

**IFA Aquaculture Submission Re: draft National Strategic Plan for Sustainable Aquaculture  
Development 2030**

**Executive Summary:**

The overall direction of the objectives and key actions of this proposed strategy are to be welcomed. However, there is a critical need for commitment from Government to ensure the economic potential and sustainable future of the Irish Aquaculture industry is realised. Prioritising immediate action to implement a functioning aquaculture licensing system must be a key priority for any future development of the Irish Aquaculture industry, including appropriate legislative changes required to facilitate this. The full implementation of the 'Aquaculture Licensing Review 2017' must be prioritised and actioned to allow for effective implementation of the actions proposed in the draft National Strategic Plan for Sustainable Aquaculture Development 2030. The Irish Aquaculture sector needs the support of policy in order to achieve any realistic sustainable development so as to unlock any future potential of the Irish aquaculture industry.

Targets to increase production and develop the Irish aquaculture industry have not been met. The target at the beginning of the previous European Maritime & Fisheries Fund (EMFF) programme (2015-2021) was to increase production by 45,000 tonnes, from 36,000 tonnes in 2012 to a predicted 81,000 tonnes in 2023. By the end of 2020, Irish aquaculture production had actually decreased in volume on 2012 levels, estimated at over €105 million in product value, and for most of that period Irish aquaculture production remained static as opposed to increasing. The cumulative loss to the sector is estimated in excess of €570 million over the period at the prevailing in-year price.

To give further context to the lost opportunity of Irish Aquaculture over the period of the EMFF programme, as global aquaculture production has grown by an average of 5.3 % per year in the period 2001–2018 (FAO) - Ireland has not matched this trend in aquaculture production growth. Ireland has gone from 5% of European aquaculture production twenty years ago to less than 2.5% currently.

The Irish Aquaculture industry already provides essential employment opportunities for rural coastal communities with almost 2,000 direct jobs and contributes to providing over 16,000 indirect jobs in the wider seafood sector. The value of Aquaculture is estimated at a total value of €175 million in production value with over 80% of this aquaculture produce being exports to the value of €150 million. The value and volume of Irish aquaculture production could be significantly increased by optimising the licenced aquaculture space we already have and allowing licence conditions to adapt to innovative, efficient aquaculture production systems. Most importantly, unlike targets and speculative

Teresa Morrissey  
Aquaculture Executive

Irish Farmers' Association | Bluebell | Dublin 12 | Ireland  
Phone: +353 1 4260338 | Mobile: +353 87 795 4728 | email: [teresamorrissey@ifa.ie](mailto:teresamorrissey@ifa.ie) | Web: [www.ifa.ie](http://www.ifa.ie)

September 2022

statements on increasing aquaculture production in the past, we need to be more specific, ambitious, and realistic.

With considerable investment and appropriate legislative changes; there can be significant increases of direct and indirect employment, volume and value of aquaculture produce. If this National Strategic Plan (NSP) is to be most effective for the development of the Irish aquaculture industry, there must be an immediate effort made to reform, modernise, and improve the aquaculture licensing system.

Appropriate legislative changes will be required to facilitate implementation of the National Strategic Plan and its strategic objectives for the future sustainable development of the Irish Aquaculture sector can only be achieved if the proposed investment is underpinned by appropriate legislation and policy.

In short, we are lacking a coherent, realistic, ambitious policy for aquaculture. The policies and objectives that we do have in relation to aquaculture are non-binding and non-specific in terms of targets and are coupled with numerous policies and regulations that are not streamlined. The long-term objective for Irish and EU aquaculture should be to set coherent, realistic, ambitious objectives for the development sustainable aquaculture which are binding on Member States.

