



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,
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Mr. Javier Ojeda
Chairman of the AAC
ojeda@apromar.es
Rue de la Science, 10
B – 1000 Brussels
Belgium

Subject: AAC recommendation on the provision of ecosystem services by European aquaculture

Dear Mr. Ojeda,

I would like to thank you for your letter with a recommendation on the provision of ecosystem services by European aquaculture. I firmly believe that EU aquaculture should play an important role in the green transition set by the European Green Deal.

As you rightly point out, aquaculture can contribute significantly to the protection of biodiversity, enhancing ecosystem services, preserving habitats and landscapes and constituting an important part of the EU's sustainable food systems. I therefore thank you for the recommendation that presents a comprehensive overview of aquaculture activities that can provide ecosystem services. I can only agree with your conclusion that specific characteristics of these types of aquaculture should be given appropriate attention, acknowledgment and promotion by both policy makers and the public at large.

The Commission recognizes the importance of aquaculture activities that can provide ecosystem services in the new Strategic guidelines for sustainable aquaculture adopted in May last year. These guidelines point out that special attention should be given to the development of aquaculture with a lower environmental impact. They also urge for the integration of suitable aquaculture activities (notably those offering ecosystem services) into protected areas, such as Natura 2000 areas. Furthermore, the guidelines recommend that spatial planning should accommodate special areas for organic aquaculture and the production of molluscs, as well as take into account the potential of certain types of aquaculture to mitigate the impact of climate change (e.g. carbon capture or preservation of ecosystems that provide for protection against extreme weather events).

In our cooperation with Member States, DG MARE uses every opportunity to stress the importance of promoting and supporting aquaculture offering environmental services like those described above. Aware that such benefits of aquaculture remain largely unknown to the public, we have published the [brochure on EU aquaculture](#). The upcoming EU-

wide communication campaign on EU aquaculture will also be the opportunity to raise awareness among the public on this important aspect of aquaculture.

Since some of the measures you recommend are the same for shellfish farming as well as pond, lagoon and estuary finfish aquaculture, I will reply to most of them in a joint manner, while some of them you will find answered below separately.

- The Strategic guidelines recognize the importance of shellfish farming as a traditional, family-based and labour-intensive activity, producing low-trophic species that can provide ecosystem services. They recognize that pond aquaculture can provide ecosystem services if well managed. Ponds and wetlands play an important role in water retention and biodiversity conservation. These types of aquaculture also tend to have a strong link to culture and tradition in some Member States, and the Strategic guidelines call for their promotion and support. Member States can use the new 2001-2007 European Maritime, Fisheries and Aquaculture fund (EMFAF) for such support.
- Regarding administrative procedures and access to space and water for aquaculture activities in Member States, the Strategic guidelines acknowledge that further improvement is necessary. They note that particular attention should be given to production of molluscs, by making sure that spatial planning envisages special areas for their production, particularly since it depends on good water quality.
- We take note of your recommendation to collect science-based knowledge about the natural values and ecosystem services of shellfish and finfish aquaculture, especially in ponds and lagoons, as well as to follow previous AAC recommendations related to shellfish. The Commission will consider these recommendations in the future work on the implementation of the guidelines.
- The Strategic guidelines also call for promoting and supporting aquaculture contributing to climate change adaptation and mitigation. The Guidelines acknowledge that, when subject to an appropriate framework, certain types of aquaculture, such as the cultivation of seaweed and molluscs, can provide climate-mitigation services (such as carbon sequestration) or climate-adaptation services (such as nature-based coastal protection). Other types of aquaculture, when managed appropriately, can help preserve ecosystems such as ponds or wetlands. These ecosystems provide protection against climate-change impacts such as sea-level rise and floods.
- In relation to your recommendation to develop knowledge platforms with research results and promote them further, please note that the Commission is working towards setting up the EU Aquaculture Assistance Mechanism, which should serve as a tool to help the Commission, EU Member States, the industry, and other stakeholders to develop further guidance and consolidate best practices on the areas covered by the Strategic guidelines. This mechanism will include an online platform with an accessible knowledge base for all stakeholders, where all EU-funded research projects on aquaculture will be registered and their results made publicly available. We hope this will facilitate the sharing of knowledge on related funding and projects.
- Regarding production losses caused by protected species in aquaculture farms, actions should be focused on promoting and applying adequate prevention measures. Such measures could be funded under the EMFAF, provided that Member States cater for this in their operational programmes. Where necessary, compensation for losses due to predators could also be considered. The issue of management of predators will also be part of the future guidance document on environmental

performance. This document will include, inter alia, the mapping of good practices at governmental and industry level on the management of predators.

- When it comes to the application of Article 54 of the Regulation setting up the 2014-2020 European Maritime and Fisheries Fund (EMFF) on support to aquaculture providing ecosystem services, we invite you to consult the [EMFF implementation report](#) published recently. Should you need more detailed information, do not hesitate to contact our services at MARE-AQUACULTURE@ec.europa.eu.

Below you will find our comments on some other recommendations on pond, lagoon and estuary finfish aquaculture:

- We take note of your recommendation to evaluate the contribution and impact at national level on aquaculture of the Commission's guidelines on aquaculture, the Water Framework Directive and Natura 2000. The Commission will take this into consideration in the context of the future work on the guidance document on environmental performance of aquaculture.

- We also take note of your recommendation to evaluate the protection status of special protected species causing fish losses in ponds. The Commission does not intend to propose any changes in the protection status of the species listed in the annexes of the Birds and Habitats Directives. The 'Fitness Check' evaluation of the Directives concluded that they remain highly relevant and are fit for purpose. Aquaculture operations may suffer from predation by some protected wild species of birds and mammals. However, if conflicts arise between the protection of these species and human activities, they can be fully addressed within the existing legal framework. In the case of predation by bird species, Article 9 of the Birds Directive gives Member States the flexibility to derogate from the strict protection for certain reasons as long as there are no other satisfactory solutions and the conservation status of the species is not put at risk. Article 16 of the Habitats Directive provides for the possibility to derogate from the strict protection provisions under certain circumstances, if all the conditions set by Article 16 are met.

To assist Member States and stakeholders in the implementation of the relevant provisions of the Birds and Habitats Directives, the Commission has issued guidance on aquaculture and Natura 2000¹, a guidance document on applying derogations under Article 9 focusing on the management of Cormorants² and has recently updated the guidance on the strict protection of animal species of Community interest under the Habitats Directive³. Furthermore, as indicated above, the future guidance document on environmental performance should include the mapping of good practices at governmental and industry level covering, inter alia, the management of predators.

- Finally, when it comes to your recommendation related to circular economy in pond, lagoon and estuary aquaculture, this is consistent with the Strategic guidelines, which note the importance of applying a circular-economy approach to aquaculture activities, including the use of waste, as part of the efforts to increase the environmental performance of EU aquaculture. The future guidance

¹ <https://ec.europa.eu/environment/nature/natura2000/management/docs/Aqua-N2000%20guide.pdf>

² https://ec.europa.eu/environment/nature/pdf/guidance_cormorants.pdf

³ C(2021) 7301 final. Commission notice Guidance document on the strict protection of animal species of Community interest under the Habitats Directive

document on environmental performance should include good practices in this respect.

I hope to have covered all your relevant topics with this letter and I look forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Pascale COLSON, coordinator of the Advisory Councils (Pascale.COLSON@ec.europa.eu; +32.2.295.62.73), who will forward them to relevant colleagues.

Yours sincerely,

Charlina VITCHEVA

c.c.: Stylianos Filopoulos stylianos.filopoulos@aac-europe.org // secretariat@aac-europe.org