

Stakeholder Consultation

Comment on:

GREEN PAPER: Reform of the Common Fisheries Policy

Response from the Scottish Salmon Producers' Organisation:

The Scottish Salmon Producers' Organisation (SSPO) is pleased to comment on behalf of Scotland's salmon farmers in mainland Scotland, Orkney, Shetland and the Western Isles. We will comment specifically on the questions relating to aquaculture.

Aquaculture in the EU is an increasingly important sector in the production of aquatic food. Globally there has been a significant change in the consumption of farmed fish and shellfish, increasing from 9% in 1980 to 50% of all seafood in 2006. According to UN FAO, aquaculture is the only way to meet the surging demand for seafood.

The salmon farming industry in Scotland dominates production within the EU 27 countries with an output of around 130,000 Tonnes annually. The farm-gate value of the industry is in excess of £350M.

With SSPO members representing 95% of the salmon produced in Scotland, the organisation thus represents the collective voice of the industry.

5.9 Aquaculture

What role should aquaculture have in the future CFP?

Aquaculture should be a distinctive part of the CFP. The role of aquaculture will become ever more important in the context of providing food, as the gap between fish production and consumption within the EU27 grows. This is highlighted within the Strategy for Sustainable Development of Aquaculture, COM (2009) 162, April 2009.

Should aquaculture be integrated as a fundamental pillar of the CFP?

The structural policy in support of the CFP has contributed to the development of the aquaculture industry and substantial further development of the industry is an EU priority. This will need Community support which would be best served by aquaculture being part of the CFP rather than in another policy area.

However, aquaculture is distinctive and quite different from fisheries in its development requirements. Thus there is a need to develop a clear strand of the CFP that is dedicated to aquaculture and which builds on the objectives set out in COM (2009) 162.

Should there be specific objectives for aquaculture within the CFP?

Yes. If specific objectives were set for the development of aquaculture, this would encourage member states to support the sector with the aim of meeting those objectives at a regional level.

Should member states be left to develop aquaculture on a national basis?

The CFP should form the framework of guidance and support for future development of aquaculture at EU level. Member states must be responsible for taking the required action to develop the sector at a national level in accordance with EFF guidance.

What instruments are necessary to integrate aquaculture into the CFP?

The use of CMOs and other measures and instruments should be utilised to allow the aquaculture industry to grow and develop sustainably. The instruments adopted should avoid interference in the market, but should be focused on product promotion, consumer interests and related matters and give clear undertaking to promote the growth of aquaculture production.

Additional relevant questions elsewhere in the Green Paper:

5.5 Integrating the Common Fisheries Policy in the broader maritime policy context

How can the future CFP contribute to the continued access of fisheries, including both fishing fleets and aquaculture, to marine space, within an integrated spatial planning framework?

The future CFP can contribute by ensuring Member States develop marine spatial planning systems which fully recognise the strategic importance of aquaculture. The Commission could also consider strengthening the linkages between Community financial instruments and the issue of space for maritime activities such as aquaculture.

5.7 Structural policy and public financial support

Should public financial support apply equally to all sectors (small and large scale)?

Yes. Public financial support should apply equally to help promote and grow smaller sectors without prejudicing the larger, more established sectors. Aquaculture and particularly the related seawater-based operations are young in comparison to the more established fish-catching sector, with less history and social influence. Aquaculture is now a sector growing in importance in terms of food security and jobs in rural areas. It deserves to be supported financially on an equal footing with other sectors.

Should the European Fisheries Fund continue to distinguish between convergence and non-convergence regions?

In Scotland, the vast majority of the salmon aquaculture sector is in the EU convergence zone. This restricts the amount of funds available and results in over-subscription of the axis. We would propose that the two regions are combined, which would result in a more balanced approach to funding development projects within the aquaculture sector.

5.8 The external dimension

Should aquaculture be included in future partnership agreements?

The aquaculture sector should not be involved in Fisheries Partnership Agreements with the catching sector, since the two sectors have a different operational focus.

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