

**STATEMENT OF ADOPTION
OF THE AQUACULTURE STRATEGY FOR THE MALTESE ISLANDS: TOWARDS
SUSTAINABILITY**

Title of Plan:

An Aquaculture Strategy for the Maltese Islands

Final draft: June 2014

Responsible Authority:

Ministry for Sustainable Development, the Environment and Climate Change (MSDEC).

Introduction

This document (hereon referred to as the SEA Statement) has been prepared in line with requirements of regulation 10 of the SEA Regulations (LN 497 of 2010).

Purpose of the Aquaculture Strategy for Malta

This document presents Government's strategic direction for the future of the aquaculture industry in Malta. It has been drawn up following a thorough consultation process and is intended to provide more clarity for investment, outline national objectives and define priorities and regulatory requirements for the aquaculture sector. The strategy builds on the strengths of the experience gained so far in this relatively young sector since its introduction in the late 1980s. The underlying principle is that of improving competitiveness whilst promoting sustainable practices.

Timeframe of the Strategy

2012– 2020

Area covered

The Aquaculture Strategy for Malta has a nation-wide coverage.

Availability of document

The Aquaculture Strategy document will be made available on the website of the Ministry for Sustainable Development, the Environment and Climate Change

WEBSITE: www.msdec.gov.mt

1 Summary of the SEA process

The proposal for an Aquaculture Strategy for Malta was subject to Strategic Environmental Assessment in accordance with the SEA Regulations (Legal Notice 497 of 2010), which transpose the European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

A Scoping Report for the Strategic Environmental Assessment (SEA) of the Aquaculture Strategy for Malta was prepared by Adi Associates Environmental Consultants Ltd (“Adi Associates”). The Scoping Report set out the framework for the SEA, included the context of the SEA, established the baseline, objectives and indicators for the assessment. The Scoping Report also discussed the proposed contents of the Environmental Report and the next stages in the SEA process

During the development of the Scoping Report, the following entities were consulted through meetings:

- The Malta Environment and Planning Authority (MEPA);
- The Environmental Health Policy Coordination Unit within the Department of Environmental Health;
- The Malta Resources Authority; and
- The Department of Fisheries.

The Scoping Report was issued for public consultation in July 2012. The Scoping Report was distributed by the then Ministry Resources & Rural Affairs (MRRA) to the identified stakeholders.

After the consultation, the Scoping Report was finalised. The draft Environmental Report was prepared in line with the finalised Scoping Report.

The draft Environmental Report was issued for public consultation November 2012.

After the expiry of the public consultation period, the draft Environmental Report was finalised taking into consideration the responses received from the consultation process.

The finalised Environmental report, in line with Article 5 of the SEA Directive, includes a description of the reasonable alternatives considered during the drafting of the Aquaculture Strategy, a description of the baseline environment relevant to the measures proposed in the Aquaculture Strategy and links with other policies, plans, programmes, environmental objectives, EU Directives, national legislation and international conventions to which Malta is party. The report also includes existing environmental problems affecting the implementation of the Strategy and also the likely significant effect of the strategy measures proposed on the environment, including issues such as biodiversity, population, human health, fauna, flora, water, air, climate, material assets, cultural heritage, landscape, and the interrelationship between such factors. A description of possible mitigation measures together with monitoring measures are also described in detail. The responses received from different entities during the consultation process, together with comments on how these comments were taken into account in the Environmental Report, were included in the Environmental Report. A non-technical summary was also included.

2 SEA statement

Regulation 10 (1) requires that the responsible authority ensures that when a plan or programme is adopted the authorities referred to in regulation 7(3), the competent

authority, the public and any Member State consulted under regulation 8 are informed that such a plan has been adopted and make available the plan and a statement in line with regulation 10(1) (b) and the monitoring plan in line regulation 10(1) c

The statement required in line regulation 10(1) b has to provide a summary of the following information

- how environmental considerations have been integrated into the plan or programme;
- how the environmental report was prepared pursuant to regulation 6;
- the opinions expressed pursuant to regulation 7;
- the results of consultations entered into pursuant to regulation 8 have been taken into account in accordance with regulation 9
- the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- the measures that have been decided concerning monitoring in accordance with regulation 11.

The sections below describe how the requirements above have been addressed.

How environmental considerations have been integrated into the Aquaculture Strategy and how the Environmental Report(ER) has been taken into account

The main recommendations emerging from the SEA are:

(i) Preferred alternative

*As identified in **Chapter 6**, the Strategy discusses three production capacity scenarios for Tuna and CCS. The proposed scenarios, in particular Scenario 3, could potentially result in what is considered to be a significant negative effect related to the extent of the proposed increase in sites along the eastern coast of Malta. Production capacity scenario 3 is also well beyond the maximum targets stipulated in Table 16 of the Strategy and is therefore not considered favourably in this SEA.*

It is therefore recommended that the Strategy identifies a preferred growth option for the industry. The targets must be justified from a socio-economic and environmental point of view. Once the production targets are established, it is recommended that the Strategy clearly defines how it will allocate marine areas for production. The SEA also considers that preference should be given to existing or planned aquaculture zones to accommodate the targets. To date there is one existing Aquaculture Zone in the south east of Malta with a capacity of 6,000 tonnes and the Government is studying the setting up of another 6,000 tonne capacity aquaculture zone in the north of Malta. Based on the maximum targets set out in Table 16 of the Strategy, this is considered to present sufficient capacity for CBS.

Should the Strategy require additional capacity for CCS, it is recommended that farms are located within a designated aquaculture zone. To date there are no CCS farms within a designated zone. As stated above and in Chapter 6 of the SEA, consideration of all the areas 1 to 8 for aquaculture zones is likely to give rise to significant environmental impacts. It is therefore recommended that the Strategy clearly identifies search areas for the establishment of these zones.

The 8 areas described in **Chapter 6** and presented in the Strategy can therefore be considered as search areas for potential aquaculture zones. As stated above, the industry does not require all 8 areas for production. The SEA therefore recommends that some zones are given preference for further consideration as a search area should they meet the following requirements:

- *Posidonia meadows should be avoided;*
- *Maerl beds and other potentially sensitive benthic habitats should be avoided;*
- *The presence of aquaculture should not negatively affect the conservation status of any other important habitats/species; and*
- *Zones should include existing permitted aquaculture sites.*

From an environmental point of view, most of the search areas, except search areas 7 and 8, a prima facie present some degree of constraint based on the criteria described in **Chapter 6**. It is moreover noted that conflicts with other uses may be an issue for areas 7 and 8. Studies such as Appropriate Assessments, and Environmental Impact Assessments would need to be carried out to identify best sites.

Search areas, 1, 2, 3, 4 and 5 are all located, to varying extents, over sensitive benthic habitats including *Posidonia* and maerl beds and Area 6 is located within 1nm. These sites are therefore considered only suitable as search areas if the detailed studies for areas, 7 and 8 show that none of these sites are suitable and the industry still needs capacity in accordance with targets set in the strategy.

