



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,
MARE/A2/EG

Dear Mr Thomsen,

Thank you for your recommendation on the Oceans Pact of 12 May. As you know, the Commission adopted a Communication on the European Ocean Pact on 5 June. Let me reassure you that we have taken into consideration all the input received by the AAC and its members in preparing that Communication.

First, I would like to highlight that the Pact takes a one-ocean approach and a source-to-sea perspective, taking into account the interconnectedness of the global water cycle and the complementarity to the Water Resilience Strategy. The European Ocean Pact focuses on six priorities: i) Protecting and restoring ocean health, ii) boosting the competitiveness of the EU sustainable blue economy, iii) supporting coastal, island communities and outermost regions, iv) advancing ocean research, knowledge, skills and innovation, v) enhancing maritime security and defence, and vi) strengthening EU Ocean diplomacy and international ocean governance.

Many of the AAC's priorities are already embedded in the Ocean Pact, which seeks to provide a coherent, integrated and ambitious framework for ocean action across the EU, including aquaculture as a key sector of the EU Blue Economy. For the sake of consistency, I will address your recommendations as per your grouping in three objectives.

Objective 1: Maintain a healthy, resilient and productive ocean

The Commission fully agrees on the need to consider people, ecosystems, and animal welfare together. As highlighted in the Communication, the Ocean Pact sets out a comprehensive agenda for ocean health that builds on existing EU policies such as the Marine Strategy Framework Directive and the Water Framework Directive. It also supports the integration of environmental goals for terrestrial and marine ecosystems—recognizing the importance of the land-sea interface as the AAC recommends.

We also reaffirm our commitment to recognise and promote the ecosystem services provided by aquaculture and other nature-based solutions. Actions in chapter 2 of the

Mr. Brian Thomsen
Chairman of the AAC
brian@danskakvakultur.dk
Rue Montoyer, 31
B – 1000 Brussels
Belgium

Pact advance blue nature restoration and better integration of marine biodiversity into EU nature legislation, including the Nature Restoration Regulation.

While animal welfare is not specifically mentioned in the Pact, it is an important part of the Commission strategic guidelines for a more sustainable and competitive EU aquaculture. The Commission, with the support of the EU Aquaculture Assistance Mechanism and the reference centre for the welfare of aquatic animals (EURCAW-Aqua) is already taking important actions to advance fish welfare in aquaculture.

Furthermore, the Commission acknowledges the essential role that social, economic, and cultural dimensions play in ocean policy. As such, the Ocean Pact recognises the broad and diverse nature of ocean stakeholders. It commits to inclusive, equitable governance, which ensures meaningful engagement and co-creation of ocean policies with all relevant actors—including aquaculture producers, coastal communities, environmental NGOs, youth, and others. To support this engagement, the Commission will also establish a **dedicated Ocean Board** to monitor implementation and foster coordination across sectors and interests.

The Pact also promotes marine multi-use spatial planning that integrates the priorities of food production with those of energy, shipping, tourism, and conservation. In this way, it seeks to ensure fair access to ocean space while safeguarding environmental sustainability and livelihoods.

On Objective 2: Promote a sustainable and competitive blue economy including food from ocean aquaculture and fisheries.

The Commission welcomes the AAC's emphasis on the vital role of aquaculture in Europe's sustainable food systems, food security and sovereignty, and the blue economy. As underlined in the Ocean Pact, aquaculture contributes to the EU's strategic autonomy in food supply, the green transition, and coastal livelihoods.

The Pact supports the continued implementation of the *2021 Strategic Guidelines for a more sustainable and competitive EU aquaculture*. A mid-term assessment in autumn 2025 will both evaluate progress on implementing actions and their effectiveness and inform the evaluation of the Common Fisheries Policy with respect to aquaculture-related objectives.

The Commission announces the launch of a dedicated **EU Initiative on Sustainable Aquaculture**. This initiative will bring together Member States, industry, other interest groups, science and innovation institutions, business accelerators and financial institutions to define concrete targets and actions, including on multi-use of maritime space. In line with the Strategic guidelines, it will also cover environmental performance, animal welfare, and social sustainability, as called for by the AAC.

The Ocean Pact recognises the importance of fair competition and a level playing field, while remaining compliant with WTO obligations. Enhancing traceability and consumer information remains a key priority.

The Commission takes note of the AAC's suggestions regarding co-culture systems, integrated multi-trophic aquaculture (IMTA), and innovative regulatory approaches. These are closely aligned with Ocean Pact actions to facilitate sustainable access to space and water and promote innovative, ecosystem-based solutions. On licensing, recent Staff

Working Documents (SWDs) offer a basis for further guidance, particularly the SWDs on access to space and regulatory and administrative framework.

On **animal welfare**, the Commission is modernising EU legislation, and the call for evidence is currently open. We encourage the AAC and its members to actively participate and share their concerns to ensure the needs of the sector are taken into consideration, including in relation to imported products.

Finally, the Commission notes the AAC's proposal on **individual transferable nitrogen quotas**. While this concept is not explicitly addressed in the Ocean Pact, the Commission acknowledges the potential of market-based tools to improve the environmental performance of the EU aquaculture sector and takes good note of the AAC's proposal, which will be duly considered in future policy development.

On Objective 3: Work towards a comprehensive agenda for marine knowledge, research/innovation and investment

Advancing ocean research, knowledge, skills, and innovation is one of the six core priorities of the Ocean Pact and central to our ambition for a sustainable blue economy.

The Ocean Pact promotes the development of a strategic research agenda to identify knowledge gaps and ensure that EU marine policies are underpinned by the best available science. We welcome the AAC's proactive work in identifying research and innovation priorities and commit to continued dialogue.

We also strongly support the continued development of the **Digital Twin of the Ocean**, which is key to enabling real-time ocean monitoring, modelling, and planning. The Pact explicitly promotes the use of digital tools to benefit ocean science and users, including aquaculture operators.

Finally, as mentioned above, animal welfare in aquaculture is already part of our policy on aquaculture and will be considered in the context of the future implementation of the Ocean Pact.

I am looking forward to our continued fruitful cooperation. Should you have any further questions on this reply, please contact Ms Julia Rubeck, our Advisory Councils coordinator, via the functional mailbox MARE-AC@ec.europa.eu.

Yours sincerely,

Charlina VITCHEVA

c.c.: Cynthia Benites: cynthia.benites@aac-europa.org; secretariat@aac-europe.org;