

Policy brief

EU Farm to Fork Strategy: Raising the ambition on global fisheries aspects

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This short brief reviews the recommendations of the EU Food Policy Coalition on the global aspects of the EU Farm to Fork (F2F) strategy, underscoring that F2F largely ignores seafood production, and highlights EU trade, cooperation and imports aspects that are essential for sustainable external fisheries.

1. Overview

In September 2020, the EU Food Policy Coalition¹ published a policy brief with recommendations, entitled “*Raising the ambition on global aspects of the EU Farm to Fork strategy*”.² The paper elaborates how the external dimension of the Farm to Fork Strategy³ could be strengthened to drive a global effective and fair transition towards inclusive and sustainable agri-food systems, including in fisheries.

¹ The EU Food Policy Coalition groups organizations working towards refining and advocating for a shared vision of sustainable food systems at the EU level. Their official website: <https://foodpolicycoalition.eu/>

² EU Food Policy Coalition, “*Raising the ambition on global aspects of the EU Farm to Fork strategy*”, September 2020. The policy brief was signed by: Action Aid, Act Alliance, CIDSE, Compassion in World Farming, EEB, Eurogroup for Animals, Fair Trade Advocacy Office, fern, Friends of the Earth, Four Paws, IATP, Oxfam, Slow Food, Urgenci Available online at : https://foodpolicycoalition.eu/wp-content/uploads/2020/09/Raising_ambition_global-aspects_EU-F2F.pdf

³ The EC Communication on Farm to Fork Strategy includes a section on the external dimension entitled “*Promoting the Global Transition*”, which highlights that “*The EU will support the global transition to sustainable agri-food systems, in line with the objectives of this strategy and the SDGs.*” The Farm to Fork strategy is available at: https://ec.europa.eu/food/sites/food/files/safety/docs/f2f_action-plan_2020_strategy-info_en.pdf

2. The Farm to Fork Strategy ignores seafood production

The brief first underlines that the Farm to Fork (F2F) strategy ignores almost completely seafood production. Although “*wild caught fisheries and aquaculture are key drivers of global biodiversity loss,*” but cannot possibly be disregarded as they are both “*key elements for a sustainable food system.*”

This NGO coalition highlights that the external dimension of the Common Fisheries Policy (CFP) should be addressed in the strategy, advocating for the EU fishing industry, including its external fleet, “*to transit towards low-impact fisheries⁴ by ending overfishing, banning destructive fishing practices, and eliminating bycatch of sensitive species.*” It also demands that “*the future EU Fisheries Fund (EMFF) should not support measures that contribute to maintain overcapacity and overfishing,⁵ including by EU fleet fishing in third countries’ waters,*” and that “*EU funds spent under fishing agreements should be used exclusively for supporting the establishment of a transparent, environmentally, and socially sustainable fisheries policy in third countries, with particular attention to the needs of local fishing dependent coastal communities.*”

3. The aspects in cooperation, imports and trade are also crucial for external fisheries

Beyond looking at the EU fisheries fleets activities, the EU Food Policy coalition paper proposes several recommendations which are crucial to promote sustainable fisheries in the external dimension of the F2F Strategy:

3.1. USING INTERNATIONAL COOPERATION TO BUILD SUSTAINABLE FOOD SYSTEMS IN PARTNER COUNTRIES

The EU Food Policy Coalition welcomes the F2F Strategy commitment to focus international cooperation on food research and innovation, with particular reference to issues such as climate change adaptation and mitigation, sustainable land governance, inclusive and fair value chains: “*The EU should ensure to use international cooperation to build sustainable food systems in partner countries.*”

In Africa, where fisheries provide essential nutrients to the population, including the poorest, the sector is characterized by a large artisanal fisheries sector⁶ that not only supplies food, but provides livelihoods for fishers and (women) fish processors, and is a source of hard currency from exports of fishery products. The contribution of artisanal fisheries to sustainable food systems in Africa should be taken into account.

In the implementation of the F2F strategy, more attention should be given to supporting African artisanal fisheries resilience to climate change, to protect their

⁴ Low-impact fisheries means that fishers reduce their impact on the marine environment by using less energy per ton of fish caught, and by preventing the destruction of essential marine habitats, the bycatch of undersized and unwanted fish, and the killing of sensitive species like cetaceans, seabirds or turtles.