As recommended in the SEA, the revised strategy has identified a preferred growth option and the preferred option was closest to Production Capacity 2 in terms of a production capacity target for CCS. For tuna, the revised Strategy seeks to meet ICCAT quota. Thus, in accordance with the findings of the SEA, the more aggressive option (Production Capacity 3) was not selected. On the other hand, rather than committing to relocating existing operations to designated Aquaculture Zones (referring specifically to the existing one in the south, and a pending one in the north) as recommended in the SEA, the Strategy now states that aquaculture operations should take place in designated Aquaculture Zones and these shall respect the limits imposed through environmental monitoring methodologies that recognise links between biomass and impacts.

(ii) Improve sustainability of the sector

The Strategy includes a number of measures that will work towards sector sustainability including research into the use of alternative feed for tuna, research into alternative species for aquaculture, improved environmental monitoring, establishment of EQSs and AZEs, etc. It is recommended that such measures are given particular priority with the development of detailed action plans (also recommended within the Strategy). Research should focus on seeking to move towards alternatives including alternative species at lower trophic levels, species where aquafeeds are from environmentally acceptable sources, etc.

The revised Strategy makes reference to the need to invest in research, although the detail of where the focus of the research will lie is not included.

(iii) Improve site specific management

The Strategy does seek to improve site management through a number of measures. It is recommended that Environmental Management Plans (EMPs) would be drawn up by each operator and implemented on site. These EMPs should be used as tools to inform monitoring. EMPs should include measures addressing aspects such as waste management including marine litter.

The revised Strategy makes reference to the need for operators occupying the same zone to draw up and adhere to area management agreements. Aquaculture Zone limits will respect the limits imposed by environmental methodologies based on biomass and associated level of impact.

How opinions expressed during consultation have been taken into account (including any consultation required with other EU member states)

Consultation with the identified stakeholders and the public during the SEA process was carried out in accordance with the requirements of the SEA regulations. The consultation responses and how these were taken into account are reproduced in Annex 1 of this document.

3 Reasons for choosing the Aquaculture Strategy as adopted

During the formulation of the Environmental Report, and discussions with the Strategy proponent, it was considered that the draft Strategy as originally presented consisted of an extensive stock-take assessment as well as strategic options. A conscious decision was made by the Strategy proponent that the final product would be a short policy document that presented the policy direction for the country. This is the reason for the change in presentation seen in the revised Strategy.

Moreover, the first draft of the Strategy presented 3 potential growth options, which were assessed in terms of environmental impact in the SEA. Following the assessment of alternatives, the Environmental Report includes a recommendation whereby it is considered that the Strategy should choose a preferred growth option based upon the knowledge of the industry and related impacts, including environmental impacts as assessed through the SEA. In this regard, therefore, the revised Strategy presents the preferred option.

4 Measures to monitor the environmental impact of the Aquaculture Strategy

Chapter 9 of the Environmental Report includes a monitoring plan with environmental indicators to be used to monitor the environmental performance of the Aquaculture Strategy and make it possible to identify corrective actions and establish how well the Strategy conforms to SEA objectives during implementation. A monitoring plan has not been specifically included in the Strategy.

ANNEX I: PUBLIC CONSULTATION COMMENTS ON THE ENVIRONMENTAL REPORT AND ADI RESPONSES

Table 1: Response to Comments made by MFF and Fish & Fish Ltd

Comments	Adi Associates' Response
<p>1. <i>Relocating tuna penning activities offshore</i></p> <p>The SEA proposes that the tuna activities in Sites G and H be relocated to Area 8 and at a distance of 1 nautical mile away from coast and at 50m depth. Monitoring for a substantial number of years at both sites have shown that, although not 1 nautical mile away from the coast, impacts, if any, are restricted and controlled, such that the monitoring activity was reduced since 2012.</p> <p>At the same time, the SEA mentions that the tuna penning activities in Site E be retained; even though the same conditions quoted as justification for the relocation of Sites G and H apply.</p> <p>The SEA offers no environmental justification as to why this should be acceptable. At the same time, it should be remarked that any new Aquaculture Strategy should take into consideration all available environmental scientific information before any specific restrictions are applied to any particular defined aquaculture activity whilst taking into consideration practical and economic implications.</p> <p>Clearly, the SEA needs to better justify this proposition.</p>	<p>The Section 8 of the Aquaculture Strategy proposes the following:</p> <p><i>Tuna farms on near shore sites should be relocated to sites with more than 50m water depth and more than 1nm from shore to limit impacts.</i></p> <p>The recommendation is therefore made in the Strategy and not in the SEA. The SEA assesses the recommendation.</p>

2. Production Scenario 3

The Aquaculture Strategy (AS) identifies three possible Production Scenarios, referred to as 1, 2 and 3.

The SEA classifies Production Scenario 3 as the worst case leading to the “intensification of negative effects” and hence should be dismissed. There is sparse scientific justification for drawing such a conclusion.

In our opinion, Production Scenario 3 cannot be so easily dismissed.

Aquaculture is a growth industry and the AS puts forward Production Scenario 3 as the only scenario that could deliver growth in Malta’s aquaculture industry. There are many emerging technologies besides the traditional forms which, amongst others, include the production of closed-cycle species (CCS). Dismissing Production Scenario 3 without just cause and scientific evidence is both capricious and short sighted.

The industry is bursting with emerging technologies and already today many alternative and innovative systems exist in the aquaculture sector such as integrated systems. In such systems, fish are cultured next to other organisms which convert discharged nutrients into valuable products such as phototrophic conversion leading to more sustainable systems which would have less adverse environmental impacts in terms of nutrient loads (Schneider et al., 2005; Chopin et al., 1999). This, coupled with good operational practices and environmental monitoring would lead to synergies with other marine uses and not conflicts.

The bottom line is that, in light of the very wide variety of species having potential for culture and advances in culture methods, management and technologies, any restrictions (whilst being precautionary) should be based on practical experience and

Section 8 of the Environment Report states:

The proposed scenarios, in particular Scenario 3, could potentially result in what is considered to be a significant negative effect related to the extent of the proposed increase in sites along the eastern coast of Malta. Production capacity scenario 3 is also well beyond the maximum targets stipulated in Table 16 of the Strategy and is therefore not considered favourably in this SEA.

It is therefore recommended that the Strategy identifies a preferred growth option for the industry. The targets must be justified from a socio-economic and environmental point of view. Once the production targets are established, it is recommended that the Strategy clearly defines how it will allocate marine areas for production.

The SEA also proposes a way forward that takes into account the growth potential for CCS:

Should the Strategy require additional capacity for CCS, it is recommended that farms are located within a designated aquaculture zone. To date there are no CCS farms within a designated zone. As stated above and in Chapter 6 of the SEA, consideration of all the areas 1 to 8 for aquaculture zones is likely to give rise to significant environmental impacts. It is therefore recommended that the Strategy clearly identifies search areas for the establishment of these zones.

having a well documented scientific basis.

