

Policy brief

“The rich man’s fish feeds on the poor man’s sardinella”¹

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This policy brief summarizes the most important points of the report published by Greenpeace and Changing Markets on the use of small pelagic fish resources in West Africa in aquaculture. It focuses on the role played by European countries as producers and importers of fishmeal and fish oil in order to propose solutions applicable to the European Union and its Member States, based on the report's recommendations.

1. Overview

Beginning of June, Greenpeace and Changing Markets launched a joint report called “*Feeding a Monster: How European aquaculture and animal feed industries are stealing food from West African communities.*” This report starts by emphasizing that “*every year, over half a million tons of fresh fish that could be feeding millions of people in West Africa are being diverted to produce fishmeal and fishoil (FMFO) in order to feed animals in industrial aquaculture and farming.*”

As CFFA and its partner CAOPA³ have highlighted numerous times, **this diversion of small pelagic fish resources from human consumption towards animal feed, undermines food security in the whole West African region, particularly because it prevents women fish processors’ access to raw material.**

Globally, highlights the report, “*roughly one-third of fishmeal goes to the agricultural sector,*” to feed pigs and chickens in industrial farms. However, “*aquaculture became*

¹ The title of this article quotes an article by APRAPAM, a Senegalese civil society organization, which promotes responsible fisheries. Available only in French at : <https://aprapam.org/publication/contributions/le-poisson-du-riche-se-nourrit-avec-la-sardinelle-du-pauvre>

² GREENPEACE AFRICA, CHANGING MARKETS, “Feeding a monster: How European aquaculture and animalfeed industries are stealing food from West African communities”, June 2021. Available at: <http://changingmarkets.org/wp-content/uploads/2021/05/Feeding-a-Monster-EN-low-res.pdf>

³ CAOPA, “Fishmeal plant: A threat to food and nutritional security?”, 21 April 2021. Available at : <https://caopa.org/en/fishmeal-plant-a-threat-to-food-and-nutritional-security/21/04/2021/news/3254/>

the dominant user of ‘reduction fisheries’ (which supply fish for FMFO rather than for direct human consumption) in the early 2000s. In 2016, 69% of fishmeal and 75% of fish-oil production went to seafood farming.”

The report title suggests that its findings apply to the European continent, which includes both EU countries and non-EU countries that are major importers of West Africa fishmeal such as Norway. Some of the recommendations have a particular relevance in the EU context, given its focus on sustainable food systems but also the increasing share (25% in 2019)⁴ of farmed seafood products in EU consumption. **In this article, we extract from the report the main findings related to the European Union and its Members States, and we look at how some of the recommendations may be implemented in the EU.**

It needs to be noted that the report focusses on the relatively modest part of the FMFO coming from West Africa to the European continent, altogether only 18% of the production, with the rest being exported mainly to China. This brings forward the question **whether the report recommendations, if they were to be only applied by European countries, would change the pattern of production of fishmeal and fish oil in West Africa, China being the main driver of the world demand for FMFO.**

2. In the dark : Fishmeal and fish oil production in West Africa

A recurring observation in the report is the opacity of the FMFO value chains in West Africa, reinforced by their complexity : *“While sardine, sardinella and bonga are directly consumed by coastal communities in West Africa, once they are rendered into fish oil or meal they become just another globally traded commodity that might be substituted with Peruvian anchoveta, added to Brazilian soymeal, fed to salmon in Norway, pigs in Denmark or taken as capsules by affluent consumers to supplement their diet.”*

Trade data is fragmented and many discrepancies exist between trading partners’ FMFO import and export declarations. Despite these shortcomings, *“the information gathered in this report makes it possible to **draw links between the consumption of farmed fish, seafood and animal feed in Europe on the one end, and extractive and unsustainable reduction fisheries in West Africa on the other.**”*

Without surprise, one of the main recommendations is for policy makers *“to implement stricter regulations on due diligence and transparency in aquafeed and animal feed supply chains,”* and for retailers to provide full transparency about farmed seafood supply chains, including *“the identity of suppliers, processors, aquafeed companies and fishmeal and fish oil producers, and the location of reduction fisheries.”*

Transparency in maritime fisheries, including in the FMFO value chain has been high on West Africa civil society agenda for quite some time.⁵ Remarkably, Mauritania,

⁴ EU SCIENCE HUB, “EU aquaculture report : sales value goes up while volume remains steady”. Available at: <https://ec.europa.eu/jrc/en/news/eu-aquaculture-report-2020>

⁵ See the sixth forum of APRAPAM that took place on the 19th of may 2016. Only available in French at: <https://www.aprapam.org/images/migrate/2016/04/rapport-du-sixieme-forum-aprapam.pdf>

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one of the main producers of FMFO in the region, is at the forefront of the Fisheries Industry Transparency Initiative (FiTI) which reports on the degree of transparency in 12 fisheries related areas, including post-harvest processing like FMFO production. However, **the recently published first Mauritania FiTI report⁶ only covered 6 of the 12 areas, and did not include the post-harvest section.** It will be interesting to see how much information is available about the FMFO production in Mauritania in the next annual FiTI report that is expected to address all the sections.