⁵ This was detailed in the Blue Manifesto, signed by hundreds of environmental and development NGOs on February 2020.

More information on this at: <https://www.cffacape.org/publications-blog/cffa-and-partners-sign-on-to-the-blue-manifesto>

⁶ FAO, The value of African fisheries, 2014. Available at: <http://www.fao.org/3/a-i3917e.pdf>

priority rights of access to resources⁷ and to invest in socially and environmentally sustainable artisanal fish value chains, including decent working conditions, improved processing strategies to diminish post-harvest losses, etc. The F2F Strategy could provide a coherent framework so that all EU-Africa policies that cover cooperation for sustainable fisheries, especially the future EU-Africa partnership, but also developments and cooperation projects, Sustainable Fisheries Partnership Agreements (SFPAs) and others, contribute to these goals.

3.2. DEVELOPING A LEGISLATION TO PREVENT IMPORTS OF PRODUCTS ASSOCIATED WITH DEFORESTATION AND HUMAN RIGHTS VIOLATIONS

In its paper, the EU Food Policy Coalition sees the announcement of the above-mentioned legislative proposal as a positive step because Europe's consumption levels significantly contribute to deforestation - and to overfishing- worldwide. They urge the EU *"to develop strong legislation to ensure products placed on the EU market are free from deforestation and human rights violations."*

When looking at EU seafood imports, two cases of human rights violations can be highlighted: the imports of fishmeal and fishoil from West Africa that threaten the right to food of African populations; the violations of labour rights by some industrial fishing fleets that supply fish for the EU market.

Fishmeal and fishoil factories are multiplying in West Africa due to a growing global demand. Fishmeal is used for feeding pigs, chickens, as well as carnivorous fish, like industrially farmed salmon or shrimps ('scampis'). Its production in West Africa leads to overexploitation of small pelagic fish, a staple of the diet in the region, traditionally caught by artisanal fishers and smoked and dried by women fish processors. Decreasing stocks and access to fish competition are provoking food insecurity, loss of jobs in the local artisanal sector, as well as environmental damage and danger to public health where the fishmeal plants are installed due to the pollution generated.⁸ Both fishmeal and fishoil from West Africa are imported onto the EU market, which is also a major market for farmed salmon and shrimps. Allowing unrestricted consumption of intensively farmed salmon and shrimp that depends on fishmeal produced in Africa violates the right to food of African populations and threatens the very survival of African coastal communities.⁹

In the last years, severe cases of labour abuses have been witnessed in the fisheries sector, mainly in Asian fleets. On board some fishing vessels, including from countries that supply EU seafood markets, fishers - many of them migrant workers - are subjected to extreme human rights abuses, including unlawful practices on board that threaten their physical integrity, their safety and sometimes their life, forced

⁷ In line with art 6.18 of the FAO Code of Conduct for responsible fisheries: *"Recognizing the important contributions of artisanal and small-scale fisheries to employment, income and food security, States should appropriately protect the rights of fishers and fishworkers, particularly those engaged in subsistence, small-scale and artisanal fisheries, to a secure and just livelihood, as well as preferential access, where appropriate, to traditional fishing grounds and resources in the waters under their national jurisdiction."* Available at: <http://www.fao.org/3/a-v9878e.pdf>

⁸ Changing Markets has published several reports on the matter. See the dedicated webpage *"Fishing the feed,"* available at: <https://changingmarkets.org/portfolio/fishing-the-feed/>

⁹ STANDING, Andre, *"European industries must disinvest in West Africa's booming fishmeal and fish oil sector,"* CFFA website, December 2019. Available at: <https://www.cffacape.org/publications-blog/european-industries-must-disinvest-in-west-africas-booming-fishmeal-and-fish-oil-sector>

labour and human trafficking. Recent cases also show distressing physical abuses¹⁰ of African artisanal fishers by the crew of industrial fishing vessels invading the artisanal fishing area.

As the EU market is the most important and lucrative market for fish products globally, a future legislation that would ensure products placed on the EU market are free from human rights violations would be an opportunity to address these concerns in the EU, but also to lead the way in global fisheries.