In fact, this is in line with the vision being proposed by Maria Damanaki, EU Commissioner for Maritime Affairs and Fisheries who proposes that through Integrated Maritime Policy, the potential of the EU marine and maritime economy will unleash favouring sustainable development of coastal areas (EC, 2012). The future is blue economy – trade-based on maritime transport, harnessing offshore wind energy, tidal and wave energy, increasing cruise tourism as well as developing further the aquaculture industry by providing the right conditions for the sustainable development of new business related to the marine environment.

Therefore the National Aquaculture Strategy for Malta should reflect this and facilitate expansion of the aquaculture sector in innovative and sustainable ways.

1 Schneider, O., Sereti, V., Eding, E.H., Verreth, J.A.J. 2005. Analysis of nutrient flows in integrated intensive aquaculture systems. *Aquacultural Engineering*, Volume 32, Issues 3–4, April 2005, Pages 379–401

2 Chopin, T., Yarish, C., Wilkes, R., Belyea, E., Lu, S., Mathieson, A. 1999. Developing Porphyra/salmon integrated aquaculture for bioremediation and diversification of the aquaculture industry. *Journal of Applied Phycology* 10-1999, Volume 11, Issue 5, pages 463-472

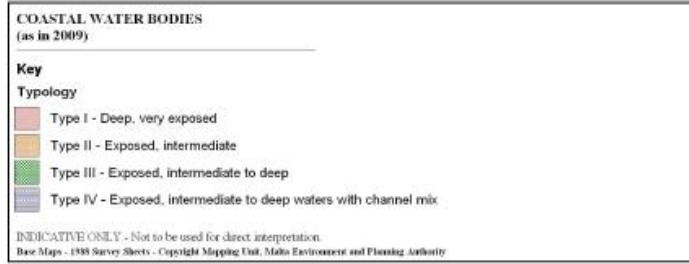
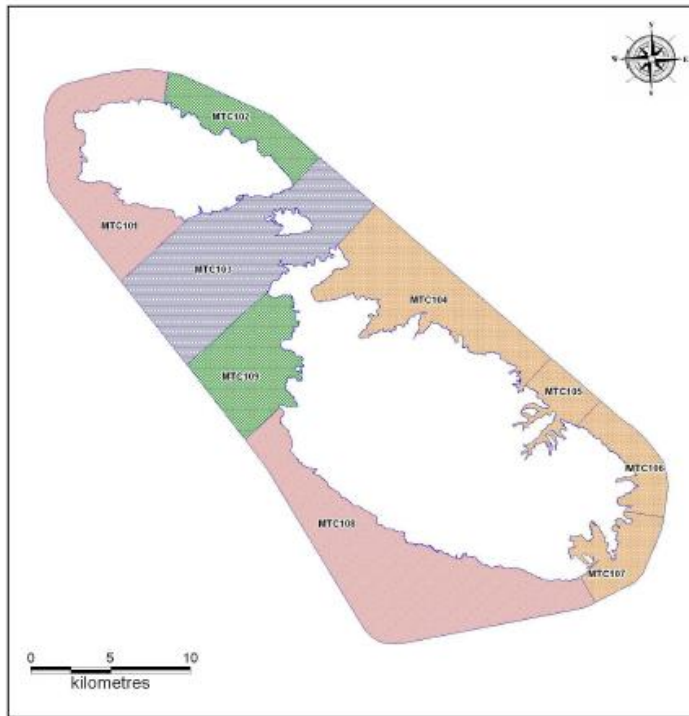
3 http://ec.europa.eu/maritimeaffairs/policy/index_en.htm as accessed on the 20 March 2013.

Table 2: Response to Comments made by MEPA

ER Section	EPD Comments	Adi Associates' Responses
<i>General Comments</i>		
Figure 2.1	Figure 2.1 in the SEA Environmental Report shows the existing and proposed aquaculture sites. These aquaculture sites are located relatively close to the accessible part of the coast and therefore, the draft Strategy is likely to affect a significant size of the population in view of the intensity of activities being carried out along such coast, both at sea and on land. Conflicts with other coastal/marine uses (e.g. recreation and tourism) along this stretch of the coast are likely to be significant. The accessible coast and the immediate marine waters, including benthic habitats, are also sensitive to the interventions proposed in the strategy.	<p>Comments noted, however it should be noted that the Strategy discusses three alternative production capacity scenarios. It is only in production capacity scenario 3 that all the areas shown in Figure 2.1 are considered for aquaculture production. Chapter 6 assesses the impacts of all three scenarios and further recommends that the Strategy justify in socio-economic and environmental terms what the production target for the aquaculture industry is in order to avoid over-production/availability of sites for aquaculture. Chapter 8 describes recommendations related to mitigating potential significant environmental impacts identified during the impact assessment.</p> <p>The Environmental Report will not be amended as chapter 2 describes what there is in the Strategy.</p>
	The draft Strategy states that tuna farms should be located more than 1 nautical mile away from the shore and in waters with a depth of more than 50m. However, the SEA Environmental Report does not provide a map showing the relationship between the aquaculture sites, the distribution of marine habitats, the 1 nautical mile limit and the 50m bathymetry contour. An analysis of the separate maps provided in the SEA Report suggests that some of the proposed sites for tuna farms may be located closer to shore and/or in waters shallower than 50m. This issue should be addressed.	Figure 6.3 has been updated to include the 1nm boundary, which is the only parameter in MEPA's comments that was not previously included in the map. Moreover, Table 6.1 flags potential conflicts or aspects (including policy requirements such as water depth and distance from shore) to be considered when identifying

		search areas.
	<p>The 1 nautical mile limit should be measured from the 'Baseline' as defined by provisions of the Water Policy Framework Regulations of 2004 (L.N. 194 of 2004)¹ rather than from the shore. Malta's obligations under the Water Framework Directive (WFD) extend up to 1 nautical mile from the 'Baseline' (see Figure 1), which is further offshore than the 1 nautical mile limit proposed in the draft Strategy. Activities which are likely to have an adverse effect on coastal water bodies designated under the WFD are subject to more stringent controls to limit their impacts on such water bodies (e.g. water pollution and damage to marine habitats). In this regard, it is worth noting that the monitoring surveys carried out in particular fish farm sites and reported in the SEA Environmental Report show that fish farming activities located closer to the shore have had a significant impact on the marine environment.</p> <p>Figure 1: Figure 1: Coastal water bodies</p>	<p>Noted. This comment will be passed onto the Strategy formulators for their consideration.</p>

¹ L.N. 194 of 2004 transpose the Water Framework Directive into national legislation



Various sites proposed in the north of Malta are located entirely or partly within a marine Natura 2000 site. EPD's comments at scoping stage highlighted that if these sites are considered further, the draft Aquaculture Strategy will require an Appropriate Assessment. Other proposed sites along the eastern coast of Malta are also located in or close to areas supporting sensitive marine habitats (e.g. *Posidonia* meadows). The findings of the SEA Environmental Report show that

