



Recommendation on Aquaculture Sturgeon and CITES

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I. Background

EU fish farmers are among the major players in the global sturgeon farming industry, with 14 countries involved in the farming of 10 different sturgeon species. They contribute significantly to the world's caviar production, accounting for an estimated 40 percent share. Sturgeon and, consequently the caviar produced in Europe, are 100 percent of aquaculture origin.

The EU has implemented strict regulations requiring the traceability of sturgeons from egg to egg. These are designed to ensure quality and sustainability and to provide a precise definition of all stages of the production process.

According to a study by the European Market Observatory for Fisheries and Aquaculture Products (EUMOFA)¹—also cited by the Food and Agriculture Organization (FAO)—sturgeon farming, particularly aquaculture, is considered essential to preserving endangered sturgeon species and maintaining their genetic diversity.

The caviar trade falls under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) regulations. CITES aims to ensure that the international trade in specimens or products of wild animals and plants does not threaten their survival. The CITES procedures impose controls on the international trade of selected species. All imports, exports, re-exports and introductions from the wild of species covered by CITES must be authorised through a licensing system.

All sturgeon species (except *Acipenser sturio* and *Acipenser brevirostrum*) are now listed in Appendix II of CITES, which specifies “species not necessarily threatened with extinction, but in which trade must be controlled in order to avoid utilization incompatible with their survival”.

In 2021, the AAC previously published a recommendation to the European Commission on CITES² regarding the trade in caviar and the negative impact of existing administrative burdens linked to extra-EU trade.

II. Justification

- CITES implementing regulations remain an essential instrument for protecting endangered wildlife populations.
- CITES implementing regulations must evolve towards harmonised enforcement and control methods (at the international level, but sometimes even at the national level).
- CITES implementing regulations must adapt to the significant changes that have

¹ Sturgeon meat and other by-products of caviar: Production, trade, and consumption in and outside the EU (EUMOFA, February 2023) <https://eumofa.eu/documents/20124/35725/Sturgeon+meat.pdf/5e78102f-670e-bae9-521a-a2d764e59aa3?t=1675868036405>

² AAC Recommendation on the CITES, August 2021
https://aac-europe.org/wp-content/uploads/2021/08/AAC_Recommendation_-_CITES_2021_11_.pdf

occurred since its introduction in 1997³, particularly the fact that almost 100 percent of EU-origin sturgeon and caviar currently on the market are aquaculture products.

III. Recommendations

AAC recommendations:

To the European Commission

1. The European Commission is called upon to simplify procedures to facilitate trade between the different countries involved while minimising the risk of illicit trade. Operationally, this may involve granting an annual renewable licence to entities listed under CITES, based on current approvals. This would allow trade between producers and processors/repackers through simple declarations, thereby reducing delivery times.
2. It is essential to adapt CITES legislation to account for the evolution of the aquaculture sector and international trade framework, and the measures put in place for the protection of wild species and the control of sturgeon products. Recognising that not all third countries may be at the same level of legislative monitoring as EU Member States, the Commission should promptly initiate and engage in discussions (which will necessarily take time) with CITES authorities to update the approach towards farmed sturgeons.

To the EU Member States

1. The Member States are called upon to simplify procedures to facilitate trade between the different countries involved while minimising the risk of illicit trade. Operationally, this may involve granting an annual renewable licence to entities listed under CITES, based on current approvals, allowing trade between producers and processors/repackers through simple declarations, thereby reducing delivery times.

IV. Minority Opinion

A representative from the other interest groups focused on animal welfare raised concerns that facilitating trade in sturgeon products should be linked to improvements in the welfare and living conditions of farmed sturgeons. While there are valid reasons to support such trade, decisions should also consider the welfare consequences for the animals involved.

³ [Council Regulation \(EC\) No 338/97 of 9 December 1996 on the protection of species of wild fauna and flora by regulating trade therein](#)



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