**Eligibility criteria for funding schemes** under the previous EMFF operational programme was hindered by the fact that most of industry was ineligible for grant aid due to state aid rules related to aquaculture licensing, which was outside of the industry's control. While the aquaculture industry accepts that Section 19(A) (4) licences are legally binding contracts on licensees awaiting a decision on a licence application (with all the conditions, responsibilities, annual fee costs which a full licence entails) the decision not to recognise these licences for the purposes of state aid must be addressed under the next EMFAF operational programme. This made it almost impossible for the majority of the aquaculture sector to draw down funds and led to a significant underspend in the 'Sustainable Aquaculture Scheme' which is aimed directly at available capital spend for aquaculture operators over a long period of time in the previous programme. In addition, aquaculture enterprises were generally unable to access funding through the 'Knowledge Gateway Scheme' as suggested on page 40 of the draft NSP document.

Further, any **proposed re-allocation of funds from underspent schemes** should stay within the sector for which the funds were allocated towards in the first instance – i.e. if funds are allocated for schemes aimed at the aquaculture sector, any underspend should be reallocated to other schemes for the sector if necessary. Given that the EMFAF is the main financial source to ensure effective implementation of the Common Fisheries Policy (CFP), available for the sustainable development of the aquaculture sector, it is imperative that access to the available funds are facilitated at every possible opportunity.

The following highlights IFA Aquaculture’s response to some of the strategic objectives and key actions outlined in the draft National Strategic Plan for Sustainable Aquaculture Development 2030:

### Objective 1: Building the Resilience and Competitiveness of Irish Aquaculture

#### Access to space and water

- Key action SP 1: IFA Aquaculture has serious concerns regarding the **exclusion of aquaculture from the MPDM Bill**. The National Marine Planning Framework (NMPF) aimed to introduce a single development management process for the Maritime Area for activities or developments. This is underpinned by legislation introduced in the form of the Maritime Area Planning Bill which aims to establish a new regulatory body in the Maritime Area Regulatory Authority (MARA) - this will not include aquaculture and fisheries, as they are not legislated for as part of the Bill. Aquaculture and fisheries must be included in associated National marine spatial planning legislation as it is essential for the fair and correct development management of the Marine space.
- Every effort must be made in facilitating and resourcing co-operation between ALL relevant coastal stakeholders.

#### Regulatory and administrative framework

- Facilitating Irish Aquaculture with investment and funding to adapt, become more innovative and improve efficiency will have to be matched by **flexible licence conditions to allow for adaptability**, where the licencing system facilitates amendments to licence conditions within a reasonable timeframe.
- Key action AP 5: gives commitment ‘*to conduct a review of aquaculture legislation*’, this is to be welcomed but it must be re-prioritised to ‘*reform of aquaculture legislation*’ and brought forward to take place in short-term rather than the medium term. The **recommendations of the Aquaculture Licensing Review need to be prioritised**, resourced, and implemented urgently with greater stakeholder engagement regarding an implementation plan with realistic timelines for completion. A streamlined, efficient licensing system providing more transparency in the process needs to be appropriately resourced to expediate the completion of the implementation plan.
- Pg 51 of the draft document describes DAFM intention to ‘**Prepare an Implementation Plan** in respect of the remaining recommendations of the Report of the Independent Aquaculture Licensing Review Group with a view to their implementation’ - this is long overdue and must be expedited and published immediately.

#### Animal and public health

- Key action ‘HA 2: **Develop control measures for new and emerging aquatic diseases**’– While there is need for further development of diagnostic capacity for fish diseases and this is to be welcomed, the pathogens listed in the draft document have already been extensively researched with many diagnostic tools available. Development of diagnostic capacity should be focused on emerging diseases and fish health issues related to mortality events and climate change impacts.
- Key action ‘HA 3: **Develop a system for near real-time animal health reporting in Irish aquaculture**’ – cannot be progressed without the full co-operation and agreement of the Irish aquaculture industry, particularly in relation to mortality reports. Further, any development of ‘*real-time animal health reporting*’ must be done in compliance with Animal Health Law.
- The impact of harmful algal blooms (HABS) continues to be an area of concern for both the finfish and shellfish aquaculture industries, particularly with increased incidences of HABS events causing harm. Any development of

monitoring and control measures should focus on these emerging threats, along with continuing work on existing monitoring programmes.

