

Policy brief

Food promotion policy –the EU should encourage quality over quantity seafood consumption

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This brief aims to contribute to the EU’s public consultation on food promotion policy. In it, we look at the sustainability concerns of both wild-caught fisheries and industrial aquaculture and argue that the EU should not promote seafood consumption but focus on providing accurate and complete information to consumers. We further insist on the need for the EU to look into the wider environmental and social sustainability issues throughout the fish value chain.

1. Overview

The European Commission has opened a public consultation to review its policy on food promotion – including for seafood - inside and outside the EU, with a view to “*enhance its contribution towards the promotion of more sustainable production and consumption, [...] in line with the Farm to Fork and Biodiversity strategies.*”¹

The European average consumer has increasingly shown interest regarding the sustainability of the food he buys. On the other hand, he remains one of the highest

¹ See the consultation procedure at the following website: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12782-EU-farm-and-food-products-review-of-policy-on-promotion-inside-and-outside-the-EU/public-consultation_en

seafood consumers in the world, with the global consumption of fish and seafood having more than doubled in the past 50 years. In a context of overexploitation of many fish resources, the promotion of seafood consumption, whether from aquaculture or wild caught fisheries, risks placing impossible demands on the supply chain to get increasing quantities of seafood to the consumer from sustainable sources.

In our view, in order to remain coherent with all its strategies and policies, **the EU should not promote more seafood consumption as it will lead to consumption levels that entail unsustainable seafood production.**

2. The European consumer and food sustainability

The public consultation, launched since the end of March, openly states that the EU aims at reducing red and processed meat consumption and shift to a more plant-based diet. In September 2020, the Food Policy Coalition,² underscored that the EU's Farm to Fork strategy largely ignored seafood production and reminded that wild-caught fisheries and aquaculture are key drivers of global biodiversity loss, while at the same time they should be taken into account as essential elements for a sustainable food system.³

With little mention of seafood in this public consultation, the concern is that the Commission omits yet again to take into account the sustainability issues of fish and seafood consumption. In fact, with an estimated of 24.35kg/year/per capita,⁴ Europeans are the second seafood consumers in the world after Asians. **The Commission has the obligation to support a responsible consumption, and therefore should focus on providing complete and accurate information to the consumer about the seafood sold on EU markets, rather than promoting seafood consumption,** in line with the objective stipulated for the common market organisation for fishery and aquaculture products, which *“should enable consumers to make better informed choices and support responsible consumption.”*⁵

3. Global wild-caught fisheries: increasing overfished stocks

In its latest report on the State of World Fisheries and Aquaculture (2020), FAO classified 34.2% of the world fish stocks as overfished, a percentage that keeps

² For more information, see their website: <https://foodpolicycoalition.eu/>

³ GOREZ, Beatrice, “EU Farm to Fork Strategy: Raising the ambition on global fisheries aspects”, CFFA-CAPE website, 16 October 2020. Available at: <https://www.cffacape.org/publications-blog/eu-farm-to-fork-strategy-raising-the-ambition-on-global-fisheries-aspects>

⁴ European Market Observatory for Fisheries and Aquaculture Products (EUMOFA), “The EU fish market”, European Union, December 2019, page 13. Available at: https://www.eumofa.eu/documents/20178/314856/EN_The+EU+fish+market_2019.pdf/

⁵ See §57 of the preamble of the Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32013R1380>

growing yearly.⁶ The European Union and its members states have carried out laudable efforts for the recovery of certain stocks in Community waters, though big concerns remain with stocks in the Mediterranean and the Black Sea.⁷

Given the current quantities of fish consumed in Europe, the EU is forced to import large quantities of fish from third countries –including farmed fish which is fed with fishmeal and fish oil processed from wild-caught fish.

