



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels, 25 March 2022
MARE/A2/LBS (2022)

Subject: AAC recommendation on achieving greater sustainability standards of imported aquaculture products and a level-playing field

Dear Mr. Ojeda,

I would like to thank you for your letter of 23 December 2021 including the recommendation on achieving greater sustainability standards of imported aquaculture products and a level-playing field.

Regarding your recommendation related to the imports of farmed fish from Turkey, DG MARE met with Danish and Greek industry representatives last September, at the request of producers of farmed trout, seabream and seabass. The Commission is aware of the concerns of the producers on the lack of level-playing field for EU aquaculture imports. Please note that concerns on the lack of level-playing field due to stricter sustainability standards for EU production as compared to imports is shared by EU producers in other sectors. This broad issue is being considered in the context of the Sustainable Food System framework.

As you rightly point out, new Strategic guidelines adopted in May last year aim to ensure a level-playing field for aquaculture through several initiatives. They seek to improve communication about the sustainability requirements on EU aquaculture and promote higher sustainability standards at the global level, including the FAO. Regarding communication on EU aquaculture, we welcome the support of the AAC. As you already know, a brochure¹ aimed at general public has recently been published in all official EU languages, which has as a main objective to raise the

¹ [Blue Farming in the European Green Deal](#)

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awareness of EU consumers on the sustainability requirements for EU aquaculture products, in order to address misperceptions and allow consumers to make informed choices. Please do not hesitate to disseminate the brochure to the members of the AAC. Furthermore, DG MARE will soon start developing an EU-wide communication campaign with the same purpose, about which the AAC has also been informed. As discussed, the AAC will have the opportunity to contribute to the development and dissemination of this campaign.

Considering your recommendation on more detailed statistical information on the imports of aquaculture products, please note that extra-EU imports per species and countries of origin (values and volumes) are available on the European Market Observatory for Fisheries and Aquaculture Products (EUMOFA) as weekly updates. However, the production methods of extra-EU imports must be evaluated for each country of origin: there are no comprehensive and specific data on the production method of imports and it is therefore based on a proxy. The methodology implemented by EUMOFA is based on the averaging of the latest three years of production volumes in terms of catches and aquaculture of the country of origin. Further assessment provides an estimate of a weighted average share of aquaculture in the total production (aquaculture plus capture) and it is expressed as a coefficient. A comprehensive overview is provided in the *EU EUMOFA Fish Market 2021 report*². As for preferential regimes, there are many of them (regional, bilateral or unilateral) which result in different import duties according to product and origin. The most useful tool in this sense is the Commission website Access2markets, where duties and regimes for each specific product are detailed: <https://trade.ec.europa.eu/access-to-markets/en/home>.

Regarding the Combined Nomenclature codes for better monitoring of aquaculture product imports, I invite you come back to us with the proposal which my services would be happy to communicate to DG TAXUD that is in charge of this subject.

Thank you for supporting the Commission's proposal to extend the traceability obligations to all aquaculture products, including processed products and products imported from non-EU countries, in the new Fisheries Control Regulation. As you know, the co-legislators are currently negotiating this Regulation.

We also take note of your support on the further work on the proposal to incorporate sustainability aspects into regulatory marketing standards for domestic and imported aquaculture products in the EU market.

With regard to your recommendation to apply the new EU trade policy principles to aquaculture products, it is interesting to note that, for the first time, sustainability has become an explicit and central pillar of trade policy and the EU is committed to leveraging its strong trade relationships to, among others things, support more sustainable and fair trade. Trade and investment agreements can be, and already are, used as platforms to engage with partners on all aspects of the European Green Deal, including biodiversity and sustainable food policy. In fact, in the most recent Free Trade Agreements, there is a chapter on Trade and Sustainable development that also covers aquaculture. The EU is also reinforcing its focus on implementing and enforcing trade agreements and ensuring a level playing field for EU businesses in all fields.

² https://www.eumofa.eu/documents/20178/477018/EN_The+EU+fish+market_2021.pdf

Finally, the European Maritime, Fisheries and Aquaculture Fund (EMFAF) Regulation does not explicitly exclude support for the processing or promotion of imported seafood. Nevertheless, it requires that support granted for the processing and promotion of fishery and aquaculture products contributes to the achievement of the objectives of the Common Fisheries Policy (CFP), as defined in Article 2 of Regulation (EU) No 1380/2013. According to these objectives, the CFP shall:

- “provide conditions for economically viable and competitive fishing capture and processing industry and land-based fishing related activity;
- promote the development of sustainable Union aquaculture activities to contribute to food supplies and security and employment;
- contribute to a fair standard of living for those who depend on fishing activities, bearing in mind coastal fisheries and socio-economic aspects;
- contribute to an efficient and transparent internal market for fisheries and aquaculture products and contribute to ensuring a level-playing field for fisheries and aquaculture products marketed in the Union;
- take into account the interests of both consumers and producers;
- promote coastal fishing activities, taking into account socio-economic aspects”.

Member States must demonstrate the contribution to these objectives in their EMFAF programme, which is approved by the Commission.

I am looking forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Pascale COLSON, coordinator of the Advisory Councils (Pascale.COLSON@ec.europa.eu; +32.2.295.62.73), who will forward it to relevant colleagues.

Yours sincerely,

[e-signed]
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