- Key action 'HA 4: **Develop a system for Norovirus monitoring of Irish Oysters to protect public health risk and commercial markets**' – this is a very high priority for the Irish oyster industry and the continued progression of this system is vital. A robust Norovirus testing and reporting system has been of great value to industry to date and needs to be maintained and developed.

### Climate change adaptation and mitigation

- Key actions CC 1, CC 2 & CC 4 - Aquaculture can benefit from projects that seek to quantify the **carbon sequestration value of aquaculture production** and the value of aquaculture as a carbon efficient source of protein. There should be supports/incentives for climate change projects such as carbon footprint research, carbon sequestration value for seaweed/shellfish, protein carbon efficiency of salmon and wind/solar energy potential on aquaculture farms.
- Every effort must be made to **protect shellfish water quality**, particularly from climate change impacts. There are 64 designated shellfish areas in Ireland as part of the EU Water Framework Directive requires all Member States to designate waters that need protection in order to support shellfish life. In recent years, mis-management of discharge into designated shellfish areas has compromised the water quality in many shellfish producing bays.
- CC 6 seeks to identify project selection criteria and additional incentives to support aquaculture projects that reduce, adapt and mitigate the impacts of climate change – one such project for consideration is research into potential natural settlements of *M. gigas* and possible mitigation controls.
- **Appropriate financial recognition must be given for the Irish aquaculture sector in its carbon sequestration services**, the added value aquaculture produce provides and the contribution aquaculture can make in meeting Climate Action targets in this regard. DAFM must integrate a payment mechanism in the EMFAF Operational Programme via the Open Method of Coordination.

### Diversification and adding value

- Key action DV 1 - Projects supporting the **concept of integrated multi-trophic aquaculture** could be funded as a means of exploring the potential of these systems in increasing marine biodiversity. As well as the potential impacts on marine biodiversity of restoration of habitats & species such as native oysters, and oyster reefs.
- Key action DV 4 - **Food security** has never been more important with the current Ukraine crisis and the Covid-19 crisis having shown the added value of sustainable food production systems. Aquaculture provides for one of the most carbon efficient sources of protein, at a time when there is an increasing demand globally for sustainable sources of protein.
- Key action DV 3 - There is now a **significant opportunity for aquaculture in light of the increasing global demand for seafood**, more sustainable food sources, and carbon efficient food production. In line the EU Strategic Guidelines for sustainable aquaculture, the European Green Deal and the Farm to Fork Strategy which underline the potential of farmed seafood as a source of protein for food and feed with a low-carbon footprint which has an important role to play in helping to build a sustainable food system.
- Key action DV 7 - The Covid-19 crisis, the invasion of Ukraine and inflationary pressures have presented a volatile market situation and exposed the **fragility of the seafood sector to shocks**. With the additional impact of Brexit,

the effects of these accumulative crises have been exacerbated for the Irish Seafood sector. There is **a clear need for a contingency fund to be allocated under the next EMFAF** to dealing with volatile market and challenges when they arise, such as was the case with the provision of the Covid-19 Aquaculture Scheme. It is essential that compensation for losses in exceptional circumstances is provided for by such a contingency fund – this should cover possible crises such as severe mortality events, economic volatility (e.g. Covid-19 crisis, Ukraine invasion, Brexit), market closures and enforced market pressures.

## **Objective 2: Participating in the Green Transition**

### **Environmental performance**

- Key action EP 1 - **Sustainable aquaculture development must be facilitated in harmony with the environment.** Supports for the designation and management process of Natura sites and MPAs, restoration of habitats and species, management measures related to Natura/MPA sites. EMFAF support should be provided for assessment of these aquaculture sites, protect biodiversity in these areas while also assisting affected producers.
- **More focused research is needed on marine biodiversity**, to better understand how the effect activities could be having on marine biodiversity and to understand how appropriate management of aquaculture systems can have the least amount of impact on marine biodiversity.
- Key action EP 5 – recent changes to **EU organic regulations** caused some issues for rope mussels and increased pressure on the organic salmon market has presented some challenges in the organic aquaculture sectors. In order for policy aiming to encourage and increase organic food production to be successful this has to be matched by appropriate policy implementation and a level playing field in the markets.

