

EU CODE OF CONDUCT ON RESPONSIBLE FOOD BUSINESS AND MARKETING PRACTICES

A common aspirational path towards achieving sustainable food systems

EFFOP Annual report 2025

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Date of signature of the Code:	19 July 2021
Step of the food chain represented:	Processing sector
Who do you represent?	EFFOP represents 13 national Associations and producers in 13 EU and EFTA countries. Alongside the 40 producers represented by the trade association, 16 companies involved in the fishmeal industry contribute to EFFOP's missions as associated members.

EFFOP – Marine Nutrients Europe pledges to:

- **endorse the aspirational objectives set out in this Code**

Yes

- **promote and disseminate this Code with(in) its constituency**

Before signing the Code, EFFOP's Secretariat had informed the members of the Board about its scope and content. As an industry, marine ingredients is all about maximising the value of aquatic resources and providing food and feed chains with high quality ingredients derived from responsibly harvested marine resources and circular materials. For years now, our industry has been committed to improving its sustainable performance to limit its environmental footprint.

Signing the Code of Conduct was therefore a logical step in implementing EFFOP's strategy.

In order to disclose EFFOP's pledge to its members, associated members and interested parties, EFFOP has published a [statement](#) on its website.

Since then, EFFOP's General Assemblies and communication channels such as its website and LinkedIn page have been the main vehicles for disseminating the Code.

- **encourage its members to align their sustainability actions and/or business practices to the aspirational objectives and targets of the Code and invite them, on a voluntary basis, to adhere to this Code, as appropriate**

Sustainability in marine ingredients production is crucial for maintaining the health of marine ecosystems and ensuring the long-term viability of the industry. By aligning with the EU Code of Conduct, EFFOP members can demonstrate their commitment to reducing their environmental footprint, fostering a culture of responsibility, and contributing to a more sustainable future. Marine ingredients are in competition with other alternative protein sources. However, the growing preference for sustainable, low-carbon, traced-origin feed ingredients could favour fishmeal and fish oil. To this end, EFFOP actively promotes the role of marine ingredients in sustainable food systems, emphasising their nutritional value, traceability, and low environmental footprint. European marine ingredients, including fishmeal and fish oil, remain foundational to responsible aquaculture feeds and broader feed markets, with their low-carbon characteristics increasingly recognised in policy discussions and scientific assessments.

In line with the Code's sustainability aspirations, EFFOP has continued to support robust life cycle assessment (LCA) data initiatives and the integration of environmental footprint metrics into marine ingredient profiles. These efforts reinforce the relative carbon advantages of marine proteins and oils compared with many plant-based alternatives and strengthen evidence-based sustainability messaging across the value chain. Indeed, the Danish LCA database shows that fishmeal has an average carbon footprint of 0.912 kg CO₂ eq per kg. Compared to the carbon footprints of soy protein (meal and protein concentrate) or insect meal, fishmeal has a carbon footprint that is 3-6 times lower. Similarly, fish oil has a carbon footprint of 1.535 kg CO₂ eq per kg, which is almost half the emissions of rapeseed oil. In collaboration with the International Fishmeal and Fish Oil Organisation (IFFO), EFFOP is pursuing its project to enhance the Global Feed LCA Institute (GLFI) database with accurate Product Environmental Footprint (PEF) profiles for European fishmeal and fish oil. Thanks to EFFOP members' commitment to provide up-to-date data, accurate PEF profiles for European marine ingredients were provided in 2025.

In addition, a significant portion of EFFOP members' raw materials, approximately 40%, comes from recycled by-products generated during the processing of fish intended for human consumption. The industry is increasing its efforts to incorporate more by-products into processing. These efforts not only promote resource efficiency but also support the circular economy by making better use of available resources.

EFFOP's engagement with external partners and certification frameworks, such as [MarinTrust](#), the [Marine Stewardship Council \(MSC\)](#), and the [Aquaculture Stewardship Council \(ASC\)](#) further supports members' alignment with recognised sustainable practice standards, as these standards contains requirements similar to the objectives of this Code.

