



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,  
MARE D3/ADV

Mr. Javier Ojeda  
Chairman of the AAC  
Rue de la Science, 10  
B – 1000 Brussels  
Belgium

**Subject: Aquaculture Advisory Council Recommendations on the proposal  
for the EMFF 2021–2027**

Dear Mr. Ojeda,

I would like to thank you for providing DG MARE with your Advice regarding the Commission proposal for a regulation of the new European Maritime and Fisheries Fund (EMFF).

Aquaculture has a key role in food security and meeting the demand of fish protein produced in the Union with high quality standards and available for consumers at affordable prices. After decades of stagnation, EU aquaculture has started a continuous (even if still slow) growth, as demonstrated in the last STECF Economic report on aquaculture<sup>1</sup>. We do share your views in terms of fragmentation and difficulties for a sector dominated by Small and Medium Enterprises (SMEs) and micro-enterprises. I reassure you that all European Commission services work together to promote the sustainable development of EU aquaculture.

The Commission agrees that the EMFF should continue to offer support to the promotion and the sustainable development of aquaculture, including freshwater aquaculture, for the farming of aquatic animals and plants for the production of food and other raw material. In particular, support for environmental sustainability, productive investments, innovation, acquisition of professional skills, improvement of working conditions, compensatory measures providing critical land and nature management services should be eligible. Public health actions, aquaculture stock insurance schemes and animal health and welfare actions should also continue to be financed.

In this regard, we take good note of your recommendations as regards the *funding scope* of the new EMFF. We can confirm that all those interventions you propose for funding

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<sup>1</sup> See report here:

[https://stecf.jrc.ec.europa.eu/reports/economic/asset\\_publisher/d7Ie/document/id/2446795](https://stecf.jrc.ec.europa.eu/reports/economic/asset_publisher/d7Ie/document/id/2446795)

(eg. promotion of sustainably farmed EU aquaculture products, awareness raising of consumers of sustainable aquaculture farming, creation and functioning of producer and inter-branch organisations, implementation of production and marketing plans, eradication of emerging diseases, protection and restoration of marine environment, data collection, monitoring, research, advisory services, farm staff training, aqua-environmental schemes for conversion to eco-management, etc.) are eligible under our proposal and may be financed within the programmes of the Member States.

As to the form of support, it is still possible to provide non-reimbursable funding (grants) for most of the interventions in aquaculture. However, productive investment should qualify only for **reimbursable support (financial instruments)** in order to ensure that those investments are sustainable not only environmentally but also in economic terms, to avoid grant-dependency in the sector.

A beneficiary of funding, in accordance with the Commission proposal on the Common Provisions Regulation (CPR), may be any public or private law body, an entity with or without legal personality or a natural person, responsible for initiating or both initiating and implementing operations. Unless the EMFF Regulation defines differently, all the entities you proposed (aquaculture producers, enterprises, scientific institutes, NGOs) may be eligible for funding under the EMFF.

Nevertheless, Article 42 of Regulation (EU) No 1380/2013 on the Common Fisheries Policy continues to apply, namely Union financial assistance under the EMFF will remain to be conditional upon **compliance with the rules of the CFP**. Therefore, applications from beneficiaries that do not comply with the applicable rules of the CFP will not be admissible.

I fully concur with the AAC's opinion concerning **simplification**, which is key to ensure easier access to the funding as well as smoother implementation of the EMFF. In this regard, the Commission proposal includes a significant modification compared to the current period that, at the same time, constitute its biggest simplification as well. The new regulation proposes a more simplified delivery that enables the Member States to tailor their programmes to their real needs. In these terms, the Member States will have greater flexibility to define how to best spend the financial support from the EMFF, with the exception of a limited list of actions which are ineligible for support.

Moreover, in the context of the Commission proposal for a Common Provisions Regulation, the framework regulation for several shared management funds including the EMFF, 80 measures have been proposed for simplifying the implementation for national authorities as well as for beneficiaries. I would like to invite you to consult a practical handbook on these proposed simplification measures:

[https://ec.europa.eu/regional\\_policy/sources/docgener/factsheet/new\\_cp/simplification\\_handbook\\_en.pdf](https://ec.europa.eu/regional_policy/sources/docgener/factsheet/new_cp/simplification_handbook_en.pdf)

Despite all efforts in simplification and reduction of administrative burden, **transparency of funding and visibility of the EMFF** should be intensified. The transparency provisions of the Common Provisions Regulation foresee that Member States should publish all documentation concerning their programme, calls for proposals, meetings of the monitoring committee. Beneficiaries are expected to make it visible if an investment has been co-financed from the EMFF.

All of this is contained in the Commission proposal that is currently in ordinary legislative procedure. The Council and the European Parliament are currently negotiating the proposal and *timely launch of implementation* depends on a timely agreement by the co-legislators. I would like to assure you that the Commission provides all the necessary assistance so that the co-legislators can reach a timely agreement.

Preparations for the new programming period are already underway. The Commission has already developed an *IT tool* for the purpose of all exchanges between the member States and the Commission with regard the implementation of the funds, namely the System for Fund Management (SFC system). The new SFC2021 will also be developed for the next period and will be available as soon as a stable drafting of the new legislative framework is available. A similar IT management tool is to be developed also by the national authorities to make all exchanges between the national authorities and the beneficiaries are digitalised. Introducing digitalisation across all levels of programming will in our view lead to a significant reduction of administrative costs for the beneficiaries.

You refer to the importance of collecting of data and I share your views on the matter. The European Commission uses several tools to ensure data collection regarding aquaculture, notably the Data Collection Framework. From our work with Member States, we know Member States are also working on strengthening collection of data on the aquaculture sector.

I also would like to reassure you that the Commission will *continue to facilitate the exchange of good practices* in implementing the EMFF through the EMFF Expert Group.

I thank you again for your position paper and invite you to contact Ms Pascale COLSON, coordinator of the Advisory Councils ([pascale.colson@ec.europa.eu](mailto:pascale.colson@ec.europa.eu); +32.2.295.62.73), should you have any question on this reply.

Yours sincerely,



Bernhard FRIESS  
Acting Director-General