



AAC Recommendations on the draft report on the mid-term assessment of the Strategic Guidelines for EU Aquaculture and the Multiannual Strategic Plans

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I. Background

The AAC welcomes the draft report on the mid-term assessment and assumes that the monitoring of progress and impact will henceforth be conducted annually.

The AAC has carefully examined the draft report and concludes that the current approach to unlocking the potential of the EU aquaculture sector remains inefficient. The AAC reiterates the need to reform EU aquaculture policy as previously recommended¹.

II. Justification

a) Regulatory framework for EU aquaculture

It is only noted (page 1) that the competence on aquaculture is largely exercised by the Member States and that few pieces of EU legislation apply specifically to this activity.

The AAC does not support this simplistic introduction and refers to the study on the impacts of aquaculture activities in Europe². The study concludes that the regulatory framework for the EU aquaculture sector is diverse and extremely complex. It includes a wide range of instruments adopted at the EU level as well as Member State legislation. In addition, site-specific measures are usually contained in the specific licence conditions of aquaculture facilities.

The complexity has three main causes: 1. the diversity of the sector (species, technologies etc.); 2. apart from specific aquaculture legislation, the sector is subject to a much broader legal framework; and 3. the scope and nature of EU legislation and its relationship with Member State legislation (aquaculture is not an exclusive EU competence). The study identifies approximately 50 legal instruments at the EU level, and only one instrument has 'aquaculture' in its title³. The study further raises specific concerns around the regulation of impacts on animal welfare and about the framework surrounding the aquaculture of macro- and microalgae.

b) Commission actions to ensure Member States' political commitment to aquaculture

The draft report refers to the close cooperation between the Commission and the Member States in the context of the Open Method of Cooperation, notably its meetings with Member State technical experts.

The Council has underlined that the aquaculture sector needs to be a high priority and calls on the Commission to present a proposal to improve coherence between the objective of a growing sustainable aquaculture sector in the EU, including practices respectful of animal welfare, on the one hand, and EU environmental legislation, including the Water Framework Directive, on the other⁴.

¹ <https://aac-europe.org/en/publication/aac-recommendation-for-an-aquaculture-policy-reform/>

² [Study on state-of-the-art scientific information on the impacts of aquaculture activities in Europe](#), 2021

³ Regulation 708/2007 concerning use of alien and locally absent species in aquaculture

⁴ Council conclusions on the EU's new aquaculture strategic guidelines, 11496/22

The AAC notes that the development and promotion of EU aquaculture is highly dependent on Member State policy decisions in relation to their fulfilment of, for example, EU environmental legislation, revising legislation and administrative practices, the allocation of space (areas and emissions of nutrients) and the allocation of resources to relevant authorities, institutions and technical experts.

c) Algae

The Strategic Guidelines do not include actions on algae. The EU algae initiative sets policy actions to develop the algae sector, but the initiative is not included in the Strategic Guidelines.

Some Member States question the inclusion of algae farmers in aquaculture farmers' producer organisations (POs).

d) Smart Specialisation and the impact of research and innovation projects

The report includes many references to research and innovation projects funded under Horizon 2020, Horizon Europe and Life 2027, but there is no information on the actual impact of these projects.

The main output from such projects typically targets Member States (recommendations on reviewing legislation and administrative processes) and/or aquaculture operators (the development of new technologies or solutions) or remains within the research community and European Commission research repositories.

The AAC finds that Member States' technical experts and farmers' associations, for example POs, alongside multi-actor national and regional research clusters, co-labs and incubators, are important catalysts in ensuring uptake of scientific project deliverables. Technical experts can propose reviews of legislation and administrative processes to policymakers, and POs can contribute to the implementation of new technologies/solutions among their members.

The first step in identifying 'impact' projects is to clarify whether Member States technical experts and POs are aware of the projects and their deliverables. For example, the portfolio analysis referred to in the report comprises 53 complete and ongoing Horizon 2020 aquaculture projects with a total cost of €305 million.

