

Patrick Moran
Oysters For Suir
The Mount
Cheekpoint
County Waterford
Republic of Ireland

11th March 2022

RE: Public consultation on revised State aid rules for the fishery and aquaculture sector & the EMFAF 2021-2027.

Dear Sir/Madam,

In reference to the public consultation on revised State aid rules for the fishery and aquaculture sector Ref.: HT.5822 & furthermore in reference to Regulation (EU) 2021/1139 of 7 July 2021 establishing the European Maritime, Fisheries and Aquaculture Fund.

I run an Aquaculture business in Waterford Estuary, Oysters For Suir, growing Oysters for the top end of the Oyster market. The business was severely impacted by the collapse of markets in China and around the world as a result of the Covid 19 pandemic. There were virtually no sales in 2020 and those few sales were sold at a loss. Holding over the stock then incurred losses along with doubling the work all the time with the other business running costs. Compared to other sections of the Irish economy, Aquaculture and Small Boat Inshore Fishing received minimal support from the Irish State on account, I am told there was no money left in the previous fund. My business came under severe financial strain in 2020 – 2021 and remains that way today.

I welcome the specific objectives as set out in article 26 (2) of the EMFAF 2021-2027 in relation to its confirmation that supports may cover “*compensation to operators of the fishery and aquaculture sector for their income foregone or additional costs; in case of “exceptional events” causing a significant disruption of markets.* **It’s imperative that the Commission establishes, by means of an implementing decision, the occurrence of an “exceptional event” in relation to the global COVID-19 pandemic.** International export markets were affected since the beginning of 2020 and therefore the duration of the implementing decision in relation to COVID-19, must cover losses as a direct result of the COVID-19 pandemic since the beginning of 2020. The EU’s PECH Committee on the impacts of the COVID-19 pandemic on EU fisheries and aquaculture published its report in July 2021 and highlighted inequalities in support provided to the fisheries and aquaculture sector throughout the pandemic. The report also states, “*the impacts on those fishers and farmers that used to sell high value species such as oysters to HoReCa was extremely harsh*”. An important finding of the PECH report and one which is often overlooked states” *while a fisher can decide to fish less when demand is low, aquaculture farmers must keep their product alive. Hence, it is believed that those*

farmers who could not find an alternative market for their products ended up bearing even high losses.

Aquaculture businesses are still in COVID- 19 as the markets have not fully recovered. In the Far East and China along with the shipping costs “exceptional events”, Russia’s invasion of Ukraine as a “exceptional event” overlapping with COVID- 19, this has started to put more pressure on a struggling Aquaculture business with fuel costs rocketing. It also highlights Ireland’s and the EU difficulties in food security. The Oysters have to be tended to and looked after in “exceptional events” regardless of market collapse or the cost of fuel.

I ask that the commission prioritise support in the form of compensation for income foregone as a result of the COVID-19 pandemic, as a matter of extreme urgency. Furthermore, we ask that the Commission make whatever implementing decisions/amendments that are required to allow for the prompt and efficient drawdown of these funds as food security within the Union is dependent on this support for oyster farmers, who have been particularly hard hit throughout this pandemic.

The survival of oyster farming in Ireland is dependent on urgent support being provided to enable these businesses to recover from the severe impacts of the global COVID-19 pandemic. These businesses allow for huge environmental benefits and are located in small local coastal communities who depend on these businesses for vital employment.

I request that the Commission establishes, by means of an implementing decision the occurrence of an “exceptional event” in relation to the global COVID – 19 pandemic and urgently makes all necessary provisions and/or amendments for such compensation to be provided to Aquaculture farmers from the new EMFAF 2021 – 2027 Regulation (EU) 2021/1139 as a matter of extreme urgency.

Yours Sincerely,

Patrick Moran