Noted. However, if an Appropriate Assessment is considered necessary it seems premature to take such a decision in the absence of the outcome of the AA. **N.B.** At the time of writing these responses, the MRRA

	<p>existing fish farms have had a significant adverse impact on the marine benthos. The sources of these impacts include organic contaminants left over from fish feed and fish excreta which give rise to enhanced nutrients levels in the area, increase sedimentation rates of organic particulates and reduce water transparency. Marine habitats under the cages are the most significantly impacted and such impacts extend to some hundreds of meters away from the cages. The SEA Report also highlights that a comparative study carried out on the effects of aquaculture activities in the general area of Mistra and Il-Gzejjer also showed further degradation on <i>Posidonia</i> meadows over time. These findings raise concerns regarding existing and proposed sites which are located within or close to sensitive marine habitats. These impacts are likely to be most significant in sheltered and shallow waters. This will also increase risks of conflicts with other coastal and marine uses (e.g. tourism and recreation) and impacts on the coastal landscape and seascape. EPD considers that sites within or close to sensitive marine habitats should not be considered any further.</p>	<p>had issued a tender for the preparation of an Appropriate Assessment; the tender has not yet been awarded.</p>
	<p>Some of the impacts associated with aquaculture development could be mitigated through improved farm management, better quality standards, enforcement of permit/licence conditions and preparation of Environmental Management Plans. Nevertheless, other impacts are primarily related to poor siting (i.e. incompatibility between the nature and scale of the current use and the physical and environmental characteristics of the site location) and need to be addressed through proper site selection process and relocation of existing inappropriate sites. Therefore, the selection of suitable sites for aquaculture remains important both in the case of tuna farms and Closed Cycle Species (CCS). In particular, the continued use of bait fish in tuna farms, risks of excess feeding practices and fish excretion highlight the need to move such activities further offshore in deeper waters in order to reduce environmental impacts and conflicts with other uses. This would reduce odour problems and possibly reduce impacts on the seabed due to clearing of accumulated waste either by decomposition or currents. It is noted that due to such conditions, the seabed would have greater possibility to recover. Restriction of feeding of baitfish to tuna cages during onshore wind conditions in the summer months, unless alternative feed is found, would also contribute to reducing odour problems although this proposal may be difficult to monitor and enforce. Moreover, the SEA Environmental Report states that if the vacated tuna sites are used for CCS, the negative impacts on the benthos,</p>	<p>Comments from EPD noted. The issues raised by EPD are documented throughout the SEA including in Chapter 4 and monitoring data available for some fish farms is discussed.</p> <p>The comment is however mainly related to the Strategy itself and EPD's requirements for the siting of tuna and CCS farms.</p>

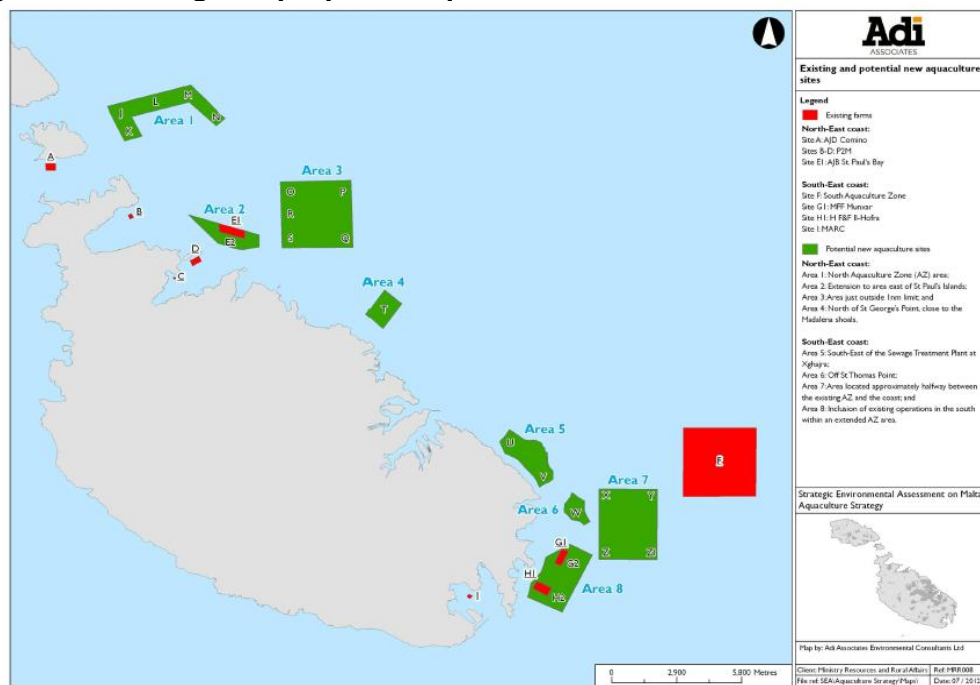
	<p>particularly in sheltered waters, are likely to remain. Therefore, EPD considers that tuna farms should be moved to specifically designated Aquaculture Zones offshore and in deep water (> 50m). Furthermore, vacated tuna sites close to the shore should not be automatically considered for CCS. EPD agrees that CCS should be located in a specifically designated Aquaculture Zone, in locations where the risks of damage to marine habitats, conflicts with other coastal and marine uses and impacts on the landscape and seascape are low.</p>	
	<p>In terms of the proposed capacities, the SEA Environmental Report concludes that Scenario 3 (i.e. retention of all existing sites, development of all potential sites, tuna farms moved further offshore and high production capacity) would have the most significant negative effect on the environment and therefore, should not be considered further. However, Scenarios 1 and 2, which consider a combination of fewer sites and lower capacities, are also expected to have negative environmental impacts at particular sites. Therefore, additional options and alternatives should be considered in the revised Aquaculture Strategy and the SEA Report should be revise/updated accordingly. In this regard, EPD agrees with the SEA Environmental Report that the Strategy should identify a preferred growth option, that production targets are established (whilst taking into account, from the outset, the relevant environmental constraints and environmental carrying capacities) and that marine areas for production are allocated accordingly. The revised Strategy should give preference to existing and planned aquaculture zones, rather than having individual farms scattered along the coast. In particular, EPD notes that the existing South Aquaculture Zone together with the planned North Aquaculture Zone will have sufficient capacity for Capture-Based Species (CBS) which includes tuna farming. Therefore, once the North Aquaculture Zone is approved, there should be no need for additional sea space for tuna farms. Approved Aquaculture Zones, or parts thereof, should be considered actively for CCS and the relocation of existing farms from inappropriate sites needs to be given priority. Additional capacity for CCS should only be considered if the existing approved Zones are demonstrated to be inadequate either due to insufficient capacity, physical constraints or the area's environmental carrying capacity.</p>	<p>Noted. The Environment Report does not need to be amended as the EPD comments are in line with the recommendations of the Environment Report.</p>
	<p>If necessary, additional capacity for CCS should be provided within a designated aquaculture zone which should be identified through a thorough site selection exercise rather than having individual sites scattered around the coast. This means that vacated tuna farm sites and new sites located in shallow waters and/or</p>	<p>Comments from EPD noted. The issues raised by EPD are documented throughout the SEA including in Chapter 4 and monitoring data</p>