The report states that less than 27% of Member States link aquaculture to Smart Specialisation Strategies (S3). However, increasing importance is being attached to the role of S3 in the development of European aquaculture, not least in S3 being referenced directly within the Strategic Guidelines, specifically with regard to knowledge and innovation transfer. There is a disconnect between the aspirations for and uptake of S3 opportunities relating to aquaculture, and much greater effort is required in the promotion of the S3 model to EU Member States and the aquaculture sector at large.

e) Impact of EMFF/EMFAF funding

The report estimates EMFF support from June 2021 to December 2023 at €291 million and approved EMFAF support from December 2021 to July 2024 at €89 million. The European Court of Auditors

(ECA) assesses EMFF support allocated in 2020–2024 as €1.2 billion and concludes that the data reported in the monitoring system is not adequate to assess the fund's contribution to the aquaculture sector's sustainability and competitiveness. The report also presents three recommendations to the European Commission⁵.

It follows from the Commission's reply to the report that the monitoring system of the EMFAF has been improved and simplified, and the EMFF ex post evaluation and the EMFAF mid-term evaluation should provide insights on the efficiency and effectiveness of support. The Commission also accepts the recommendations from the ECA and introduces specific actions to meet the recommendations⁶.

f) Data on aquaculture

The AAC underlines the importance of having valid, reliable and timely data on the sector's production and expresses concern about the asymmetries found between import and export figures in EUROSTAT. The AAC notes that data on production volume are collected both as 'weight of sales'⁷ and as 'net production'⁸.

The STECF Aquaculture Economic Reports uses 'weight of sales' data because they are relevant for economic analysis, and the 2024 publication includes a special section on economic sustainability indicators⁹. The AAC notes that the 2022 production data for Romania need to be verified.

The Eurostat database and the EUMOFA reports on the EU fish market use 'net production'. Regulation 762/2008 calls on Member States to submit data to the Commission within 12 months of the end of the reference calendar year, and the Eurostat database does include data for 2023. It is possible to extract aggregated production data, but it is not possible to extract segmented data for example on species or aquaculture method. In addition, the regulation does not include data collection on organic aquaculture and integrated multi-trophic aquaculture (IMTA), and the definition in annex 1 on 'Recirculation systems' "*means systems where the water is reused after some form of treatment (e.g. filtering)*" is not in line with the definition used in the Strategic Guidelines (fully controlled environment for fish, low water use, etc.).

The farm-to-fork strategy¹⁰ calls for a significant increase in organic aquaculture, but the draft report concludes that "*data on organic production in the EU is insufficient to determine detailed trends*".

The Strategic Guidelines aim to promote various farming technologies, and it is imperative that this promotion be monitored in the statistics on aquaculture production.

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

⁶ Replies of the European Commission to the European Court of Auditors special report, 2024

⁷ Commission Delegated Decision 2021/1167

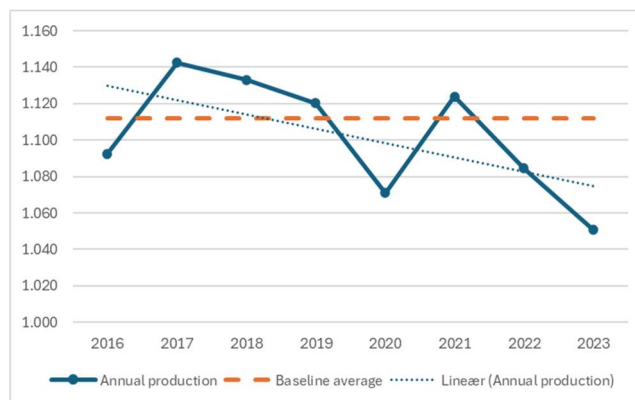
⁸ Regulation 762/2008

⁹ The 2024 Aquaculture Economic Report, STECF 2025

¹⁰ A Farm to Fork Strategy, COM(2020) 381 final

The AAC notes that a draft proposal for a Regulation on the European Fisheries and Aquaculture Statistics (EFAS) has been prepared and will provide a comprehensive new legal framework that will also encompass Regulation 762/2008 (page 23).

The graph shows the development in EU aquaculture production (1,000 tonnes) based on aggregated Eurostat data. The trendline points to a decrease in production notably in Spain, Italy, France, Ireland, Romania and Denmark.



The mid-term assessment should include detailed analysis on the development vis-à-vis EU objectives and Multiannual National Strategic Plan (MNSP) production targets.

g) MNSPs

The report is structured around the four horizontal objectives of the Strategic Guidelines and the various topics covered therein.

