



AAC Recommendation on the second 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 Aquaculture Advisory Council (AAC) welcomes the second draft report on the mid-term assessment of the Strategic Guidelines for EU Aquaculture and the Multiannual Strategic Plans.

The AAC concludes that the open method of coordination is neither efficient nor sufficient in achieving the objectives of the Strategic Guidelines and the Common Fisheries Policy (CFP).

The two key enabling conditions for the EU aquaculture sector to become more resilient and competitive are access to space and water and a transparent and efficient regulatory and administrative framework. The draft report confirms that the actions taken under the Strategic Guidelines have not been able to achieve these enabling conditions.

The AAC acknowledges that the European Commission has delivered on the actions assigned to it in the Strategic Guidelines. However, it asserts that the progress of the Member States on the key conditions has been insufficient due to the low policy priority given by the Member States to aquaculture, as the AAC has pointed out in its recommendation on the need to reform the EU's aquaculture policy.

The AAC further emphasises that the mid-term assessment substantiates the need to establish a robust, transparent and data-based performance and evaluation framework, as was also pointed out in the recommendation on policy reform.

The AAC finds that successful and impactful strategic planning is an active process and that the Member States' Multiannual National Strategic Plans should be reviewed and revised annually. The current static nature of the strategic plans does not provide a timely and adaptive roadmap.

Finally, the AAC recalls that it has been 23 years since the European Commission first launched its ambitious plan to increase aquaculture production through proposals for solving conflicts in access to space and improved governance. However, the second draft report on the mid-term assessment of the Strategic Guidelines concludes that long-term stagnation in aquaculture growth persists in the EU.

II. Justification

The AAC previously published detailed recommendations to the European Commission in response to the first draft report and is pleased that some of these recommendations have been considered in the second draft.

This second recommendation focuses on three key areas:

1. Data on aquaculture production (baseline and post-guidelines aquaculture production)
2. Access to space and water and the regulatory and administrative framework
3. Member States' Multiannual National Strategic Plans (MNSPs)

Data are essential to draw valid and substantiated conclusions on the progress and efficiency of the implementation of the Strategic Guidelines and the MNSPs. Solving conflicts related to access to space and water and improving the regulatory and administrative framework are key enabling conditions for the sustainable development of the EU's aquaculture sector. Efficient and timely implementation of the MNSPs is also essential to achieve the objectives of the Strategic Guidelines.

III. Recommendations

Recommendations

To the European Commission:

1. Data (baseline and post-guidelines aquaculture production volume)

The development of increased volume in EU aquaculture production is the most important and tangible output indicator, as reflected in the CFP objective (aquaculture shall contribute to food security and supply) and the European Ocean Pact (aquaculture is vital for food supply and security).

The AAC is deeply concerned that, due to a lack of data on the sector, the report does not provide clear conclusions about efficiency in developing a sustainable EU aquaculture sector following the actions implemented so far by the European Commission, the Member States and the AAC.

It is imperative that the production indicator be based on valid, reliable and timely official statistics. The AAC does not support the information provided in Table 1 on baseline and post-guidelines production, as the data is based on Member States' surveys.

The AAC is concerned that the report refers only to a decline in the production of mussels and oysters – which is indeed the most worrying due to its continuing decline since the early 2000s – when the latest EUMOFA report on the EU fish market concludes that there has been a decline in most commodity groups (Chart 83).¹

The AAC recommends revising the draft report by:

- Using the EUMOFA methodology on net production in establishing the baseline and post-guidelines production volume as per the example shown in Chart 82 in the latest EUMOFA report on the EU fish market in 2024.
- Including baseline and post-guidelines production volumes per commodity group (bivalves and other molluscs, algae, freshwater fish, salmonids and other marine species).
- Including a longer-term perspective on aquaculture production trends covering the past two decades, which would allow for a clearer understanding of structural developments, including long-standing declines that predate the implementation of the EU guidelines. This is essential to distinguish between temporary fluctuations and persistent trends and to accurately assess the effectiveness of EU aquaculture policy over time.

Additionally, the AAC recommends that the European Commission take the following ex-post actions:

¹ EU Fish Market, EUMOFA, 2024



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- Address the weaknesses in the current aquaculture datasets that were pointed out in the AAC's first recommendation. The second draft report refers to these weaknesses but does not include any actions to address them.
- Invite the AAC to submit comments on the draft proposal for a Regulation on the European Fisheries and Aquaculture Statistics.

2. Access to space and water and the regulatory and administrative framework

The report notes that the implementation of the Member States' MNSPs is essential to achieving the objectives of the Strategic Guidelines and concludes that:

- The designation of specific zones for aquaculture is an important step, but its practical effectiveness in creating new aquaculture enterprises or sites has been limited (3.2.1.1.)
- 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 (5.1.1.), and progress has not translated into improvements in the efficiency of aquaculture licensing (6.1.2.)
- There has been insufficient progress in two of the most long-standing obstacles to the sustainable growth of aquaculture in the EU: (i) access to space and water and (ii) the complex and lengthy licensing procedures and that these areas are fundamental to achieving the objectives of the Strategic Guidelines (6.2.)
- The extent and relevance of Member States' reviews of their legislative, regulatory or institutional frameworks for aquaculture varies among the Member States (3.2.)
- The time required for processing aquaculture licences has increased in some Member States, while it has remained stable in others (3.2.1.2.)

