THIS DOCUMENT PROVIDES A FACTUAL OVERVIEW OF THE CONTRIBUTIONS TO THE PUBLIC CONSULTATION ON “OPEN METHOD OF COORDINATION FOR EU AQUACULTURE”, WHICH TOOK PLACE BETWEEN 24 APRIL 2018 AND 20 JULY 2018. THE CONTENT OF THIS DOCUMENT SHOULD NOT BE REGARDED AS REFLECTING THE POSITION OF THE COMMISSION. IT DOES NOT PREJUDICE ANY FEEDBACK RECEIVED IN THE CONTEXT OF OTHER CONSULTATION ACTIVITIES.
**INTRODUCTION**

On 26 May 2018, the European Commission launched an Open Public Consultation (OPC) on their public consultation website¹ with regard to effectiveness of the Open Method of Coordination (OMC) as a process to promote and guide the sustainable development of aquaculture across the European Union (EU). Individuals and organisations wishing to participate in the OPC were able to provide their feedback directly via the website and the interactive survey questionnaire that was available. The OPC closed on 20 July 2018 and received a total of 42 responses from 16² EU Member States³.

The OPC was part of a wider consultation strategy by the European Commission, which includes targeted consultations of recognised stakeholder groups, such as the Aquaculture Advisory Council, aquaculture associations and national authorities. The Commission has notably committed to assessing national and EU efforts to promote the development and competitiveness of EU aquaculture, with a view of informing Member States, various stakeholders and the public on the achievements of the OMC in this sector and of identifying ways to improve the effectiveness of the OMC for aquaculture development.

Specifically, the OPC questionnaire asked respondents about the OMC and their experiences on its impact on aquaculture development. It was divided into four sections and had a total of 18 questions⁴: (1) Profile of respondents (“About you”); (2) EU Policy Framework on Aquaculture; (3) Aquaculture at national level; and (4) Final comments and recommendations. Sections two and three formed the main part of the OPC and were composed of a total of seven questions. Although it was not mandatory to answer each question⁵, the OPC received a high response rate in sections two and three⁶.

The second section examined respondents’ familiarity and use of EU policy, programmes and guidance, including the OMC, strategic guidelines for the sustainable development of aquaculture, guidance documents on aquaculture, multi-annual national strategic plans for aquaculture and national good practices. The third section gathered views on various factors affecting the sustainable development of aquaculture at national level, improvements in the last 3-4 years and identification of various needs at national level.

Respondents were able to provide additional comments when answering the questions and could also submit contributions. As is described in the ensuing sections, the European Commission received two formal contributions through this OPC⁷.

The following sections of this report provide an overview of the main results of the consultation and issues raised by respondents. The summary will contribute to further developing evidence-based policy

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¹ https://ec.europa.eu/info/consultations_en
² This includes respondents who were responding to the OPC in their personal capacity and as such were asked to state which Member State they resided in as well as respondents who were responding in their professional capacity or on behalf of their organisation and were asked to state in which Member State their organisation was headquartered.
³ ES, FR, EE, DE, IE, IT, PL, PT, RO, UK, CZ, SE, BG, EE, NL. Two other non-EU countries were listed: USA and AL.
⁴ Ten questions were in section 1, though this excludes counting e.g. 7a etc. as a separate question.
⁵ For example, certain questions in section 1 were not mandatory (anonymity was respected) and questions in sections two, three and four were not compulsory.
⁶ Sections two and three received a response rate of roughly 98% and 99%, respectively, though this excludes free-form textboxes, where respondents had the option of adding comments.
⁷ The contributions received cannot be regarded as the official position of the European Commission and its services and thus does not bind the European Commission.
making for the sustainable development of EU aquaculture, strengthening the use of the OMC approach in this important sector, and providing robust evidence for preparing the subsequent programming period.