### **Animal welfare**

- One of the Animal Welfare key actions (AW1) recommends to ***‘establish an industry-wide code of practice for animal welfare in Irish aquaculture’***. A code of practice is already established for the salmon sector (Farmed Salmonid Handbook) which is referred to in Section 4.3 Pg 53 which must be updated to reflect new Animal Health legislation and recent changes in practice since it was established in 2008.

## **Objective 3: Ensuring social acceptance and consumer information**

### **Communicating on EU aquaculture:**

- Key action CI 1 & CI 3 – **Building on existing initiatives** such as the ‘Aquaculture Remote Classroom (ARC)’ and **Aquaculture tourism initiatives** such as the ‘Taste the Atlantic – a Seafood Journey’ must be further developed, as well as supports for aquaculture farm site visits, aquaculture farm tours, aquaculture farm shops, to further develop aquaculture tourism around the coast.
- **Funding must be made available for education, communications, public perception of the contribution of aquaculture** - IFA Aquaculture are working on a policy proposal to bring more awareness of the responsibility of the industry in regard to environmental objectives, with the ambition of drafting key strategic guidelines for sustainable aquaculture with regard to environmental objectives to make available to our members.
- **Public perception research** should also be funded in an effort to establish what is the public’s understanding of aquaculture production and the products available on the market. Projects that facilitate telling the story of Irish Aquaculture and its links to Irish coastal communities should be prioritised.

### Integration of aquaculture in the local economy:

- Key action BE 1 -aims to ‘develop synergies between aquaculture and mother local maritime economic activities to support their coexistence and mutual development’ – This must also include developing synergies with MARA and Marine spatial planning developments to avoid Aquaculture being overlooked as a maritime economic activity.

### Data and monitoring

- The development of a **National Aquaculture database** and the integration of data across Government and State agencies would be an essential step in the life of this strategy. Data needs to nationally co-ordinated by one single owner as outline in key action DM1. Further the key action DM3 to review the DCF data collection and National Seafood survey is essential based on the experience of administering the Covid Aquaculture Scheme.
- Resources should be provided to assess **the productivity of licensed aquaculture sites in Ireland** – the Department and relevant state agencies should carry out an assessment of the relative productivity and capacity of licenced areas, including establishing active and inactive sites.
- A review of data relating to Irish aquaculture should be carried out with a view to further developing AquaMIS to include more functionality to address data gaps, information sharing and fragmentation of data available on aquaculture sites, productivity, and economic impact.

### Objective 4: Increasing Knowledge and Innovation

#### Innovation

- **Research and innovation must be industry led and industry focused.** Research projects should encourage partnerships with academia and industry as well as state agencies. There should be a stronger emphasis on knowledge transfer to industry with better dissemination methods used.
- Funded research projects should specifically target benefits/outcomes that support the development of the Irish aquaculture industry, with an in-built evaluation of the effectiveness and direct value of such research projects for the Irish aquaculture industry.
- Key action IN 2 aims to ‘investigate the establishment of an Aquaculture Innovation Fund’ – IFA Aquaculture supports this initiative as further investment in Aquaculture technology will needed into the future.

#### Human capacity-building and training

- Key action HC 1 - Funding must be made available for **Training/Qualifications/Skills initiatives**, particularly there must be the provision of an incentive for succession/new entrants into the Irish aquaculture industry – **initiation of ‘Blue Cert’ incentive** similar to ‘Green Cert’ available in the agriculture sector.

### Implementation and Monitoring:

It is a welcome addition to see a framework for the implementation of the NSP over the next 10 years. We sincerely hope that this a live and active plan with regular reviews on implementation and assessment of impact as outlined in Tables 19 and 20.