On the EU side, there is also definitely room for improvement when it comes to the transparency and traceability of farmed seafood using FMFO. Today, it is today impossible to know whether farmed salmon sold in the EU has been fed with FMFO coming from West Africa, or even if the FMFO has been sourced legally. Indeed, the EU IUU regulation, which includes the delivering of a catch certificate to show that the fishery products come from legal operations, does not cover fishmeal.⁷

The European Green Deal and the Farm to Fork strategy strive to increase transparency across food systems, therefore contributing to deliver environmental sustainability safe food, food poverty reduction and empowerment of communities. The issues of traceability and transparency for farmed seafood products, including on their use of FMFO, should be raised, notably through the EU Food 2030⁸ policy to align farmed seafood production with these EU strategies.

3. The root of the evil in Europe : intensive salmon farming

The report recalls that the global FMFO production is dominated by a few large companies, three of these being Norwegian: Cargill Aqua Nutrition/EWOS, Skretting, and Mowi (*formerly Marine Harvest*) – the fourth, the Danish company BioMar. “*Norway is the largest producer of aquafeed, contributing 45% of the region’s total aquafeed production (1.83 million MT), followed by Turkey.*” Producing fishmeal is a lucrative business: “*in 2017, these four leading European aquafeed producers reportedly had combined sales of \$3.3 billion, including Norway-based companies Cargill Aqua Nutrition/EWOS (\$2.19 billion, estimated),¹²⁴ Skretting (\$742 million) and Mowi (\$371 million), and Denmark’s BioMar (\$2.6 million).*”

Norway is also described in the report as the “*home*” of salmon farming. **In the last decades, many have denounced the catastrophic consequences of the intensive salmon farming in Norway,⁹ -the main source of farmed salmon imports to the EU- and in the UK (Scotland),¹⁰ where many farms are owned by Norwegian companies.**

Farmed salmon are fed on processed food that includes FMFO, and are treated with medicines to fight against diseases and parasites such as sea lice, that literally eat the

⁶ First report of Mauritania to the Fisheries Transparency Initiative (FiTI), 18 May 2021. Available at: https://www.peches.gov.mr/IMG/pdf/gmn_vfrapport_fit_mauritanie_2018_20210518.pdf

⁷ NOAA, “European Union IUU Frequent Questions”, 25 February 2020. Available at: <https://www.fisheries.noaa.gov/national/seafood-commerce-certification/european-union-iuu-frequent-questions>

⁸ EUROPEAN COMMISSION, “Food 2030, Research and innovation policy to make our food systems ready for the future”. Available at: https://ec.europa.eu/info/research-and-innovation/research-area/environment/bioeconomy/food-systems/food-2030_en#what-is-food-2030

⁹ BBC NEWS, “Is there a problem with salmon farming?”, 20 May 2019. Available at: <https://www.bbc.com/news/uk-scotland-48266480>

¹⁰ See the campaign against salmon farming in Scotland. Available at: <https://scottishscamon.co.uk/>

fish alive. Their pens are placed in coastal waters, with thousands of tons of waste (including pesticides, fish feces, food waste) released into the surrounding environment. Sea lice from farmed fish pens also plagues wild salmon as they swim past fish farms.

Adding to the problems of intensive salmon farming, the Greenpeace/Changing Markets report underscores that **these major FMFO producing companies have all been connected to West African FMFO suppliers** in recent years: *“Well-known retailers across Europe are sourcing farmed fish (such as salmon) from companies linked in a supply chain to the big four aquafeed companies – EWOS/Cargill, Biomar, Skretting and Mowi – which are involved in the trade of FMFO from West Africa.”*

For the authors, the use of fishmeal and fish oil needs to be phased out across the entire industry for transformational change to take place. Such a recommendation also echoes what artisanal fishing communities have been asking: **Based on its negative environmental, social and economic impacts, West African governments should phase out any fishmeal and fish oil production using fish fit for human consumption.**

For the EU, this may sound like wishful thinking, given the increasing consumption of (imported) farmed carnivorous seafood, especially salmon by European consumers. However, **a slight breeze of change¹¹ can be felt in the recently adopted ‘Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030’,** which promote *“low-impact aquaculture (such as low-trophic, multi-trophic and organic aquaculture).”* These guidelines also emphasize how *“limiting feed producers’ reliance on fish meal and fish oil taken from wild stocks (e.g. using alternative protein ingredients such as algae or insects or the waste from other industries)”* will improve the environmental performance of the EU aquaculture sector.

