

European Association of Fish Producers Organisations
Association Européenne des Organisations de Producteurs dans le secteur de la pêche



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EAPO feedback on the Farm to Fork Roadmap – 13 March 2020

<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12183-Farm-to-Fork-Strategy->

The Farm to Fork strategy's goals are within the framework of the wider EU Green Deal. For this reason the strategy should reflect the ambitions set up in the Green Deal such as the importance to relieve pressure on food land. The strategy also mentions the Sustainable Development Goals and should specifically reference SDG2: zero hunger. The greenhouse gas emissions ambitions of the EU are referred to and low CO₂ emitting activities should be actively supported. The health benefit objective of the strategy should go hand in hand with the identification of food providing such benefit and with active support to producers of such food.

EU managed fisheries are sustainable and highly regulated. They produce local seafood for EU citizens. In the meantime, they generate reduced CO₂ emissions and have a much lower carbon footprint than alternative meat proteins. Fish products are of high nutritional quality and have the advantage of recognised benefits for health. Shifting to increased seafood-based diets will also help reduce pressure on farmlands. Supporting fisheries is supporting local fishers' communities from rural areas of the EU that depend on this activity. It is also allowing for on-land jobs to be sustained across the value chain and for economic benefits to spread. The strategy should therefore bring forward and actively support EU fisheries and fishery products as sustainable solutions to the challenges highlighted here. This means explicitly pointing at the above-mentioned benefits and ensuring thriving conditions for EU fishers.

One of the ways to do this is to reflect on the apparent contradiction in the Green Deal itself where low impact and low emission food production is being promoted - such as through well managed fisheries - and the Green Deal objective of 30% MPA's to be achieved by 2030. On this spatial aspect of the Green Deal the fishing industry already will be very much impacted by the expansion of windfarms at sea to achieve the CO₂ reduction objectives and that will very much reduce fishing grounds and therefore the production capacity of the fishing industry. This reduction will be exacerbated by the obligation for nature compensation at sea because of the newbuilding of windfarms.

Another apparent contradiction is the limits in the current vessel capacity regulations (GT and kW) and the need to transition towards new forms of propulsion technologies on vessels with new low emission fuels for which more space and thus capacity in GT and/or kW for the vessel is needed.

Finally, the naming of the Farm to Fork strategy is very much land oriented. At least a seafood equivalent should be introduced in the terminology around this strategy: for instance, the Ship to Shelf strategy.