The Strategic Guidelines allocate specific actions to the Commission, the Member States and the Aquaculture Advisory Council, but they do not include a timetable.

The AAC adopts annual Strategic Plans including a list of planned recommendations and actions. The Commission provides comments to the Strategic Plans, and the draft report notes that AAC annual plans are strongly aligned with the Strategic Guidelines. This set-up makes it relatively easy to monitor Commission and AAC progress on the Strategic Guidelines, but the impact depends on actions taken by the Member States.

It is inherently more difficult to assess the progress and impact of Member States' MNSPs as there is no consolidated overview on either the actions planned or taken by the Member States or the (mandatory) timetables to meet the objectives in the MNSPs.

The Common Fisheries Policy (CFP) has stipulated since 2013 inter alia that MNSPs shall include timetables to achieve the Member States' objectives and that MNSPs shall aim to simplify licensing procedures, ensure reasonable certainty for aquaculture operators in relation to access to water and space and include indicators for environmental, economic and social sustainability¹¹.

The survey includes a question on environmental indicators, and only 13 Member States answered 'yes'. The survey did not include questions on economic and social indicators.

The ECA report compared the 2020 targets/forecast for aquaculture production in six Member States and found that production had decreased in two Member States and that the other Member States

¹¹ Common Fisheries Policy, article 34, 1380/2013

had made limited progress towards their targets. The AAC underlines that 17 Member States have included production targets in their MNSP.

The structure of the report makes it very difficult to assess the development in each Member State because the actions are included in the horizontal objectives. Furthermore, the AAC finds that identifying tangible barriers to the development of aquaculture requires detailed insight into the situation in each Member State as *"implementation of the MNSP is of essence to achieve the objectives of the strategic guidelines"* (page 25).

For example, the Danish MNSP calls for the Ministry of Food, Agriculture and Fisheries to:

- a) Present a proposal for a new approach to shellfish farming by 2023.
- b) Work towards amending the EU rules on organic aquaculture to make it easier to use technological solutions in productions (no timetable).
- c) Analyse the need and possibilities for setting up a specialised training offer for aquaculture in 2023.

In another example, the Italian MNSP recognises that communication and collaboration between the Central Administration, which has a general coordinating role, and the Regional Administrations, which are responsible for identifying territorial priorities for aquaculture, are essential to meet the objectives in the MNSP:

- a) Tools for organisational coordination and dialogue at national and territorial levels.
- b) Networking of data related to the aquaculture sector.
- c) Spatial planning and environmental monitoring of aquaculture sites, with special reference to mollusc farming areas.

A "concertation table" with the involved stakeholders formally exists, but it is not consulted, and the essential issues have not yet been discussed regarding the delays in achieving the objectives of the MNSP.

The above national shortcomings in implementing MNSP actions – not included in the draft report – impede the development of the EU's aquaculture sector. Such shortcomings are present in many if not all Member States.

The AAC is concerned that the report may have overlooked similar important actions in other MNSPs that are not directly linked to the Strategic Guidelines. The AAC is also concerned that the MNSPs are not updated at regular intervals to consider results from research and innovation projects, recommendations from the AAC or emerging challenges that must be solved, for example.

The AAC notes that several AAC members have identified errors or misleading answers in the Member States' responses to the questionnaire, and several point out that the MNSPs are not updated with and do not reflect the current barriers relevant to the sustainable development of aquaculture.

h) Access to space and water

Several Member States work to reduce nutrients emissions from (for example) agriculture to meet the environmental objectives in the Water Framework Directive and the Marine Framework Strategic Directive. This challenges growth in finfish aquaculture as increased sustainable production of finfish equals increased emissions of nutrients. The Commission Staff Working Document (SWD) on access to space and water recognises this challenge, but the SWD does not provide solutions or recommendations on how to meet it.

The report notes that 19 Member States have included the planning of aquaculture areas in their Marine Spatial Plans, but there is no information on whether the total area allocated to marine aquaculture has increased (or decreased) or whether new farms were established in the areas allocated for aquaculture.

The draft report concludes that *"Progress in increasing and ensuring access to good quality water is less evident and not reflected in the MS survey results"*. Ensuring access to good quality water is essential to the farming of shellfish and to other extensive aquaculture systems.

