

The FEAP thanks the European Commission for organising the workshop on MFFD licensing and permitting procedures, held in Brussels on the 8th of April 2016.

Following the meeting and the discussions held there, the aquaculture sector wishes to emphasise the following points:

1. As pointed out in the presentation made by Mr Javier Gordo (APROGA), the European aquaculture sector faces severe obstacles for its development. Key reasons for this are the excessive red tape and legal availability of sites, caused by an over-restrictive implementation of EU environmental legislation at National/Regional levels.
2. The aquaculture sector would like to believe that the MFFD is not supposed to duplicate existing legislation and add more red tape, as some Member States appear to do, but more to pull it together in a strategic manner (NRE, Maritime Spatial Planning etc.)
3. In respect to MFFD, this Directive is, in general, not well understood by the sectors operating in the marine environment. Most of the aquaculture stakeholders have never heard of the MFFD, mainly because it is not applicable to most of the finfish and shellfish industries. The MFFD (exclusive) area is indeed outside most if not all areas where aquaculture is achieved.
4. There may be a few marine fish farms outside the baseline + 1 nautical mile (the border between the WFD and the MFFD). However, there are – after recommendation from some state administrations – a lot of applications for establishment outside the baseline + 1 nautical mile.
5. The application of the precautionary principle and the implementation of European environment Directives are others. However, aquaculture needs good water to be efficient and productive. High quality water is of primary importance for both the growth and health performance of the fish. The provision of positive impacts of aquaculture are a reality and we regret that sewage discharge water and agriculture runoff have not been taken into account in the Arcadis study for the GES (Good Environment Status) descriptors.
6. Clear guidance is needed for Member States so that they can act appropriately and ensure the avoidance of additional burdens to sustainable development in the marine environment, this comment is particularly relative to the measurement of scale (i.e. project scale vs regional scale), the cumulative effects of different activities (i.e. how these are measured / calculated) and data availability (who collects, pays and uses such data).