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**Delilah Al Khudhairy**  
Director  
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Brussels, 17 April 2023

Dear Ms Al Khudhairy,

The Aquaculture Advisory Council (AAC) reiterates its concern that the Union Treaty does not consider aquaculture as a shared competence on an equal footing with primary food production sectors such as agriculture and fisheries and that the Union consequently does not define and implement a Common Aquaculture Policy.

The main EU instruments to facilitate aquaculture development are non-binding strategic guidelines, Member States multiannual national strategic plans, the exchange of information and best practices among Member States and the European Maritime, Fisheries and Aquaculture Fund.

The AAC reiterates that, in its view, the lack of growth in the EU aquaculture sector is a direct consequence of the lack of a Common Aquaculture Policy.

In 2009, the Commission concluded<sup>1</sup> that the volume of EU aquaculture production has stagnated and that the main barriers to growth included access to space and water and licences. These conclusions were 'copy-pasted' in the 2013 Strategic Guidelines and are echoed in the 2021 strategic guidelines.

Despite the European Union Council<sup>2</sup>'s, the European Parliament<sup>3</sup>'s, the European Economic and Social Committee<sup>4</sup>'s, the Committee of the Regions<sup>5</sup> support to the sustainable development of EU aquaculture's Commission plans for the years ahead, the Communication on the CFP<sup>6</sup> only refers to the "instruments" and that have so far not proved efficient enough in un-locking the potential of EU aquaculture.

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<sup>1</sup> Building a sustainable future for aquaculture, COM(2009) 162.

<sup>2</sup> Council Conclusions on the EU's new aquaculture strategic guidelines, 11496/22

<sup>3</sup> Report on striving for a sustainable and competitive EU aquaculture: the way forward, 2021/2189(INI)

<sup>4</sup> Opinion on the Strategic Guidelines for the sustainable development of EU aquaculture, NAT/816

<sup>5</sup> Opinion Sustainable blue economy and aquaculture, NAT-VII/020, 2021

<sup>6</sup> The Common Fisheries Policy today and tomorrow, COM(2023) 103 final





The AAC reiterates its recommendation<sup>7</sup> that EU aquaculture should be recognised as a shared competence and that a Common Aquaculture Policy should be developed.

The AAC acknowledges that this is a long-term objective and points to the need for short-term initiatives to assess actual impact of the current non-binding instruments on aquaculture. The CFP Regulation calls on the Commission to report each year on the progress made towards sustainable fishing in the EU, whereas the Commission will assess the progress made under the strategic guidelines in 2025 at the latest<sup>8</sup>.

The AAC finds that it is equally important to assess annually the progress made towards sustainable EU aquaculture.

The AAC supports the European Parliament's proposal<sup>9</sup> to establish quantitative objectives for the growth of EU aquaculture and points to the use of supplementary indicators to monitor progress made. To this end, and in response to the suggestion received from the Aquaculture Assistance Mechanism's, the AAC will gladly consider what might constitute effective baseline indicators, either at the Member State or pan-EU level, and provide recommendations for future inclusion. The AAC will be pleased to contribute to work on the development of a protocol for follow up with the Commission, the Aquaculture Assistance Mechanism and the Member States.

Developing the sustainable EU aquaculture activities is instrumental in achieving the EU's food security and lower dependency on EU fish imports objectives. The AAC welcomes this opportunity to contribute to this common goal.

Best regards

Brian Thomsen  
Chair  
**Aquaculture Advisory Council**

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7 Recommendations on the CFP/CMO targeted consultations, AAC March 2022

8 Common Fishery Policy – State of play, SWD(2023) 103 final

9 Report on striving for a sustainable and competitive EU aquaculture: the way forward, (2021/2189(INI))