4. EU companies’ direct involvement in FMFO production in West Africa

The report shows that the EU - mainly Greece, Spain, Denmark, Germany- receives 16% of the total fishmeal exports from the West Africa region to Europe. If that percentage is relatively modest, it is a different story when it comes to fish oil. The EU, and France in particular, is a major market for West African produced fish oil. The report highlights that in 2019, *“more than 70% of the 35.000 tons of fish oil produced by Mauritania, the largest exporter of FMFO in the region, was destined for the EU [...] with France totaling over 60% of the EU imports from Mauritania, followed by Denmark.”* When it comes to fishoil from Senegal, *“Spain is the main importer with 2,116t out of a total of 4,836t.”*

The report highlights that the main French importing company is Olvea, a supplier of vegetable and fish oils for animal feed and human consumption. Whilst its headquarters are located in Fécamp (France), the company also has a refinery in

¹¹ GOREZ, Béatrice, “The EU new approach on blue economy should recognize that artisanal fisheries are the main provider of “ocean livelihoods” in Africa”, CFFA-CAPE website, 8 June 2021. Available at: <https://www.cffacape.org/publications-blog/the-eu-new-approach-on-blue-economy-should-recognize-that-artisanal-fisheries-is-the-main-provider-of-ocean-livelihoods-in-africa>

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Morocco and a storage plant in Mauritania, and is the largest buyer of fish oil from Mauritania. France therefore plays a key role as an “end market” for fish oil from West Africa, that deprives millions of West Africans of access to this essential source of fatty acids and vitamins.

But EU companies are not only *buyers* of FMFO from West Africa. Some are also *producing* FMFO in West Africa, causing havoc in coastal communities, like the Spanish company Barna that opened a fishmeal plant in Cayar (Sénégal).¹²

Many in Cayar are opposed to the factory, believing it will only contribute to the destruction of the already fragile small pelagics resource. Another reason for the population’s anger is “*the disastrous environmental consequences of the dumping of waste water and the stench that the factory has given off since it started production*” which has led to “*the appearance of many respiratory infections in the area.*”

To address such situations, the Greenpeace and Changing Markets report calls for urgent drastic action: “*Governments should support the phase-out of wild-caught fish for use in aquafeed and animal feed. They can start by immediately withdrawing subsidies and other public support measures for aquaculture that relies on wild-caught fish.*”

This demand is strongly supported by CFFA and its partners, as we called earlier¹³ on European businesses with vested interests in the fishmeal sector to “*end their reckless investments and support for fishmeal and fish oil in Mauritania, Senegal and the Gambia.*”

Companies such as Olvea spent considerable means in green washing their image,¹⁴ including by financing and engaging with a ‘fisheries improvement project’ (FIP) in Mauritania, aimed at helping the fish reduction industry become more responsibly managed.

As we denounced at the time, these efforts are highly dubious, given the structural overcapacity of small pelagic fishing and FMFO processing that exists in Mauritania and in the region. Such ‘eco-labelling’, ignores the fundamental point that the rights of local artisanal fishers, food processors and traders, as well as people’s right to food in the region, must take precedence over the profits of FMFO companies in developed countries.

CAOPA, which represents African small-scale fishing communities, pointed out recently that “[i]t would be **unjustifiable for us if aquaculture dependent on fishmeal, produced in competition with fishermen fishing for human consumption, were to be declared sustainable.**”

¹² MBAYE, Samb, “Sénégal: vive polémique autour de l’installation d’une usine de farine de poisson à Cayar”, 12 December 2019, press article only available in French at: <https://www.afrik.com/senegal-vive-polemique-autour-de-l-installation-d-une-usine-de-farine-de-poisson-a-cayar>

See also LE QUOTIDIEN, “Cayar pollution environnementale à cause d’une usine de farine de poisson : Alioune Ndoye dans une vague de protestations”, 9 April 2021. Available at: <https://lequotidien.sn/cayar-pollution-environnementale-a-cause-d-une-usine-de-farine-de-poisson-alioune-ndoye-dans-une-vague-de-protestations/>

¹³ STANDING, Andre, “European industries must disinvest in West Africa’s booming fishmeal and fish oil sector”, CFFA-CAPE website, 10 December 2019. Available at: <https://www.cffacape.org/publications-blog/european-industries-must-disinvest-in-west-africas-booming-fishmeal-and-fish-oil-sector>

¹⁴ See the website of OLVEA Fish Oils. Available at: <https://www.olvea-fish-oils.fr/actualites/>

5. If the EU wants sustainable aquaculture, it must ban intensive fish farming

Given the current EU focus on supporting sustainable food systems at home and internationally, the first step should be to improve transparency for farmed seafood products, including imported ones. Such transparency must extend to the origin of the FMFO used in the feed of these farmed products.

In line with its commitments to support “*low-impact aquaculture (such as low-trophic, multi-trophic and organic aquaculture)*,” **the EU should also withdraw all subsidies and public support to fishmeal dependent intensive fish farming.** This is a first step. On longer term, the EU should go further, and, like Argentina,¹⁵ **completely ban intensive fish farming.**

An EU sustainable approach to fish farming has to be reflected in its trade policy. Farmed fish that has been produced in unsustainable environmental and social conditions, including when the fish feed uses FMFO from West Africa, threatening the food security of millions, should not be imported onto the EU market. Similarly, fish oil from West Africa, of which the EU (France in particular) is a major consumer, should not be imported by the EU, if it is serious about promoting sustainability internationally, and fight against hunger.

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¹⁵ HO, Sally, “Argentine takes lead as world’s first country to ban salmon farming”, Green Queen, 5 July 2021. Available at: <https://www.greenqueen.com.hk/argentina-bans-salmon-farming/>