

From: COMP H6
To: [REDACTED]
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Subject: HT.5788_Reply_from_an_organisation FISSTA SUBMISSION To: Bruxelles
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From: fissta2017@gmail.com [REDACTED]
Sent: Sunday, March 13, 2022 9:38 PM
To: [REDACTED] <COMP-H6@ec.europa.eu>
Subject: HT.5788_Reply_from_an_organisation FISSTA SUBMISSION To: Bruxelles

FISSTA SUBMISSION To:
Directorate-General for Competition
Unit H.6
1049 Bruxelles /Brussel
Belgique /België
Ref.: HT.5788

Public consultation on revised State aid rules for the agricultural and forestry sectors and in rural areas

Federation of Irish Salmon

& Sea Trout Anglers

Conaidhm na Slat Iascairí Bradáin agus Breac Geal

F.I.S.S.T.A.

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FISSTA* POLICY ON AFFORESTATION - RIVER OF IRELAND

Forestry is an important industry and can play a significant role in supporting healthy water environments. But definitely not Sitka Spruce, as it increases sedimentation which impedes fish reproduction and especially on a river habitat that has Freshwater Pearl mussels.

Forests

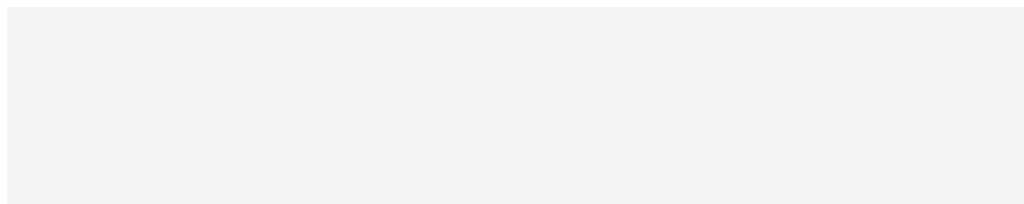
When planted properly and in locations that protect the sensitive nature of the watercourse forests have an amazing ability to store water, which can prevent flooding and help maintain consistent, even flows down rivers.

River shading from sensitively planted trees will also play an increasingly important role in mitigating the effects of climate change in our rivers, keeping water temperatures at levels that be tolerated by salmon, trout and sea trout.

For forestry to work in sync with nature, it must be operated sensitively. By planting broadleaf species in sensitive areas like the River Feale an Appropriate Assessment must be completed to inform the planners that any commercial developments do not contribute to acidification or impact on the specific habitat in question.

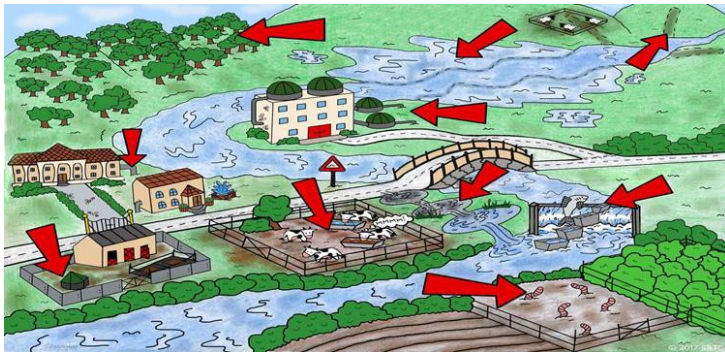
The red arrows shows what problems can occur along a river, and then switch to our solutions illustration to see how they can be controlled. How many of these activities have you seen happening on your river?

BAD PRACTICE





GOOD PRACTICE

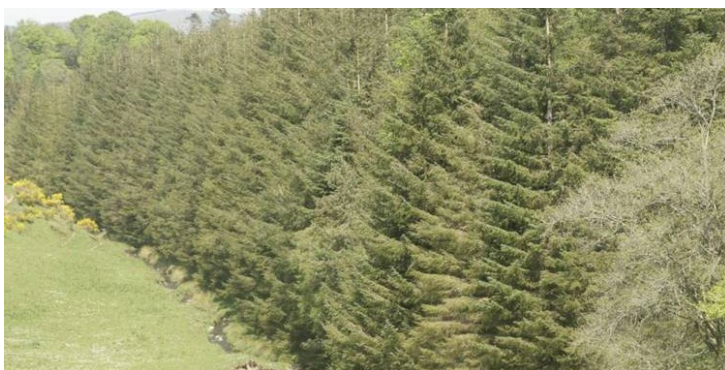


FORESTRY – IMPACT ON SALMONID & FRESHWATER PEARL MUSSELS

Issue: Intensive commercial conifer forestry plantations cause acidification of river water, which is damaging to aquatic invertebrates and can inhibit spawning of salmonids. Pesticides used to treat young trees also enter the rivers and have a toxic impact on aquatic life.

Good Practice

Good practice: Keep conifers away from sensitive headwaters and instead plant broadleaf species in sensitive areas, as these do not contribute to acidification. Use alternative non-toxic methods of pest control within forestry plantations to prevent damage to aquatic life.



