



Future Strategic Guidelines for the sustainable development of EU aquaculture

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Contents

1	Introduction	3
2	Securing sustainable growth in aquaculture through optimising licensing procedures	3
3	Enhancing the competitiveness of EU aquaculture	5
4	Establishing a level playing field	6

1 Introduction

In 2009, the Commission published ‘A new impetus for the Strategy for the Sustainable Development of European Aquaculture’ as a follow up to the EU aquaculture strategy from 2002. The Commission concluded that EU aquaculture had not grown since 2002, and the 2009 communication aimed ‘to identify and address the causes of this stagnation’. The communication pointed to key challenges. In 2013, the Commission published their ‘Strategic Guidelines for the sustainable development of EU aquaculture’. The Commission concluded again that EU aquaculture production is stagnating and addressed four priority areas to unlock the potential of EU aquaculture. In 2018, the European Parliament published an own-initiative report ‘Towards a sustainable and competitive European aquaculture sector’. The report states that EU aquaculture is stagnating and that the strategic guidelines “were not a match for the sector’s expectations”. The report points to many challenges. In 2020, the Commission will draft new guidelines for the sustainable development of aquaculture in line with the Member States’ (MSs’) update of their national strategic plans. The past efforts have de facto not had the desired impact. The Aquaculture Advisory Council (AAC) finds that the main reasons are the failure to address specific key challenges and insufficient implementation. The AAC proposes that the revised guidelines are more focused and more agile with an 18-month revolving review period. The AAC stresses the importance that the guidelines aim to increase growth and reflect sectoral needs. The Shellfish Waters Directive aimed to protect shellfish growth and contribute to a high-quality product for human consumption. It has now been repealed by the Water Framework Directive (WFD). The AAC points to the lack of designated protected areas specific to shellfish farming in many Member States and calls for the new guidelines to address this issue. The AAC proposes to address three priority areas: Securing sustainable growth through optimising licensing procedures, enhancing the competitiveness of EU aquaculture and promoting a level playing field.

2 Securing sustainable growth in aquaculture through optimising licensing procedures

Establishing a new farm, or expanding an existing one, requires access to ‘physical space’. Increasing production requires ‘environmental space’ for nutrient emissions. Coordinated spatial planning can facilitate the process for the access to ‘physical and environmental space’ by identifying suitable new sites, checking the aquaculture sites’ compatibility with other activities and assessing the related environmental impact e.g. eutrophication, the effects on the wild population through escapees and the introduction of invasive alien species in the EU.

A key issue is defining ‘*environmental space*’, as this must comply with the targets in the WFD, the Marine Strategy Framework Directive (MSFD) and the Natura-2000 Directives.

This can be illustrated by the concept applied by HELCOM (Baltic Marine Environment Protection Commission - Helsinki Commission), the governing body of the Convention on the Protection of the

Marine Environment of the Baltic Sea. HELCOM has calculated the maximum allowable inputs (MAIs) of nitrogen and phosphorus for each sub-basin that can be allowed to achieve good ecological status as required by the WFD and the MSFD. The difference between the MAIs and actual inputs can be defined as ‘*environmental space*’. If the MAIs are less than the actual inputs, further reductions are needed but if they are greater than the actual inputs, the difference can be allocated to growth in aquaculture. The AAC finds that such a definition can help MS in assessing the ‘*environmental space*’ for growth in aquaculture.

The ‘*environmental space*’ must often also comply with the Natura-2000 directive. The key question is whether an aquaculture project ‘*is likely to have a significant effect*’.

The ‘*Guidance document on aquaculture activities in the Natura 2000 Network*’ (2012)¹ has not simplified the administration. The AAC argues that MS administration is too restrictive and that authorities often assume that any effect or risk of affecting a Natura-2000 area should lead to a refusal (zero-tolerance).

It follows from the guidance document that for a competent authority to authorise a project, it must be sure that ‘*no reasonable scientific doubt remains as to the absence of adverse effect*’. The AAC argues that in most cases, it is impossible for an SME to provide the required scientific documentation for ‘*no adverse effect*’ and that there is a need for a specific guideline on this issue. Furthermore, due to the importance of food security policies for the union, a basic principle of ‘acceptable environmental impact’ should be admitted.

A guideline could build on two provisions: a) extra emissions from an aquaculture operation is less than e.g. 1 % of the total inputs to a Natura-2000 area and b) the extra emissions comply with the ‘environmental space’ for the area. In such cases, the operation is not likely to have a significant effect.

In sum, the AAC points to the following targets for securing sustainable growth through simplifying licensing procedures.

