

De Voorzitter van de Tweede Kamer  
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\_\_\_\_\_ Geachte Voorzitter,

Naar aanleiding van uw bovenvermeld verzoek doe ik u hierbij een afschrift toekomen van de Nederlandse bijdrage aan de consultatie van de Europese Commissie over "Opportunities for the Development of Community Aquaculture".

Bij de bijdrage is aangegeven dat dit een eerste voorlopige reactie is en dat de Nederlandse regering een definitief standpunt zal innemen zodra het definitieve voorstel van de Europese Commissie is gepresenteerd.

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Dear Commissioner,

Following your request to participate in the public consultation on the further development of sustainable aquaculture in the European Community, I am pleased to share my views with you.

- 1. Do you consider it justified for the Community to develop a specific strategy for aquaculture and why?*

Yes. Aquaculture is a relatively young but fast growing industry. Without a clear strategy aquaculture might develop into an unsustainable activity with consequent negative impacts on the environment and on fish welfare. A Community framework has to provide guidelines for the further sustainable development of this industry and as such will provide a level playing field for the Member States.

- 2. Do you share the vision for a sustainable development of European aquaculture as set out in the 2002 Strategy? Would you consider that it needs to be adapted to evolving circumstances?*

Yes, but it needs to be adapted to evolving circumstances. In the Netherlands aquaculture is developing, both in areas that are connected to the fishing industry, as well as in areas where no fishery exists. Due to the availability of closed recirculation systems the location of a fish farm is not depended on access to open water sources. Therefore, agriculture farmers are also involved in aquaculture. Community focus should be broadened as to include the

integration of aquaculture with other production sectors (agriculture, industry, energy production, and recreation). The European Strategy should provide sufficient room for the support and development of such a variety aquaculture production systems.

3. *What effect is globalisation having on the EU aquaculture sector and what are the main factors affecting its competitiveness?*

Globalisation results in an increased import of (sometimes cheap and less sustainable) products resulting in more competition. Because of the high production costs in the Community, the Community strategy should include a framework to enhance competitiveness, based on consumer perception of sustainability, high quality, and safe products. This could be achieved through research, innovation in product quality, chain logistics and promotional campaigns.

4. *How do you see the future of the market for Community aquaculture (niche markets, mass production...)?*

Niche markets for fresh products, preferably produced under specific labels of origin or sustainability. Besides, the European aquaculture industry should also be able to produce high quality products in large quantities. Innovation, efficiency, traceability, and transparency are the keywords for such an development.

5. *How can the image problem of aquaculture be addressed to increase consumer acceptance of farmed products?*

Pay more attention to the demands of consumers (through market research and marketing strategies). Other aspects are: improved production technologies, less impact on the environment, less use of pharmaceutical products, improved fish welfare, high product quality and traceability.

6. *What are the most important environmental challenges faced by aquaculture and what are the appropriate avenues to address them?*

For fish: reduction of the discharge of waste products into the environment. This can be realised through the further development and introduction of closed water recirculation systems.

For shellfish:

- To integrate shellfish activities within the European legislation (Birds & Habitats directive, Water Framework Directive)

- To manage criticism from nature conservation organisations
- To reduce the dependence on nature (shell fish seed, locations for shell fish grow-out).

Innovation is for both sub-sectors the best way to face those challenges.

7. *Can you identify, within the framework of Community environmental legislation, business-friendly options to regulate aquaculture activities?*

The use of closed systems for the production of fish, and the issue of long-term permits for the operation of shell fish farms.

8. *In a context of increasing scarcity of pure water, what are the main avenues to ensure that aquaculture producers continue to get access to water of the best possible quality for aquaculture development?*

Fish produced in closed recirculation aquaculture systems require less water than most other forms of animal production. Furthermore, these systems are environmentally friendly and allow for a maximum control over water quality parameters thus contributing to enhanced fish health.

9. *What are the most important challenges related to animal health and welfare and how should they be addressed, in view of the different constraints faced by the aquaculture sector?*

The most important challenge is to introduce installations for slaughtering different fish species in an animal friendly way. Practical research is still needed to develop and fine-tune an installation that can be used for different species. When such an installation is available entrepreneurs should be stimulated to use it. Another challenge is to develop operational indicators to detect adverse effects of water quality on health and welfare. At this moment there is not enough knowledge to set the necessary indicators. Furthermore research is needed to improve transports of live fish.