- **explore the possibility of developing sector-specific tools and resources in support of this Code**

Our association is also a forum for sharing knowledge and expertise between our members. Throughout 2025, EFFOP continued to provide tailored sector-specific resources and platforms, such as workshops, webinars and working groups, for knowledge exchange that support the implementation of sustainable practices relevant to the Code. The Secretariat regularly informs EFFOP members of regulatory updates and new scientific studies relevant to the sector.

EFFOP is involved in environmental footprint for several years. The collaboration with IFFO to update the PEF profiles for fishmeal and fish oil, as explained above, is a sector-specific tool directly linked to the [aspirational objective 3. “A climate neutral food chain in Europe by 2050”](#).

EFFOP is constantly emphasising the need to promote the circularity of feed and food systems. Good management of fish stocks is essential to the survival of our industry, which is why using all parts of aquatic resources must be a priority.

This is why, in 2024, EFFOP joined forces with seven industry associations and stakeholder organisations to develop a catalogue of actions aimed at improving feed circularity. EFFOP was actively engaged in drafting the catalogue which was released in May 2025. The document provides decision-makers with recommendations on how to design a regulatory framework that supports feed circularity while maintaining feed safety. We presented two specific case studies that demonstrate how our industry can enhance feed circularity: lifting the ban on using fishmeal in feed for ruminants (following EFSA approval) and expanding the definition of fishmeal and fish oil.

In addition, EFFOP delivered to the Directorate-General for Health and Food Safety (DG SANTE) a draft industry guideline for the production of food grade fish oil in European factories. Indeed, together with its members, EFFOP advocates for a better regulatory framework that would enhance the possibility to place on the EU food market fish oil from European origin. By developing an industry guide to food grade fish oil and having worked on a catalogue on feed circularity, EFFOP fully supports [aspirational objectives 1. “Healthy, balanced and sustainable diets for all European consumers”, 2. “Prevention and reduction of food loss and waste”, 4. “An optimised circular and resource-efficient food chain in Europe” and 6. “Sustainable value creation in the European food supply chain through partnership”](#).

Finally, it must be remembered that EFFOP is committed to working in collaboration with the scientific community, whose opinion is central to determining fishing quotas. We advocate that the management of fish stocks should follow scientific advice, which is entirely in line with the [aspirational objective 7. “Sustainable sourcing in food supply chains”](#). The Secretariat participates in the [International Council for the Exploration of the Sea \(ICES\)](#) working group meetings and events and provides EFFOP members with relevant information on the biology and status of fish stocks. We also closely followed the negotiations between the coastal states on the allocation of pelagic stocks for 2026. Furthermore, EFFOP is a full member of the North Atlantic Pelagic Advocacy (NAPA) since 2024 and also seating at its Steering Committee. NAPA is a coalition that lobbies for a sustainable, science-based agreement among coastal

states for the management of mackerel, herring and blue whiting. EFFOP represents the fishmeal and fish oil industry within NAPA, actively participating in each species' working group.

- **continue to engage in dialogue with other food chain/systems actors and EU and international policymakers to forge (new) relationships, exchange good practices and discuss challenges encountered, learn from each other (studies, projects) and create better mutual understanding, and identify opportunities for collaboration and potential partnership**

As a representative for the European fishmeal and fish oil industry, EFFOP maintains an active and strategic policy dialogue with EU institutions, international organisations and key actors across the food and feed value chains. The Secretariat and Board engaged with EU policymakers on a range of legislative and regulatory files, providing evidence-based feedback on issues including animal feed sustainability, fisheries and aquaculture policy, and environmental reporting frameworks.