	<p>close to the shore should not be considered prematurely for CCS in order to ensure that such activities do not have significant impacts on the marine environment and do not conflict with other coastal/marine uses. The draft Strategy should focus on finding a suitable search area for CCS taking into account compatibility with other uses, impact on the landscape/seascape, the conclusions of the SEA Environmental Report and the findings of the monitoring studies at existing fish farms. This process should also have regard to the criteria set out in paragraph 233 of the SEA Report. A detailed site selection exercise and assessment of site-specific conditions will be required within the identified search area in order to determine its environmental carrying capacity which will determine the maximum number of cages which may be accommodated, appropriate production capacities within cages and the minimum distances between cages in order to avoid unacceptable cumulative and synergistic impacts. Sensitive marine habitats and coastal seascapes should be avoided upfront, and suitable buffer zones should be established from such habitats where no fish farming activities should take place. This is in line with the findings of the monitoring surveys which showed that the extent of such impact was reported at some distance away from the cages.</p>	<p>available for some fish farms is discussed.</p> <p>The comment is however mainly related to the Strategy itself and EPD's requirements for the siting of tuna and CCS farms.</p>
	<p>Current data/information on the marine and benthic environment is limited and this needs to be addressed or (where not reasonably feasible) acknowledged in the SEA Environmental Report such that the information gaps can be duly factored into the relevant decision-making processes. New information on the seabed characteristics is expected to be available later on this year as a result of MEPA's EU project on the Development of Environmental Monitoring Strategy and Environmental Monitoring Baseline Surveys. This project is expected to aid the mapping of the seabed, including its physical and geomorphological characteristics and its benthic habitats. Moreover, a paper on the Biomaerl Project published by the University of Malta shows that the distribution of the maerl bed extends beyond that shown in Figure 4.7, further towards the north-eastern coast of Malta and Gozo.</p>	<p>Noted. Reference has been made in this regard in the updated SEA. All relevant figures in the SEA have been updated to show the more recent distribution map of the maerl bed lying off the northeast of the Maltese Islands.</p>
	<p>It was also noted that the projected rafting zones, as shown in Figure 6.2, are different from those provided by BirdLife Malta (BirdLife Malta, 2004, <i>Important Bird Areas of European Union Importance in Malta</i>). This information should be used to update the environmental baseline in the SEA Environmental Report and the identification of more suitable options and search areas in the revised</p>	<p>Kindly clarify this point. The publication referred to illustrates IBAs, not rafting zones per se.</p>

Aquaculture Strategy.

EPD agrees with the conclusions in the SEA Environmental Report that search areas 2, 3, 4 and 5 should not be considered further for fish farms in view of the sensitivity of the marine environment. In addition, EPD also considers that Areas 6 and 8 are not suitable for aquaculture activities in view of their close proximity to the shore and sensitive marine habitats. Figure 2 shows the location of these sites.

Figure 2: Existing and proposed aquaculture sites



Source: Adi Associates (2012) Strategic Environmental Assessment on Malta's Aquaculture Strategy: Environmental Report version 1.

Noted. These comments will be passed on to the Strategy formulators to take the necessary action.

EPD considers that the revised Strategy should also have regard to the required land-based facilities and their environmental impacts, including odour problems

This has already been addressed in the Environment Report - refer to

	from storage of feed and maintenance of equipment directly on the coast particularly in the light of issues encountered vis-à-vis such facilities and related uses at Xrobb l-Ghagin and It-Trunciera tal-Mistra.	Table 7.2 of the Environment Report.
	We consider that reference should also be made to the recent discussions with MEPA regarding the accommodation of the land-based hatchery at San Lucjan.	Noted.
<i>Detailed Comments</i>		
Maps	<ul style="list-style-type: none"> ○ Area 1 should be replaced by the preferred location for the North Aquaculture Zone as agreed in principle with MEPA. ○ The bird rafting zones should reflect the ones provided by BirdLife Malta ○ Figure 6.3 should also super-impose the existing/proposed aquaculture sites, 50m bathymetry contour and the 1 nautical mile limit. 	<ul style="list-style-type: none"> ○ The areas in the map reflect how they are currently presented in the Strategy. The Strategy should be updated to include the latest proposed location for the North Aquaculture Zone and the Environmental Report can then be subsequently updated to reflect the areas being described in the Strategy. ○ Kindly refer to comment above. ○ This figure does include existing/proposed aquaculture sites, in accordance with the strategy and the 1 nautical mile limit. The 50m bathymetry contour has also been included in the updated version.
Chapter 3, para. 35	The Environmental Report states that no comments were received on the Scoping Report. Kindly note that EPD provided comments on the Scoping Report in July 2012.	The Environment Report has been amended to reflect this.
Chapter 4, para. 42	This paragraph should also refer to the National Environmental Policy, 2012.	Noted, text has been amended in this regard.
Chapter 4, para. 62	The National Biodiversity Strategy and Action Plan (2012 – 2020) has been approved in 2012.	The text has been amended to reflect this.
Chapter 4, Protected areas and species	Bluefin tuna is listed in the updated version of Legal Notice 311 of 2006, specifically under Schedule VIII (Animal and Plant species of national interest whose taking in the wild and exploitation may be subject to management measures) and therefore, should be reflected in the SEA Environmental Report.	Noted. The Environmental Report has been updated to make reference to this.
Chapter 4, marine	No information is provided on the bait fish used in tuna farms (e.g. quantities used and whether these are	Noted. Some further information has been included in the updated Environmental Report, however, it should be noted,

biodiversity	cultured species or caught from the wild).	that only limited data is in fact available.
Chapter 4, para. 75	This paragraph refers to coral beds which have recently been recorded (see Figure 4.7). It is unclear whether this is referring to the extent of mearl bed mapped in the paper published by the University of Malta (see comment above).	Maerl beds are described in paragraphs 73-74.
Chapter 4, para.76	This section does not discuss other benthic habitats as implied by its title.	Title has been changed to 'Other species'.
Chapter 4, Landscape	The section in the SEA Report on the landscape baseline does not highlight the different qualities of the landscape and seascape of Malta's northern and eastern coast and does not give examples of the visual impact of existing fish farms close to shore.	This information can be included, however, this paragraph notes that the visual footprint of these facilities is relatively limited.
Chapter 4, Material Assets and Population	The scoping report highlighted that the Environmental Report will also assess the impacts of the draft Strategy on commercial fishing, waste management infrastructure, coastal and marine based tourism/attractions, and sea uses. This section of the Environmental Report does not address these issues.	This section presents the baseline, not the impact assessment. Kindly refer to Chapter 7 for the impact assessment.
Table 5.1 and Table 9.1, SEA Indicators related to water	Indicator: Maintenance of ecological status in accordance with the Water Framework Directive (WFD). When reporting on this indicator, the ecological status under the WFD is usually defined at the scale of a water body. Ecological status is determined by a number of biological quality elements, the status of which could be influenced by several pressures acting on any water body simultaneously. Therefore, it is important to establish the links between aquaculture and its effects on the status of the affected water bodies. Moreover, with respect to nutrient contamination and water quality monitoring, the maintenance of chemical status as defined by the WFD also needs to be ensured.	Noted.
Table 9.1, Biodiversity, Flora and	It is unclear how the indicator on Illegal & Unreported and Unregulated (IUU) Fishing infringements is relevant to the implementation of the Strategy, noting that the	Agreed. Indicator has been removed.

