

To: Virginus Sinkevicius  
Jutta Urpilainen

Brussels, Dakar, 25 January 2024

**Subject: West Africa: The EU should promote human consumption over the production of fishmeal and fish oil**

From 5 to 7 December 2023, the FAO, in collaboration with the Global Roundtable on Marine Ingredients and the Iceland Ocean Cluster, organised a workshop in Accra (Ghana) on the theme: "Optimising food and nutritional security and the benefits of small pelagic species production in sub-Saharan Africa"<sup>1</sup>. The aim of this meeting was to discuss how to increase the benefits derived from small pelagics for food and nutrition security and livelihoods, while managing trade-offs with the demand for fishmeal and fish oil.

This workshop followed a report commissioned by the Fishery Committee for the Eastern Central Atlantic (CECAF) on the "Socio-economic and biological impacts of the fish feed industry in sub-Saharan Africa"<sup>2</sup>, published in 2022. This report recommended to (1) limit the production on FBF based on the status of fish stocks and the human consumption needs, (2) to reduce bycatches and losses being directed to fishmeal production, and (3) to purposely regulate the price for edible fish to reduce the harmful competition from the FBF industry.

**Protecting small-scale fishers and promoting human consumption**

Civil society organisations, local fishing communities, scientists and international NGOs have been alerting for more than a decade about the decline of sardinella in West Africa. Sardinella, a small pelagic species, is a staple food for the region, traditionally caught by artisanal fishers and processed and marketed by women. For example, in Senegal, a report<sup>3</sup> published under an EU-funded project, found that the availability of small pelagics per capita has declined from 16kg/year to 9kg/year in 10 years. We, the signatories, would like to stress that the scarcity of this fish is putting at risk the food security of the entire West African region and destabilises coastal communities.

There are 3 main causes for this food crisis:

First, there is a **lack of a concerted management**. Small pelagics are species which migrate between the coasts of Morocco and Guinea Bissau. Whereas these stocks are shared among Mauritania, Senegal and The Gambia, these countries are not working together to set total allowable catches or quotas for each country, despite the legal obligation of States to insure the concerted management of these

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<sup>1</sup> See more background information at: GOREZ, Beatrice, "The message from African artisanal fishers to the FAO: 'Sardinella should be reserved for small-scale fishers, for human consumption, not for fishmeal'", CFFA-CAPE news blog, 7 December 2023. Available at: <https://www.cffacape.org/news-blog/the-message-from-african-artisanal-fishers-to-the-fao-sardinella-should-be-reserved-for-small-scale-fishers-for-human-consumption-not-for-fishmeal>

<sup>2</sup> THIAO, Djiga and BUNTING, Stuart W., "Socio-economic and biological impacts of the fish feed industry in sub-Saharan Africa", FAO Fisheries and Aquaculture Circular No. 1236, 2022, Rome, FAO, Worldfish and University of Greenwich, Natural Resources Institute. Available at: <https://www.fao.org/3/cb7990en/cb7990en.pdf>

<sup>3</sup> DEME, El Hadj Bara, « Mise en marché des petits pélagiques côtiers au Sénégal : Formes de valorisation et enjeux autour de la ressource », EchoGéo 58, December 2021. Available at : [https://www.researchgate.net/publication/358513203\\_Mise\\_en\\_marche\\_des\\_petits\\_pelagiques\\_cotiers\\_au\\_Senegal\\_Formes\\_de\\_valorisation\\_et\\_enjeux\\_autour\\_de\\_la\\_resource](https://www.researchgate.net/publication/358513203_Mise_en_marche_des_petits_pelagiques_cotiers_au_Senegal_Formes_de_valorisation_et_enjeux_autour_de_la_resource)

species<sup>4</sup>. This institutional inertia has been going on for more than a decade despite repeated calls by artisanal fisheries stakeholders regarding the alarming state of the stocks<sup>5</sup>.

Secondly, the **growing global demand for fishmeal and fish oil (FMFO) has led to the proliferation of factories** in the region, which use sardinella. The use of sardinella for fishmeal to feed farmed fish in developed countries instead of feeding hungry populations is inconceivable<sup>6</sup>, yet this is what is happening in West Africa. For the signatories of this letter, access to sardinella should be exclusively reserved for artisanal fishers which fish for human consumption.