1. **OVERVIEW OF PROFILE OF RESPONDENTS**

More than half of the 42 survey respondents participated in the public consultation in their professional capacity or on behalf of an organisation. Eighteen respondents who were replying in their personal capacity resided in 12 different Member States. There were four respondents from Spain, three from France and two from Greece. The remaining nine respondents indicated nine different countries of residence, with one of them residing in a non-EU country (Albania). The respondents replying in their professional capacity or on behalf of an organisation were asked to specify the country where their organisation was established. Fourteen of the 24 respondents indicated that their organisation was established in either Belgium (five), Spain (five) or Czech Republic (four).

**Figure 1: Quality in which respondents replied to OPC**

![Pie chart showing the distribution of respondents by capacity](image1.png)

**Figure 2: Respondents who replied in personal capacity: country of residence**

![Bar chart showing the number of respondents by country](image2.png)
The majority of the respondents replying in their professional capacity or on behalf of an organisation worked in a private enterprise (nine) or regional/local authority (five, with four of them in a regional authority). Three respondents worked in a trade, business or professional association, with two of them specifying that their employer was a representative of professions or crafts and one categorising his employer as a business organisation. The two respondents who selected the response option “International or national public authority” clarified that they worked for a national public authority or agency. Similarly, the two respondents who chose the response option “Research and academia” worked in an academic institution. Finally, there were two respondents who worked in a non-governmental organisation, platform or network and one person who chose the response option “Professional consultancy, law firm, self-employed consultant”.

Figure 3: Respondents who replied in their professional capacity or on behalf of an organisation: country of organisation’s headquarters

Figure 4: Types of organisations represented
Six of the nine respondents who worked in private enterprises indicated that their private enterprises had less than ten employees.

**Figure 5: Size of private enterprises represented**

![Pie chart showing the size of private enterprises represented](image)

Finally, half of the respondents replying in their professional capacity or on behalf of an organisation reported that their organisation was not included in the Transparency Register (12 out of 24). All but one private enterprise and both academic institutions participating in the consultation were not part of the Register. Among the organisations not included in the Register were a representative of professions or crafts as well as one national and one regional public authority.

Nine respondents indicated that their organisation was part of the Register, four of whom worked in a regional or local authority, two in a non-governmental organisation, platform or network, two in a trade, business or professional association and one in a private enterprise. Three respondents chose the response option “Not applicable”, as each of them worked in a different type of organisation: one respondent represented a national authority or agency, one worked for a private enterprise and one chose the response option “Professional consultancy, law firm, self-employed consultant”.

**Figure 6: Inclusion of respondents' organisations in the Transparency Register**

![Pie chart showing the inclusion of respondents' organisations](image)
2. EU POLICY FRAMEWORK ON AQUACULTURE

Respondents’ familiarity with the different elements of EU Policy Framework on Aquaculture was fairly similar. The survey shows that the Multiannual National Strategic Plans (MANPs) are the most well-known policy instrument, as more than half of the respondents (26) rated their familiarity with them as 4 or 5. However, five of the nine respondents who worked for private enterprises were not familiar with MANPs or had only very limited knowledge of it. Half of the respondents indicated good familiarity with the Strategic Guidelines, while national good practices and the guidance documents on the application of relevant legislation were well known by slightly less than half of the respondents (20 and 19 respectively). The least well-known EU policy instrument was the OMC to support EU aquaculture, as most respondents (25) admitted to having little to no familiarity with it.

Figure 7: Extent of familiarity with EU policy, programmes and guidance

The survey shows that from the five OMC tools that were listed, MANPs and guidance documents on the application of relevant legislation were used most widely among the organisations responding to the survey. Seventeen respondents indicated that their organisation used these OMC tools. Thirteen respondents confirmed that their organisations used Strategic Guidelines. It is important to note that the profile of organisations that used OMC tools is highly varied. For example, the survey suggests that MANPs were not only used by national or regional authorities but also by academic institutions, non-governmental organisations, representatives of professions or crafts and private enterprises. The survey also shows that the available documents on best practices were used less frequently by the respondents’ organisations, with 13 respondents confirming their usage.

