



# AAC Recommendation for an Aquaculture Policy Reform

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## **List of Acronyms**

AAC	Aquaculture Advice Council
AAM	Aquaculture Assistance Mechanism
APC	Aquaculture Policy Reform
ASR	Aquaculture Sustainability Regulation
CFP	Common Fisheries Policy
CMO	Common Market Organisation
DCF	Data Collection Framework
ECA	European Court of Editors
EMFAF	European Maritime Fisheries and Aquaculture Fund
ESG	European Commission Strategic Guidelines 2021 to 2030
FEAP	Federation of European Aquaculture Producers
IBO	Interbranch Organisation
JRC	Joint Research Centre
MAC	Market Advisory Council
MNSP	Multi-annual National Strategic Plan
MS	Member State
MSFD	Marine Strategy Framework Directive
MSPD	Marine Spatial Planning Directive
PMEF	Performance and Evaluation Framework
PMP	Production and Marketing Plan
PO	Producer Organisation
STECF	Scientific, Technical and Economic Committee for Fisheries
TFEU	Treaty on the Functioning of the European Union
WFD	Water Framework Directive

## **Main references in the Recommendation**

[Treaty on the Functioning of the European Union](#)

[Common Fisheries Policy](#)

[Common Market Organisation](#)

[The Data Collection Framework](#)

[The European Maritime, Fisheries and Aquaculture Fund](#)

[Water Framework Directive](#)

[Marine Strategy Framework Directive](#)

[Marine Spatial Planning Directive](#)

[Birds Directive](#)

[Habitats Directive](#)

[EU Commission's Strategic guidelines for a more sustainable and competitive EU aquaculture](#)

## I. Background

### 1. Current EU aquaculture policy framework

#### 1.1 Treaty on the Functioning of the European Union (TFEU)

In article 4, the TFEU<sup>1</sup> includes agriculture and fisheries as principal areas; article 38 stipulates that the Union shall define and implement a Common Agriculture and Fishery Policy; and article 40 calls for the establishment of a common organisation of agricultural products.

The TFEU has no express references to aquaculture in the provisions on fisheries and agriculture, but aquaculture products fall under the scope of Annex 1 as it includes CN code 3 and 16 products.

The TFEU therefore does not distinguish between agriculture and fisheries, but the provisions on “common policy” and “common products” cover the products listed in Annex 1.

On this, the Aquaculture Advice Council (AAC) concludes and presupposes that the recommendation on an Aquaculture Policy Reform (APR) complies with the relevant provision in the TFEU.

The AAC recommends the inclusion of aquaculture as a principal area in the next revision of the TFEU.

#### 1.2 Common Fisheries Policy (CFP)

The CFP originally formed part of the Common Agricultural and Fishery Policy, but it developed a separate identity in 1970 in the form of the CFP.

The Commission decided on 26 April 2000 that aquaculture was not eligible under the rural development regulation even if it is a farming activity of privately owned stocks<sup>2</sup>.

The Commission’s Communication on aquaculture adopted in 2009 identified key barriers to the development of aquaculture and pointed to the need to consider aquaculture in the 2013 CFP reform<sup>3</sup>.

The CFP<sup>4</sup> reform included article 34 on “*Promoting sustainable aquaculture*” to contribute to food security and supplies, growth, and employment, and it mandates:

- the Commission to adopt non-binding Strategic Guidelines to develop sustainable aquaculture;
- Member States (MSs) to establish Multiannual National Strategic Plans (MNSP) based on the Strategic Guidelines;
- the Commission to work with MSs to exchange best practices through an Open Method of Coordination of the measures contained in the MNSP; and
- the Commission to encourage the exchange of best practices and to facilitate the coordination of national measures foreseen in the MNSP.

The Commission/MSs adopted Strategic Guidelines/MNSPs in 2002 (A Strategy for the Sustainable Development of European Aquaculture), 2009 (Building a Sustainable Future for Aquaculture – A New Impetus for the Strategy for the Sustainable Development of European Aquaculture), 2013 (Strategic

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<sup>1</sup> Consolidated version of the *Treaty on the Functioning of the European Union*, 2012

<sup>2</sup> Report on aquaculture in the European Union, European Parliament, 2002

<sup>3</sup> Building a sustainable future for aquaculture, COM(162) 2009

<sup>4</sup> CFP Regulation 1380/2013

Guidelines the Sustainable Development of EU Aquaculture), and 2021 (Strategic Guidelines for a More Sustainable and Competitive EU Aquaculture for the Period 2021 to 2023).

