**Høringssvar til revision af IE Direktivet - om industrielle emissioner (integreret forebyggelse og bekæmpelse af forurening), EUROPA-PARLAMENTETS OG RÅDETS DIREKTIV 2010/75/EU af 24. november 2010**

**Fremsendt via EU høringsportal 21.4.2020.**

Danish Aquaculture strongly recommends that the revised Industrial Emissions Directive (IED) does not include aquaculture.

The Organization Danish Aquaculture fully supports the objectives and means of the European Green Deal. Specifically, the new growth strategies built in both the Farm to Fork Strategy and the Circular Economy Action Plan that aim to transform the EU into a fair and prosperous society, with a modern, resource-efficient and competitive economy.

IED is based on several pillars, in particular on an integrated approach, the use of best available techniques (BAT), flexibility, inspections and public participation (<https://ec.europa.eu/environment/industry/stationary/ied/legislation.htm>). Danish Aquaculture wishes to highlight that aquaculture is currently exhaustively regulated and monitored by EU, national and regional regulations, amongst others from an environmental perspective already covering the great majority of the aspects of the IED.

Aquaculture is not an industrial activity causing significant pollution, and the monitoring and control of effluents and impact from aquaculture on the environment are already taken care of by the existing regulations and directives within the scope of the Water Framework Directive (2000/60/EC), the Marine Strategy Framework Directive (2008/56/EC), the Habitats Directive (92/43/EEC), the Birds Directive (2009/147/EC) and the Environmental Impact Assessment Directive (85/337/EEC), followed by supplementary national and regional rules.

The development of additional BAT for aquaculture at EU-level is strongly advised against due to the great diversity of aquaculture (different species, different water use, different techniques, etc.) and completely different potential environment footprint impacts in the different water bodies. Furthermore, BAT and Codes of conduct are already part of aquaculture regulations in most countries.

Being the aim of the European Green Deal to achieve its objectives in the most effective and least burdensome way, Danish Aquaculture thinks that it is not appropriate to include aquaculture into the scope of the Industrial emissions Directive. If aquaculture is included in the revised IED scope its governance will become more complicated with additional unnecessary burdens which is a contradiction to the EU current strategy.

Regardless of the adoption by the European Commission of successive Strategies for the Sustainable Development of European aquaculture, reality is that aquaculture in the European Union continues to be in stagnation since the turn of the century, in strong contrast with sustained growth of aquaculture production at global level (FAO State of World Fisheries and Aquaculture <http://www.fao.org/fishery/sofia/en>). The main reason for this is the extremely complicated legal framework in which it must develop. The European Commission has recommended to “reduce the administrative burden on aquaculture”, and “to simplify administrative procedures and reduce licensing time for aquaculture farms” (<https://www.europarl.europa.eu/factsheets/en/sheet/120/european-aquaculture>).