Fauna	Strategy deals with the site's operationality and carrying capacity from a national perspective. Moreover, this is not relevant to CCS species.	
Table 9.1, Water	The use of a migratory species such as <i>Caretta caretta</i> is questionable, noting that in view of the migratory nature of this species it would be very difficult to be able to link to the source of the materials ingested to aquaculture.	This is a suggestion taken from the JRC working group related to monitoring of marine litter, refer to JRC Scientific and Technical Reports. 2011. <i>Marine Litter: Technical Recommendations for the Implementation of MSFD Requirements</i> . MSFD GES Technical Subgroup on Marine Litter. This is one of a number of indicators and given that this information is collected anyway, the data collected could also be used to inform the monitoring for the SEA. Further reference can also be made to Galgani, F., Fleet, D., Van Franeker, J., Katsaneuakis, 2010. <i>Marine Strategy Framework Directive Task Group 10 Report Marine Litter</i> .
Table 9.1, Climatic Factors and Climate Change	It is unclear why only CCS is considered in the indicator, since tuna farms are/will be located in the same waters.	Having closed cycle aquaculture is considered to be desirable in terms of adaptation to climate change, and aquaculture that relies on wild populations, which are potentially more vulnerable to climate change, is therefore less desirable. Once tuna becomes a CCS (in a feasible way) this figure will go up providing a positive trend for this indicator.

Table 3 Response to Comments by Fish 4 Tomorrow.

Comment	MAR Response
<p>A number of specific objectives are mentioned in the report. Disappointingly, environmental protection does not appear to be one of these objectives. Although the environment might come up during work on other objectives – such as Identification of sites or zones for aquaculture development - it should be given more importance and listed as one of the specific objectives.</p>	<p>Although environmental protection is not a direct objective of the Aquaculture Strategy, it is emphasised within the strategy that production will be mainly dependent on which of the potential new sites / zones identified are approved, and the carrying capacity agreed for these and existing sites. In addition, there would need to be negotiations with existing operators to agree on the rationalisation of sites especially if site exchanges or modifications are proposed which are outside the terms of individual leases. There is also mention of R&D for developing environmental carrying capacity criteria, development of offshore cage technology and better feeds and methods of feeding for penned tuna. Over and above these factors, it is suggested that an independent review of the monitoring system is carried out, leading to the development of Environmental Quality Standards (EQS) and Allowed Zone of Effects (AZE). One of the four main strategic objectives of the strategy is Improved Environmental Monitoring.</p>
<p>With specific reference to “Annex 1: Section 2 – Contract Objectives and Expected Results” there is a lot of talk on ‘Sustainability’. f4t’s main concern is that over here, sustainability refers to economic and industrial sustainability more than environmental. Needless to say, we think that environmental, ecological and social “sustainability” are just as important as the economical factors and would like to see more importance given to these aspects which reachable and fair objectives set by the industry as a whole and any envisaged issues to be brought up and tackled, not set aside. Any aquaculture project inevitably brings with it social, environmental and ecological impact and the absence of a review of these possible impacts within the report and the lack of explanation on any possible mitigating measures with which the Ministry would choose to tackle these issues is quite disappointing.</p>	<p>The SEA addresses potential environmental impacts as a result of the Strategy. Based on the outcome of the SEA, the Strategy will be updated so as to ensure that the industry will be sustainable economically, socially and environmentally. The strategy ensures that these environmental issues will be tackled and provides concrete solutions by adopting a system that will be standard for all aquaculture zones, present existing ones and future new ones.</p>
<p>We agree with the consultants that there must be a clear definition as to what environmental impact is acceptable and what is not acceptable. But further to this the data from environmental monitoring must be publically available.</p>	<p>The strategy includes the need for this acceptable environmental impact, that will be site specific depending on the Carrying capacity that will be determined for each site.</p>

Comment	MAR Response
<p>Some other concerns held by the team:</p> <ul style="list-style-type: none"> • Who is responsible for carrying out environmental monitoring? • How is this carried out? • Is the data made public? • Have infringements been penalised? • We agree with the report in that permit conditions should be regularised and relevant to the type of species and methods used. Permit conditions have known to be fair since MEPA seems to regulate in a balanced way between the environment and industry (in our opinion) however there is no evidence whether infringements have been penalised. • The decline in enforcement since the tuna farming started is a concern and should be addressed. • Why are Posidonia beds no longer being monitored? <p>In a strategy document such as this, one would expect to find details on how environmental monitoring would be carried out, what methods would be used and with whom responsibilities for such monitoring would lie. The lack of these details is highly disappointing.</p>	<p>At present, farm operators are responsible for carrying out environmental monitoring in line with permit conditions. In the future when the strategy is adopted, the regulatory directorate will be responsible for all sites and will lease out concessions that will include fees for the monitoring required. Methodologies are and will be presented to MEPA in the form of a method statement for MEPA's approval prior to data gathering. The whole monitoring system will be revised and updated to include all requirements. This will be done with agreement with MEPA. There has been no decline in enforcement and all farms carry out regular monitoring which includes water quality monitoring and benthos as required and approved by MEPA. The details on environmental monitoring will be revised and finalised as one of the many lines of action required by the strategy. The strategy is for the way forward for aquaculture, and this includes environmental monitoring.</p>
<p>The Bluefin Tuna Ranching Industry</p> <p>Within Annex 1 the consultants state that “the bluefin tuna fattening industry is under a lot of pressure from international bodies due to very strict control of the bluefin fisheries, so it is essential to develop techniques for the aquaculture of new species.” There is no mention of the reasons why there is such pressure on the industry. The fact that the pressure is being applied to the industry because of the devastating environmental consequences is important and fish4tomorrow feel that it is not given enough importance throughout the document. In fact throughout the report very little regard is given to the issue of the wild stock sustainability of bluefin tuna.</p> <p>Within the document the quotas set on bluefin tuna are depicted as a limitation to the growth of the industry however little regard is given on how to overcome this issue. The report does not divulge a strategy in which the local aquaculture industry will be moving away from the exploitation of wild-caught tuna. In fact, the report suggests that following</p>	<p>The whole strategy document refers to sustainable aquaculture and this includes the sustainable fishing of bluefin tuna. Indeed, with the present catch quotas, there are already indications of increases in the wild populations. With the present quotas, the fattening of bluefin tuna is strictly controlled and this factor helps to keep the prices up, so in turn this is beneficial in the long term. Each of the production targets envisaged in the scenarios are options which have to be decided following the SEA.</p> <p>The strategy aims at moving away from wild caught bluefin tuna or any other species for that matter, and this is why the strategy emphasises the construction of a commercial scale marine hatchery; so that the production of closed cycle species can be increased without the need to import from other countries. Moreover, Malta has a lot of know-how in the culture of “new” species for aquaculture and this will make use of our resources for the</p>

