



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,
MARE.A.2/LDCI

Subject: AAC Recommendation for an Aquaculture Policy Reform

Dear Mr Brien Thomsen,

I would like to thank the AAC for the email of 4th July 2024 including the “*AAC Recommendation for an Aquaculture Policy Reform*”.

As you know, the Commission has launched the evaluation of the Common Fisheries Policy (CFP) Regulation. This evaluation will cover the provisions of the CFP Regulation on aquaculture. The purpose will be to evaluate the performance of the CFP Regulation towards its objectives and emerging needs. A supporting study has been recently launched and should be finalised by autumn 2025. A public stakeholder consultation will be launched by the end of 2024. It will be based on targeted questions for which your input will be highly valued. In the meantime, we will also take into consideration your recommendation in the context of the ongoing evaluation. The evaluation findings, which will be presented in a staff working document of the Commission, will feed into the next step of the decision-making cycle.

Let me refer to certain specific aspects of the AAC recommendation below.

With respect to the **policy impact and efficiency of the aquaculture policy framework**, I welcome the support of the AAC to the Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030 that were adopted by the Commission in 2021. We also welcome your trust in the implementation of the actions laid down therein. I also take this opportunity to thank the AAC for your constructive cooperation in this implementation.

The recommendation notes that **Council Presidency working programmes** do not include sections on aquaculture. However, while the work programme of each Council's Presidency usually follows the structure of the relevant Council formation, work on aquaculture is carried out during most Council's Presidencies.

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Aquaculture has been one of the key priorities of the Hungarian 2024 Council's Presidency. There have also been Presidency Conclusions on the Fisheries policy package for a sustainable, resilient, and competitive fisheries and aquaculture sector during the Swedish 2023 Council's Presidency. Back in 2022, Council conclusions on the EU's new aquaculture strategic guidelines were adopted under the Czech Council's Presidency.

In terms of the **ideas for a reform of EU Aquaculture policy** described in the recommendation, the Commission agrees that insufficient progress has been made in terms of sustainable development of aquaculture activities in the EU. This is due to a combination of factors that are described in the Commission strategic guidelines. As you know, these guidelines are the result of close consultations with both Member States experts and the AAC. They include concrete recommendations and propose concrete actions on a wide diversity of areas where further work is necessary to achieve the sustainable growth of aquaculture in the EU.

Among the actions that have already been implemented are the publication of two staff working documents including more detailed recommendations on how to streamline the regulatory and administrative framework for aquaculture in Member States and to ensure adequate planning and access to space for marine aquaculture. Dedicated trainings for Member States' administrations have been organised and an e-learning module will be made available on the EU Aquaculture website together with each of the staff working documents.

As indicated in your recommendation, the Commission has created a survey on the progress in terms of implementation of the strategic guidelines that also covers the implementation of the multi-annual national strategic plans for the sector of EU Member States. EU Member States have been given until 8 November to reply to this detailed survey covering all the aspects of the strategic guidelines as well as the use of funding. The results of this survey, together with the assessment of progress by the Commission regarding the implementation of actions under its responsibility, will be the basis for a mid-term assessment of the implementation of the strategic guidelines due in 2025. This assessment will be done with the support of the EU Aquaculture Assistance Mechanism and the AAC will be involved. This assessment will allow us to evaluate the impact of the strategic guidelines' implementation up to date and to determine whether additional action, including the definition of specific targets, would be necessary.

I would like to thank you for your proposals on **indicators** to take into consideration in the context of the **monitoring of progress** towards achieving the sustainable development of aquaculture in the EU. In view of the results of the mid-term assessment and input provided by Member States in the first survey on progress of the implementation of the strategic guidelines, we could consider reviewing the indicators used so far.

With respect to **indicators of progress on sustainability**, the future document on environmental performance will establish as a first step a set of indicators that would assist the farmers in assessing their environmental performance while, at the same time, collecting and providing information necessary in the context of the Product Environmental Footprint (PEF) methodology.

