

### **Policy brief**

# Norway is flooding the EU market with unsustainable fish products, like farmed salmon – This should stop

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In this article, the author underscores the ecological and social impacts of Norwegian intensive salmon farming, including the impact on food security in West Africa. The author remarks that while on the one hand, the European Union promotes fish for human consumption in Africa, on the other, the EU also opens wide its market gates for Norwegian farmed salmon, which is fed West African fish.

#### **Overview**

On April 9<sup>th</sup> 2024, during a discussion in the European Parliament Fisheries Committee on the fisheries negotiations with Norway, a member of the Committee questioned the European Commission: "What can we do about a Norway that respects nothing while flooding our market with its salmon?" Norway "respecting nothing" refers to the country turning a blind eye, up to now, to sustainability, including for the production of farmed salmon.

## 1. Impacts of Norwegian intensive salmon farming

The majority of farmed salmon in Norway is produced by large companies. Among them, Møwi<sup>2</sup> is the largest, with its 20% market share of the production worldwide.

<sup>&</sup>lt;sup>1</sup> See Twitter thread by CFFA-CAPE on this quote: <a href="https://x.com/capecffa/status/1778030985625440759">https://x.com/capecffa/status/1778030985625440759</a>

<sup>&</sup>lt;sup>2</sup> More information about Møwi can be found on their website: <a href="https://mowi.com/contact/mowi-asa/">https://mowi.com/contact/mowi-asa/</a>

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The industry has had catastrophic environmental and social impacts, documented by NGOs in Norway³ and in other countries where these Norwegian companies operate, like Chile⁴ or Scotland:⁵ pollutions; disease spreading to wild salmon populations; fish farms workers' abuse; violations of animal welfare; farmed salmon escaping in the wild, where their inter-breeding with wild salmon genetically weakens wild stocks, reducing their survival rate.

A particularly acute problem is the infestation of farmed salmon by sea lice<sup>6</sup>, a parasite which "eats salmon alive", festering and multiplying at alarming rates. The fish farming industry uses various methods to tackle sea lice epidemics – including poison dumped into the ocean or put into feed, and pumping salmons into boats where they are bathed in 30 degrees hot water, often resulting in high mortality rates.

Norwegian salmon farming companies are also starving West African population: a recent report<sup>7</sup> from the NGO Feedback shows how these companies, - Mowi, BioMar, Skretting, Cargill -, use fishoil and fishmeal produced in West Africa from small pelagics stocks, fish that are essential for the diet of the populations, undermining the livelihoods and food security of millions of people in the region.

Put in the hot seat by the Financial Times<sup>8</sup> about whether their sourcing of fishoil and fishmeal was contributing to the decline of fish resources off West Africa, these companies argued it would be misleading to say that, as "their ingredients are from one of two factories recognised as working to improve the fishery by the industry's certification body, MarinTrust." They were, of course, "committed to sourcing sustainable feed ingredients." However, if there is something misleading, it is the use of the MarinTrust certification as a proof their sourcing is sustainable. As we demonstrated earlier, there is no evidence<sup>9</sup> provided that a fishery in an improvement program covered by MarinTrust is sustainable, or that it is likely to become sustainable any time in the future.

### 2. On the one hand, the EU promotes the use of fish for human consumption in West Africa

The European Union is a vocal defender of using West African fish resources for human consumption, rather than for processing into fish oil and fishmeal. When the latest Sustainable Fisheries Partnership Agreement (SFPA) with Mauritania, - the West African country with the biggest resources in small pelagics, and the largest number of fish feed factories-, was presented to the European Parliament, the EP

<sup>&</sup>lt;sup>3</sup> Joint statement letter to EFTA Surveillance authority by 4 Norwegian NGOs, "Environmental impact from salmon farming", 30 May 2023. Available at: <a href="https://naturvernforbundet.no/content/uploads/2023/06/lmpact\_from\_salmon\_farming\_\_May-2023\_Letter-from-Sabima-and-other\_Norwegian\_NGOs.pdf">https://naturvernforbundet.no/content/uploads/2023/06/lmpact\_from\_salmon\_farming\_\_May-2023\_Letter-from\_Sabima-and-other\_Norwegian\_NGOs.pdf</a>. See also: North Atlantic Salmon Fund website, "Disaster in Norway". Available at: <a href="https://nasf.is/en/norway/">https://nasf.is/en/norway/</a>