In 2023, the Commission established the Aquaculture Assistance Mechanism (AAM) to support the implementation of the Strategic Guidelines, but the guidelines are non-binding.

Aquaculture falls under exclusive EU competence only as regards market and financial measures<sup>5</sup>. For other aspects, it falls under shared competence between the EU and MSs, subject to the principles of subsidiarity and proportionality. The shared competence on aquaculture has been exercised mostly at the MS level, with the EU playing only a strategic policy coordination role as per the CFP Regulation.

Article 25 concerns “*Data requirements for fisheries management*,” and the article includes data to assess the socio-economic performance of aquaculture.

Article 35 mandates the establishment of a “*Common Market Organisation in fishery and aquaculture products*”.

Article 43 mandates the establishment of an “*Advisory Council for Aquaculture (AAC)*”. The AAC provides recommendations on policy issues to the Commission and MSs. Further rules detailing the functioning of the Advisory Council(s) are laid down in Commission Delegated Regulations<sup>6</sup>.

### 1.3 Common Market Organisation (CMO)

The CMO<sup>7</sup> for fishery and aquaculture products establishes – inter alia – a legal framework for consumer information, market standards, producer organisations (POs), and interbranch organisations (IBOs).

The legal framework for POs and IBOs includes an implementing regulation on the recognition of POs and IBOs<sup>8</sup>, an implementing regulation<sup>9</sup> concerning Production and Marketing Plans (PMPs), and a Commission Recommendation<sup>10</sup> on the establishment and implementation of PMPs.

### 1.4 The Data Collection Framework (DCF)

The DCF Regulation<sup>11</sup> establishes a framework for the collection and management of data in the fisheries (and aquaculture) sector. A Commission Delegated Decision<sup>12</sup> specifies the data to be collected on aquaculture, and a Commission Implementing Decision<sup>13</sup> establishes thresholds for the data collection.

### 1.5 The European Maritime, Fisheries and Aquaculture Fund (EMFAF)

The development of the EU aquaculture sector and fisheries is financially supported by the EMFAF<sup>14</sup>. Aquaculture production and the processing and marketing of its products is included in EMFAF priority 2.

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<sup>5</sup> Ibid. article 1 (1) (b)

<sup>6</sup> Commission Delegated Regulations 2015/242 and 2022/204

<sup>7</sup> CMO Regulation 1379/2013

<sup>8</sup> Commission Implementing Regulation 1419/2013

<sup>9</sup> Commission Implementing Regulation 1418/2013

<sup>10</sup> Commission Recommendation (2014/117)

<sup>11</sup> DCF Regulation 2017/1004

<sup>12</sup> Commission Delegated Decision 2021/1167

<sup>13</sup> Commission Implementing Decision 2021/1168

<sup>14</sup> EMFAF 2017/1004

## 1.6 Horizontal EU policies

Horizontal policies on e.g. environmental protection, human and animal health, and organic farming have a significant impact on the development of aquaculture.