Finally, due to the **lack of investment in the small pelagic chain for human consumption**, a lot of the fish which could be consumed by the local population is wasted and processed as “unfit for consumption” in FMFO factories. It is urgent that infrastructure for conservation, processing and transporting fish throughout the region is developed in a way that ensures and optimizes the food security of populations.

### European companies’ due diligence

First of all, we would like to draw the attention of the European Commission to the fact that European companies are benefitting from this unsustainable production which causes the loss of jobs for men and women in artisanal fisheries and is threatening the right to food of West African population as both fishmeal and fish oil from West Africa are imported onto the EU market<sup>7</sup>.

For example, the EU imports 70% of the fish oil produced in Mauritania, with a French company, OLVEA, importing most of this fish oil<sup>8</sup>. OLVEA claims that it sources its products sustainably. However, despite greenwashing efforts<sup>9</sup> by the company, this production cannot be made sustainable<sup>10</sup>. We are concerned that this production falls through the cracks of the new Corporate Sustainability Due Diligence Directive (CSDDD) due to the small size of a company such as OLVEA. However, the impact of its operations in West Africa is nefarious.

And secondly, the EU is a major market for farmed fish produced in countries, such as Norway, China, or Turkey, that also use these products from West Africa. Currently, fisheries and aquaculture imports are only subject to sanitary regulations and to the IUU regulation. However, there is nothing that ensures that the production conditions of these imports abide by EU environmental, human rights and labour standards.

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<sup>4</sup> See the United Nations Convention on the Law of the Sea (UNCLOS), art. 63 §1, available at: [https://www.un.org/depts/los/convention\\_agreements/texts/unclos/unclos\\_e.pdf](https://www.un.org/depts/los/convention_agreements/texts/unclos/unclos_e.pdf). See also the answer of ITLOS to SRFC question 4 in the Advisory Opinion No 21 of 2 April 2015: [https://www.itlos.org/fileadmin/itlos/documents/cases/case\\_no.21/advisory\\_opinion\\_published/2015\\_21-advop-E.pdf](https://www.itlos.org/fileadmin/itlos/documents/cases/case_no.21/advisory_opinion_published/2015_21-advop-E.pdf).

Finally, for a thorough legal briefing on the specific case of West Africa, see: MORIN, Michel, “Fisheries management in West Africa: the example of sardinella”, CFFA-CAPE policy brief, 17 October 2022. Available at: <https://www.cffacape.org/publications-blog/fisheries-management-in-west-africa-the-example-of-sardinella>

<sup>5</sup> FAO, “Report of the 9<sup>th</sup> session of the scientific sub-committee”, Fishery Committee for the Eastern Central Atlantic, 5-9 December 2022, Nouakchott, Mauritania. Available at: <https://www.fao.org/3/cc7106b/cc7106b.pdf>

<sup>6</sup> GOREZ, Beatrice, “When people are starving, footage of fresh fish used for fishmeal is disturbing”, CFFA-CAPE news, 22 February 2022. Available at: <https://www.cffacape.org/news-blog/when-people-are-starving-footage-of-fresh-fish-used-for-fishmeal-is-disturbing>

<sup>7</sup> See page 7 of “Feeding a monster: how European aquaculture and animalfeed industries are stealing food from West African communities”, joint report by Greenpeace Africa and Changing Markets Foundation, June 2021. Available at: <https://www.greenpeace.org/static/planet4-africa-stateless/2021/05/47227297-feeding-a-monster-en-final-small.pdf>

<sup>8</sup> *Ibid.* See page 7 and 37.

