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<b>Document title</b>	The work of CG Aquaculture – Development of BAT/BEP regarding animal welfare and Aquaculture Management Zones
<b>Code</b>	6-2
<b>Category</b>	CMNT
<b>Agenda Item</b>	6 – BAT/BEP for sustainable aquaculture
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<b>Submitted by</b>	Denmark
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## Background

### *Animal welfare*

The HELCOM Heads of Delegation have agreed that CG Aquaculture should develop BAT and BEP for sustainable aquaculture. The scope of the work is based on HELCOM recommendation 25/4 (adopted the 2<sup>nd</sup> of March 2004) and 37/3 (adopted the 11<sup>th</sup> of March 2016) and includes now 12 topics e.g. nutrient pollution, marine litter, fish feed composition and feeding practices.

The content of every topic is extensive and keeps growing despite a deadline in the end of 2022. In addition, it has unfortunately not been possible to find Contracting Parties who are interested and have the resources to take lead in the writing process for several topics. Further, the terms of reference do not include the subject 'animal welfare'. For the reasons above, Denmark does not believe it is necessary to develop BAT and BEP measures for animal welfare.

### *Aquaculture Management Zones*

Denmark would also like to draw attention to an informal meeting in CG Aquaculture the 30<sup>th</sup> of November 2021 (appendix 6-1). At the meeting, a discussion about whether and how to recommend aquaculture management zones (AMZ) was brought up again by the lead country Germany. At a previous meeting the 16<sup>th</sup> of June 2021 (CG AQUACULTURE 4-2021) the Meeting did not support to recommend AMZs (c.f. appendix of document 6-1). This was pointed out by Denmark at the informal meeting in November 2021. Furthermore, Denmark reiterated at the meeting that Denmark was not able to support AMZs.

It could be noted that Denmark do not support AMZs because Denmark has tried to identify such suitable areas. Ensuring compliance with WFD and Nature directives is a very difficult task to perform as it requires extensive modelling and is very costly. Furthermore, specific permits must be based on individual assessment of the aquaculture facility as described in an application, the details of which are impossible to take into account beforehand.

By drawing attention to this issue, Denmark hopes to improve the future work in CG Aquaculture and make way for better progress.

## Action requested

The Meeting is invited to agree that animal welfare and Aquaculture Management Zones should not be included in the work of CG Aquaculture to develop BAT/BEP for sustainable aquaculture.