As a net importer, **the EU needs to consider the sustainability of the practices of its seafood trade partners, and in parallel, seriously question the sustainability of European seafood consumption.** In its paper, the Food Policy Coalition stated that the EU's F2F strategy should go further than regulating seafood imports, and that *“measures are needed to reduce the overall consumption of such products.”*⁸

4. Aquaculture products and the false narrative of sustainability

Sustainability concerns of global wild fish production have been repeatedly raised by NGOs, scientists, decision makers, journalists, and some have presented fish farming as an alternative. The narrative is that with a growing world population, fisheries will not meet the demand and farmed-fish will provide the solution. In 2014, for the first time in history humans consumed more farmed-fish than wild-caught fish.⁹ According to EUMOFA, even though the apparent consumption of seafood per capita in Europe has remained more or less stable, the consumption of salmon, 99% of which is coming from aquaculture, has increased from 1,7kg/capita to 2,25 in the last ten years.¹⁰

However, turning to farmed seafood will not help address sustainability concerns. As we stated in a position on industrial aquaculture¹¹ last November, a common myth is that aquaculture can help stop overfishing and replace fisheries as a seafood supply chain and this belief has taken root into the European average citizen's mindset. Yet, what this belief omits is that farmed-fish needs to be fed, and usually, by wild-caught fish processed into fishmeal.

⁶ FAO, "The State of World Fisheries and Aquaculture 2020. Sustainability in action", Rome, 2020, page 48. Available at: <http://www.fao.org/3/ca9229en/ca9229en.pdf>

⁷ See for example: GOMEI, M. et al., "30 by 30: Scenarios to recover biodiversity and rebuild fish stocks in the Mediterranean". WWF Mediterranean Marine Initiative, Rome, Italy, 2021. Available at: https://wwf.eu.awsassets.panda.org/downloads/wwf_med_30x30_full_report_2021_1_.pdf

⁸ 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

⁹ See for example a speech in 2018 by then Commissioner for Environment, Maritime Affairs and Fisheries, M. Karmenu Vella, "EU aquaculture: Supporting the farmers in the water". Available at: <https://www.openaccessgovernment.org/eu-aquaculture-supporting-the-farmers-in-the-water/43991/>

¹⁰ EUMOFA, *Ibid.*, page 34.

¹¹ CFFA-CAPE, "Replacing fisheries and decarbonizing the sector? We should not expect it from industrial aquaculture", Position paper, 9 November 2020. Available at: <https://www.cffacape.org/publications-blog/replacing-fisheries-and-decarbonizing-the-sector-we-should-not-expect-it-from-industrial-aquaculture>

Several NGO reports¹² have pointed at how global aquaculture supply chains are leading to the destruction of wild fish stocks, often putting food security at risk in developing countries. According to Changing Markets foundation, which has been leading an awareness campaign¹³ for the last few years, at least one fifth of wild-caught fish is used to produce fishmeal and oil, either for livestock or fish farming.

Salmon and shrimps are on the top five species consumed by Europeans, out of which 99% and 49% respectively come from aquaculture.¹⁴ Salmon produced in Norway and Scotland and fed with fish meal and fish oil sourced in Peru and Mauritania, is then sold in supermarkets throughout Europe¹⁵. These two countries are also the main suppliers of “*fishmeal and fish oil for the aquaculture feed used by the French aquaculture sector*,” says Changing Markets in its most recent report.¹⁶ In view of this, **it is counter-productive to promote fish consumption in the EU, without considering the impacts that the aquaculture and fisheries sector have in third countries.**

4.1. THE PROBLEM OF FISHMEAL PRODUCTION IN WEST AFRICA

In the last decade, the unreasonable expansion of fishmeal factories, often installed by foreign companies, particularly Chinese, has decimated stocks of small pelagics in West Africa. This expansion started first in Mauritania,¹⁷ and has since spread to Senegal and the Gambia,¹⁸ and is now reaching countries like Sierra Leone.¹⁹ “*Artisanal fishermen are being pushed into supplying these factories, which is causing many women processors to lose their jobs*”, denounced recently Gaoussou Gueye, president of the Senegalese Association for the Promotion and Empowerment of Artisanal Maritime Fishing Actors (APRAPAM), in a recent interview.²⁰

