



# Aquaculture Advisory Council Recommendations on the proposal for the EMFF 2021– 2027

**Recommendation – October 2019**



The Aquaculture Advisory Council (AAC) gratefully acknowledges EU funding support.

On 12th June 2018, the European Commission published a proposal (COM (2018) 390 final) for a new regulation of the new European Maritime and Fisheries Fund (EMFF).

The Aquaculture Advisory Council (AAC) has discussed the proposal and decided to submit recommendations to the Commission.

The AAC consists of members that are representatives of sector organisations and other interest groups affected by the aquaculture components of the Common Fisheries Policy (CFP).

The AAC aims to adopt recommendations by consensus. In this case the AAC has concluded that there are marked differences in the opinions of the sector organisations and other interest groups and that it has therefore not been possible for the AAC to reach consensus on a common set of recommendations.

The AAC calls upon the Commission and the Member States (MS) to acknowledge the recommendations from both the sector organisations and the other interest groups.

Against this background, the AAC has decided by consensus to present the recommendations from both member groupings in this advice.

### **The sector organisations:**

1. Call for the EMFF to support the sustainable growth of aquaculture in the European Union (EU), contribute to lowering the environmental impact and express a stronger commitment to consumer interests.
2. Stress the importance of balancing sectoral development, environmental concerns and consumer interests.
3. Point out that EU aquaculture production has stagnated for decades and that the sector is fragmented and dominated by Small and Medium Enterprises (SMEs)/microenterprises.
4. Welcome the focus on SMEs and microenterprises and ask that large enterprises should also be eligible for EMFF support for both aquaculture production and commercialisation of their products.
5. Advise that use of financial instruments (FI) should be optional, that MS should be able to combine grants and FI and that MS should be encouraged to perform a feasibility study on the use of FI.
6. Insist that the EMFF supports actions to promote the consumption of sustainably-farmed EU aquaculture products and facilitates consumers to be aware of sustainable aquaculture farming practices in the EU.
7. Advise that aquaculture producers and enterprises (both SMEs and large enterprises) should be eligible for EMFF support, including grants, for processing their own farmed fish.
8. Suggest that stakeholders, such as scientific institutes and Non-Governmental Organisations involved in relevant projects with aquaculture producers, be eligible for EMFF support.
9. Propose that collective and innovative actions can be 100% funded.

10. Emphasise that producer organisations and interbranch organisations and their associations, including transnational ones, are key for improving sectoral stability and marketing efficiency. Their creation and operation should be assisted and their production and marketing plans intensively supported.
11. Emphasise that where interbranch organisations exist they can play a crucial role in improving sectoral structuration. Their creation should be encouraged.
12. Underline the importance of timely implementation and reduction of EMFF bureaucracy at MS level.
13. Advise the Commission to facilitate exchange of know-how and best practices in implementing and managing the new EMFF programme.
14. Advise the Commission to strengthen consultations between the AAC and DG MARE and, where necessary, DG SANTE.
15. Point to the use of IT tools to streamline and align MS EMFF management and advise the Commission to develop and implement an EMFF IT management tool.
16. Request more transparency in the EMFF implementation statistics across MS and in direct management, through the European Commission DG MARE website.
17. Underline the importance of collecting data on aquaculture (e.g. economic, veterinary and environmental data), note the existence of such collections within the agricultural sector and advise the implementation of an Aquaculture Statistical Information Network (ASIN).
18. Insist that the EMFF supports actions seeking to eradicate emerging diseases or diseases listed pursuant to Regulation 2016/429.
19. State that EMFF must aim to improve the EU's food security. EU aquaculture can contribute to reducing the gap between consumption and production of seafood in the EU in a way that is environmentally, socially and economically sustainable.

#### **The other interest groups:**

1. Stress that public money must be spent on generating public goods, e.g. gathering knowledge, finding solutions, effective planning and ensuring that rules are properly applied.
2. Advise a substantial funding shift to ensure that the sector employs the best housing systems and management practices that would effectively improve fish welfare.
3. Support the need for simplification but underline the importance of clear procedures to ensure that public money is spent where it is most needed.
4. Are concerned that delegating decisions to MS on what is eligible spending and who can access the fund will create non-strategic spending, unequal access to funds across the EU and a potential backlash against the questionable use of EU taxpayers' money.

5. Advise that at least 25% of the EMFF budget per MS should be ring-fenced for activities that protect and restore the marine environment.
6. Advise that funding must be conditional upon compliance by MS and operators with the rules of the CFP and EU farming and environmental law.
7. Underline the importance of the fund respecting the transparency principle.
8. Point to the fact that public support provided through the EMFF can crowd out private investments and lead to market distortions and overcapitalisation in aquaculture.
9. Stress that caution must be employed to ensure that aquaculture funding does not incentivise unsustainable production.
10. Point to the importance of developing defining principles of sustainable aquaculture under EU law and ensuring this definition is applied under relevant action plans.
11. Stress that EMFF funding should not be used to help aquaculture producers comply with compulsory legislation.
12. Advocate that EMFF funding supports data collection, monitoring, research, advisory services, farm staff training and spatial planning initiatives.
13. Advise that the EMFF fosters aqua-environment schemes for the conversion to eco-management, such as extensive aquaculture for wetland restoration.
14. Advise that the EMFF does not support investments that would have harmful effects, i.e. open cage systems in areas with eutrophication problems, farms that produce non-established exotic/non-native species, ranching or non-hatchery-based aquaculture—with the exception of bivalve ranching, use of chemicals, antibiotics used in human medicine, hormones and activities such as harmful predator control within protected areas.



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