

## Feedback from European Marine Board to [European Commission's roadmap on 'farm to fork' strategy](#) (21 February 2020)

Do not forget about food from the ocean! We welcome the EU's ambition to have an end-to-end strategy for food, with connections to the circular economy to make the system more efficient, but the roadmap still lacks strong explicit connections with food coming from the sea, even though it mentions fishers and the Common Fisheries Policy (CFP) several times. In addition, there is no mention of the 'Farm to Fork' Strategy having "strong connections with and directly contribution to" the 2008 Marine Strategy Framework Directive, the marine environmental pillar of the EU. This is especially important if you consider that many of the problems of the ocean originate from land, including chemical pollution from agriculture such as herbicides (in addition to pesticides, fertilizers and antibiotics, as mentioned in the roadmap).

At the request of former Commissioner Karmenu Vella (Commissioner for Environment, Maritime Affairs and Fisheries, 2014-19), the EU Group of Chief Scientific Advisors provided scientific advice through the EU Scientific Advice Mechanism (Food from the Oceans, EC, 2017), with specific recommendations on how to benefit sustainably from the opportunities provided by the ocean in terms of food. We recommend that the strategy take into account these results, and consider other scientific advice from the Group of Chief Scientific Advisors on agricultural biotechnology, health risks of microplastic pollution and glyphosate.

Highlighted in the Food from the Oceans report, the biggest potential for increasing seafood production in the foreseeable future is through the farming of marine species (i.e. mariculture or aquaculture at sea), especially those at lower levels in the oceanic food chain, which are much more abundant than the top-level predatory fish that currently account for most seafood. However, farming marine species will require significant marine space, and no links have yet been made between the 'farm to fork' strategy and the 2014 EU Directive on Marine Spatial Planning (MSP). The development of spatial planning tools for aquaculture remains a key enabler for the development of locally sustainable aquatic food production systems in European waters. These links could enable the fair and favourable full potential of aquaculture at sea in Europe.

It is mentioned that the 'farm to fork' strategy will have strong connections with and directly contribute to the 2030 EU Biodiversity Strategy, and that that the CFP will be key a tool to support the strategy. We would like to highlight that commercially exploited fish are part of marine biodiversity. Although the CFP requires sustainable fisheries, the IPBES global assessment report (IPBES: UN panel for biodiversity) found that fishing has had the most impact on marine biodiversity in the past 50 years due to an increasing proportion of marine fish stocks being overfished. Industrial fishing is concentrated in a few countries and corporations, and covers at least 55% of the oceans. Small-scale fisheries account for more than 90% of commercial fishers (over 30 million people globally), and yet, only half of global fish catch. The EU Group of Chief Scientific Advisors emphasized that it is essential for many different socio-economic, ecological and other reasons to continue efforts such as those under the EU Common Fisheries Policy to return to traditional small-scale sustainable fishing, reversing the decline in fish stocks. This will also permit increased harvest in the future. For both aquaculture and fishing, the key is to ensure responsible and sustainable practices and to move to catching fish at lower levels in the food chain. Aquaculture and feed for aquaculture should also be included in fisheries partnership agreements between the EU and Southern partner countries. Related to this, and as

highlighted in the official communication of the ‘farm to fork’ strategy, imported food products from third countries must comply with the EU’s environmental standards. We call on the EU to ensure fair and just conditions of the people working in these third countries and to ensure that the fishing undertaken in those countries do not overexploit their ecosystems, and thereby exporting the environmental impacts of the fish we eat in Europe to less developed nations.

Finally, the ‘farm to fork’ strategy should be forward-looking and include climate change impacts, not only on land (the IPCC report on Climate change and Land is mentioned on the roadmap), but also in the ocean – by including the very important predictions from the IPCC Report on the Ocean and Cryosphere. According to the IPBES global assessment report, climate change impacts are expected to be geographically variable, with many fish populations projected to move poleward due to ocean warming, meaning that local species extinctions are expected in the tropics. However, that does not necessarily imply an increase in biodiversity in the Polar seas, because of the rapid rate of sea ice retreat and the enhanced ocean acidification of cold waters. The ‘farm to fork’ strategy should include the impact of these dramatic changes in the food we will consume in Europe in the future.

In conclusion, ensuring sustainable food production from the oceans while protecting biodiversity entails policy action to apply sustainable ecosystem approaches to fisheries management; spatial planning (including the implementation and expansion of marine protected areas); and more broadly, policy action to address drivers such as climate change and pollution (IPBES, 2019).