Small pelagics are the staple food of West African coastal communities and the competition with fishmeal factories to access this resource is leading to a food

¹² CHANGING MARKETS, “Fishing for catastrophe: How global aquaculture supply chains are leading to the destruction of wild fish stocks and depriving people of food in India, Vietnam and The Gambia,” October 2019. Available at:

<http://changingmarkets.org/wp-content/uploads/2019/10/CM-WEB-FINAL-FISHING-FOR-CATASTROPHE-2019.pdf>

¹³ See all the related reports and research at the dedicated website “Fishing the feed”: <https://www.fishingthefeed.com/get-the-facts/>

¹⁴ EUMOFA, *Ibid.*, page 32.

¹⁵ CFFA-CAPE, “The French, the third largest consumers of seafood in Europe, are unaware of the harmful impacts of aquaculture”, 12 May 2021. Available at: <https://www.cffacape.org/news-blog/french-unaware-impacts-aquaculture-fmfo>

¹⁶ CHANGING MARKETS, “Dans les mailles du filet. Comment les grandes surfaces françaises font face à l'utilisation de poissons sauvages dans les chaînes d'approvisionnement aquacoles », May 2021, page 14. Available at: <http://changingmarkets.org/wp-content/uploads/2021/05/CMF-WEB-LIGHTWEIGHT-FRENCH-REPORT-DANS-LES-MAILLES-DU-FILET-copy.pdf>

¹⁷ GOREZ, Beatrice, “Mauritania pledged to eliminate fishmeal production by 2020. Today, it has tripled”, CFFA-CAPE website, 16 October 2020. Available at: <https://www.cffacape.org/news-blog/mauritania-pledged-to-eliminate-fishmeal-production-by-2020-today-it-has-tripled?rq=Mauritania>

¹⁸ GOREZ, Beatrice, “New report from Changing Markets Foundation highlights the catastrophe provoked by fishmeal factories in The Gambia”, CFFA-CAPE website, 15 October 2019. Available at: <https://www.cffacape.org/news-blog/new-report-from-changing-markets-foundation-highlights-the-catastrophe-provoked-by-fishmeal-factories-in-the-gambia?rq=Changing>

¹⁹ McVEIGH, Karen and KARGBO, Kabba, “‘Catastrophic’: Sierra Leone sells rainforest for Chinese harbour”, The Guardian, 17 May 2021. Available at: <https://www.theguardian.com/environment/2021/may/17/sierra-leone-sells-rainforest-for-chinese-fishmeal-plant>

²⁰ GOREZ, Beatrice, “Senegal: ‘If fish is not there, we will not be able to fish, even if they gave us gold canoes’”, CFFA-CAPE website, 19 May 2021. Available at: <https://www.cffacape.org/news-blog/senegal-if-fish-is-not-there-we-will-not-be-able-to-fish-even-if-they-gave-us-gold-canoes>

security crisis in the region while fishermen and women fish processors are losing their jobs and livelihoods.

The UN Special Rapporteur on the right to food²¹ pointed at the reliance on wild-caught fish for fish feed as one of the key problems of industrial aquaculture, especially of carnivorous species. “*Fishmeal has shifted from use in livestock farming to use in aquaculture over the past decade. [...] Recent reports highlight extensive overfishing and negative ecosystem impacts caused by the reduction industry.*” He also warned that the “*use of the industry to produce farmed fish for wealthy consumers may come at the expense of poorer populations who could benefit from improved availability of and accessibility to wild fish.*”

In this regard, **it is essential that the EU does not promote the products from aquaculture, especially carnivorous species which need to be fed from wild-caught fish.** Following the consultation of last fall 2020, the Commission just recently issued new aquaculture guidelines²² which calls Member states to review their national plans to ensure “*sustainable feed systems[...] using feed ingredients that are sourced in the way that is most respectful of ecosystems and biodiversity.*” This is a welcome step but it remains to be seen whether and how these non-binding guidelines are implemented at national level.