### Contingency fund to address the fragility of the seafood sector to shocks:

Aquaculture production will be key to meeting global demands for seafood produce in the coming years. As such, Irish Aquaculture production needs to be part of the global move towards meeting these demands. Innovation, technology, and efficient aquaculture farming practices will drive the adaptation needed to fulfil 'EU Green Deal' goals of developing sustainable food production systems and ensuring food security. Smarter, more efficient food production systems are what is needed in order to increase production sustainably and ensure secure food sources into the future. Research and innovation are key drivers in accelerating the transition to sustainable, healthy, and inclusive food systems from primary production to consumption.

The Covid-19 crisis, the invasion of Ukraine and inflationary pressures have presented a volatile market situation and exposed the **fragility of the seafood sector to shocks**. With the additional impact of Brexit, the effects of these accumulative crises have been exacerbated for the Irish Seafood sector. There is **a clear need for a contingency fund to be allocated under the next EMFAF** to dealing with volatile market and challenges when they arise, such as was the case with the provision of the Covid-19 Aquaculture Scheme. It is essential that compensation for losses in exceptional circumstances is provided for by such a contingency fund – this should cover possible crises such as severe mortality events, economic volatility (e.g. Covid-19 crisis, Ukraine invasion, Brexit), market closures and enforced market pressures.

Additionally, consideration must be given to making available emergency funding under the provision granted by the European Commission. A crisis mechanism of the European Maritime, Fisheries and Aquaculture Fund (EMFAF) was activated by the European Commission, to enable Member States to grant **financial compensation to aquaculture operators for income foregone and additional costs** due to the current market disruption. The EMFAF crisis mechanism is a temporary measure and applies retrospectively as of 24<sup>th</sup> February 2022 and will be in place until the end of 2022. The provision of these temporary measures must be included in the EMFAF programme - This must now be a priority for the next EMFAF programme in Ireland.

IFA Aquaculture are calling on the Government to consider these time limited funding mechanisms made available by the European Commission to assist Irish Aquaculture operators affected by these severe cost increases. A 'Temporary Crisis Scheme' to allow for financial compensation to operators in the aquaculture sector for their income forgone and additional costs incurred must be made available to **ALL** aquaculture operators affected by the Ukraine crisis and eligibility criteria must reflect that - this must be done without delay.

Teresa Morrissey  
Aquaculture Executive

Irish Farmers' Association | Bluebell | Dublin 12 | Ireland  
Phone: +353 1 4260338 | Mobile: +353 87 795 4728 | email: [teresamorrissey@ifa.ie](mailto:teresamorrissey@ifa.ie) | Web: [www.ifa.ie](http://www.ifa.ie)

September 2022



**Concluding Comments:**

In summary, to achieve the objectives and specific actions outlined in the draft National Strategic Plan for Sustainable Aquaculture Development 2030 are to be most effective for the sustainable development of the Irish aquaculture industry, there must be an immediate effort made to reform, modernise, and improve the aquaculture licensing system. Reducing the administrative burden and having an efficient, transparent aquaculture licensing system is of benefit to regulators, the industry and aquaculture stakeholders alike.

The 'Review of the Aquaculture Licensing Process' recommended legislative reform stating, '*work to commence immediately on the preparation of new Aquaculture legislation*' (Recommendation 8.16). Since this report was published in 2017, a further number of EU and National legislative policies have been given effect. Most specifically, the recent Marine Planning and Development Management Bill (MPDM) Bill which could be viewed as missed opportunity for Irish aquaculture reform, regulation, and development management due the exclusion of the sector from the legislative bill. Aquaculture legislation, both primary and secondary, have been amended numerous times, in particular to give effect to EU environmental legislation – making it difficult to follow and establish the current status of various provisions.

**It is now critical that a single piece of legislation is brought forward to implement and underpin appropriate aquaculture policy and bring together all the existing primary, secondary and amended legislation in one single provision. This work should be prioritised, expediated and fully resourced with immediate effect in order to achieve the objectives and specific actions outlined in the draft National Strategic Plan for Sustainable Aquaculture Development 2030.**