



AAC Recommendation on the Oceans Pact

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I. Background

The AAC welcomes the Commission's initiative to develop a European Oceans Pact.

This recommendation presents the AAC's advice with regard to the three key objectives of the Oceans Pact and supplements the AAC's provisional input to the call for evidence.

II. Justification

Objective 1: Maintain a healthy, resilient and productive ocean

The seas face many complex challenges, for example, pollution with nutrient enrichment and contaminants, marine litter and climate change.

The restoration of healthy oceans requires an integrated approach coherent with other EU policy domains, notably the environment, agriculture and energy.

As the Commission recently concluded regarding implementation of the Water Framework Directive, the average health of EU surface water bodies is critical: only 39.5% have a good ecological status. The EU has made recommendations to Member States to improve water management by 2027.¹

On a similar note, the Commission has concluded on the implementation of the Marine Strategy Framework Directive that Member State measures partially address what needs to be done but that measures relating inter alia to nutrient and chemical contamination are still insufficient.²

The AAC adds that discharges of insufficiently treated urban wastewater and norovirus contamination pose a significant threat to shellfish farming and a potential risk to farming in general. The recast urban wastewater directive requires Member States to take several new initiatives.

The AAC further refers to additional EU environmental directives and policies aimed at restoring healthy oceans.

Objective 2: Promote a sustainable and competitive blue economy including food from ocean aquaculture and fisheries

European aquaculture will be an essential component of any future Oceans Pact, with algae, shellfish, molluscs and finfish all playing an essential role in feeding Europe. Furthermore, aquaculture production will prove to have an essential role in supplying fertilisers and animal feeds (including through the farming of lower trophic species of shellfish and algae) and in the production of essential nutraceutical and pharmaceutical products.

¹ https://ec.europa.eu/commission/presscorner/detail/en/ip_25_342

² https://environment.ec.europa.eu/news/eu-member-states-introduce-more-measures-protect-coastal-and-marine-environments-2025-02-04_en

Any Oceans Pact must support the sustainability and competitiveness of the production of aquatic foods across all trophic levels and production systems. At the same time, and in line with Commission strategic guidelines for a more sustainable and competitive EU aquaculture, an Oceans Pact should emphasise the need to diversify sustainable production based on upcoming environmental and animal welfare indicators in aquaculture under development by the Commission. In this way, the Oceans Pact should consider the precautionary principle, in the absence of science and practical experience, where there are reasonable concerns about the potential adverse effects of a practice.

Aquatic resources can provide healthy and sustainable food to European citizens. In all, 71% of the Earth's surface is covered by water, yet only 2% of the world's per capita food originates from the sea. With population growth forecast to reach 10 billion by 2050, we will require 56% more food. With 50% of vegetated land now allocated to agriculture, aquatic resources will be needed to feed the global population. Furthermore, while over 50% of the world's aquatic foods now come from aquaculture, EU Member States account for less than 2% of global aquaculture production, despite Europe being the largest seafood market in the world.

The goal of the **Common Fisheries Policy (CFP)** is to ensure the long-term sustainability of fisheries and aquaculture, the availability of food supplies and a fair standard of living for fishery and aquaculture communities.

The Commission's strategic guidelines for a more sustainable and competitive EU aquaculture introduce various actions to meet the objective and encourage the adoption of higher welfare farming practices.³ Animal welfare indicators and standards should be introduced and applied to imports to ensure alignment with the EU's competitiveness and market positioning.

The AAC has addressed this objective in its recommendations on the evaluation of the CFP and reform of the EU's aquaculture policy.

Combining the farming of different species and restoring natural wild fish stocks can improve aquatic food productivity without increased nutrient discharges. The Commission has called on Member States to promote environmentally favourable farming systems, including for example **integrated multitrophic aquaculture** (IMTA) and co-culture systems.⁴ However, issuing licenses for IMTA and co-culture systems and managing restocking programmes pose legal and administrative challenges, as interrelated farming systems are rarely considered in EU and Member States legislation.

Under the auspices of the Aquaculture Assistance Mechanism, the Commission has in implementing the strategic guidelines published **Commission Staff Working Documents** on planning of space for marine aquaculture, access to space and water for freshwater and land-based aquaculture, and the regulatory and administrative framework for aquaculture. The AAC welcomes the working documents but is concerned about the actual uptake of the guidelines in Member States.

³ Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 – 2023, SWD(2021) 102 final

⁴ The Common Fisheries Policy today and tomorrow, SWD(2023) 103 final

Ensuring a **level playing field** with imported aquatic foods and marine ingredients is instrumental in achieving the objective of a sustainable and competitive EU aquaculture sector. In 2022, the EU produced 3.9 million tonnes and imported 8.8 million tonnes of aquatic food products.

The ecosystem services provided by aquaculture should be **recognised and supported**, especially those that benefit to water quality.

Improved **allocation of nitrogen between sectors** by more efficient regulation of environmental externalities can lead to private and societal gains, improve the environmental status of water bodies and accelerate adherence to pollution limits.

Member States are working to reduce nutrient pollution to meet the environmental objectives in the WFD and the MSFD. The EU has recommended that Member States improve water management by adhering to pollution limits, particularly nutrient pollution from agriculture.⁵ The Commission has pointed out that this makes it challenging to find sites for new or expanded aquaculture farms.⁶

Reallocation of permits allows farms restricted in their use of nitrogen because of their location in areas with low environmental carrying capacity to sell nitrogen permits to farms located in areas with higher carrying capacity. This can improve the environment's status without reducing the total cap because more nitrogen is transferred to areas with a higher environmental carrying capacity.