The EU can also use its leverage to improve the sustainable management of these stocks in West Africa. In a recent statement by the LDAC, EU long-distance fisheries value chain stakeholders and NGOs unanimously called the Commission to step up its game and support concrete steps that would lead to the formation of a non-tuna Regional Fisheries Management Organisation (RFMO) in West Africa.²³

4.2. THE PROBLEM WITH ECOLABELS

Beyond the promotion of seafood, taking into account sustainability issues, the Commission also needs to look seriously into certification schemes. Indeed, these ecolabels do not cover the social and environmental issues in the lower levels of the supply chain, particularly in developing countries. For example, these certifications are blind to the precarious working conditions faced by workers and the pollution suffered by the communities who live nearby the fishmeal plants.

For example, the French company Olvea and several other European companies involved in the fishmeal supply to European salmon farms have been financing a “Fisheries Improvement Project” (FIP)²⁴ with the goal to eco-label West-Africa fishmeal and fish oil products, made from overfished small-pelagic stocks. As Andre Standing, advisor at CFFA, states, eco-labelling “*ignores the fundamental point that the rights of local artisanal fishers, food processors and traders, as well as people’s*

²¹ UNGA, “Interim report of the Special Rapporteur on the right to food,” A/67/268, August 2012. Available at:

<https://undocs.org/A/67/268>

²² EUROPEAN COMMISSION, “Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030”, COM(2021) 236, Brussels, 12 May 2021. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52021DC0236&from=EN>

²³ CFFA-CAPE, “EU stakeholders call for the EU to step up its game for the sustainable management of small pelagics in West Africa”, CFFA-CAPE website, 20 May 2021. Available at: <https://www.cffacape.org/news-blog/eu-stakeholders-call-for-the-eu-to-step-up-its-game-for-the-sustainable-management-of-small-pelagics-in-west-africa>

²⁴ For more information on the FIP, see the following website: <https://fisheryprogress.org/fip-profile/mauritania-small-pelagics-purse-seine>

*right to food in the region, must take precedence over the profits of companies in developed countries.*²⁵

Instead, **the EU should ensure the highest environmental and social sustainability standards apply to all products deriving from ocean exploitation.**²⁶ In this process, the EU should of course support developing countries to commit and achieve necessary changes for meeting these standards, through international partnerships, cooperation and trade policies.

5. Conclusion

The EU market is the most important and lucrative market for fish products globally. In view of the concerns regarding the sustainability of both wild-caught fisheries and industrial aquaculture, and taking into account the EU's obligation to support a responsible consumption, it is clear that the EU should not promote seafood consumption, but rather focus on providing accurate and complete information to the consumers.

Moreover, the EU needs to seriously look into the wider environmental and social issues throughout the fisheries value chains, including for imports, to ensure all seafood deriving from ocean exploitation is sustainable. In this regard, the EU should discourage the consumption of intensive aquaculture products that depend on fishmeal and also stop the imports of seafood that has been produced abusing workers' rights, requiring the privatisation of vast coastal areas, displacing communities or destroying vital ecosystems, such as mangroves.

There is no way that European citizens can continue consuming the same amounts of seafood, whilst ensuring it is produced in sustainable conditions. The EU should promote a general diminution of fish consumption, privileging quality over quantity, consuming wild fish coming from environmentally and socially sustainable, low-impact and preferably local fishing, while also encouraging low-impact or restorative aquaculture such as for mussels, oysters or algae.

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²⁵ STANDING, Andre, "European industries must disinvest in West Africa's booming fishmeal and fish oil sector", CFFA-CAPE website, 10 December 2019. Available at: https://www.cffacape.org/publications-blog/european-industries-must-disinvest-in-west-africas-booming-fishmeal-and-fish-oil-sector?rq=European%20industries#_ftn2

²⁶ PHILIPPE, Joëlle, "International Ocean Governance: more can be done to promote socially and environmentally sustainable fisheries", CFFA-CAPE website, 11 December 2020. Available at: <https://www.cffacape.org/publications-blog/international-ocean-governance-more-can-be-done-to-promote-socially-and-environmentally-sustainable-fisheries>