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DG MARE**Comments to the ISC/2020/01398 on the Farm to Fork Strategy** (Ares(2020)1333725)**Positive Opinion with Comments**

DG MARE welcomes the text presented and gives its positive opinion, provided the following comments are taken into account:

Draft Communication

- In the introductory chapter, add an additional reference to **innovation** as the driver for the food system's sustainable change.
- There is a need for **greater coherence on wording and figures** throughout the text. While page 3 highlights that "almost half of the EU agricultural GHG emissions come from the animal sector", page 7 states that "nearly 60%" of agricultural GHG emissions are linked to animal farming". Consistency in terms of wording is also important: "animal farming" should be preferred to "animal sector", as the latter seems to put the responsibility of GHG on animals more than on human activities related to animal exploitation.
- On chapter 2, the Communication should include an **ambitious target on fertilizers**. DG MARE recalls that excess nutrients from fertilizers are harmful for both human health and the environment. The Green Deal Communication promised an "increased level of ambition" in the reduction of fertilizer use. Nitrogen and phosphorus pollution are among the four planetary boundaries being exceeded, demanding urgent action. Climate, health and environmental impacts are severe, as is the negative cost for our economy on the whole. The Commission should take a leading role in this regard, by conveying a strong political message and calling for a 50% reduction on the use of fertilizers. Alternatively, a zero pollution target should be set. A reference to the reduction of the surplus by 2030 is also indispensable in the target setting.
- DG MARE welcomes the reference to the **Guidelines for Aquaculture** and would like to clarify that this new initiative consists in replacing the existing Guidelines for Aquaculture (dating from 2013). A Communication in this regard is envisaged for Autumn 2020. The increased production and use of algae will be promoted through a distinct set of Guidelines on Algae. The following wording is, thus, suggested: "(...) The Commission will **also** provide guidance on how the innovative algae industry (...)".
- On section 2.2, please add the word fishers in the following sentence: "will help farmers and fishers to capture a fair share (...) for farmers "and fishers" cooperation". Additionally, on the following reference: "carbon capture by farmers with payments through cap", DG MARE calls attention to the fact that **the fund supporting the implementation of the CFP also rewards carbon capture services**. 30% of the overall financial envelope of the European Maritime and Fisheries Fund for 2021-2027 is has been announced to support actions that contribute to the achievement of the Union's climate objectives. For instance, this Fund may support investments that reduce the carbon footprint of aquaculture and promote carbon capture in the aquaculture sector. It would be important to stress that objective as a platform for of negotiating meaningful operational programmes (in shared management) with Member States, that include real, effective carbon reductions.

- On section 3.1, **R&I examples on fisheries and aquaculture are missing from the narrative**. DG MARE suggests including a reference to its planned actions on **digitalisation and on artificial intelligence for the fisheries and aquaculture sector**. In this regard, the Commission will 1) promote the full digitalization of the entire supply chain of fisheries and aquaculture products, also guaranteeing the traceability of these products and 2) promote the introduction of artificial intelligence on board of fishing vessels, on imports, and on weighting and processing premises, to facilitate control by competent authorities. A reference to the opportunities of using **Marine Data bases** is also missing from the current text.
- We welcome the allusion to farmed fish and seafood as low carbon footprint food. Still, the narrative would be enriched with a reference to the **important ecosystem services of certain forms of aquaculture, and their contribution to climate change mitigation and adaptation**. Algae and mussel farming, for instance, can help absorb additional carbon emissions as well as nutrients from agriculture and fish farms. Aquaculture can also help preserve or recover wetlands, highly valuable in addressing climate change impacts.
- On the spending target for sustainable seafood farming under the EMFF (1 bn €), DG MARE proposes the following wording: "The next **Maritime and Fisheries Fund** is likely to spend more than EUR 1 billion to support sustainable food farming", to account for the shared management nature of the expenditure.
- On page 13, last bullet point, on the reference to **building "green" alliances**, DG MARE suggests deleting the reference to the color. Together with the word "alliances", it gives the impression that we refer to political alliances between parties. "Blue" would actually be more appropriate in this regard. The following wording is suggested as an alternative: **"build alliances with third countries"**.
- On page 14, the sentence "the EU will continue to fight overfishing" should convey the message that the EU will continue to fight illegal, unreported and unregulated (IUU) fishing. The following amendment is requested: **"the EU will continue to fight overfishing and illegal fishing"**.

Draft Action Plan

- DG MARE welcomes the Action Plan in its current format, only mentioning relevant new initiatives. Still, given the importance of fisheries in our food system and its almost absolute absence from the text, a reference to the **Action Plan for a Better Implementation of the Common Fisheries Policy** (expected by 2021) would be highly welcomed.
- On the proposal for a **sustainable food labelling framework to empower consumers**, DG MARE recalls the relevance of fisheries and aquaculture products in this context, and requests the listing of DG MARE among the leading services for the initiative.