When not managed responsibly, intensive commercial non-native conifer forestry plantations can cause acidification of river water and pesticides used to treat young trees can contaminate water life.

PREVENTING PLANTATION CREATION

The Feale river is already acidified and FISSTA affiliated anglers have already invested a great deal to improve water quality. Local clubs on the river are encouraged to detail their and our concerns about how the proposed plantation will damage water quality and fish habitat and the very sensitively protected freshwater pearl mussels. We should demand that a full environmental impact assessment should take place before a licence was even considered.

SIGNED ON BEHALF OF FISSTA BY NOEL CARR SECRETARY.

PLEASE ACKNOWLEDGE

Policy field

State aid

Target group

All citizens and organisations are welcome to contribute to this consultation. Contributions are particularly sought from (i) Member States and their aid granting authorities, (ii) business associations and companies operating in the European single market, as well as (iii) legal and economic practitioners.

Period of consultation

From 11.01.2022 to 13.03.2022

Objective of the consultation

The Commission is publishing for consultation the draft Agricultural Block Exemption Regulation (ABER) and the revised draft Guidelines on State aid for the agricultural and forestry sectors and in rural areas

The main drivers of the revision are the fact that the agricultural State aid rules need to be aligned to the new Common Agricultural Policy ([Regulation \(EU\) 2021/2115](#)) so that the aid measures under the agricultural strategic plans can be authorised from a State aid point of view where this is required. The draft rules also take into account aspects related to the Green Deal. Moreover, the Commission has gained sufficient experience to enlarge the scope of the ABER so that Member States may in the future adopt more State aid measures without having to notify them to the Commission.

How to submit your contribution

We welcome contributions from citizens, organisations and public authorities.

- If you are answering this consultation as a **citizen**, please click [here](#) to submit your contribution.
- If you are answering this consultation on behalf of an **organisation**, please click [here](#) to submit your contribution.
- If you are answering this consultation on behalf of a **public authority**, please click [here](#) to submit your contribution.

Received contributions will be published on this webpage. Submissions that are clearly marked "confidential" will be treated as such and not published. In that case please also provide a non-confidential version of your reply. It is important to read the privacy statement attached to this consultation for information on how your personal data and contribution will be dealt with.

When providing us with the documents requested above, please ensure that redactions made by you properly cover all confidential information and cannot be reversed.

Please note that we cannot guarantee to take account of replies received after the deadline.
We would appreciate receiving documents in an electronic format.

Consultation document / Questionnaire

- [Draft Commission Communication](#) - Guidelines for State aid in the agricultural and forestry sectors and in rural areas;
- [Communication from the Commission on the endorsement of a draft Agricultural Block Exemption Regulation](#) and [Draft Commission Regulation](#) declaring certain categories of aid in the agricultural and forestry sectors and in rural areas compatible with the internal market in application of Articles 107 and 108 of the Treaty on the Functioning of the European Union and repealing Commission Regulation (EU) No 702/2014;
- [Press release](#): Commission invites comments on draft proposals for future State aid rules in agriculture, forestry and fishery sectors.

Reference documents and other, related consultations

- [Explanatory Note](#) accompanying the consultation on the draft rules on State aid to the agricultural and forestry sectors and in rural areas;
- 2014 EU Guidelines on State aid to the agricultural and forestry sectors and in rural areas;
- Regulation (EU) No 702/2014 declaring certain categories of aid in the agricultural and forestry sectors and in rural areas compatible with the internal market in application of Articles 107 and 108 of the Treaty on the Functioning of the European Union;
- First round of public consultation;
- Staff Working Document on the evaluation of the 2014 State aid rules in the agricultural and forestry sectors and in rural areas.

Contact details

Responsible service:

Directorate-General for Competition – Unit H.6


Please always indicate the reference number in your correspondence: HT.5788

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***FISSTA - WHO WE ARE.**

FISSTA, the Federation of Irish Salmon and Sea Trout Anglers are Ireland's all island salmon and seatrout angling body representing the majority of the 20,000 club anglers and the sport on the many salmon and seatrout rivers north and south of the border.

The affiliated club structures supports an industry of sport and tourism that employs over 12,000 jobs and is valued at over €750 million to the Irish economy.* They play a vital role in the conservation of our wild salmon and seatrout habitat and lobby government for to improve the lot of the fish and angling conditions. Their campaigns against the commercial netting, salmon farming, sealice and other threats to the life cycle of the salmon challenges all anglers to play their part and use their voluntary effort to ensure future generations continue to enjoy the king of fish.

FISSTA is club member driven organisation of volunteers who receive no state funding so they can speak with an independent voice for the angler. Inspired and supported by the voluntary efforts of its members, FISSTA was established in 1986 and succeeded the STCI - Salmon & Trout Council of Ireland to become a more effective lobby group to improve and assist the lot of the Irish angler. During the past years the Federation has assisted many angling members to protect their salmonid angling waters by organising them into formally registered clubs on the best salmon rivers of Ireland.