The report also notes that the administrative burden on Member States is increasingly complex, partially due to the scope and nature of EU legislation and its relationship with Member State legislation as aquaculture is not the exclusive responsibility of the EU.

The AAC underlines the inefficiency of the current EU policy on aquaculture and of the open method of coordination, and it reiterates the AAC's recommendation on reforming the EU's aquaculture policy.

Solving conflicts related to access to space and water and improving the regulatory and administrative framework requires policy initiatives and decisions at both the Commission and Member State levels.

Therefore, the AAC recommends that the report:

- Acknowledge the inefficiency of the current measures and propose an EU aquaculture policy reform.

3. Multi-Annual National Strategic Plans (MNSPs)

The report notes that several Member States have implemented measures to improve the welfare of farmed aquatic animals and have developed good practices and indicators on animal welfare.

The AAC welcomes the increased focus on fish welfare and supports the proposal to harmonise and extend the practices and indicators on a larger scale across the Member States. The AAC agrees that more Member States should include good practices and indicators for farmed aquatic animals in their national welfare strategies.

The AAC recommends that the European Commission take the following ex-post action:

- Ask the Aquaculture Assistance Mechanism (AAM) to collect the Member States' good practices and indicators on the welfare of aquatic animals and make them publicly available on the AAM website

It is difficult to assess the progress and impact of individual Member States' MNSPs as there is no consolidated overview of either the actions planned or taken by the Member States or the mandatory timetables to meet the objectives outlined in the MNSPs. The AAC reiterates that the MNSPs should include timetables on Member States' objectives.

Seventeen Member States have included production targets in their MNSP, but the draft report does not assess the validity and reliability of these targets.

The AAC reiterates its concern that the report does not include critical shortcomings in the implementation of the MNSPs and that the MNSPs are not updated at regular intervals to take into consideration the results of research and innovation projects, recommendations from the AAC and emerging issues relevant to the sustainable development of aquaculture at the national or EU level.

Therefore, the AAC recommends that the report request that the Member States update their MNSPs as follows:

- Include a timetable for specific policy actions, as mandated by the CFP
- Review and revise targets on production volume
- Include production targets where these are missing
- Include animal welfare as an EU funding and policy priority
- Include clear linkages between the targets set for performance indicators and the EU's aim of achieving sustainable growth
- Include the views of an aquaculture industry representative on production targets before approving EMFAF funding for innovation projects

4. Animal welfare

The AAC welcomes the second draft report's acknowledgment that NGOs have called for a harmonised, EU-wide legislative framework for the welfare of farmed aquatic animals. In view of the Commission's recent reply to the AAC's recommendation on the Ocean Pact, which confirms that animal welfare will be included in the upcoming Ocean Pact EU Initiative on Sustainable Aquaculture, the AAC calls on the Commission to include a clear recommendation in this report on the introduction of EU legislation on farmed aquatic animal welfare that can be applied to imports. Further, the report needs to indicate the legislative pathway for introducing such legislation, for example, through the upcoming EU Initiative on Sustainable Aquaculture, the Ocean Act or binding post-2030 strategic aquaculture guidelines. Finally, the report also needs to indicate how funding will be allocated to animal welfare.

It is essential to provide clarity and a timeline for the introduction of this legislation.

Second, the AAC welcomes the second draft report's acknowledgement that NGOs have noted the need to ensure that diversification must not be at the expense of animal welfare needs, as well as the report's encouragement of diversification in lower-trophic species, rather than solely in higher-level and more sentient species.

Therefore, the AAC calls on the Commission to issue a clear recommendation to this effect.

The AAC reiterates its call to the Commission to include in the second draft report the recommendations from the May 2025 AAC recommendation on the mid-term assessment of the Strategic Aquaculture Guidelines, as follows:

- Recommend the introduction of binding EU animal welfare standards for farmed aquatic animals by including aquatic animals in the scope of the forthcoming modernisation of the Kept Animals regulation (Council Directive 98/58/EC of 20 July 1998), the Slaughter regulation (Council Directive 93/119/EC of 22 December 1993) and/or the upcoming Ocean Pact initiatives, including the EU Initiative on Sustainable Aquaculture and the Ocean Act.
- Recommend the introduction of targets on the update of animal welfare practices and the development of low-trophic aquaculture.
- Recommend the enforcement of the precautionary principle to prevent the development of new carnivorous species and systems without prior welfare evaluation at the EU level, such as through an EFSA scientific statement.
- Tie the disbursement of subsidies to animal welfare criteria, based on the welfare indicators under development by the Commission.



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