



Mr Frans Timmermans, Executive Vice-President-designate for the European Green Deal  
CC: Mr Virginijus Sinkevičius, Commissioner for Environment, Oceans and Fisheries  
Ms Stella Kyriakides, Commissioner for Health and Food Safety  
Ms Ilze Juhansone, Secretary-General of the European Commission

Brussels, 17 March 2020

Dear Vice-President Timmermans,

**Subject: Concerns over lack of consideration for harmful impacts of seafood production in Farm-to-Fork Strategy**

Seas At Risk, Birdlife, ClientEarth and Our Fish would like to express our serious concerns about the lack of consideration, in the current draft of the Farm to Fork Strategy<sup>1</sup>, for the harmful environmental impacts of seafood production. Wild caught fisheries and aquaculture have been recognized as one of the key drivers of biodiversity loss at sea in last year's authoritative [UN IPBES global assessment report on biodiversity](#).

This major gap is reflected in the current draft Strategy by:

- The lack of **comprehensive measures and targets for a full transition of the European fishing industry to low-impact fisheries**, by ending overfishing, banning destructive fishing practices and non-selective fishing gear, eliminating bycatch of sensitive species and ensuring that fisheries are fully monitored and controlled. No EU citizen wants to eat fish that has been caught at the expense of iconic species like dolphins, seabirds or turtles, or is coming from an overfished or depleted fish population. 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.
- The lack of **comprehensive measures and targets for a full transition to an environmentally-responsible and low impact aquaculture production**. Systematically, adding the word 'sustainable' in front of aquaculture is not sufficient to ensure that current and future aquaculture practices develop in an environmentally-responsible way. At the very least, an aquaculture target is needed to address appropriately spatial planning, feed, escapes and nutrient issues, in addition to antimicrobial resistance, the only issue covered at the moment in the Strategy. In addition, the Commission should ensure that the innovative algae industry develops within the EU regulatory framework, licensing procedures and with the necessary environmental impact assessments.
- The **inaccurate statement that fish consumption by EU citizens is 'insufficient'** and the underlying assumption that it should be increased. In fact, Member States guidelines for weekly fish consumption are on average around 300g of fish per week and inhabitant for a healthy and balanced diet<sup>2</sup>, which amounts to about 15.6 kg/inhabitant/year. European Commission statistics show that EU citizens eat on average 25.1 kg/inhabitant/year, which is 40% more than what Member States' health guidelines promote<sup>3</sup>. In addition, promoting the consumption of seafood overlooks the fact that seafood production negatively impacts the ocean's ability to cope with climate change, as highlighted in last year's IPCC special report on the ocean and cryosphere<sup>4</sup>. Given that the European Green Deal and subsequent strategies are meant to address the biodiversity and climate crises together, it would be counter-productive to promote fish consumption in the Farm to Fork Strategy without consideration for the harmful environmental and climate impacts of the fisheries and aquaculture sectors.

<sup>1</sup> The draft Strategy referred to in this letter are the draft dated 6 February and published in a Politico article 'Commission's Farm to Fork sets new targets and actions' on 28 February 2020, as well as the [draft](#) published by Politico on 17 March 2020.

<sup>2</sup> <https://ec.europa.eu/jrc/en/health-knowledge-gateway/promotion-prevention/nutrition/food-based-dietary-guidelines>

<sup>3</sup> [https://ec.europa.eu/fisheries/6-consumption\\_en](https://ec.europa.eu/fisheries/6-consumption_en)

<sup>4</sup> It has been shown, for instance, that coastal habitats, which are regularly destroyed by bottom trawling, can capture CO2 40 times faster than a tropical forest: <https://www.biogeosciences.net/2/1/2005/bg-2-1-2005.html>

- **The lack of structured dialogue between the European Commission and civil society on fisheries and aquaculture topics.** The European Commission intends to use existing platforms to consult with stakeholders on the actions set out in the Strategy. However, no such platform exists to engage with civil society on fisheries and aquaculture. Although there are existing “Advisory Councils”, these are established and organized by stakeholders and are not a replacement for the dialogue that should occur between the European Commission and civil society in a structured format and organized by the Commission itself. In fact, this lack of structure is, in our opinion, one of the main reasons explaining the gaps related to seafood production in the current draft of the Farm to Fork Strategy. Whereas consultations between the Commission and agriculture stakeholders were held regularly during the process of developing the Strategy, under the scope of the [Civil Dialogues](#), no similar type of consultations were organised to discuss fisheries and aquaculture issues, as no such platform exists on these topics.

Europe needs a **Farm to Fork strategy** that recognises that our current seafood production system is ecologically unsustainable and that fisheries and aquaculture are a major driver of marine biodiversity loss, waste production and habitat degradation, which in turn undermines the ocean’s resilience to climate change.

There is still time to correct the course before the publication of the final Farm to Fork Strategy. We urge you to take our comments into account – including the detailed suggestions for targets provided in annex to our responses to the public consultation on the Roadmap – and deliver a strategy that will enable the transition to a truly sustainable and low-impact seafood system in Europe.

Yours sincerely,



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