



AAC Recommendation on the evaluation of the Common Fisheries Policy

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I. Background

The Aquaculture Advisory Council (AAC) welcomes the evaluation of the Common Fisheries Policy.

The AAC notes with concern that the survey¹ and the Commission's news announcement² of the public consultation on the Common Fisheries Policy regulation refer only to fisheries and not to aquaculture.

The evaluation builds inter alia on the Fisheries and Oceans package adopted in February 2023. The package is intended to improve the sustainability and resilience of the EU's fisheries and aquaculture sector. The package includes four elements:

1. Communication on the Energy Transition of the EU Fisheries and Aquaculture Sector
2. Action Plan to protect and restore marine ecosystems for sustainable and resilient fisheries
3. Communication on the Common Fisheries Policy today and tomorrow
4. Report on the Common Market Organisation for fishery and aquaculture products.

II. Justification

Communication on the Energy Transition of the EU Fisheries and Aquaculture Sector

The Communication on the Energy Transition presents a framework for the energy transition in the fisheries and aquaculture sector. The Communication argues that the sector's energy intensity, its dependence on fossil fuels and the Union's ambition to reach climate neutrality by 2050 show a need to reduce dependency on fossil fuels and to move to renewable and low-carbon sources as quickly as possible.

The Communication does not properly consider the differences between fisheries and aquaculture.

The consumption of fuel in marine and freshwater aquaculture is marginal. A cost breakdown analysis shows that energy accounts for only 2% of total costs in marine aquaculture,³ and in most cases of freshwater aquaculture, it is negligible. The emissions of greenhouse gases (GHGs) from the electricity used in land-based aquaculture enterprises depends on the Member State's transitions to renewable energy sources and on energy optimisation initiatives at the farm level.

Feed accounts for 23%–60% of the production costs in finfish aquaculture,⁴ and feed is the main driver of GHG emissions.

¹https://ec.europa.eu/eusurvey/runner/CFP_Regulation_Evaluation

² https://oceans-and-fisheries.ec.europa.eu/news/commission-opens-public-consultation-common-fisheries-policy-regulation-2025-01-27_en

³ Economic Report on the EU Aquaculture, STECF 22-17

⁴ Ibid

- The AAC argues that the Communication is biased towards fisheries as it excludes that main driver of costs and GHG emissions in aquaculture.

Action Plan to protect and restore marine ecosystems for sustainable and resilient fisheries

The action plan considers only fisheries.

Communication on the Common Fisheries Policy today and tomorrow

The Communication essentially refers to four Commission guidance documents on aquaculture (good administrative and regulatory practices, access to space, environmental performance, and climate mitigation) and concludes that the 2013 Common Fisheries Policy (CFP) reform coupled with EU funding *“has allowed for progress in terms of sustainability and competitiveness of this important sector.”*

- The AAC does not agree with the conclusion and refers inter alia to the report by the European Court of Auditors.⁵
- The AAC finds that the Communication does not provide a proper presentation of the state of play of EU aquaculture.
- The AAC regrets that the Communication does not consider AAC recommendations and important elements such as fish welfare, fish and shellfish health, terminology, ecosystem services and organic aquaculture.

Report on the Common Market Organisation for fishery and aquaculture products

- The AAC refers to recent recommendations on consumer information⁶ and Producer Organisations/Interbranch Organisations⁷, for example.

Competitiveness Compass for the EU

The Commission's ambitions and initiatives to boost Europe's competitiveness should be considered when evaluating aquaculture – notably the need to “shift gear.” The AAC finds that two initiatives are relevant to Union aquaculture:

1. Flagship action pillar 3: Reducing excessive dependencies and increasing security (on aquatic food)
2. Horizontal enablers: Reducing unnecessary regulatory and administrative burdens for enterprises

⁵ EU aquaculture policy: Stagnating production and unclear results despite increased EU funding, European Court of Auditors, 2023

⁶ Aquaculture Advisory Council – Market Advisory Council, 2024. Recommendation on consumer information on fishery and aquaculture products, particularly in the context of the HORECA sector <https://aac-europe.org/en/publication/aac-mac-recommendation-on-consumer-information-on-fishery-and-aquaculture-products-particularly-in-the-context-of-the-horeca-sector/>

⁷ Aquaculture Advisory Council, 2021. Recommendation on the role of producers' organisations in the sustainable development of aquaculture <https://aac-europe.org/en/publication/aac-recommendation-on-the-role-of-producers-organisations-in-the-sustainable-development-of-aquaculture/>

Public consultation – survey

The goal of the Common Fisheries Policy is to ensure the long-term sustainability of fisheries and aquaculture, the availability of food supplies and a fair standard of living for fishery and aquaculture communities.

Union institutions have for more than two decades echoed the ambition to unlock the potential of EU aquaculture, and more than €1 billion have been allocated to aquaculture for the 2014–2020 period, but the realities are as follows:

1. EU aquaculture production has stagnated in volume since 2000.
2. Employment in the sector has decreased.
3. The EU's self-sufficiency rate for aquatic products reached its lowest level in 2022 at 37.5%.
4. The EU's trade deficit in aquatic foods amounted to €22 billion in 2023.
5. The EU has not introduced indicators on the sustainable development of aquaculture.

On this the AAC finds that Common Fisheries Policy is not:

1. Effective in fulfilling expectations and meeting its objectives
2. Efficient in terms of cost-effectiveness and the proportionality of actual costs to benefits
3. Relevant to current and emerging needs
4. Coherent (internally and externally) with other EU interventions or international agreements.

III. Recommendations

Recommendations

To the European Commission:

- The AAC remains firm on the need to align EU policies on aquaculture, agriculture, animal welfare and fisheries and reiterates the recommendation for an EU Aquaculture Policy Reform⁸.
- The Common Fisheries Policy reform should consider the EU Competitiveness Compass.

⁸ Aquaculture Advisory Council, 2024. Recommendation for an Aquaculture Policy Reform <https://aac-europe.org/en/publication/aac-recommendation-for-an-aquaculture-policy-reform/>



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