



**FEDERATION OF
EUROPEAN
AQUACULTURE
PRODUCERS**

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Concerns:

HELCOM recommendations for aquaculture in the Baltic Sea region

Aquaculture has been growing at 7% p.a. globally, but in both the EU and the Baltic Sea region, the industry has stagnated or even decreased its production levels. The new Common Fisheries Policy (CFP) has acknowledged the importance of European aquaculture and seeks to promote the expansion of the EU aquaculture sector, recognising the potential of its contributions to the Horizon 2020 strategy, as well as that of Blue Growth, providing healthy, safe food that is produced sustainably.

The new CFP is accompanied by a set of Strategic Guidelines for the sustainable development of European aquaculture, which highlights four priority areas: Reducing administrative burdens, improving access to space and water, increasing competitiveness, exploiting competitive advantages due to the high quality of European aquaculture's products, their contributions to health and the industry's respect for environmental standards.

In line with these Guidelines, EU Member States are currently drafting national plans for the development of sustainable aquaculture on this basis.

The European aquaculture industry has welcomed these initiatives from the Commission and the FEAP agrees with the four identified core priorities.

The HELCOM recommendation for aquaculture should thus act with and be complementary to and not against these initiatives.

Previous draft recommendations did not provide a balance for the requirements of growth with environmental protection. The overall objective was to reduce discharges from aquaculture and was a major disappointment to the aquaculture production sector.

The core of the previous draft recommendation was that "New types of aquaculture farms and methods for sludge removal should be developed and introduced so as to decrease the discharges of nutrients, organic matters and chemicals". This singular and focused approach is not in line with the principles of the Strategic Guidelines for sustainable aquaculture development.

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Furthermore, the draft fails to recognise that European aquaculture already has access to the most advanced technologies for operation, including water treatment and waste removal, and that the current regulation is blocking both investments and incorporation of innovations in aquaculture. The application of the regulation is itself blocking access to available and/or new technologies that can be applied.

The HELCOM recommendation for aquaculture should ask for a more flexible and modern form of aquaculture regulation and it should also act to improve access to water and space.

The FEAP recommends that HELCOM should focus on three objectives that would encourage rather than inhibit aquaculture growth and development:

1. Enforcing emission-based regulation as opposed to the current “command and control” regulation.
2. Allocating space for aquaculture by means of effective maritime spatial planning
3. Securing ecological space by means of quotas for nitrogen and phosphorous emission.

The FEAP and its member associations recognise that special conditions apply to the Baltic region but underline its support for the Blue Growth initiative and policies that support and encourage the sustainable development of European aquaculture, as put forward in the Dublin declaration of the FEAP, ‘Streaming Sustainability’.

I remain at your disposition for any further information that you may require.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'A. Chaperon', with a long horizontal stroke extending to the right.

Arnault Chaperon
President

cc. FEAP Member Associations of Denmark, Poland, Germany, Finland