Comment	MAR Response
<p>a number of years of low production (to allow for the replenishing of stocks) the quotas will be set at the same level as in 2007 – Malta’s best year for tuna production. The 2007 quotas were clearly well above Maximum Sustainable Yield and it is perplexing to see a strategy document which claims to be aiming for a sustainable industry forecast such yields. This seems like wishful thinking, at best.</p> <p>How sustainable would the local aquaculture industry be if we keep its success so closely tied to the Japanese market and economy? The proposals with respect to tuna penning seem highly unsustainable and even less resilient with regards to the environment and economic feasibility. The strategy does not seem to address any of these worries and just recommends more of the same, once the stocks have replenished.</p> <p>It has been brought to our attention that tuna farmers are permitted to carry out lampara fishing, for mackerels to be used as baitfish, around their pens. We have heard that the catches can be of over 10 tonnes of mackerels for each far every day. Is this accurate? If this continues it will inevitably have a devastating effect on the food web and we will see further losses in species which are already dwindling such as groupers, amberjack and dentex.</p>	<p>production of a sustainable aquaculture industry. The 7,000 tonnes is the maximum capacity of the pens and not necessarily the production targets and may even be used for closed cycle species if the need arises and sites will be permitted.</p> <p>There are alternative markets that are already being tapped by the present companies. Market diversification is an important factor mentioned in the strategy document; that refers to all aquaculture products. The tuna fattening is mentioned as remaining for the niche market in Japan, although there may be some diversification and sale of the products into Europe and USA. The strategy includes suggestions for product diversification and product marketability, including a wide range of quality and certification schemes, as well as diversification of species. With reference to <i>Lampara</i> fishing, this is nto a matter that needs to be dealt within the strategy; however there have been no such permits granted at present.</p>
<p>Identification of sites or zones for aquaculture development & permitting issues</p> <p>Environmental impact should be given prominence in the identification of sites. We have already seen the pollution of both the sea and the seabed all around existing inshore sites. Existing inshore sites should be moved offshore. The aesthetic impact on the local coastline must also be taken into consideration- with inshore sites posing harm to tourism industry and sanitary concerns due to pollution.</p> <p>The creation of a Malta Offshore Aquaculture Zone (MOAZ) seems, initially, to be a suitable alternative to inshore sites however fish4tomorrow has some serious concerns about this. Firstly, it appears to us that the two operations which have been started in the MOAZ are new operations and no inshore operations have been moved there. Also, there is clear reluctance for operators to move their sites that far offshore due to the exposed nature of the site and the financial risk involved. This</p>	<p>An assessment of marine sites has been carried out taking into account planning and policy considerations, conservation interests and designations, marine space available for aquaculture and other competing uses for marine space and the production capacity for such space. Although it is likely that any new sites so identified will face challenges in terms of acceptance, they are considered to represent an upper resource limit in estimating any future production target. If Malta is to move to the production of closed cycle species (CCS) as opposed to capture based species, the sheltered sites are needed as nurseries. When small fingerlings are stocked into cages, the type of cages used and their nets have a very small mesh so these types of systems cannot be put in offshore sites. There are still some problems with the offshore sites, namely the very large and intense currents that threaten to destruct fish farms as already happened to some tuna farms. In fact, tuna farms in that zone only operate for 6 months per year due to these operational constraints; this is not ideal when CCS requires year round culture. The movement of cages to outer seas has to be done with caution as</p>

Comment	MAR Response
<p>is worrying, since there will still be pressure for the creation of inshore sites which have a proven damaging effect on the coastline ecology. It is also worrying that the legal situation and permitted number of farms within the MOAZ is not entirely clear.</p> <p>We strongly emphasise that, although the setting up of zones is beneficial since the sites will be clustered and offshore, operational and planning permits should always be issued from MEPA as a governing authority alongside the MRRA. Environmental monitoring, control and enforcement alongside planning regulation should always be carried out on a case-by-case basis, depending on the species to be farmed and the methods used – it would be in no way acceptable to group all operators within an aquaculture zone within one operational permit to be monitored/regulated by the Ministry. We emphasise that an Aquacultural Zone is in no way similar to an industrial estate, where the planning and operational permits can be controlled by an intermediate authority such as Malta Enterprise (in the case of Industrial Estates), since aquaculture has a very direct, immediate and delicate impact on the environment.</p> <p>The report makes it clear that operators find MEPA to be a difficult entity to work with and we understand that investors should be incentivised to open up aquaculture operations. A typical industry complaint is that it takes over a year for MEPA to approve a permit due to the number of stakeholders consulted – issuing a blanket permit for MRRA to award to operators may make sense for practical and bureaucratic reasons however we insist that these stakeholders are of importance and they should be consulted during the application process.</p> <p>There is also a lack of detail with regard to enforcement and monitoring of compliance. If MRRA were to issue permits in an aquaculture zone instead of MEPA, who would be responsible for monitoring and regulating environmental issues and permit conditions? We feel that as the local environment protection agency that this should remain MEPA's jurisdiction.</p> <p>We feel that the best compromise for this issue would be the setting up of a working group, as suggested within the report, along with a contact person at MEPA to ease the permit process.</p>	<p>it may completely destroy the fish farming industry that has so much potential for a very sustainable growth. New offshore technologies are being investigated but the technology is still being developed. However indications are that as the industry grows further throughout the world, more investment will be made and these technologies will be developed; it is just a matter of time.</p> <p>The permits will be issued by MEPA to MRRA, then MRRA will lease the concession to the farmers. Monitoring will be included in the lease so that the farmers can pay for the monitoring to be conducted. All monitoring will be determined according to MEPA's specifications that will be concluded by discussion by all the stakeholders.</p> <p>When the sites are determined, all processes required by MEPA for fish farming will be undertaken, ASA, EIA etc. MEPA will always reserve the right to retract a permit if all requirements are not adhered to. MEPA will always be involved; the aim is to work hand in hand with MEPA.</p> <p>MRRA will always have to report all monitoring that will be pre-agreed with MEPA, to MEPA.</p> <p>Noted.</p>