Moreover, the Commission, with the support of the EU Aquaculture Assistance Mechanism, will work on general fish welfare indicators as part of the implementation of the actions under the strategic guidelines.

Indicators to monitor the overall sustainability of the EU aquaculture sector of a Member State aquaculture sector could be established as a second step. However, the assessment of progress based on those indicators would require additional data collection and reporting by Member States. So far, Member States have only agreed to make available to the institutions implementing the DCF data for which a reporting obligation exists in the Member State concerned.

With regards to your proposals on a **CMO Regulation for aquaculture**, I would like to refer first to your recommendation on expanding marketing standards to include sustainability aspects. It is crucial that any environmental, social, or economic criteria used for this purpose are grounded in robust scientific evidence. Notably, the aspects recommended by the AAC, such as environmental sustainability, animal welfare, and social responsibility, are already raised in the Commission strategic guidelines. Therefore, it is essential to complete the follow-up to the guidelines and allow its outcome to inform potential policy initiatives, including any new marketing standards.

We also appreciate the importance of accurate and comprehensive **consumer information**, as highlighted in the recommendation. The revised Control Regulation's enhanced traceability provisions will contribute to improving transparency and accountability in the supply chain of aquatic food. The ongoing evaluation of the CFP Regulation will assess the effectiveness of the current regulatory framework, including the provisions on mandatory and voluntary consumer information under the CMO. As part of the evaluation, we will consider the views expressed by stakeholders, including the recommendations of the AAC, to identify potential areas for improvement to ensure that consumer information requirements are fit for purpose.

We take note of your recommendation to make it mandatory for aquaculture **Producer Organisations (POs) and Interbranch Organisations (IBOs)** to follow the objectives of contributing to food security, food supply, growth, employment, animal welfare and to decreasing environmental impact. It would however require a revision of the CMO Regulation, which, as explained above, is not currently on the agenda.

Regarding the recommendation to adopt a **CMO Regulation on aquaculture products**, I would like to note that the ongoing evaluation of the CFP Regulation will cover the current CMO provisions. This evaluation will identify if the CMO has delivered on the objectives established by the CFP, including for aquaculture products. Based on the outcome of this evaluation, the Commission will consider next steps.

We cannot unfortunately agree to the recommendation to support the establishment and functioning of transnational **POs and IBOs** under direct management. DG MARE recognises that the modalities for the establishment of such professional organisations, and the difficulties to set-up administrative arrangements between concerned Member States to ensure financial support, are a barrier to their development. This has already been the object of a guidance to the sector and competent authorities. While there is a need for further support, direct management is not considered appropriate. The whole POs and IBOs' system is based on the principle that concerned competent authorities are the best placed to decide on the measures to be deployed by professional organisations, on the assessment of the implementation of these measures and on the adequate level of financing. Moreover, a differentiated treatment of professional organisations according to their transnational character would pose a problem of level-playing field vis-à-vis national professional organisations, especially as the objectives and obligations from the CMO Regulation are identical for national and transnational professional organisations.

In relation to your recommendation to improve coherence between aquaculture policy and **EU environmental legislation**, we would like to note that this legislation consists of Directives which, by definition, leave a margin of manoeuvre to Member States in the way they are transposed into national law. The future document on environmental performance to be published by the Commission will include a description of relevant EU legislation, as well as list good practices in terms of environmental performance. I would like to also note that, without prejudice to its right of initiative, the Commission is finalising the evaluation of the Marine Strategy Framework Directive, which aims at a sustainable use of the marine environment through the application of the ecosystem-based approach. If this leads to a revision of this Directive, the Commission will ensure that its proposal balances the sustainable use of marine resources with environmental objectives.

I am looking forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Julia RUBECK, coordinator of the Advisory Councils (Julia.rubeck@ec.europa.eu; +32.2.296.88.89), who will forward them to relevant colleagues.

Yours sincerely,

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