

## Policy paper – key messages

European Fishmeal and Fish Oil Producers (EFFOP) represents European producers of fishmeal and fish oil, a major fish processing industry with a key role for fisheries, aquaculture, and agriculture. Our members produce high-quality products, with a low carbon footprint, based on sustainable raw material supplies: forage fish as well as by-products from the fish processing industry.

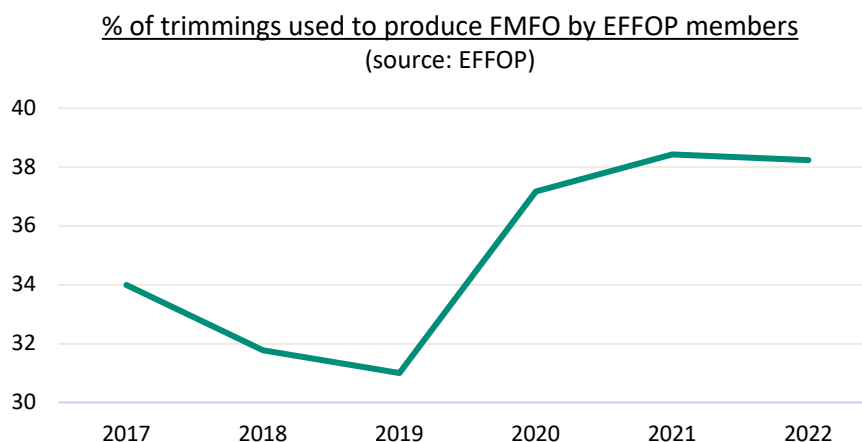
Our member countries include Denmark, United Kingdom, Ireland, Norway, Iceland, Faroe Islands, Germany, Estonia, Latvia, Finland, and Malta.

The European industry excels in the international competition, setting a benchmark for excellence. The factories' commitment to continuous quality control ensures fresh raw materials and traceable products that comply with quality requirements and safety standards throughout the distribution chain.

## Valorising fisheries side-streams

Fishmeal and fish oil are produced mainly from small, short-lived fish with little or no value for direct human consumption as well as recycled trimmings from fish processing for human consumption. The most important fish species are capelin, sand eel, blue whiting, sprat, and Norway pout. All fisheries are strictly regulated and catch limitations are always based on scientific advice from the International Council for the Exploration of the Sea (ICES).

A growing amount of raw material comes from recycled trimmings. The fillet yield for most fish species varies between 30% and 65% of the mass of the fish, and the cutoffs constitute a valuable resource for marine ingredients producers. Full use of valuable marine resources is thus obtained.



The use of cut offs has increased significantly over the last few years and today, EFFOP members use around 40% of cut offs. It should be noted that some plants only process trimmings to produce fish oil and fish meal.

European industry is leading in optimizing the exploitation of these valuable marine resources, contributing to the circularity of the blue economy, and reducing the environmental footprint of aquaculture production.

### **Barriers faced by the industry to optimize the use of valuable natural marine resources.**

In Europe pelagic fishing vessels are modern and equipped with RSV tanks that ensures the freshness and high quality of the fish when landed to the factories.

To produce fish oil for human consumption, producers need to process food grade raw materials, following food safety regulation requirements, in food grade plants. However, European plants face a significant challenge in pursuing the production of fish oil for food due to the co-existence of animal by-product materials processed within the same establishment. Certain fishery products, and in particular cut offs from the processing industry, are indeed classified as animal by-products, and once declared animal by-product, such raw materials cannot be upgraded and processed for food markets. Mixing different raw materials, approved for food or for feed, is not permitted either.

As responsible manufacturers, we recognize the importance of adhering to strict hygiene measures and ensuring that facilities meet food-grade standards to produce fish oil for human consumption. Nevertheless, it seems regrettable that a large proportion of raw materials cannot be valued in food markets. Particularly when current industrial processes, logistics and appropriate hygiene rules can ensure the safety and freshness of these materials.

We believe solutions can be discussed to enable European factories to optimize valuable natural marine resources and provide European consumers with healthy omega-3 fatty acids produced from European fish stocks. Currently fish oil for human consumption use is imported into Europe. Therefore, EFFOP is working on operational scenarios that could enable European producers to make the most of aquatic resources, offering the food and feed sectors high-value products, while ensuring full compliance with European legislation.

We have been engaged in a dialogue with the Commission for several years, and we are positive about the outcome of these discussions for the competitiveness of our industry and to move even further towards a circular blue economy.