<sup>9</sup> GOREZ, Beatrice, “Accused of greenwashing and opacity, the French company Olvea replies. Is it convincing?”, CFFA-CAPE news, 18 July 2023. Available at: <https://www.cffacape.org/news-blog/greenwashing-opacity-french-company-responds>

<sup>10</sup> STANDING, Andre, “Certifying the unsustainable: The Fisheries Improvement Project in Mauritania”, CFFA-CAPE policy brief, 14 June 2022. Available at: <https://www.cffacape.org/publications-blog/certifying-unsustainable-fip-mauritania>

## What the EU can do

The final statement<sup>11</sup> of the Accra workshop confirms yet again the relevance of the recommendations of the 2022 FAO report<sup>12</sup>. First, they reaffirm the right to food and access to healthy foods and nutrition for local communities. This includes small pelagic fish, the consumption of which needs to be increased among the most vulnerable populations. The statement also puts an emphasis on the overexploitation of certain small pelagics stocks and the urgency of their sustainable and regional management and the responsibility of coastal states. Finally, the lack of data on the catches used for fishmeal and fishoil remains an obstacle to sustainable fisheries management.

We would like to reaffirm our support to the recommendations provided in the FAO report, and would urge the EU to support these demands publicly at international level. To counter institutional inertia a real political impetus is needed. The EU has a crucial voice thanks to its involvement in the region through Sustainable Fisheries Partnership Agreements, and more generally, the EU-Africa partnership.

On the other hand, to ensure there is coherence between internal and external actions, the EU should ensure the following:

- Support research and regional coordination to ensure that assessments and recommendations are produced in time, in particular through support and cooperation with FAO and other regional fishing organisations such as SFRC; and
- Support investments in the small pelagic value chain for human consumption; in particular by reinforcing the structures for the treatment of these fish (adapted landing sites, improved conservation facilities, etc.).

This must be done both through sectoral support of SFPAs and through projects funded under DG INTPA.

Furthermore, we urge the EU to strictly restrict the imports of fishmeal and fish oil from regions where people are food insecure and where fish stocks are proven to be overexploited. The EU should also urge its companies that import fish oil and fishmeal to introduce full transparency on their sourcing practices and should demand that they carry out effective due diligence of their supply chain. The signatories stress that a *simple commitment* to address issues is not sufficient to consider the issue is *adequately addressed*<sup>13</sup>.

Finally, the EU should look at restricting imports of aquaculture products which have been fed fish-based feed from these regions. The signatories of this letter stress that **the EU cannot continue to import fishery and aquaculture products that run counter to the principles of sustainability that it advocates**<sup>14</sup>.

With best regards,

*The signatories* (see details in the next page)

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<sup>11</sup> The final statement is available on this link: [https://drive.google.com/file/d/1Gwdcf\\_mLxZsxHe5ZoMQ-L-ORhbBO4qbR/view?usp=drive\\_link](https://drive.google.com/file/d/1Gwdcf_mLxZsxHe5ZoMQ-L-ORhbBO4qbR/view?usp=drive_link) Last accessed on: 23 February 2024.

<sup>12</sup> THIAO, Djiga and BUNTING, Stuart W., "Socio-economic and biological impacts of the fish feed industry in sub-Saharan Africa", *op. cit.*

<sup>13</sup> OECD, "OECD Guidelines for Multinational Enterprises on Responsible Business Conduct", 2023. Available at: <https://mneguidelines.oecd.org/mneguidelines/>

<sup>14</sup> PHILIPPE, Joëlle, "The EU must develop fisheries specific due diligence legislation", CFFA-CAPE policy brief, 1 September 2023. Available at: <https://www.cffacape.org/publications-blog/the-eu-must-develop-fisheries-specific-due-diligence-legislation>

## **The signatories**

[Association pour la promotion et la responsabilisation des acteurs de la pêche artisanale maritime \(APRAPAM\)](#)

[African Confederation of Artisanal Fisheries Organisations \(CAOPA\)](#)

[Brot fuer die Welt, Germany \(Bread for the World\)](#)

[Canoe Owners Association of Ghana \(CaFGOAG\)](#)

[Coalition for Fair Fisheries Arrangements \(CFFA\)](#)

Fédération Libre de Pêche Artisanale (FLPA, Mauritanie)

[Feedback EU](#)

Sierra Leone Artisanal Fishermen Union (SLAFU)

[Swedish Society for Nature Conservation \(SSNC\)](#)

Cc:

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