



Brian Thomsen

Chair

Aquaculture Advisory Council

Rue Montoyer, 31 - 1000 Brussels

Mrs Charlina Vitcheva

European Commission

DG MARE

Rue Joseph II, 99 - 1000 Brussels

Brussels, 31 October 2024

Subject: AAC response to Guidance Documents

Dear Mrs Vitcheva,

The Strategic Guidelines foresee the development of several non-binding European Commission Guidance Documents (Commission Staff Working Documents).

These Guidance Documents are designed to provide clear connections between the obstacles to sustainable aquaculture development in the EU, as highlighted in the Strategic Guidelines, and the possible solutions available to Member States.

Guidance Documents are created with the aid of the Aquaculture Assistance Mechanism (AAM), involving consultation with aquaculture experts from Member States and the Aquaculture Advisory Council (AAC).

The intricacy of Guidance documents depends on their scope as well as their technical and legal context.

The AAC makes decisions through consensus, and individual AAC members may need to consult their own members on certain parts of a Guidance document to form an opinion. Additionally, AAC representatives from sector organisations and various interest groups might hold differing views on specific issues. In some cases, the AAC may need to form a Focus Group to deliberate on a Guidance Document. The conclusions drawn by the Focus Group must then be reviewed and approved by the relevant Working Group and the Executive Committee.



T +32 (0) 2 720 00 73

E secretariat@aac-europe.org

www.aac-europe.org

Rue Montoyer, 31

BE 1000 Bruxelles



When drafting Guidance Documents, the European Commission must consider the internal AAC decision-making procedures, allowing adequate time for the AAC to develop its recommendations.

On this, the AAC calls on the Commission to establish a procedure for the consultation of the AAC on Guidance Documents.

The AAC proposes an 8-week consultation period following the first draft and a 4-week consultation period following a second draft. The consultation deadlines should be announced when the first draft is published.

With my best regards,

Brian Thomsen

**Chair
Aquaculture Advisory Council**