<sup>&</sup>lt;sup>4</sup> More information about impacts in Chile: https://www.ecoceanos.cl/

<sup>&</sup>lt;sup>5</sup> More information about impacts in Scotland: https://scottishscamon.co.uk/

<sup>&</sup>lt;sup>6</sup> OSTERLOFF, Emily, "The problem of sea lice in salmon farms", Discover, Anthropocene, Natural History Museum. Available at: <a href="https://www.nhm.ac.uk/discover/the-problem-of-sea-lice-in-salmon-farms.html">https://www.nhm.ac.uk/discover/the-problem-of-sea-lice-in-salmon-farms.html</a>

<sup>&</sup>lt;sup>7</sup> Feedback EU, "Blue Empire. How the Norwegian salmon industry extracts nutrition and undermines livelihoods in West Africa", January 2024. Available at: <a href="https://feedbackglobal.org/wp-content/uploads/2024/01/Feedback-BlueEmpire-Jan24.pdf">https://feedbackglobal.org/wp-content/uploads/2024/01/Feedback-BlueEmpire-Jan24.pdf</a>

<sup>&</sup>lt;sup>8</sup> HEAL, Alexandra et al., "The hidden cost of your supermarket salmon", Visual investigation, Financial Times, 31 January 2024. Available at: <a href="https://ig.ft.com/supermarket-salmon/">https://ig.ft.com/supermarket-salmon/</a>

<sup>&</sup>lt;sup>9</sup> STANDING, Andre, "Certifying the unsustainable: The Fisheries Improvement Project in Mauritania", CFFA-CAPE Policy Brief, 14 June 2022. Available at: <a href="https://www.cffacape.org/publications-blog/certifying-unsustainable-fip-mauritania">https://www.cffacape.org/publications-blog/certifying-unsustainable-fip-mauritania</a>

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made it clear<sup>10</sup> that Mauritania should be supported to "phase out negative impacts caused by the fishmeal and fish oil industry in Mauritania," noting that fish should primarily be used for human consumption and not as raw material for the feed processing industry.

Indeed, the SFPA highlights<sup>11</sup> (Annex 2) that its sectoral support component shall contribute, inter alia, to "advancing Mauritania's commitment to food and nutrition security." To that end, support should be provided to 'Infrastructures to promote human consumption of fishery products." Additionally, in the latest SFPA protocol, the EU and Mauritania agreed to develop a plan for the sustainable management of small pelagics, that includes a new zoning of fishing areas, the closing of several fishmeal factories, and management measures to channel small pelagics to supply chains for human consumption.

Further action is still to be taken by Mauritania on this using sectoral support, but for Sid'Ahmed Abeid, President of Mauritania National Artisanal Fishers Fédération, "the priority is to support activities in the value chain of small pelagics for human consumption. This is where the future of artisanal fishing lies."<sup>12</sup>

Through its International Partnerships policy, the EU has reinforced that commitment of using fish resources for human consumption, in particular through PROMOPÊCHE,<sup>13</sup> an EU funded project implemented by the Spanish cooperation (AECID), the German cooperation (GIZ), and the International Labour Organisation (ILO). The project supports, since 2019, the building of an educational fish cannery<sup>14</sup> to provide training on how to process quality fish products for human consumption. This initiative is also good for creating jobs. Mahfoud Taleb Ould Sidi, the Director of the 'Institut Supérieur des Sciences de la Mer' (ISSM) explains that, based on the 400.000 tons of small pelagics that were processed into fishmeal and fish oil in 2019, less than a thousand permanent jobs have been created.<sup>15</sup> With a ratio of 22 tons of fresh fish to generate one permanent job in the canning of small pelagics, there would be more than 20 times the number of jobs generated by fishmeal and fish oil plants.