10. *What do you see as the most promising avenues in fish or shellfish domestication to provide opportunities for aquaculture growth in the EU?*

More efforts should be directed towards the domestication of local indigenous fish species, especially those species that are under threat from over-fishing and that have good market potentials. Opportunities for innovation in shellfish fishery primarily involve alternative or new production techniques such as hatchery and nursery systems.

11. *To what extent do you consider that fish oil and fish meal would represent a limiting factor to aquaculture growth in the European Community? Which option would you favour to reduce limitation from such feed?*

The availability of sufficient quantities of fish meal and fish oil is definitely an important limiting factor for the further development of aquaculture. Therefore, more emphasis should be given to the aquaculture of herbivorous and omnivorous fish species, and research into fish meal/oil substitutes.

12. *What technological innovation would you consider most promising to allow aquaculture development in a limited space context? What are the main obstacles to their development and how could they be overcome?*

- Promising technology: aquaculture at open sea. Main obstacles: physical conditions at open sea and difficulties to fit within current legislation.
- Promising technology: culture of marine species in land-based closed recirculation systems. Obstacles: technology not perfected (growth retardation), high costs.
- Promising technology: use of mussel seed capture installations for the supply of mussel seed. Obstacles: lack of enough space in Dutch coastal waters and interference with other users. This can be overcome by optimizing the space at existing bottom culture areas and through shellfish production in open sea.

13. *What are the main obstacles to access to marine or fresh water space for aquaculture activities? Would you consider that there is a need for public decision maker to set aside specific locations dedicated to the development of aquaculture?*

The main obstacles are the competing claims for space by other users (nature, recreation, urban and industrial development), and/or inconsistent legislation at the different government levels. The establishment of specific locations for aquaculture development could prevent the damaging of vulnerable ecosystems.

14. *How could marine/maritime spatial planning be developed to provide appropriate conditions for the sustainable growth of aquaculture sectors in coastal and offshore waters?*

Through Integrated Coastal Zone Management.

15. *How can we ensure that EFF implementation will contribute to sustainable aquaculture growth in the EU?*

Use EFF funding to stimulate innovative projects that contribute to a further sustainable development of the aquaculture industry.

16. *Are there already some lessons to be drawn from the preparation of your National Strategic Plan and Operational Programme regarding aquaculture?*

The involvement of the stakeholders has been an effective way for the identification of the measures and objectives that are the most promising.

17. *How can research policy be set in a strategic context to enhance its benefits, specifically for European aquaculture and/or European technology and know-how?*

There should be a balance between fundamental research and applied research. On issues such as fish welfare and controlling the reproduction (for example in eel) fundamental research is required. More practical research can be set-up in cooperation with private enterprises through public-private partnerships. The European 7<sup>th</sup> Framework programme should be the main tool for (fundamental) aquaculture research taking into account environmental and socio-economic perspectives.

18. *How can the transfer of research results be optimised so as to maximise the benefit to European Business?*

Transfer of technology will be ensured if the research is undertaken in close collaboration with the industry, and if the results have been made accessible to the entire industry and other stakeholders.

19. *Which cross-cutting areas in marine research would you consider most important for aquaculture?*

- Development of indigenous marine species for aquaculture in land-based closed recirculation systems and nutrient-neutral combinations of fish and shellfish culture at open sea
- Development of alternative seed supply for shellfish aquaculture
- Alternatives for fish meal and fish oil
- Fish health and fish welfare
- Integration of aquaculture with other agro- or industrial production systems, recreation and energy production
- Development of salt tolerant crops, algae and sea weeds

- Development of biological aquaculture.

I appreciate that you have given me the opportunity to contribute to this consultation. I would like to stress that these are our preliminary comments. As soon as the strategy has been published, we will formulate an official position.

The Permanent Representative  
On his behalf:

Mr. G.P.G. Kunst  
LNV Counsellor

A handwritten signature in black ink, appearing to be 'G.P.G. Kunst', written over the printed name and title.