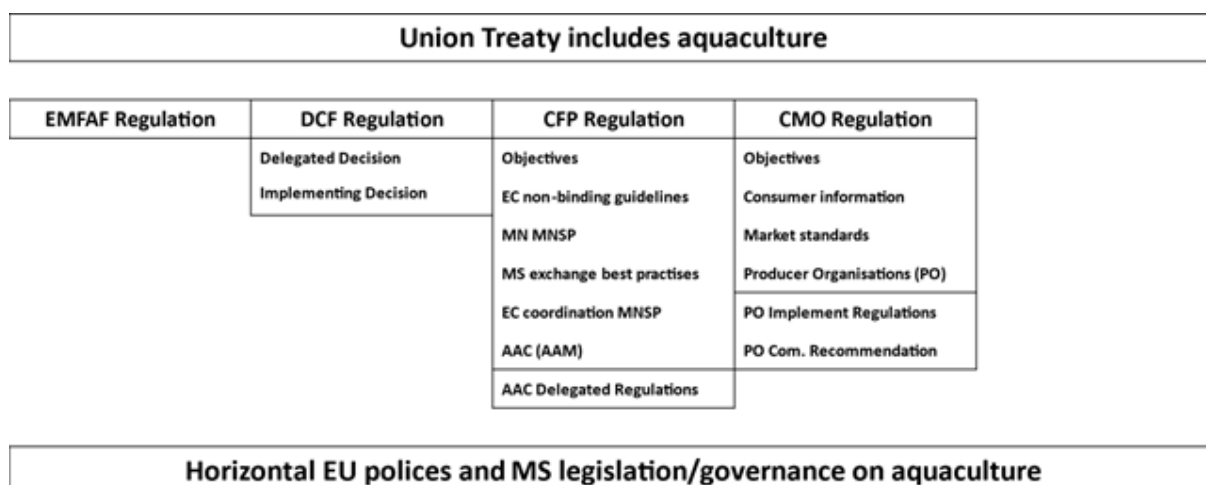
The following environmental directives have a particular impact on the aquaculture sector's access to water and space: the Water Framework Directive (WFD)<sup>15</sup>, Marine Strategy Framework Directive (MSFD)<sup>16</sup>, Marine Spatial Planning Directive (MSPD)<sup>17</sup>, Birds Directive<sup>18</sup>, and Habitats Directive<sup>19</sup>.

Horizontal directives do not consider that the EU aquaculture sector mainly consists of micro and small enterprises that face the same requirements as larger enterprises.

## 1.7 MS legislation and governance on aquaculture

MS legislation and governance on aquaculture is at the national or sub-national level and is flagged by the aquaculture sector as an important barrier to growth and development of the sector.

The current EU aquaculture policy framework is visualised below.



## 2. Policy impact and efficiency

More than two decades have passed since the Commission published the first Strategy for the Sustainable Development of European Aquaculture in 2002<sup>20</sup>. The strategy addressed a slowdown of growth and aimed at increasing aquaculture production, solving conflicts in access to space, and improving governance.

The Commission concluded in 2009<sup>21</sup> that the volume of EU aquaculture production had stagnated and that the main barriers included access to space, water, and governance. These conclusions were repeated in the 2013 Strategic Guidelines and again in the 2021 Strategic Guidelines alongside initiatives to improve welfare and reduce environmental impacts.

<sup>15</sup> WFD, 2000/60

<sup>16</sup> MSFD, 2008/56

<sup>17</sup> MSPD, 2014/89

<sup>18</sup> Birds Directive, 2009/147

<sup>19</sup> Habitats Directive, 92/43

<sup>20</sup> COM(2002) 511 final

<sup>21</sup> COM(2009) 162 final



The AAC welcomes the Commission's proposal of annual surveys to monitor progress and the impact of the current EU instruments<sup>22</sup> and anticipates discussing the results of the first survey in Spring 2024.

In addition, the AAC takes note of the thorough assessment to be launched in 2025, the number of Commission guidelines that are still to be implemented, and the 2029 evaluation of the Strategic Guidelines.

The AAC is confident that the Commission will deliver on the actions foreseen in the Strategic Guidelines and agrees that the Commission guidelines address key issues related to aquaculture.

The AAC emphasises that the European Parliament, the European Economic and Social Committee, the Committee of the Regions, and the Council of the EU also support the Strategic Guidelines.

The recent special report from the European Court of Auditors (ECA)<sup>23</sup> concluded that the MSs have made limited progress on their aquaculture production targets, production has stagnated, employment in the aquaculture sector has decreased, and there are no indicators available to monitor the sustainability of EU aquaculture. The ECA had concluded in 2014 that MS measures to support the sustainable development of aquaculture have not been well designed and implemented<sup>24</sup>. The AAC notes that a coherent and supportive policy framework is required for the sector and society to benefit from public aid schemes.

The fact remains that EU aquaculture production has stagnated in volume since 2000, that the objective in the CFP on promoting sustainable aquaculture to contribute to food security and supply, growth, and employment has not been met, and that the EU's self-sufficiency rate for aquatic products reached its lowest level in 2021 at 38 pct<sup>25</sup>.