### 3. On the other, it welcomes Norwegian farmed salmon, fed with West African fish, on its market

<sup>&</sup>lt;sup>10</sup> EUROPEAN PARLIAMENT, "European Parliament non-legislative resolution of 8 June 2022 on the draft Council decision on the conclusion of the Sustainable Fisheries Partnership Agreement between the European Union and the Islamic Republic of Mauritania and the Implementing Protocol thereto", 12208/2021 – C9-0419/2021 – 2021/0300M(NLE), 8 June 2022, Strasbourg. Available at: <a href="https://www.europarl.europa.eu/doceo/document/TA-9-2022-0229\_EN.html">https://www.europarl.europa.eu/doceo/document/TA-9-2022-0229\_EN.html</a>

<sup>&</sup>quot;Partnership Agreement on sustainable fisheries between the European Union and the Islamic Republic of Mauritania", Official Journal of the European Union, L 439/3, 8 December 2021. Available at: <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:22021A1208(01)#d1e7538-57-1">https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:22021A1208(01)#d1e7538-57-1</a>

<sup>&</sup>lt;sup>12</sup> Informal discussion with CFFA-CAPE. Quoted with permission.

<sup>&</sup>lt;sup>13</sup> More information on the project « PROMOPÊCHE: Création d'emplois décents et consolidation de l'emploi existant pour les jeunes et potentiels migrants dans le secteur de la pêche artisanale » on the EU's website Emergency Trust for Africa : <a href="https://trust-fund-for-africa.europa.eu/our-programmes/promopeche-creation-demplois-decents-et-consolidation-de-lemploi-existant-pour-les-jeunes-et\_en">https://trust-fund-for-africa.europa.eu/our-programmes/promopeche-creation-demplois-decents-et-consolidation-de-lemploi-existant-pour-les-jeunes-et\_en</a>

<sup>14 «</sup> Communiqué de presse : Une conserverie, trois marchés et une piscine pédagogique financés par l'Ue inaugurés à Nouadhibou en présence du ministre des pêches et de l'économie maritime et des ambassadeurs de l'équipe Europe en Mauritanie », Taqadoum, 21 septembre 2023. Available in French at: <a href="https://taqadoum.mr/fr/node/9116">https://taqadoum.mr/fr/node/9116</a>

<sup>&</sup>lt;sup>15</sup> SIDI, Mahfoudh O., « Nouadhibou : construction d'une usine pédagogique de conserve de la sardine et des thons », Cridem, 23 mars 2022. Available in French at: <a href="https://cridem.org/C\_Info.php?article=754955">https://cridem.org/C\_Info.php?article=754955</a>

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However, when it comes to the Norwegian farmed salmon, fed with fish oil and fishmeal coming from West Africa, the EU opens wide its market gates. Salmon is the most consumed farmed fish species in the European Union. Norway, the largest producer of farmed salmon in the world, is its main supplier, with the European market taking approximately 70% (in volume) of Norwegian farmed salmon in recent years. <sup>16</sup> Poland and France, the primary hub markets for processed salmon, are the largest importing countries of Norwegian salmon.

Norway is not a member of the EU, but is closely linked with the EU through membership in the Agreement on the European Economic Area (EEA), which brings together all the 27 EU Member States and three of the European Free Trade Association (EFTA) countries, - Iceland, Norway, and Liechtenstein -, in a Single Market. Like all members of the Single Market, Norway contributes financially towards social and economic cohesion in Europe. The European Commission and EEA-EFTA States recently reached an agreement<sup>17</sup> on the EEA Financial Mechanism 2021-2028.

On the basis of the EEA-EFTA States Agreement and additional bilateral agreements, customs duties on most types of white fish products have been abolished. Farmed salmon falls outside<sup>18</sup> the scope of the Agreement. However, in what is described as a "boost for salmon that will lead to an increase in salmon trade," the press<sup>19</sup> announced that Norway and the EU have recently signed a seafood deal that includes new duty-free quotas for processed salmon and smoked salmon.