The AAC underlines that the CFP requires Member States to ensure reasonable certainty for aquaculture operators in relation to access to water.

i) Licences

The MNSPs shall aim to simplify licence procedures. The AAC finds the number of new and renewed aquaculture licences issued to be a powerful indicator for the sector's development and the impact of Member States initiatives to simplify licence procedures including reviews of legislative, regulatory or institutional frameworks for aquaculture since 2021.

The AAC welcomes the table (page 73) on the number of new and renewed licences for aquaculture farms used in the survey but notes that it does not distinguish between the species produced.

The draft report notes that *"there is a worrying lack of improvement in the efficiency of aquaculture licensing across the EU, with processing times staying the same or increasing in many cases"*.

j) Annual survey: Baseline and performance indicators

There is obviously a need to revisit the proposed baseline and performance indicators (average 2016–2020) in relation to the answers received from the Member States and the recommendations from the AAC.

k) Implementation gaps

The diversity of the EU aquaculture sector in relation to, inter alia, national legislation, administration and licensing/concession systems, the species farmed, and farming technologies/practices complicates the applicability of pan-European "solutions".

National farmers associations (NFOs) such as POs or interbranch organisations (IBOs) play a key role in implementing AAC actions on promoting and disseminating certain aspects to aquaculture producers. Some actions can benefit from joint AAC/NFO actions, whereas others appear to be more adapted to NFOs acting independently.

One example of a possible joint action is to “*disseminate the good husbandry practices identified by the Commission among aquaculture producers*”. The AAC could convene a webinar to introduce the pan-European concept, but the NFOs can increase the applicability by adapting the Commission document to consider national conditions and translating it to overcome language barriers.

The action to “*promote the use of digitalisation tools and AI for the traceability and transparency of aquaculture products*” is more adapted to NFOs as there is no pan-European framework for the use of digitalisation tools and AI.

Actions on informing aquaculture producers about relevant research and innovation projects and project outputs should be allocated to organisations such as relevant European Technology Platforms (e.g. EATiP, FABRE TP, and TP Organics) and European research infrastructures (e.g. EMBRC), with higher TRL (technology readiness level) innovation transfer being supported through the S₃ vehicle. Full use must be made of the Aquaculture Assistance Mechanism Knowledge Base, whilst knowledge transfer should be supported, where necessary and appropriate to do so, by specialised EU institutions – for example EURCAW on aspects of animal welfare or EFSA on food safety, etc. – as the AAC does not have capacity or competence for this.

In addition, the AAC has identified specific implementation gaps related to the actions listed in the annex to the Strategic Guidelines. In this context, ‘implementation gaps’ refers to additional aspects that have been uncovered since the Strategic Guidelines were published and that the AAC finds critical for the sustainable development of EU aquaculture but where no solutions or actions have yet been identified.

I) Implementation failures

The Strategic Guidelines actions aim to introduce changes in the Member States (conditions for aquaculture farmers) and at the farm level (farming practices).

The AAC finds that an efficient implementation of the Strategic Guidelines requires closer cooperation between the European Commission, the Member States, the AAC and the NFOs.

The Strategic Guidelines cover ten years with no detailed timetable, and the MNSPs cover seven years, whereas the AAC Strategic Plan and the PO’s Production and Management Plan (PMP) cover only one year. This makes it very difficult for the AAC and the PO to ensure that their planned actions are aligned with the European Commission Directorate-general for Maritime Affairs and Fisheries’ (DG MARE) work and deliverables.

m) Animal welfare

Developments at the EU level

Good progress has been made on animal welfare, particularly in the Commission with the publication of a document on "Good husbandry practices for aquaculture", the inclusion of aquatic animals in the scope of the "EU Partnership on animal health and welfare" launched in 2024, the establishment of EURCAW-Aqua the same year, as well as through the ongoing work on a general code of good practices on fish welfare and fish welfare indicators.

As a further step, the Commission should explicitly clarify that these developments aim to lay the ground for binding EU animal welfare legislation for aquatic animals.

More generally, all the initiatives in the scope of the Strategic Aquaculture Guidelines should systematically cover animal welfare. This includes the ongoing Commission communication campaign, the scope of the EU barometer on fishery and aquaculture and the scope of the survey to Member States, which should require Member States to justify why they have not taken up animal welfare in their national strategies and legislation with supporting data, in order to identify obstacles to the uptake of better animal welfare practices and standards and remedies for them.