The number of organisations that participated in the development of OMC tools was lower. In total, 13 respondents indicated that their organisations participated in the development of MANPs – the highest
figure among all OMC tools. In contrast, four respondents noted that their organisation participated in the development of Strategic Guidelines.

Figure 8: Participation in the development or use of OMC tools

Question 3: Please provide your view on the usefulness of the [OMC] tools. Please indicate in the scale: 1 (not useful at all) to 5 (very useful).

The survey shows that MANPs, good practice events and dissemination of good practices were all seen as useful or very useful by the majority of respondents. The perceived usefulness of Strategic Guidelines and the guidance documents was lower, with less than half of the respondents rating these tools as useful (4) or very useful (5). In the comments section, few respondents noted the limited use and application of these tools. One respondent specifically referred to the EU guidance documents, stressing that some of them are disregarded by national authorities. Another respondent highlighted the importance of having a sound monitoring system to track the implementation of MANPs.

Figure 9: Views on usefulness of OMC tools
3. **Aquaculture at National Level**

**Question 4:** Please confirm whether you are aware of the following activities [happening at national level].

The majority of respondents confirmed that their Member State has a national strategic plan for aquaculture (36) and has set objectives for the development of sustainable aquaculture (32). Slightly fewer respondents were aware of the communication campaigns to improve the image of aquaculture products (25) and the guidance on EU legislation provided by their public authority (23). Less than half of the respondents (18) could confirm that their industry sector was consulted on the national aquaculture strategy.

In the comments sections, there were some comments that the communication campaigns were not aimed at increasing the consumption of aquaculture products and were focused on fisheries instead. The campaigns’ limited effectiveness was another problem raised. There was one comment that there is potential for more support and awareness raising for a sustainable aquaculture sector with high animal welfare and fish health standards. There was also a comment that the development goals were not clearly communicated by the authorities.

**Figure 10:** Awareness of following activities

<table>
<thead>
<tr>
<th>Activity</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>My country has a national strategic plan for aquaculture</td>
<td>36</td>
<td>2</td>
</tr>
<tr>
<td>My country has set objectives for the development of sustainable aquaculture</td>
<td>32</td>
<td>4</td>
</tr>
<tr>
<td>My industry sector was consulted on national aquaculture strategy</td>
<td>18</td>
<td>10</td>
</tr>
<tr>
<td>My public authority provides guidance on EU legislation</td>
<td>23</td>
<td>8</td>
</tr>
<tr>
<td>Communication campaigns have been carried out in my country to improve the image of aquaculture products</td>
<td>25</td>
<td>11</td>
</tr>
</tbody>
</table>

**Question 5:** To what extent do the following affect the sustainable development of aquaculture in your country? *Please indicate in the scale: 1 (no effect at all) to 5 (big effect).*

Respondents were asked to rate the five factors that were likely to have an affect on sustainable aquaculture development. The results indicate that most significant factor (listed) was complicated and time-consuming administrative procedures, for example for licensing. Thirty-four out of 42 respondents indicated that the administrative procedures had a considerable affect. Competition from outside the EU

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8 We note that the question in the OPC had both the terms ‘affect’ (in the formulation of the question) and ‘effect’ (in the rating).

9 Twenty-three chose option ‘5’ and 11 chose option ‘4’.
was the second most significant factor (listed) affecting the development of sustainable aquaculture, according to the majority of respondents (26). A slightly lower number of respondents chose the response options 5 and 4 when assessing the importance of the amount of space available in waters and land (21), communication to consumers about aquaculture products (21) and the lack of innovation in the sector (20).

The respondents also named a few other factors that were relevant for the development of sustainable aquaculture. There was one comment on the need to find large investors with a long-term vision, and one that EMFF funds do not sufficiently reach producers and are not used efficiently and as intended. The importance of applied research and the promotion of the aquaculture activity and products were also mentioned in the comments.