Comment	MAR Response
<p>When analysing the various options for setting up of new sites it is clear that we, as a country, are highly limited. The proposed sites as shown in page 72 of the report seem to be the only possible sites for aquaculture zones. We think that it is highly unrealistic to fit so many farms in such small areas and that the Ministry should face the facts that Malta's capacity for aquaculture is physically restricted.</p>	<p>This will be determined by the SEA, followed by permit applications. All processes that are stabilised to protect the environment will be adhered to. Our aim is to increase aquaculture production for socio-economic benefits, but we do not want to do this at all costs, and we are very much aware of the requirement and need to preserve our environment. Malta's aquaculture potential is huge, and it can be done in a sustainable way without the destruction of our environment.</p>
<p>Consultations</p> <p>Within the strategy document, NGOs seem to be given very little prominence as stakeholders. This is quite disappointing. MTA and HCEB are also stakeholders in view of the pollution created by these farms which has an adverse impact on tourism and also on consumer consumption trends.</p>	<p>The consultations were vast and all stakeholders were consulted. Moreover the draft strategy was launched for public consultation for a period of six weeks. Comments that were submitted during this time-frame and even late comments were all taken into consideration. If carried out in a proper way, fish farms do not create pollution and the strategy proposes a number of improvements to good management of practice.</p>
<p>Market Concerns</p> <p>The concern that the tuna penning industry (the largest revenue by percentage of the industry) is tied so closely to the Japanese market has already been mentioned. With respect to other products we have the following comments to make: With reference to "Annex 1: 4.1.1 Project Description", this section mentions a drastic change in market demands that is expected in the coming years. What is this change and what are the causes of this change?</p> <p>With reference to Annex 13, understanding that this is just a reference model for closed-cycle species, we find the figures quite exaggerated and misleading. It is not explained, nor understood by us, how switching the focus of aquaculture to amberjack is to increase profit by 885%. An explanation of these very positive values is much needed. The document as a whole lacks concrete financial projections. This is surprising considering 1) the professional manner with which the strategy document is written 2) the amount of weight and importance given to the economic sustainability of aquaculture. In fact, high profits seem to be the only reason which the Ministry are encouraging an increase and investment in aquaculture activity (since environmental and social benefits are not mentioned) so it is very worrying to us that solid financial projections are missing from this strategy document.</p>	<p>The aim of the strategy is to promote further CCS so that the whole industry does not rely only on the tuna penning industry. The market demands will change according to the needs of the consumers, that is pointing towards an increase in the consumption of processed or frozen products. The industry will produce according to the demand of the people as it will be useless to produce a product that is not consumed.</p> <p>The prices of amberjacks are indeed high. This is the advantage that Malta will have when compared to other countries due to the know-how mentioned previously. When a new species is produced and distributed on the market, it will have a very high value for the first few years. This was the case with sea bream and sea bass before they started to be produced in such large numbers that saturated the market. Malta has the advantage of producing such "new species" and gaining the advantage. Other species being studied for CCS are the bluefin tuna, grouper, meagre, white bream, sea urchins and sea cucumbers. There is also interest being generated to invest in octopus propagation.</p>

Comment	MAR Response
<p>Aqua-Environmental Measures</p> <p>“Annex 4: 2.2 Aqua-environmental measures” suggests the implementation of aqua-environmental methods aimed at protecting and enhancing the environment and producing more eco-friendly aquaculture products however no guidance is given regarding to what such methods might be, although there is scope for compensation for revenue lost as a result of such methods. This is a good argument for obtaining compensation for risks incurred by the more environmentally friendly offshore aquaculture operations.</p> <p>Within the report itself, reference is give to enclosed cages such as “Aqua-pod” and “Ocean Spar” cages however it seems like the expense is too high and they are unlikely to be considered. It is quite disappointing that within a strategy document written up by some of the world’s top aquaculture scientists there is no strategy to use new and innovative technologies to enhance productivity and decrease environmental impact.</p>	<p>The strategy actually refers to such technologies as these cage structures that are submersible cages. The technology is still young so there is no specific reference however as mentioned earlier, the trend in there and once these technologies are developed, the need for their use will increase and this will in turn decrease their costs. The industry is moving in that direction and the new European Maritime Fisheries Fund promotes such environment friendly measures so as to encourage investment.</p>
<p>Land Based Hatcheries</p> <p>Land based hatcheries should be strictly restricted to industrial zones and fish4tomorrow thinks that a historical building dating back to 1610 such as San Lucjan Tower should not be used any more for this purpose.</p>	<p>MRRA is currently proposing to construct an underground marine hatchery so that the historic Fort is handed to conservation bodies. A marine hatchery has to be near the sea so that the sea water is utilised. The hatchery is proposed to be underground so that the area can be embellished and there will be no large building by the sea. The coastline and landscape will have a minimum disturbance.</p>
<p>Diversification of Product</p> <p>The strategy document explains the importance of diversification of species for market reasons however it seems that the main result would be large quantities of amberjack production. We would expect greater diversification and, if possible, the shifting to herbivorous species to decrease the burden on wild-fish stocks, however it is understood that herbivorous fish do not hold much respect in European markets.</p>	<p>The production of CCS will lead to consumption of pelleted feeds that can incorporate alternative proteins and micronutrients. It is a matter of fact that salmon feeds have already been developed with very low percentages of fish meal. The same trend is being followed for sea bass and sea bream. As species are developed commercially, feed companies develop feeds and it is within their interest to develop environment friendly feeds that have alternative sources of protein and lipids.</p>
<p>Public Image</p> <p>With reference to the consultants’ view of public image (section 13 of the Executive Summary), the negative public image of aquaculture is not solely related to the feeding of baitfish to tuna. There is the general impression that aquaculture companies are solely interested in makin a</p>	<p>All companies in any business are interested in making a profit; this is what keeps the economy alive in any business, in any country. However, the aquaculture strategy has been designed to consider all factors that are related to all stakeholders so that there will be due consideration for the environment and the promotion of a sustainable industry. The strategy refers to education and codes of good practice to be implemented.</p>

Comment	MAR Response
<p>profit, with little or no regard to the environment and ecosystems. Very little or no Corporate Social Responsibility has been exercised by the local aquaculture entrepreneurs despite revenues ranking into millions. People who enjoy local coastline have often come across large bags of feed swept onto the shore, while recently photographs from St Paul's Bay showed the shoreline covered in plastic bits, evidently from a fish farm where maintenance had taken place in high winds.</p> <p>There are fears that the farms are doing a lot more damage to the seabed and coastline than they claim to do and that they are given an easyride since they are big money makers for the government. More transparency with regards to environmental monitoring and enforcement would encourage the public with respect to the actual impact which the local farms have on the environment.</p> <p>Also, the public is not ambivalent with regards to the issue of the bluefin tuna. We are well aware that the stocks have dwindled due to heavy fishing in the Mediterranean and that the local fattening pens are related to this issue. The public would like to see a national strategy aimed at utilising innovative techniques and new species which would avoid such problems in the future and develop a holistically sustainable industry for aquaculture for Malta and not just an enhancement of the status quo.</p>	<p>More education is required to deal with "large bags of feed" and the "shoreline covered in plastic bits" however the working group on the follow-up of the strategy will include the regulatory and monitoring bodies so that the aquaculture control unit can become more stringent on these offences.</p> <p>Noted.</p> <p>The strategy covers these issues and promotes an innovative industry with new species; however this takes time to implement and develop.</p>