Furthermore, additional fundamental and applied research is needed on the welfare of farmed aquatic animals, including stunning.

Developments at the Member State level

The fact that only 11 Member States have included farmed aquatic animal welfare in their national animal welfare strategies/legislation highlights the need for harmonisation through overarching EU legislation on aquatic animal welfare.

Indeed, whilst the progress made by these Member States is a positive first step, the absence of an EU framework contributes to a highly fragmented application of animal welfare legislation in the EU and therefore to an unequal playing field within the EU but also vis-à-vis third countries.

Additionally, Member State survey results indicate that regardless of their uptake, animal welfare standards are fairly limited in scope (e.g. covering a small number of species) and lack structured common indicators. The results also show that EU support is needed to develop indicators for assessing the welfare of farmed aquatic animals.

The AAC recognises the ongoing work by EURCAW-Aqua to develop species-specific welfare indicators and emphasises these indicators need to be the basis for binding standards in order to ensure their adoption by Member States, which has been slow.

Another issue relates to ensuring Member States contribute to the growth of sustainable aquaculture in the EU. Some Member States are diversifying towards novel systems and species without applying the precautionary principle and evaluating prior compatibility with animal welfare, such as in the case of attempts to farm novel carnivorous species or using novel feed methods such as insects. Given the

guidelines' encouragement of Member States to diversify towards low-trophic species, there needs to be mandatory criteria attached to funding disbursement to ensure aquaculture projects' alignment with EU animal welfare standards. As highlighted by the Commission during the launch event of the Strategic Aquaculture Guidelines in March 2025, the guidelines should provide more transparency and details on projects funded under EMFAF, as well as data to measure the sustainability of aquaculture development in the EU.

This situation is particularly problematic as the mid-term assessment recognises that funding of animal welfare projects remains very low (only 1% of aquaculture funding), with only four Member States using EMFAF funds towards animal welfare improvements. Other EU funds also showed limited spending by Member States on animal welfare. The new Strategic Aquaculture Guidelines need to mandate a dedicated funding pot for animal welfare in all relevant Commission funding schemes which is proportionate to spending in other areas in order to ensure faster progress in the uptake of animal welfare tools and standards by Member States.

III. Recommendations

The AAC provides the following recommendations **to the European Commission**:

a) Regarding Regulatory framework for EU aquaculture

1. Include in the report a section that elaborates key bottlenecks in the regulatory framework and in the administrative procedures that impede the development of sustainable EU aquaculture.
2. Underline in the report that several of these have been flagged repeatedly since the Commission published its first strategy in 2002 and that the 2021 Strategic Guidelines are essentially a follow-up to the 2013 Strategic Guidelines in relation to access to water and space and improving licensing processes, for example.

b) Regarding Commission actions to ensure Member States political commitment to aquaculture

3. Include Commission initiatives to ensure Member States' political commitment to the development of sustainable aquaculture.
4. Introduce annual policy meetings between the Commission and the Member States to monitor the development of Member States policy actions on aquaculture.
5. Update on the progress made to achieve the above-mentioned Council calls on the Commission.

c) Regarding Algae

6. Exclude algae from the mid-term assessment, carry out a mid-term assessment on the algae initiative and consider the inclusion of algae initiatives in the Strategic Guidelines' actions.

7. Clarify algae farmers' membership in aquaculture POs.

d) Regarding Smart Specialisation and the impact of research and innovation projects

8. Limit references to research and innovation projects with a clearly identified impact.
9. Launch a survey of Member States' technical experts, POs and other farmers' associations on their awareness and assessment of the impact of Horizon 2020, Horizon Europe and Life 2027 projects that have been completed.
10. Consider linking research and innovation grants and project funding to demonstrable exploitation actions with aquaculture producers.
11. Promote the opportunities provided under the S3 scheme to Member States and encourage Member States and Regions to include aquaculture within S3 whilst simultaneously promoting the opportunities of S3 as a tool for innovation transfer within the aquaculture sector.