Some respondents added further comments in relation to this question of the survey. For example, one respondent noted the low prices of sea fish as a factor that hinders the development of the aquaculture sector. Another respondent noted that aquaculture farming is inhibited by existent legislation which bans the import of certain types of fish into closed aquaculture facilities. Specifically, the respondent called for the legalisation of the import of shrimp postlarvae and broodstock. There were a few respondents who emphasised the environmental aspects of sustainable aquaculture development; for example, the need to align technological development to environmental restrictions was referred to by one of the respondents. Another respondent highlighted the fact that the sustainable aquaculture sector depends on the protection of the environment and high animal welfare. It was also mentioned that high pollution has been a hindering factor for the development of shellfish farming areas.

Figure 11: Factors affecting sustainable development of aquaculture

The figure below reveals that the majority of survey respondents did not see clear improvements in any of the five listed areas. In each case, the majority of respondents considered that there either has been no or almost no improvements. The largest number of respondents chose response options 1 and 2 when assessing the improvements made in the areas of administrative procedures (29) and spatial planning (28). Lack of innovation was the factor most rated 3 by the respondents (14).
Of the five listed areas, between one and four out of 42 respondents indicated that there had been improvements in each of the areas listed. Of these, four respondents indicated that these improvements had been in addressing complicated and time-consuming administrative procedures as well as lack of innovation and/or opportunities for business diversification.

The survey respondents considered that there was a need for each of the six improvements listed. The areas where respondents indicated the greatest need for improvement by rating with scores of 4 or 5 were:

- simplified administrative procedures (33 respondents, of which 27 indicated a strong need (5 rating));
- improvements in terms of coordinated spatial planning for aquaculture activities (31 respondents, of which 15 indicated a strong need (5 rating)); and
- improved communication campaigns on domestic aquaculture (28 respondents, of which 19 indicated a strong need (5 rating)).

Some other improvements were also suggested by the survey respondents. The following needs were highlighted:

- to reduce pollution by ensuring appropriate implementation of the Water Framework Directive;
- to ensure the effective control of unregulated aquaculture production;
- to increase the number of officials working with the promotion of aquaculture and its products;
- to adopt the EU legislative act on freshwater/marine aquaculture, which would ensure the wide-scale simplification of the aquaculture business, including the simplifications in the areas of environment, biodiversity, Water Framework Directive/Marine Strategy Framework Directive and veterinary aspects.
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4. Final Comments and Recommendations

Respondents’ comments highlighted very different issues, reflecting the different profiles of those participating in the consultation. The following recommendations were made by the survey respondents:

- to develop non-binding EU-level guidelines to support the involvement of stakeholders, especially local communities. According to the respondent, stakeholders’ participation in the decision-making process could help avoid conflicts in the implementation phase;
- to include more governmental departments (especially those specialising in environmental affairs) into the OMC process;
- to ensure that private actors are better informed about the actions and documents adopted by the EC;
- to make sure that the OMC tools address fish welfare as well as the impact of aquaculture on antimicrobial resistance; and
- to set up a single, simplified and business-friendly licensing system that could operate at EU-level.

One respondent emphasised that the existing tools were non-binding and thus lacked proper control mechanisms.

5. Contributions to the OPC

In addition to the open comments provided in the survey, two formal contributions were submitted as part of this public consultation. The first contribution confirms the importance of biosecurity and health for the aquaculture sector. The contribution notes that monitoring quality and health is key to integrated management plans of the sector and this must be accompanied by early and accurate diagnosis, including...
optimised therapeutic protocols. It also highlights the fact that biosecurity standards, if applied intelligently, can support and facilitate decision-making in aquaculture companies for sustainable activity.

The second contribution submitted is a report of the aquaculture study carried out in Sweden in 2017. The purpose of the study was to compile knowledge on the licensing and monitoring processes that were in place in Sweden, as well as to provide recommendations on how these processes can become more effective. According to the report, it takes over six years on average for the permit for fish farming to be granted in Sweden. The study provides a list of recommendations that could help to shorten the licensing process, which includes revising the Environmental Code, improving the coordination between different public bodies, increasing the duration of licenses and providing clear guidelines for those applying for aquaculture licenses.