In 2025, our policy engagement demonstrated a broader and deeper involvement in key EU public consultations on several strategic initiatives, underlining EFFOP's constructive role in shaping policies relevant to sustainable blue food systems and circular bioeconomy frameworks. In addition to providing feedback on the simplification of food and feed safety regulations and delegated acts for fisheries control and enforcement, EFFOP submitted formal responses to several consultations launched by the European Commission, including:

- Regarding the [Vision for Agriculture and Food](#), we advocated for the explicit integration of seafood production and marine ingredients within the overarching agriculture and food framework. We also emphasized the value of marine-derived nutrients for food security, sustainable diets and carbon-efficient food chain solutions, and urged policy makers to ensure that aquatic production is not marginalized compared to agriculture in the future design of EU food policy.
- EFFOP's submission to the consultation on the [EU External Fisheries Strategy](#) emphasized the need for science-based, long-term fisheries management in external relations, in particular to ensure sustainable access and equitable quota sharing. It called on the EU to promote constructive international engagement mechanisms and to ensure equivalent environmental standards for imported seafood, emphasizing the importance of global ocean governance for sustainable value chains.
- In response to the consultation on the forthcoming [Circular Economy Act](#) EFFOP highlighted the strategic role of marine raw materials in a systemic circular economy and called for a regulatory framework that enables value-added use of marine resources while removing unnecessary barriers in animal by-products and hygiene legislation that currently hinder resource efficiency. We also urged the prioritization of contaminants, such as PFAS, that compromise the quality and market acceptance of recovered marine materials.

By contributing substantive evidence and policy positions to these various consultations, EFFOP has reaffirmed its commitment to evidence-based policy dialogue and to ensuring that the perspectives of

the marine ingredients sector are reflected in the shaping of EU regulatory and policy frameworks relevant to the Code's aspirational goals.

In November 2025, the EFFOP Board met with the European Commission's DG SANTE in Brussels to discuss the regulatory framework of the fish oil production and the maximum limits for contaminants, as well as the importance to gather data and develop trustful analysis method while setting limits in the EU regulation. Further discussions with the UK Mission to the EU centred on sustainable resource management in the North Atlantic. The Board also met with EAPO and FEAP, a signatory to this Code representing respectively the European producer organisations in fisheries and aquaculture producers, to discuss among other things, the need to strengthen sustainable seafood production. The last meeting with a MEP representative of the Committee on Fisheries allowed us to present our industry and how marine ingredients producers are a key player in the European food production.

EFFOP also collaborates closely with FEFAC, also signatory to the Code, particularly on matters concerning the enhancement of sustainability and circularity within the feed industry.

Moreover, EFFOP is a member of several Advisory Councils (ACs), including the Pelagic Advisory Council (PelAC), the North-Sea Advisory Council (NSAC), Market Advisory Council (MAC) and the Aquaculture Advisory Council (AAC).

The last two ACs work on responsible food production, sales and marketing practices. Pursuant to the Common Fisheries Policy, the ACs advise the European Commission and EU Member States on matters relating to aquaculture production and the market of fishery and aquaculture products. They bring together stakeholders from across the seafood value chain and other interest groups. EFFOP has contributed to several advices released in 2025 dealing with subjects closely related to the objectives set out in this Code, such as: [MAC advice on Development of Fishery Sustainability Indicators by STECF](#), [the AAC Recommendation on the draft Code of good practices on fish welfare and fish welfare indicators](#), [MAC advice on the Vision for Fisheries, Aquaculture and their Market in 2040](#), [the AAC Recommendation on Industrial Contaminant Levels in Aquaculture and Climate Change](#), [the AAC Recommendation for a Vision for Aquaculture in 2040](#), [the AAC Recommendation on the draft guidance document on environmental performance in EU aquaculture](#).

At the international level, EFFOP naturally works closely with IFFO, MarinTrust, Marine Stewardship Council (MSC), and the Aquaculture Stewardship Council (ASC). EFFOP is also a member of the North Atlantic Pelagic Advocacy (NAPA).