The AAC notes that most MSs' Council Presidency working programmes include sections on agriculture and fisheries but not aquaculture and that the annual December roundtable discussions with the DG MARE Commissioner do not include aquaculture in the agenda.

## **II. Justification**

### **3. The need for a new policy framework on aquaculture**

The Strategic Guidelines motivate the need for a new strategy and conclude that *"a strategic and long-term approach for the sustainable growth of EU aquaculture is therefore more relevant today than ever"*.

Aquaculture is reliant on access to common goods (i.e. open waters, coastal areas, freshwater, sites), and increasing competition with other users calls for a new policy framework to support the strategic development of the sector.

The AAC and the before-mentioned EU institutions support the ESG.

The Council has recently concluded on the need to prioritise aquaculture and that this is essential to ensure the provision of nutritious, healthy and safe food, reduce the high EU dependency on imports of aquatic products, and create economic opportunities and jobs<sup>26</sup>. Priority is also needed to ensure

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<sup>22</sup> Commission Strategic Guidelines, MS MNSP's, exchange of best practises

<sup>23</sup> EU Aquaculture Policy, European Court of Auditors, 2023

<sup>24</sup> The Effectiveness of European Fisheries Fund Support for Aquaculture, European Court of Auditors, 2014

<sup>25</sup> The EU Fish Market 2023, EUMOFA

<sup>26</sup> Council Conclusions on the EU's new strategic guidelines, PECHE 270, 2022

animal welfare and environmental protection both for EU production and for imported aquatic products.

This leads to the conclusion that the current Union policy framework and measures have not proven efficient in unlocking the potential of the EU aquaculture sector.

The AAC finds that the main problem is the lower policy prioritisation given to aquaculture in MSs as compared to agriculture and fisheries and that the root cause is the lack of MS political commitment to develop sustainable Union aquaculture. The consequence is policy implementation failures:

1. the non-binding Strategic Guidelines have a limited impact on MS legislation/governance, use of EU subsidies, and the development of the sector;
2. MNSP shortcomings in relation to content and implementation;
3. efficient and timely follow-up measures have not been established; and
4. the policy objective of promoting sustainable aquaculture is unmeasurable.

The AAC concludes that an APR is required to overcome the policy failures.

#### **4. The Aquaculture Policy Reform**

The APR considers that aquaculture is comparable to agriculture because the sectors share the same business uncertainties with the addition that aquaculture is more exposed to competition from imported aquatic products.

The AAC has a split opinion on the CFP. The “other interest groups” favours the alignment of agriculture, fisheries and aquaculture in an overarching new Common Food Policy, whereas “representatives of sector organisations” favours establishing a separate Common Aquaculture Policy. The APR does not include a recommendation on the CFP.

The objectives of the recommended APR are to increase MS policy-makers’ commitment to aquaculture, together with related sustainability issues including animal welfare and environmental protection, to overcome current policy failures and to prepare the EU aquaculture sector for a Common Food Policy as proposed by the IPES<sup>27</sup> and previously recommended by the AAC. The APR includes:

1. establishing an Aquaculture Sustainability Regulation (ASR);
2. establishing a new CMO regulation on aquaculture products;
3. amending the legal framework for POs and IBOs;
4. establishing a new legal act on a Performance and Evaluation Framework (PMEF);
- and
5. improving coherence between aquaculture policy objectives and EU environmental directives.

The AAC proposes the following roadmap for the APR:

	2025	2026	2027
1. ASR			
2. PMEF			

<sup>27</sup> Towards a Common Food Policy for the European Union, 2019



3. CMO regulation on aquaculture			
4. Legal framework PO/IBO			
5. Coherence aquaculture and EU environmental directives			

The recommendation on the APR and its elements needs further refinement.

Legal compliance with the Union treaties and the principles of subsidiarity and proportionality should be examined. The AAC finds that the APR is effective and efficient in meeting the objectives, relevant to the current situation and new challenges and opportunities, coherent with other EU policies and that it has EU added value.

The sequencing of implementing actions and milestones must be carefully considered.

