

COMMENTS ON THE PUBLICATION ON THE REFORM OF THE EU COMMON FISHERIES POLICY

WHAT ROLE SHOULD AQUACULTURE PLAY IN THE FUTURE CFP?

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The overfishing in marine fisheries is a permanent problem over the past decades – as it is also expressed in the CFP documents. The prevailing practice is based on the exploitation of the natural resources directly threatening the sustainability of the natural marine ecosystems. For this reason the volume of marine catch is not sustainable.

In our view, despite the World tendency of decreasing marine catches and the growing need for fish and fish products, the development of aquaculture that is sustainable both in economic, environmental and social sense has a disproportionally little share in CFP. When considering aquaculture development: there is a need for a more clear distinction regarding the level of intensity, so the intensive aquaculture systems capable of industrial scale production – either marine or freshwater – and the semi-intensive or extensive production systems are to be treated separately.

Major reasons for sustainable development of intensive aquaculture:

- whole control over the production can be guaranteed, thus the production can be calculated and fitted to the changing market needs, and high utilisation of the capacities can be achieved in the processing ⇒ competitive average cost ⇒ competitive prices in the domestic and EU markets ⇒ decreasing imports of uncertain origin and quality (the economic sustainability can be ensured, which is also the basis of the other two, environmental and social sustainability);
- it produces the safest possible fish and fish products;
- because of water recirculation it enables environment-friendly production;
- it compensates decreasing marine catches;
- closed production technology does not threaten marine wildlife;
- controlled organic production can be realised;
- it can provide workplaces in rural areas where the fish production was never existing before (regional resource use + regional consumption)

Major reasons for the development of semi-intensive and extensive systems:

- these are often serve as water habitats with high ecological value
- controlled organic production can be realised;
- natural environment, full predominance of animal welfare issues during production;
- maintenance of national fish consumption traditions in some Member States (e.g. Christmas carp consumption)

Beyond the above mentioned, we are describing the key problems for Central-Eastern European member states having mainly pond fish culture of carp:

Aquaculture – and within this the extensive pond fish culture – is practically missing from the draft CFP, however this sector has growing importance in the volume of production and emphasized significance in the wise utilisation of natural resources as well as in the production of healthy and safe fish products.

There are several problems emerge nowadays in connection with EU marine fisheries, that draws attention to the growing importance of aquaculture.

Extensive pond fish culture differ either from fisheries or other animal production sectors regarding both its characteristics and complexity: it is based on natural processes undergoing in the ponds. The substantial element of the good pond fish culture practice is the reproduction/renewal of natural resources thus the extensive pond fish culture is a sustainable way of production in the long run. Thanks to the management practice, the ponds are having exceptional agro-ecology value, these are of high significance from nature conservation, water management and social point of view, as well.

Wetland habitats made by fish ponds are home to natural values of European importance. Their major significance is to sustain nesting, resting and – not least – feeding habitats for avifauna that twit with water.

Due to the climate change and according to the forecasts, the continental climate of Hungary is facing decreasing amount of precipitation, and subsequently, serious draughts are expected. Fish ponds situated in areas of limited or no agriculture importance (e.g. those low-altitude sites) are form water habitats with significant area, thus having major role in water retention. As the result of this the ponds have favourable mesoclimatic effect, and it is also advantageous for the soil water household, too. Due to the specific characteristics of the production the ponds – under certain conditions - are suitable to retain water from floods or inland inundations contributing to their cost-effective mitigation in the area.

The existence of fish ponds nowadays comes with ever increasing social importance. The water habitats as natural environment and the fish ponds operated by proper technology are significant recreational targets for people seeking healthy environment.

According to the above points inland aquaculture – and within this extensive pond fish culture – needs more emphasis in the CFP. In our view, because of the increasing economic importance of this sector, the outstanding significance in natural and water management issues, it has to be a pillar to CFP with adequately defined goals.

Summarising our main comments:

- aquaculture should be a characteristic pillar of CFP and its development should not belong exclusively to the authority of a Member State on national basis under any circumstances (aquaculture and marine and freshwater fisheries are closely related areas, they are linked horizontally but the vertically integrated sectors over them are the same.);
- fishing efforts are to be decreased in areas specialised traditionally in marine and freshwater fisheries, and the aquaculture can be developed on the redundant labour and capital (it is especially important that the connected vertical integration – i.e. fish processing, logistics, storage etc. – can already be found in the location);
- the large-scale extensive pond fish culture important for the Central-Eastern European Member States is to be developed but giving priority to ecological sustainability;
- development of aquaculture not using fish meal (e.g. grain-based feeding in Central-Eastern European pond fish cultures) has to get special attention;

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