

FEAP opinions and suggestions for the aquaculture components of the Common Fisheries Policy (CFP), the Common Organisation of the Markets (COM) and the European Maritime and Fisheries Fund (EMFF)

A) The Common Fisheries Policy

1. The CFP and its references to aquaculture should recognise that European aquaculture, in many cases, is already 'smart' and 'green' and innovative.
2. The Guidelines for aquaculture development must:
 - Be of high quality, well-argued and referenced
 - Be elaborated with sectoral participation
 - Include targets and indicators - for benchmarking development over time and between countries
 - Develop a clearly defined European aquaculture production target for 2020

B) The Common Organisation of the Markets

There is a need to assure financing for the operations of aquaculture Producer Organisations (POs)

- Mechanisms to facilitate storage, in times of crisis, are needed
- Trigger prices that relate to emergency actions of the POs
- Consumer information for EU and imported products must be identical and include:
 - Common name and species
 - Country of origin
 - Whether it is fresh or defrosted
 - Date of harvest
 - Production system and processing method
 - Extension to catering with compulsory information on the origin of fish and whether fresh or defrosted
- Mechanisms to improve the implementation and following of the obligations of consumer information

The CMO must contribute to achieving the Level Playing Field for aquaculture, given the standards that have been achieved within the EU, and imports should provide guarantees that they are produced to the same criteria (including feeds, environmental issues, food safety, welfare...).

FEAP is opposed to

1. Compulsory National (government) approval of PO production plans
- these should provide information only
2. Vague conditions for Rules of Extension
- these must be made much clearer
3. High levels of red-tape for POs

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C) The European Maritime and Fisheries Fund

There should be no delays to the implementation of the aquaculture component of the EMFF even if fisheries are not in agreement with their aspects; there should thus be a conditional separation of the different sectors that benefit from the EMFF.

For the EMFF to work efficiently for European aquaculture:

- Far less bureaucracy and red tape is needed.
- Financing must be available to allow producers to comply with ('new?') legislation
- More financing must be made available for grouped actions (within the profession) and for fish farmers' associative structures
- All types of aquaculture must have access to funding possibilities
- There should be no differences in treatment for aquaculture financing (i.e. convergent/non-convergent regions)
- Insurance (Article 57) - there is need to look at the effects of notifiable diseases and consider the use of mutualisation funds
- There is a need to better define 'coastal areas' and include rivers (for freshwater aquaculture)
- The results of EMFF application should be measured against targeted plans and checked
- National financing criteria should be coherent with EU regulations and their strategic plan
- Good animal health is key for the sustainability of aquaculture. For this reason, the EMFF must provide ample and broader support to this issue. Amongst other measures, EMFF must support the creation and development of aquaculture animal health groups, as already exist for land-based livestock protection.

FEAP is opposed to

- Financing measures should not destabilize the market - a position that underlines the importance of strategic development plans at National level and their European integration.
The FEAP intends to make recommendations for guidelines for the MS strategic plans
- Restricting access to EMFF funding to companies assumed to be larger than small and micro.

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