATION OF BY-PRODUCTS IN PROCESSING**

The valorisation of by-products is crucial to the EU's circular economy goals. The Commission continues to encourage research and development in this area through projects funded by Horizon Europe and the European Innovation Council. These initiatives are designed to support the development of new technologies and processes that valorise by-products, such as fish waste, while also reducing environmental impact. We will continue to prioritize R&D funding in this area, recognizing its potential for

reducing waste and creating value-added products in the fisheries and aquaculture sectors.

## **7. ONGOING WORK WITH THE EUROPEAN SUSTAINABLE PHOSPHORUS PLATFORM**

We are closely following the work of the European Sustainable Phosphorus Platform (ESPP) and its exchanges with Commission services concerning the valorisation of by-products. The EU supports efforts to align phosphorus recovery and reuse with the principles of the circular economy, and we will consider amendments to legislation where appropriate. This aligns with broader goals to reduce waste and recover valuable nutrients, contributing to more sustainable agricultural and aquaculture practices.

We would like to thank again the Advisory Councils for this joint advice and emphasize the EU's commitment to the circular economy and sustainability within the fisheries and aquaculture sectors, reflecting ongoing efforts to improve research, stakeholder engagement, and policy coordination across Member States. The Commission agrees on the importance of innovation, funding, and collaboration in achieving these goals.

Yours sincerely,

Charlina Vitcheva

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