



Baltic Marine Environment Protection Commission

HELCOM Fish Correspondence Group concerning a draft document on BAT/BEP descriptions for sustainable aquaculture in the Baltic Sea region (CG Aquaculture)

CG AQUACULTURE 2-2018

Berlin, Germany, 7-8 November 2018

Document title	Ideas for further development of BAT and BEP
Code	5-1
Category	INF
Agenda Item	Agenda Item 5 – First ideas on BAT/BEP concept by Contracting parties
Submission date	31.10.2018
Submitted by	Estonia

Background

Under Agenda Item 5, Germany is invited to present a first draft concept of BAT/BEP for discussion by the meeting. Additionally, Contracting Parties are invited to prepare short expert inputs on the above listed topics or any additional issues that are not yet listed and to notify the secretariat in advance about contributions.

Action requested

The meeting is invited to consider this as an input for discussions for further development of BAT and BEP.

Ideas for further development of BAT/BEP

In Estonia, there is no specific document or guidance available for the use of BAT or BEP in aquaculture. In recent years some studies have been made in order to obtain information on the use of BAT and BEP in other countries in the Baltic Sea region. Additionally, studies have been made in order to evaluate and describe the existing measures, technologies or practices when permits for aquaculture activities have been authorized. From these studies we can conclude that some of the existing fish farms are more advanced in terms of using measures for mitigation of possible negative environmental effects.

Based on the information obtained from other countries in the region some recommendations are available to guide both the national permitting authority and aquaculture sector. But these recommendations are not substantive and give only partial reference to practices used in the countries without concluding or arguing whether these can be considered as BAT or BEP.

As the maritime spatial planning in Estonia is still ongoing, the prospects for future aquaculture are widely discussed. During recent years the interest of both national and some foreign entrepreneurs has risen with the aim of establishing aquaculture facilities in Estonia. This has brought several issues that need to be discussed and in which often the need for common regional approach or understanding in managing and operating aquaculture facilities is emphasized.

With this we would like to list some of them as these could be also the ones where the establishment of BAT and BEP would support the sustainable aquaculture in the Baltic Sea region:

1) Technological aspects and pollution abatement measures

Here we see that we could have an overall understanding on preferences which technology should be more favorable and which less. For instance, for fish farming there are also closed systems available for fish farming in the sea and we think that this knowledge and practice should be more used and introduced, especially for new fish farms.

But there seems to be a lack of data and experience on all aspects related to it together with the insufficient spread of this knowledge. Also in relation to technological aspects, we see that a possible list of most favorable technological measures to diminish the pollution from all sorts of fish farms should be widely known for the whole region.

As the knowledge on different pollution abatement measures varies the level of implementation of these measures is also different.

Recently, more attention has been paid on measures which we understand as compensatory measures. This means that if the fish farm discharges pollutants in an area where there is no room for additional pollution, such compensatory measures should be implemented to take out the pollutants from the sea (for instance taking low quality fish out from the sea, cutting straws in shallow coastal areas or similar).

Unfortunately, there is no understanding when, how or where such measures should be implemented so that they could really have the positive compensatory effect.

2) Aspects related to the environmental charges and fees

The main question here for us is that when and who should financially compensate the environmental damage and if at all. In the Baltic Sea region there are different approaches for applying environmental fees and charges or pollution charges but we would prefer that there would be again some sort of a common

understanding on how to put in practice the polluter pays principle. Of course, in the end it is a national or a political question to decide, but still if we could agree on common principles or approaches, it could be helpful for the whole aquaculture sector.

Applying pollution fees and charges goes hand-in-hand with calculation of pollution loads from fish farms and methods used for that, since different methods and principles are available.

3) Aspects related to the permitting and impact assessment

In relation to permitting, the overall question is if and how important this is, as in different countries we have several practices. If all the environmental requirements are enforced by national laws and the system works well, there is no added value for additional permitting procedures.

More important here seems to be the impact assessment, in order to find out, if the planned or existing fish farm allows to achieve the environmental objectives of a particular marine area or a water body. But in order to assess the impact, then again, there are different understandings of what the impact is and under which conditions the environmental objectives would have to be achieved. With this we have to consider also the water quality status by different parameters and determine which the exact cases are when it should be concluded that the deterioration in the status of water has taken place or will do so. There are some court cases in the EU on that matter but in practice there seems to be lack of common understanding.

4) Aspects related to the monitoring

Environmental monitoring is also done differently in countries, but monitoring costs can be high. And if the fish farmer has to do it and if these requirements differ significantly there are also financial consequences for fish farmers or to the state when doing the environmental monitoring. Also the monitoring as such could benefit from common principles and approaches when designing the monitoring needs for a particular aquaculture facility. This could cover the frequencies, parameters to monitor, different types of aquaculture, the use of data etc.