

## ESPP input: **EU public consultation on the Roadmap for updating guidelines for Aquaculture**

*Deadline = 21<sup>st</sup> April 2020* <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12261-Strategic-Guidelines-for-EU-aquaculture-update>

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ESPP supports the emphasis on the Green Deal and the Farm to Fork Strategy. Key aspects are to improve the nutrient footprint of aquaculture feedstuffs, to reduce the environmental impacts of nutrient losses from aquaculture (both offshore and freshwater) and to implement where possible nutrient recycling. Also, as indicated, some forms of algae and shellfish production can contribute to depollution, by nutrient 'harvesting'.

R&D and commercial testing is needed to improve the feed efficiency and the environmental footprint of vegetable-based aquaculture feeds, in particular improving uptake (digestibility by fish, in particular salmonidae) of plant phosphorus (esp. phytate) and developing efficient use of local crops or crop residues or food processing by-products. Better understanding of the nutrient flows in aquaculture feed production and use is also needed. This should include phosphorus and nitrogen footprints for aquaculture consumer products. For these aspects, links should be made to the integrated nutrient strategy proposed in Horizon Europe and in the Green Deal, as well as to EU water policy and eutrophication.

ESPP supports the proposal to integrate aquaculture into the Industrial Emissions Directive (public consultation underway in parallel).

Recycling of fish manure (nutrients, organics) should be integrated into the new EU Fertilising Products Regulation, with appropriate sanitisation and safety criteria.

The European Sustainable Phosphorus Platform (ESPP) promotes the implementation of sustainable phosphorus management in Europe, in particular phosphorus recycling. ESPP is a non-profit organisation, funded by its members. The Platform has over 40 members from a range of different industries (water and waste companies, mineral and organic fertilisers, chemicals, recycling technologies), knowledge institutes and public establishments.

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