e) Regarding Impact of EMFF/EMFAF funding

12. Include the comments from the ECA, the European Council's conclusions on the ECA report, the Commission's conclusions from the above evaluations and a status on the specific actions listed in the Commission's reply to the ECA.
13. Require funding decisions made at the Member State level to demonstrate alignment with the EMFAF's sustainability objectives, and specifically the Strategic Aquaculture Guidelines.
14. Ensure appropriate mechanisms are in place for enforcing EMFAF spending according to its sustainability objectives, including clear processes for retracting funds that have been put towards environmentally unsustainable and low-welfare developments.

f) Regarding data on aquaculture

15. Use publicly available net production data from the Eurostat database.
16. Improve data collection methodology and validation by involving farmers' associations.
17. Update the Eurostat database to allow extraction of segmented data.
18. Collect data on organic aquaculture/IMTA/simultaneous farming of species and revise the definition on recirculation systems and IMTA.
19. Collect data on animal welfare, based on the animal welfare criteria under development by EURCAW-Aqua.
20. Include a summary from the recent STECF reports on economic sustainability indicators.
21. Include a 'deep dive' analysis on the development of EU production.
22. Invite the AAC to submit comments to the draft EFAS regulation.



Recommendations on the draft report on the mid-term assessment of the Strategic Guidelines for EU Aquaculture and the Multiannual Strategic Plans

23. Standardise EUROSTAT, EUMOFA and STECF evaluation methods and indicators.

g) Regarding MNSP

24. Include a detailed follow-up on the Member States' MNSPs notably on objectives and timetables related to access to water and space and simplification of licensing processes.
25. Include a follow-up on MNSP production targets.
26. Introduce a binding follow-up methodology for Member States.
27. Encourage all Member States to set production targets for fish and shellfish.
28. Propose biennial updates of the MNSP.
29. Consider the establishment of national bodies responsible for ensuring progress in the implementation of MNSP actions.
30. Consult national farmers' associations on national barriers and consider Member States' answers to the questionnaire.
31. Consider MNSP compliance with article 34 of the CFP and in particular paragraph 3 (timetables).

h) Regarding Access to space and water

32. Consider 'access' to emissions of nutrients from increased production of farmed finfish.
33. Quantify new marine areas, for example in m² or allowed new or increased production at existing farms.
34. Clarify what Member States have done to ensure shellfish farmer access to good quality water.

i) Regarding licences

35. Include the table on developments regarding the number of new and renewed licences in the Member States and distinguish between species produced.
36. Consider additional steps to improve the efficiency of aquaculture licensing.
37. Include a section on Member States' use of short-term authorisations.

j) Regarding annual survey: Baseline and performance indicators

38. Convene a meeting between the Commission, the AAC and the EU Aquaculture Assistance Mechanism (AAM) on revising indicators.

k) Regarding implementation gaps

39. Include the following implementation gaps in the report:

- Level playing field: Notably in relation to imports of farmed aquatic products from Türkiye and action to revise the preferential custom union agreement, including applying EU sustainability and animal welfare standards to imports.
- Organic aquaculture: Steps to achieve the objectives of the Farm-to-Fork strategy.
- Ecosystem services: Actions that promote and provide value to forms of aquaculture that offer ecosystem services.
- Shellfish farming: Include areas directly and indirectly affected by shellfish farming in EMODnet.
- Norovirus: Amend Annex III to Regulation 853/2004, risk prevention tool for noroviral contamination and possible measures for controlling the presence of norovirus in bivalve molluscs.
- Consider NFOs' role in promoting and disseminating Commission deliverables.

l) Regarding implementation failures

40. DG MARE is to publish an annual work programme on the Strategic Guidelines and other Commission initiatives that the AAC and the POs, IBOs and other national organisations should consider in their Strategic Plan/PMP. The annual work programme should be published in April to consider the AAC consensus process for adoption of its Strategic Plan.

m) Regarding animal welfare

41. Introduce binding EU animal welfare standards for aquatic animals by including aquatic animals in the scope of the forthcoming modernisation of the Kept Animals (Council Directive 98/58/EC of 20 July 1998) and the Slaughter regulations (Council Directive 93/119/EC of 22 December 1993).
42. Introduce targets on the update of animal welfare practices and the development of low-trophic aquaculture.
43. Enforce the precautionary principle and prevent the development of new carnivorous species and systems without prior welfare evaluation at the EU level, such as through an EFSA scientific statement.
44. Tie the disbursement of subsidies to animal welfare criteria, based on the welfare indicators under development by the Commission.



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