## 5. The Aquaculture Policy Reform elements

### 5.1 Establish an Aquaculture Sustainability Regulation (ASR)

The Farm to Fork strategy includes a legislative proposal for a framework for sustainable food systems to accelerate and facilitate the transition towards fairer and more sustainable EU food systems.

The ASR should be a framework regulation focused on four key elements.

The main objective of the ASR is to ensure a level playing field and to contribute to the sustainable provision of long-term food security on aquaculture products. The ASR should therefore establish quantified and progressively increasing targets for the supply of sustainable aquaculture products considering the various types of EU aquaculture.

To give direction and monitor progress, the ASR should mandate the introduction of clear targets for a set of key sustainability indicators (environmental, economic viability, social and animal welfare).

A sustainable food system should promote sustainable consumption. This is partly addressed in the proposed new CMO regulation on aquaculture products, but the ASR should call for the inclusion of sustainability criteria in public procurement of aquaculture products.

The availability of public aid should be linked to achieving sustainability targets.

Finally, the ASR should mandate the establishment of a Performance and Evaluation Framework (PMEF).

The legal basis for the ASR should be articles 43 and 114 of the TFEU.

### 5.2 Performance and Evaluation Framework (PMEF)

The legally binding PMEF aims to overcome current policy implementation failures by introducing a robust framework for monitoring the progress and impact of the APR.

The PMEF must consider the Council's request that an increase in the administrative burden of data collection for indicators must be avoided to the greatest extent possible<sup>28</sup> by means consistent with the need to improve environmental protection and animal welfare.

<sup>28</sup> Council conclusions on the European Court of Auditors Special on Aquaculture Policy, 6023/24, 2024

The Commission Strategic Guidelines recommend that each MS adopt a single piece of legislation on aquaculture and set up a single national aquaculture authority entity. The AAC finds that complying with the guidelines will ease the administrative burden on the MS.

### Annual survey to monitor progress on MS quantitative growth targets

The survey uses performance indicators and baseline indicators for 2016 to 2020. The survey should be launched for the first time in 2024<sup>29</sup>.

Significant volume growth in aquaculture is defined by four milestones:



It takes 1–3 years to meet each milestone, and the survey aims to consider this time lag when assessing progress made to reach MS quantitative growth targets.

The first step includes ten indicators based on existing data collection frameworks or publications:

DCF Delegated Decision	EMFAF Funding	EUMOFA Annual Reports
1. Weight of sales per species (kg)	7. Productive investments (€)	9. Self-sufficiency rate aquatic products (%)
2. Gross sales per species (€)	8. Innovations (€)	10. Trade deficit (€)
3. Investments (€)		
4. Fish feed used (kg)		
5. Number of enterprises (number)		
6. Employment (number)		

The second step includes five additional indicators that calls on MSs to collect additional data. The AAC finds that the data are available but that they might need to be collected from different MS authorities. The AAC underlines the importance of these additional indicators because they provide essential information on the sector's access to space and water, which is identified as an important barrier to growth and development.

Indicator	Data source
1. New licences <sup>30</sup> for aquaculture farms (number and surface km <sup>2</sup> for marine farms)	EU MAP
2. Allocated zones for marine and freshwater aquaculture (km <sup>2</sup> and % of waters covered by the WFD)	
3. Allocated zones for marine aquaculture (km <sup>2</sup> and % of waters covered by the MSFD)	
4. Status of production of zones 3 and 4 under the provision of WFD Annex IV 1.2	

The four indicators should be included in the Commission Delegated Decision 2021/1167's Table 10.

### Establish indicators and targets for sustainable aquaculture

<sup>29</sup> Commission letter to the AAC, 2023

<sup>30</sup> The term 'licenses' includes permits, concessions etc. required to establish and operate an aquaculture farm

Establishing indicators and targets has also been proposed by the ECA<sup>31</sup> and the Joint Research Centre<sup>32</sup>. The AAC considers it essential to formalise and implement sustainability targets such that they are integrated with growth targets.

The Commission's Guidance Document on environmental performance will define environmental indicators and consider the work done on indicators for aquaculture by the Joint Research Centre in the context of the EU Bioeconomy Monitoring System and Scientific, Technical and Economic Committee for Fisheries (STECF) reports identifying sustainability indicators for aquaculture<sup>33</sup>.

