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IFA Aquaculture Position on the European Commission Communication on the Common Fisheries Policy Reform (COM(2011) 417 final)

Submitted to the official Irish Government response site:

<http://www.fishingnet.ie/CFPR/submissions.htm>

IFA represents producers of farmed fish and shellfish in licenced aquaculture sites around the country's 2,700km coast and in freshwater sites throughout rural Ireland.

Ireland produces 4% of the EU's total of 1.3 million tonnes of aquaculture produce and 3.65% of the total Community value of €3.2 billion.

The industry is a very important employer in coastal regions, especially in the most peripheral areas where little alternative employment can be found. Over 2,000 full and seasonal jobs are supported by the industry.

A unique aspect of the Irish aquaculture industry is the export-led focus of the business, with over 70% of all fresh and value-added seafood generated by fish and shellfish farmers destined for continental European markets.

Independently certified quality schemes cover all the main aquaculture species in Ireland including salmon, mussels, oysters and trout. In addition, producers are increasing the profile and value of their products by becoming independently certified as "organic". Traceability for fresh and processed fish products is unanimously supported by the industry and is vital for both farmers and consumers.

IFA welcomes the Commission's recognition of the importance of aquaculture for "food security and growth and jobs in rural regions" at the present time. It is also important to note the recognition in the Communication of the highly important role aquaculture will play in the future in redressing the increasing seafood deficit in Europe, where seafood imports have overtaken total indigenous EU production in a state of growing market demand.

The future of the industry depends on providing an environment for sustainable growth in the sector. "Environment" should be read as not only the natural surroundings, but also the economic, social and legal/regulatory environments. The industry has been hampered by a narrow view of "sustainability" at EU level where only the natural environmental sustainability is taken into account, leading to a situation where the regulatory, planning and management approach to legislation is invariably led primarily by these issues and this has had a severe impact on growth in the sector due to an untrue perception that all aquaculture has a negative impact on the environment. Like every other heavily regulated industry, aquaculture, once properly

managed, is a benign and often beneficial sector for both marine and freshwater environments and provides immense amounts of data of use to regulators and scientists on their surroundings. The reformed CFP must recognise this fact and deliver incentives for the industry which are compatible with the objectives outlined by the Council, Commissioner and the Green Paper to increase aquaculture production to meet the needs of European consumers. The concept of “Sustainability” in legal texts and EU policies relating to aquaculture must embrace equally economic and social issues as well as the environment. Only by adopting this three-pillar approach to sustainability will the Commissioner’s vision for a developing industry be achieved.

The current CFP is primarily focused on wild fishing and the conservation of wild stocks. While this is important, there needs to be more stated action points than mere aspiration for the farmed sector outlined in the new reformed policy.

A clear, legally grounded, framework for development of the aquaculture sector, which can support Member State policies and plans, should be central to the CFP. This should begin by focusing on ensuring a level playing pitch for the sector in terms of legislation, regulation and policy in parallel with the wild fishing and seafood processing sectors.

While the aquaculture sector is currently impacted by some specific aspects of the CFP, it is equally, and in some cases, more, subject to EU policies and legislation in the areas of food safety, environment, research, transport and agriculture. There is an overwhelming need for greater co-ordination and dialogue between the various directorates within the European Commission, with DG MARE playing a central role alongside a well-resourced, focused and updated consultative forum for industry. Aquaculture is a relatively small industry in EU terms, but, as has been pointed out by DG MARE themselves, is regulated by over 400 separate pieces of EU legislation as well as national regulations.

In terms of industry consultation, the proposed new structure of the advisory process must be carefully planned. The current ACFA (Advisory Committee on Fisheries and Aquaculture), has succeeded in many areas, including new fish health legislation, the EU Communications on Aquaculture, organic standards, and many other policy and legislative areas. IFA was honoured to hold the presidency of this committee for 10 years and the experience showed that the key to the committee’s success was the fact that European producer federations consulted and agreed on common positions before meetings in Brussels. Those federations (FEAP, EMPA and COPA/COGECA) have structures that co-ordinate democratic consensus on positions representing all the major aquaculture producers within the EU. Based on their long experience and strong professional record, these organisations should continue to represent the industry in any future consultative forum, rather than an unbalanced situation where all member states – including those where aquaculture is not a major industry - are represented.

The associated policies with the CFP include the financial (EFF) and marketing (CMO) regulations. Funding to the sector is vital, and must be focused on making the industry more competitive, reducing costs, improving marketing, developing production techniques, stock health, onshore infrastructure and applied research.

Under the new CFP, the EU must continue to fund producers to develop production, modernise and introduce new technology and farming methods as well as new environmental and marketing initiatives. Collective and individual actions

The CMO must focus on improving the ways in which Producer Organisations can work for aquaculture industries to encourage interbranch and transnational work which facilitate the growth of the industry, allow for better organisation and dialogue on markets and promote greater co-operation throughout the value chain. The current focus of PO legislation is unsuitable for aquaculture, focusing as it does on issues within the wild fishing sector. Aquaculture POs should be focused on developing collective marketing plans, introducing more PGIs into the industry and promoting the use of EU labelling and the highest standards of traceability.

IFA Aquaculture
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