### Conclusion: the EU fishing sector and NGOs say stop

But may the tide be slowly changing? In its reply to a letter from NGOs<sup>20</sup> concerned about the imports of salmon fed with fish feed from West Africa, DG MARE informed that it is "currently reflecting internally on a potential fisheries-specific sustainability scheme applying to products imported to the EU,"<sup>21</sup> keeping in mind that any measures with the objective to ensure that products imported into the EU do not contribute to food insecurity or environmental issues in non-EU countries "must be

<sup>17</sup> EUROPEAN COMMISSION, "The Commission and the EEA-EFTA States have reached an agreement on the EEA Financial Mechanism 2021-2028", Press Release, Brussels, 1 December 2023. Available at:

https://ec.europa.eu/commission/presscorner/detail/en/ip\_23\_6244

<sup>19</sup> OUTRAM, Robert, "Boost for salmon in new Norway-EU deal", News, Fish Farmer Magazine, 4 December 2023. Available at: <a href="https://www.fishfarmermagazine.com/2023/12/04/boost-for-salmon-in-new-norway-eu-deal/">https://www.fishfarmermagazine.com/2023/12/04/boost-for-salmon-in-new-norway-eu-deal/</a>

<sup>&</sup>lt;sup>16</sup> "Norwegian salmon value chain: how does it influence the EU markets?", Research Findings Brief, H2020 Valumics project Food Systems Dynamics, August 2021. Available at: <a href="https://valumics.eu/wp-content/uploads/2021/08/Salmon\_Brief.pdf">https://valumics.eu/wp-content/uploads/2021/08/Salmon\_Brief.pdf</a>

<sup>&</sup>lt;sup>18</sup> See Article 8(3) of the EEA agreement. "DECISION OF THE COUNCIL AND THE COMMISSION of 13 December 1993 on the conclusion of the Agreement on the European Economic Area between the European Communities, their Member States and the Republic of Austria, the Republic of Finland, the Republic of Iceland, the Principality of Liechtenstein, the Kingdom of Norway, the Kingdom of Sweden and the Swiss Confederation", Official Journal of the European Communities, Volume 37, 3 January 1994. Available at: <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L:1994:001:FULL&from=CS">https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L:1994:001:FULL&from=CS</a>
<sup>19</sup> OUTRAM, Robert, "Boost for salmon in new Norway-EU deal", News, Fish Farmer Magazine, 4 December 2023. Available at:

<sup>20 &</sup>quot;West Africa: The EU should promote human consumption over the production of fishmeal and fish oil", Joint Statement by 11 African SSF organisations and development NGOs, CFFA-CAPE website, 29 January 2024. Available at: https://www.cffacape.org/publications-blog/west-africa-the-eu-should-promote-human-consumption-over-the-production-of-fishmeal-and-fish-oil

<sup>&</sup>lt;sup>21</sup> The response of the Commission is also available at: <a href="https://www.cffacape.org/publications-blog/west-africa-the-eu-should-promote-human-consumption-over-the-production-of-fishmeal-and-fish-oil">https://www.cffacape.org/publications-blog/west-africa-the-eu-should-promote-human-consumption-over-the-production-of-fishmeal-and-fish-oil</a>

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very well-calibrated to stay within the limits of the EU commitments in the World Trade Organization."

In that context, on April 10th, the EU Advisory Council on Long Distance Fisheries (LDAC) produced an advice<sup>22</sup> on "The need to address sustainability concerns of fisheries and aquaculture production in EU-Norway trade relations". Since Brexit, Norway has been unilaterally taking excessive quotas, for species like mackerel, which worries the EU sector. The advice underlines that the Norwegian behavior also creates serious concerns about the sustainability of the Norwegian aquaculture production conditions: "This is particularly true for the unsustainable production of farmed salmon."

The LDAC asks the EU to promote, in its relations with Norway, social and environmental sustainability in the production of fisheries and aquaculture products, as with its other trade partners. It goes further and calls on the EU "to stop the continuation of tax derogations to Norway's fisheries products entering the EU market," like salmon. For the longer term, the LDAC insists that "it is important that further negotiations with Norway should be based on a mandate that gives consideration to the need for Norwegian fisheries and aquaculture products to follow international resolutions from RFMOs, as well as sustainability rules and standards from FAO in aquaculture and fish welfare."

In a nutshell, the EU should not continue to import unsustainably produced farmed salmon from Norway, as it flies in the face of the sustainability the EU advocates. Until it stops doing it, European consumers wishing to support thriving fishing communities in West Africa have but one choice: stop eating intensively farmed salmon!

Brussels, 7 May 2024

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