A recent research paper identifies criteria for choosing indicators and proposes a set of indicators<sup>34</sup>, the Joint Research Centre (JRC) proposes a sustainability assessment framework on a broad food system<sup>35</sup>, the STECF proposes criteria and indicators to incorporate sustainability aspects in the marketing standards under the CMO<sup>36</sup>, the AAC and the Market Advisory Council (MAC) recommend that the STECF propose indicators on economic sustainability and corresponding thresholds at farm and sector levels<sup>37</sup>, and the Federation of European Aquaculture Producers (FEAP) proposes criteria for sustainable finfish aquaculture<sup>38</sup>.

The AAC recommends indicators on animal welfare and underlines the importance that the sustainability indicators consider the standards for responsible aquaculture developed and managed by the EU Platform on Animal Welfare, World Organisation for Animal Health and the Aquaculture Stewardship Council (ASC)<sup>39</sup>.

The AAC proposes that the Commission publish the performance and sustainability indicators on a public dashboard, that STECF economic reports on the EU aquaculture sector be published annually and that they include a chapter on EU aquaculture policy efficiency based on the above indicators.

### **Regular monitoring to assess progress of MNSP/Strategic Guidelines**

The monitoring could be based on two questionnaires.

The Annex to the Strategic Guidelines proposes specific actions by the Commission, the MS and the AAC.

The first questionnaire could be a follow-up on the actions listed in the Annex.

The second questionnaire is a follow-up on the MNSP using a new template. The AAC proposes that a more "measurable" template be developed for the English summary of the MNSP in relation to the objectives, measures and timetable necessary to achieve them. This is essential in order to have an efficient follow-up on progress on the MNSP and the template should consider the indicators proposed above.

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<sup>31</sup> EU aquaculture policy, European Court of Editors, Special Report, 2023

<sup>32</sup> Concepts for a sustainable EU Food System, Joint Research Centre, 2022

<sup>33</sup> Reply of the European Commission to the European Court of Editors Special Report on aquaculture, 2023

<sup>34</sup> Making a web-portal with aquaculture sustainability indicators for the public, Frontiers in Sustainable Food Systems, E. Mikkelsen et al, 2021

<sup>35</sup> Ibid Joint Research Centre, 2022

<sup>36</sup> STECF-20-05

<sup>37</sup> Joint AAC/MAC Recommendation, July 2023.

<sup>38</sup> Technical Screening Criteria for Finfish Aquaculture, FEAP, 2022

<sup>39</sup> asc-aqua.org

The AAC notes that the current Strategic Guidelines cover a decade and include several actions, but they do not include a timetable. The AAC proposes splitting the guidelines into periods of 3 years to ensure a more targeted approach and conducting a monitoring exercise at the end of each period.

### **Regular monitoring of MS compliance with Commission guidance**

The Strategic Guidelines foresee several Commission non-binding guidance. The Delegated act on the PMEF should call on MS to give the Commission feedback on how, when and to what extent the MS intend to comply with a guidance. This would enable the Commission to follow up on the implementation accordingly and improve efficiency in the exchange of best practices.

The AAC finds that a robust and legally binding follow-up procedure is essential to ensure impact from non-binding instruments.

### **5.3 Establish a CMO regulation on aquaculture products**

Establishing a CMO regulation on aquaculture products is instrumental in building a separate identity for aquaculture. The ambiguous use of the term “fisheries” creates legal uncertainty and implementation confusion in MSs. The new regulation should include the following amendments:

#### **Expanding marketing standards to include environmental, animal welfare and social aspects**

The current marketing standards include only the quality, size, weight, packaging, presentation or labelling of aquaculture products.

The 2019 evaluation of the implementation of the marketing standards identified shortcomings regarding the effectiveness of the standards in achieving CMO objectives. The evaluation concluded that the existing standards do not sufficiently contribute to a level playing field on environmental and social aspects and do not deliver on the objective of providing sustainable aquatic products<sup>40</sup>.

The Farm to Fork strategy includes a revision of the marketing standards for a fair, healthy and environmentally friendly food system<sup>41</sup>.

The marketing standards should be expanded to include environmental, animal welfare and social aspects as per example proposed by the STECF<sup>42</sup>.