However, the F2F strategy needs to go further than regulating imports. Currently, more than 60% of the total seafood supply consumed in EU comes from imports, including from countries where seafood production (both capture fisheries and seafood farming) leads to a loss of biodiversity, threatens local food security and livelihoods, and generates pollution and abuses on workers. The EU Food policy coalition underlines that “*measures are needed to reduce the overall consumption of such products, animal feed being a case in point.*” Indeed, it’s counter-productive to promote fish consumption in the F2F strategy, without consideration for the harmful environmental and social impacts the fisheries and aquaculture sectors have in third countries.

The EU Food Policy Coalition also looks at ecolabels, which are numerous in the seafood sector, recommending that “*When clarifying competition rules for collective initiatives that promote sustainability in supply chains, the EU should make sure such initiatives actually translate in clearly substantiated sustainability benefits, and that there are no human rights or environmental standards violations along the value chain.*” This is also important for fisheries, where some ecolabels pretend to deliver environmental sustainability, often with little regard to human rights issues.¹¹

3.3. EFFECTIVE SUSTAINABLE DEVELOPMENT CHAPTERS IN TRADE AGREEMENTS

The F2F Strategy proposes to have ambitious trade and sustainable development (TSD) chapters in all EU bilateral trade agreements and to improve their implementation and enforcement with the appointment of a Chief Enforcement Officer in DG TRADE. The EU Food Policy Coalition remarks that “*First, such TSD chapters already exist in all recent EU trade agreements but are not legally enforceable. Second, TSD chapters do not address the adverse impacts of the agreement itself on human rights and the environment chapters are therefore not a sufficient response to the many challenges related to the adverse impacts of trade and investment policies.*”

The NGO Coalition recommends that not only the enforcement mechanisms of TSD chapters should be strengthened but also that “*the EU should integrate environmental and social objectives in a comprehensive and holistic manner across all trade agreement provisions, beyond TSD chapters, and ensure that no provisions*

¹⁰ A recent case was widely reported in the West African press. « Un pêcheur sénégalais brûlé vif par des chinois au large de la Gambie », IGFM news site, 25 September 2020. Available at: <https://www.igfm.sn/Un-pecheur-senegalais-brule-vif-par-des-chinois-au-large-de-la-gambie>

¹¹ In this regard, CFFA developed an FAQ page detailing the challenges that Artisanal and Developing World Fisheries face if they want to adhere to certification schemes. CFFA FAQ, “*Certification Standards for Artisanal and Developing World Fisheries.*” Available at: <https://www.cffacape.org/certification-schemes>

in the agreement undermine the objectives and standards enshrined in the TSD chapter.”

This echoes concerns expressed by many EU fisheries stakeholders, from NGOs and sector, which have been recently articulated in an advice from the EU Markets Advisory Council (MAC).¹² This advice requests that all bilateral free trade agreements should include reinforced chapters on sustainable development that address specific fisheries concerns and that explicitly reinforce the requirements of the Illegal Unreported Unregulated (IUU) Fishing Regulation. Free Trade Agreements (FTA) should incorporate a binding dispute settlement mechanism (that include government-to government consultations, a panel procedure, public access to documents and the consultation of civil society), and, in addition, the possibility of applying sanctions in case of non-compliance by the third countries of international commitments.

The EU Food Policy Coalition also demands the EU to “*obtain commitments from third countries to meet European standards when they export agri-food products to the EU.*” In this regard, the MAC advice requests the European Commission “*to require the third country with which it is negotiating a FTA/offering GSP scheme to ratify and implement effectively key international fishery instruments, such as the UN Convention on the Law of the Sea, the UN Fish Stocks Agreement, the UN Food and Agriculture Organisation (FAO) Port State Measures Agreement and the FAO Compliance Agreement, and to adhere to the standards of the relevant regional fisheries management organisations (RFMOs), and, in the case of GSP, provisions to allow the suspension of GSP+ status in cases where the provisions of these instruments are not applied; at a minimum it should allow for individual fisheries to demonstrate their adherence to these requirements.*” It also highlights that “*appropriate support should be provided to third countries and third countries producers in order to facilitate the implementation of social and environmental sustainability standards for seafood products.*”

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¹² Market Advisory Council, “MAC Advice: Level Playing Field,” 30 September 2019. Available at: <https://marketac.eu/wp-content/uploads/2019/10/MAC-Advice-Level-Playing-Field-LPF-30.09.2019.pdf>