The transferability of emission permits induces private and societal gains when more efficient producers (sectors) buy nitrogen from less efficient producers (sectors), as it allows more efficient producers (sectors) to grow.

EU regulation of environmental externalities should aim for optimal use of environmental resources by including all polluters in a coherent regulatory framework. The effects of nitrogen policy reforms have been studied in several scientific papers⁷ and addressed briefly in previous STECF reports.⁸

Objective 3: Work towards a comprehensive agenda for marine knowledge, research/innovation and investment

The AAC agrees on the need to support research and innovation. The AAC is concerned that reliance solely on the EMFAF programme may lead to insufficient and delayed support and an uneven playing field among EU aquaculture farmers.

Sharp an unforeseen climate crisis and the introduction of alien species requires fast and timely responses.

⁵ Ibid 1

⁶ Commission Staff Working Document on Access to space and water for freshwater and land-based aquaculture, SWD(2024) 281 final

⁷ Gains of integrating sector-wise pollution regulation, Ecological Economics, 129 (2016)

⁸ The economic performance of the EU aquaculture sector, STECF 13-29

III. Recommendations

The AAC provides the following recommendations:

- a) Regarding **Objective 1: Maintain a healthy, resilient and productive ocean**

Recommendations

To the European Commission:

- The Oceans Pact must consider people (societal needs), the ecosystem (interaction of human, biotic and abiotic factors) and the health and welfare of sentient aquatic animals harvested for food and feeds.
- The Oceans Pact should focus on proper implementation of existing EU directives and policies relevant to the restoration of healthy EU water bodies while at the same ensuring that they remain a source of sustainable food and contribute to economic activity.
- The Oceans Pact must complement terrestrial European environmental ambitions. The Blue/Green interface is essential, and aquatic and terrestrial ecosystems are inextricably linked. Any Oceans Pact must address the relationship of aquatic / agro-ecology and the potential for the aquatic ecosystem to play a full part in arriving at European Green Deal ambitions.
- The maintenance of a healthy aquatic ecosystem is essential, particularly with so many research and knowledge gaps existing. The role of aquaculture in the provision of ecosystem services and nature-based solutions, and that it provides a source of food and feeds (in addition to services such as carbon sequestration and habitat restoration) must be duly considered.
- The Oceans Pact should recognise the broad and diverse nature of ocean stakeholders and ensure that all sectors and interests be treated equitably and with fairness.
- Specifically, the need of different stakeholder groups for ocean space must be recognised. The principles of fair and just marine spatial planning should be applied, and planning should fully integrate the priorities of food production alongside those of other sectors, such as energy, shipping and tourism. The principles of marine multi-use spatial allocation must therefore be considered and optimised.
- European oceanic waters play important social, economic and cultural roles and underpin communities and livelihoods. Any Oceans Pact must recognise the social, economic and community aspects of European citizens and support and promote coastal communities and economies.

- b) Regarding **Objective 2: Promote a sustainable and competitive blue economy including food from ocean aquaculture and fisheries**

Recommendations

To the European Commission:

- The AAC reiterates its recommendation on reform of the EU's aquaculture policy and adds that this reform should consider the EU Competitiveness Compass.

- Develop a Commission recommendation on licencing procedures for IMTA and co-culture systems and the use of restoration programmes (for example restocking programmes).
- Transform the abovementioned Commission Staff Working Documents into Commission recommendations.
- Ensure that EU aquatic food imports meet equivalent social, environmental and animal welfare requirements to those demanded for production in the EU. This is essential to prevent unfair competition and to maintain consumer trust in sustainable and ethical seafood production.
- Ask the STECF to draft a paper on introducing individual transferable nitrogen quotas in EU environmental legislation and establishing a data collection framework on nitrogen emission and capture at the farm level. The paper should include the transfer of nitrogen quotas between aquaculture facilities both within and across water bodies covered by the WFD and the MSFD.
- Include farmed aquatic animals in the scope of the modernisation of the EU animal welfare legislation on the keeping and killing of farm animals, and ensure provisions apply to imports, to ensure alignment with the EU's competitiveness and market positioning.
- Consider the precautionary principle, in the absence of science and practical experience, where there are reasonable concerns about the potential adverse effects of a practice.

3) Regarding Objective 3: Work towards a comprehensive agenda for marine knowledge, research/innovation and investment

Recommendations

To the European Commission:

- The principles behind any European Oceans Pact should be based on science and research, with an associated strategic research agenda identified to address those areas where there is insufficient knowledge or a requirement for further research.
- In its recent recommendations in "Research & Innovation Priorities for the Aquaculture Sector," the AAC proposed a table of priorities to be updated on an annual basis. An annual meeting should be convened (under the auspices of either the AAC or the European Commission) comprising the relevant representatives with responsibility for the aquaculture sector to discuss research and innovation priorities and transfer barriers relating to the aquaculture sector.
- The Oceans Pact should support the continuing development and refinement of the Digital Twin of the Ocean (DTO) and maximum exploitation of satellite, data and information technologies and systems in supporting marine science and ocean users.
- The support of aquaculture should be an Oceans Pact theme. The theme should include aspects on the welfare of aquatic animals.



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