#### **Amending mandatory consumer information requirements as proposed by the MAC/AAC.**

The joint MAC/AAC advice on consumer information in the HORECA segments identifies problems in the current CMO regulation and proposes solutions to overcome the problems. The new CMO regulation on aquaculture products (and the CMO on fishery products) should consider the MAC/AAC advice.

### **Objectives of POs**

The current CMO mandates POs to endeavour to ensure that aquaculture finfish feed products of fishery origin come from fisheries that are sustainably managed whereas the objectives of contributing to food supply, promoting high food quality and safety standards and contributing to employment are optional. For shellfish, it merely aims to manage quality labels.

Food security and supply, growth and employment, animal welfare and environmental impact are policy objectives that should be mandatory for POs and IBOs.

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<sup>40</sup> SWD(2019) 453 final.

<sup>41</sup> Farm to Fork Strategy, COM(2020) 381 final.

<sup>42</sup> STECF-20-05.

#### 5.4 Amend the legal framework for POs and IBOs

The Commission Recommendation on the establishment and implementation of PMPs (2014/117)<sup>43</sup> should be amended to consider the revised objectives in the new CMO on aquaculture products.

The AAC further proposes that Commission Implementing Regulation 1419/2013 on recognition of transnational POs/IBOs be amended. They should be recognised and financially supported by DG MARE under direct management and not by the MS where the transnational PO/IBO is established.

#### 5.5 Improve coherence between aquaculture policy objectives and EU environmental directives

Most MSs have not established specific legislation on aquaculture activities, and most EU legislation applicable to aquaculture is not specific to the sector. Applicable EU environmental legislation consists of directives that MS authorities must transpose into regulations applicable to the sector. The transposition in the absence of national legislation on aquaculture may not always be consistent among MSs or among authorities within the same MS. This causes uncertainty among operators over the applicable legislation<sup>44</sup>. The AAC emphasises that the complexity of the EU regulatory framework on aquaculture is amplified due to the lower policy prioritisation given to aquaculture in the MSs.

The Council has called on the Commission to present a proposal to improve the coherence between the objectives of a growing sustainable aquaculture sector in the EU and EU environmental legislation<sup>45</sup>.

The AAC recommends that the findings in the proposal be included and considered in the APR.

### III. Conclusions

The European Commission announced the “*strategic dialogue on the future of agriculture in the EU*” in its 2023 State of the Union address with references to the importance of food security and sufficiency and the growing impact of new challenges and obligations.

The AAC invites EU institutions and MSs to open a dialogue on aquaculture policy and to take the proposed APR on aquaculture into its next phases.

The AAC does not foresee the creation of a new Directorate General for Aquaculture, but the organisational and economic consequences of implementing and managing the new policy must also be examined. The AAC proposes that the creation of a separate unit on aquaculture should be considered.

The AAC recommends DG MARE to ensure timely consultation of the AAC in the development and implementation of the APR.

The proposed new EU policy on aquaculture is visualised below.

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<sup>43</sup> Commission Recommendation of 3 March 2014 on the establishment and implementation of the Production and Marketing Plans pursuant to Regulation (EU) No 1379/2013 of the European Parliament and of the Council on the common organisation of the markets in fishery and aquaculture products

<sup>44</sup> Regulatory and administrative framework for aquaculture, Commission Staff Working Document, SWD(2024) 95 final

<sup>45</sup> Council conclusions on European Court of Auditors special report No 25/2023 on EU aquaculture policy, 2024

**Union Treaty includes aquaculture**

EMFAF Regulation	DCF Regulation	CFP Regulation	CMO Regulation	Aquaculture Sustainability Regulation
	Delegated Decision Implementing Decision	Objectives EC non-binding guidelines MN MNSP MS Exchange best practises EC coordination MNSP AAC (AAM) AAC Delegated Regulation	Objectives Consumer information Market standards Producer Organisations (PO) PO Implement Regulations PO Com. Recommendation	Supply targets Public procurement (Indicators) (PMEF)

Legal act on PMEF: MS growth targets, indicators on sustainability, MNSP/strategic guidelines, Commission Guidance

**Horizontal EU polices and MS legislation/governance on aquaculture**

Amendments  
New elements





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