Member States	<ul style="list-style-type: none"> • Collect information on the number of new licences granted in 2014–2018, the success rate of applications for licences and the main reasons for refusal (s) • Put in place measures for reducing the time and documents needed for obtaining an aquaculture licence and other authorisations involved • Put in place coordinated spatial planning for waters and land and secure an adequate allocation of space for sustainable aquaculture growth (s) • Involve (regional) authorities with competencies in areas not directly related to aquaculture but in related fields – e.g. environment, management of river basins - in the implementation of these guidelines .
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¹ <https://ec.europa.eu/fisheries/sites/fisheries/files/docs/body/guidance-aquaculture-natura2000.pdf>

Commission	<ul style="list-style-type: none"> • Identify best practices and margins for improvement (s) • Organize annual best practice seminars (o) • Disseminate studies and experiences to help MSs in their planning (o) • Prepare a guidance documents addressing 'environmental space' for aquaculture in relation to the WFD and the MSFD (s) • Prepare a guidance document aimed at speeding up the screening exercise under the Habitat directive for SMEs (s) • Set a requirement for MSs to bring existing and potential aquaculture sites up to A class water (s). • Ensure more coherence in MS' implementation of various EU regulations relevant to shellfish farming • Ensure that reducing the administrative burden is properly addressed in the National Strategic Plans for Aquaculture (s) • Draft guidelines on how to define 'sustainable aquaculture'
AAC	<ul style="list-style-type: none"> • Perform a screening of main administrative burdens (time/costs) in different types of aquaculture in the MS (s)

(s): Specific task (o): Ongoing task

3 Enhancing the competitiveness of EU aquaculture

The AAC supports that the next European Maritime and Fisheries Fund (EMFF) is simplified without predefined measures and detailed eligibility rules at the union level and that the MS can draw up a programme listing the most appropriate means for achieving national priorities. The AAC further points to the advice on the new EMFF.

The AAC notes that an increased focus on fish welfare, fish health and climate impact can help increase sustainability, social acceptance and competitiveness of EU aquaculture, and it is important that these high standards are implemented and communicated to the consumer through adequate and fair labelling.

An increased focus on fish welfare can significantly contribute to preventing the emergence and transmission of diseases by supporting the production of robust fish that are kept in conditions that best support the functioning of their immune systems.

A strategy should be established for implementing the intentions of the Slaughter Regulation 1099/2009, as called for in the parliament report referenced above² and proposed in AAC position papers³⁴.

² 2017/2118 (INI)

³ Farmed Fish Welfare During Slaughter

⁴ Fish Welfare at Slaughter

There is a need to involve young people in the farming sector through educational and vocational programmes dedicated to aquaculture.

Some types of pond fish farming and shellfish farming also provide ecosystem services for society. These services need to be recognised and valorised as a factor of competitiveness.

The guidelines should encourage MSs to focus on the fight against pathogens in shellfish due to their lack of a developed immunity.

In sum, the AAC points to the following targets for enhancing the competitiveness of EU aquaculture:

Member States	<ul style="list-style-type: none"> • Make full use of the fund to support growth through the adequate allocation of funds to aquaculture (s) • Introduce national strategic plans for aquaculture’s effective actions to reduce administrative burdens related to aquaculture (s).
Commission	<ul style="list-style-type: none"> • Ensure that the next EMFF is introduced in a timely fashion (s) • Reduce bureaucracy at the MS level by identifying best practices for the administration of EMFF (o) • Organize annual best practice seminars on EMFF (o) • Coordinate and support RDI for aquaculture through all the relevant EU programmes and funds including assessments on climate impacts from EU aquaculture (o) • Promote the transfer of EU research project findings (o) • Ensure that fish welfare is included in the work programme for the EU reference centre for animal welfare (s) • Recognise and valorise certain types of pond fish farming and shellfish farming • Encourage MSs to focus on the fight against pathogens in shellfish. • Ensure that fish welfare standards are part of the communication on the high quality of EU production

(s): Specific task (o): Ongoing task

4 Establishing a level playing field

The EU aquaculture sector must be profitable to be able to invest in innovation and sustainable growth. Profitability is only possible if the products are competitive with imports from third countries.

A significant level of EU seafood imports is provided by aquaculture in third countries. EU producers must respect strict environmental sustainability, animal health, animal welfare and consumer protection standards. The AAC does not want the EU standards to be lowered. However, to meet the objectives of an equitable level playing field, the basic production and environmental standards adhered to in the EU should be met equally by non-EU production imported to the EU markets.

The AAC supports the position of the EU Parliament that *'Calls on the Commission to ensure that under trade agreements with third partners preferential market access is made conditional upon respect for sustainability and animal welfare standards equivalent to those applicable in the EU'*⁵.

The EU and Turkey's preferential trade agreement from 1998 allows for the tariff- and quota-free import of fish from Turkey to the EU, and the AAC calls on the commission to take all necessary steps to find a lasting mutually agreeable solution with the Turkish government to allow the EU trout, sea bass and sea bream farmers to have an equally competitive environment within the EU territory.

In sum, the AAC points to the following targets for establishing a level playing field.

Member States	<ul style="list-style-type: none"> • Support the development of producer and interbranch organisations, including at the transnational level • Implement and control labelling requirements and provisions (o)
Commission	<ul style="list-style-type: none"> • To find a lasting solution with the Turkish government to ensure a level playing field with the Turkish import of farmed fish (s) • Ensure that labelling rules are fully implemented (s) • Improve markets' transparency and disseminate markets' information on trends (o) • Launch a communication campaign on the strengths of EU aquaculture (s) • Ensure that EU farming regulations are included in EU audits of third-party competent authorities (o).
AAC	<ul style="list-style-type: none"> • Support structuring aquaculture production and marketing, including certification and labelling (s) • Contribute to improved market intelligence of the sector (s) • Facilitate self-regulatory initiatives and help communication these to the consumer (s)

(s): Specific task (o): Ongoing task

⁵ Towards a sustainable and competitive European aquaculture sector; EU Parliament, Committee on Fisheries, 2018.



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