



FEDERATION OF
EUROPEAN
AQUACULTURE
PRODUCERS

FEAP recommendations for the action plan to follow up on the fitness check of the EU Nature Directives

The Federation of European Aquaculture Producers (FEAP) is the united voice of the European aquaculture production industry, being the federation of national aquaculture associations in Europe that represent professional fish farming. With 26 members drawn from 22 states across European continent the FEAP represents more than 2 million tons of produce, an ex-farm value of over € 8 billion and about 100.000 direct jobs in coastal and rural areas.

Worldwide, aquaculture is the fastest growing food producing sector, currently providing half of all aquatic animals for human consumption.

Aquaculture's role is to "contribute to the preservation of the food production potential on a sustainable basis throughout the Union to guarantee long-term food security, including food supplies, as well as growth and employment for Union citizens, and to contribute to meeting the growing world demand for aquatic food".

Food and nutrition security is a top priority for Europe and requires a coherent and inclusive approach. For many years, the key concern of the FEAP has been how to maintain and improve the competitiveness of European aquaculture producers in the market place, while adapting to consumer preferences, legislative demands and financing the accompanying investments. The FEAP notes the high importance of the economic and social dimensions for assuring the sustainability of European aquaculture.

Reference is also made to Strategic Guidelines for the sustainable development of EU aquaculture (Com 2013 229 Final on April 29 -2013), that calls for a considerable growth in European aquaculture.

Overall, it is crucial that both the formulation and implementation (by Member States) of the Nature Directives secure a **balance between environmental protection and economic development - especially in rural and coastal areas throughout the EU, where most of European aquaculture takes place (fish and molluscs)**. Therefore, an action plan must take social and economic objectives into account as well as environmental objectives.

In respect to the upcoming development of an Action Plan from the Commission to follow up on the fitness check of the Nature Directives, the FEAP has identified four central topics that are strongly recommended to be addressed in a future action plan.

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1. NEED FOR ECONOMIC IMPACT ASSESSMENTS

- The FEAP finds that there is a need to focus on the economic consequences of the directives. In connection with the national implementation of the regulations of the Directive – particularly the active administration of the Natura 2000 sites (art. 6.1 and 6.2) – it is very problematic that the directive contains no requirements for economic impact assessments. There ought to be evaluation requirements of both business and socio-economic consequences of actions that implement the Directive. Similar requirements are present in the Water Framework Directive and the Marine Strategy Framework Directive.
- Such economic assessments should be considered both in connection with actions implementing and administering the Directives and actions that achieve the upcoming action plan.

This proposal is doubly justified:

- a) because of the negative experience in implementing the Directive during the last decades, which has prevented growth and development in large rural areas of the EU;
- b) because of the positive experience that the development of projects initiated in the environments affected by Natura 2000, which in most cases has been neutral and, in many others, clearly positive for the environment.

2. NEED FOR IMPROVED GUIDELINES TO CREATE A LEVEL PLAYING FIELD AMONG EU MEMBER STATES

- The FEAP supports the need for better guidelines on the implementation of the Directives.
- The EU's Nature Conservation Directives, and in particular the Habitats Directive, have a great impact on the agriculture, aquaculture and food sector's ability to develop and adapt the sector's production in order to accommodate and secure the much-needed growth - both socially as well as economically.
- The Directive's very broad terms create an even greater range of possible interpretations of the regulations, to such an extent that it is extremely difficult for (fish) farmers and companies to foresee the consequences both generally and in specific cases. In the same way, it has a great impact on the availability of marine and land space or areas for both marine and fresh water aquaculture projects.

This is a limiting factor that has no environmental justification, given that European aquaculture has proven its sustainability for both space use and habitats.

- Misuse of the precautionary principle, following Article 6.3 of the Habitats Directive, allows theoretical positions – without appropriate studies – to reject applications. Improved guidelines on the application of the precautionary principle to project development are needed.
- The FEAP sees a strong need to create a level playing field among Member States through guidelines on appropriate implementation on the Directives – especially in respect of Article 6.3.

3. NEED FOR GREATER FLEXIBILITY IN SPECIES MANAGEMENT

- The FEAP finds that the annexes to both Directives need to be reviewed to ensure an up-to-date position on the populations of protected species, particularly where the populations have recovered or grown significantly and become widespread since the annexes were written. Many examples¹ show a need for the approach to adapt to the current status, so that the management is coherent with such status.
- Protection of species in accordance with the regulation of Article 12 in the Habitats Directive can impose huge economic and operational consequences on landowners and fish farmers. This calls for a more flexible national protection of protected species in situations where a species listed in Annex IV is widespread and common in one or several Member States, even though it is endangered at an overall EU level. The Directive should be interpreted in a flexible way and in accordance with the principle of subsidiarity while reflecting the dynamics of populations, allowing the Member States to manage the species in a more flexible way as long as they maintain a favourable conservation status.

4. NEED FOR BETTER SPECIFIC FUNDS FOR FISH FARMERS TO ENGAGE IN NATURE MANAGEMENT

- The FEAP finds a need to ensure specific funds with regard to the implementation of measures of environmental protection in Natura2000 areas.
- Despite the Member States' individual responsibility to realise targets and obligations, it is highly desirable that the Commission, when developing the action plan, addresses the development of specific funding measures.
- Professional organisations, as well as private fish farmers, find that the realisation of targets and obligations are being implemented in an extremely uncompromising manner. It is still perceived negatively to be a fish farmer in Natura 2000 areas and there is a strong need for far more flexibility in relation to the possibilities to engage in the realisation of the targets under the Nature Conservation Directives.

FEAP Secretariat
10th February 2017

¹ a) both heron species (grey and white, *Ardea cinerea* and *Alba*); b) pygmy cormorant (*Microcarbo Pygmeus*); c) beaver (*Castor fiber*); d) otter (*Lutra lutra*); e) Grey/Common seals