



AAC Recommendation on European fisheries and aquaculture statistics

AAC 2026-1

November 2025



The Aquaculture Advisory Council (AAC) gratefully acknowledges EU funding support





Index

Index	2
I. Background.....	3
II. Justification.....	3
III. Recommendations.....	7

I. Background

The AAC welcomes the Commission's proposal (COM(2025) 435 final) for a regulation on European fisheries and aquaculture statistics (EFAS) aimed at ensuring consistency, streamlining statistical processes and enabling a more holistic approach.

The AAC agrees that relevant, high-quality, comprehensive, comparable and timely European statistics are necessary to design, implement, monitor and evaluate European Union policies related to aquaculture.

The AAC supports the idea that the proposal expands the statistical coverage on organic aquaculture and aquaculture establishments.

II. Justification

Proposed definitions in article 2

Fisheries and aquaculture

The proposal aims, inter alia, to align the definitions with those of the Food and Agriculture Organization and the OECD.

The FAO defines aquaculture as *'the farming of aquatic organisms, including fish, molluscs, crustaceans and aquatic plants. Farming implies some form of intervention in the rearing process to enhance production, such as regular stocking, feeding, protection from predators, etc. Farming also implies individual or corporate ownership of the stock being cultivate'*¹.

The EU defines aquaculture as *'rearing or cultivation of aquatic organisms using techniques designed to increase the production of the organisms in question beyond the natural capacity of the environment, where the organisms remain the property of a natural or legal person throughout the rearing and culture stage, up to and including harvesting'*².

The inclusion in the EU definition of the condition to enhance the production of aquatic organism beyond the natural capacity of the environment questions important aquaculture segments such as non-fed aquaculture, extractive aquaculture and algae.

The Data Collection Framework (DCF) regulation³ defines the 'fisheries sector' as *'activities related to commercial fisheries, recreational fisheries, aquaculture and industries processing fisheries products'*.

¹ FAO (1988). Definition of aquaculture, Seventh Session of the IPFC Working Party of Expectations on Aquaculture, IPFC/WPA/WPZ, p.1-3, RAPA/FAO, Bangkok

² Regulation 1380/2013 on the Common Fisheries Policy,

³ Regulation 2017/1004: On the establishment of a Union framework for the collection, management and use of data in the fisheries sector and support for scientific advice regarding the common fisheries policy

The definition is confusing as 'fisheries' sometimes refers only to commercial fisheries and sometimes to commercial fisheries and aquaculture. This is the case not only in the proposal on the EFAS but also in many other commission documents. The AAC has addressed this issue on many occasions.

Article 2, (13) and (16) refers to the concept of 'first sale'. This concept is very difficult to apply in the shellfish farming sector, when the producer has vertically integrated activities to add value to the product in the absence of intermediate transactions.

Aquaculture establishments

The definition includes the term 'production lines' but this is not specified. The purpose of introducing production lines is unclear and may lead to misunderstandings and misinterpretations.

Hatcheries and juveniles

The production in hatcheries may be limited to the production of fertilized eggs, but it can also include the production of larvae as is the case in for example carps farming or juveniles in sea bass and sea bass farming.

The definition states that the 'first juvenile stages' of aquatic animals are produced in nurseries, but it does not define 'first juvenile stages'. This may lead to misinterpretations.

Production versus weight of sales

The proposal's Article 2 (18) defines aquaculture production as '*output including production from hatcheries and nurseries, offered for sale*'.

Table 10 in Commission Delegated Decision 2021/1167⁴ mandates the collection of data on *weight of sales*, but it does not provide a definition.

The AAC emphasises that 'production' and 'weight of sales' are not synonymous terms.

The farming of some species and aquatic products such as large trout and salmon takes more than 12 months, and the same fish may be sold twice when sold for on-growing. A land-based aquaculture establishment may for example sell 1 tonne of 1 kg fish to a marine aquaculture establishment for on-growing to 3 kg. In this case the 1 tonne is counted twice.

The AAC acknowledges that it will be difficult and complicated to establish a methodology for collecting data on net-production from aquaculture establishments.

The AAC finds that the EFAS and the DCF should provide the same data on 'production', and that

⁴ Commission Delegated Decision 2021/1167: Establishing the multiannual Union programme for the collection and management of biological, environmental, technical and socioeconomic data in the fisheries and aquaculture sectors from 2022

'production' should be defined as weight of sales to ensure alignment and avoid misinterpretations.

Fertilized eggs versus non-fertilized eggs sold as roe and caviar

The proposal does not introduce a clear distinction between fertilized eggs produced in hatcheries and non-fertilized eggs sold for human consumption produced in aquaculture establishments.

Commission Delegated Decision 2021/1167 only refers to weight of sales of species.

Shellfish species

In Table 11 of the Commission Delegated Decision 2021/1167, shellfish are grouped into four categories: 'Mussel', 'Oyster', 'Clam', and 'Other molluscs'.

In the Commission's proposal COM(2025) 435, Article 2, (8), it is specified that 'species' means *taxa of organisms identified by the international 3-alpha code*, as established by the UN Food and Agriculture Organization (FAO) (Aquatic Sciences and Fisheries Information System (ASFIS) : list of species for fishery statistics purposes), or – where this is absent – by the 3-alpha code for aggregates of taxa.

Since the World Register of Marine Species (WoRMS) registers Pacific cupped oysters, formerly members of the genus *Crassostrea*, in the new genus *Magallana*, the AAC specifies that FAO Fisheries and Aquaculture data for cupped oysters are registered under two names:

- ASFIS species name 'Pacific cupped oyster', ASFIS species scientific name 'Magallana gigas'
- ASFIS species name 'Cupped oyster nei', ASFIS species scientific name 'Crassostrea spp'

It should therefore be noted that the two terms refer to the same species.

On the other hand, European mussels are registered under three names:

- ASFIS species name 'Sea mussel NEI', ASFIS species scientific name 'Mytilidae'
- ASFIS species name 'Blue mussel', ASFIS species scientific name 'Mytilus edulis'
- ASFIS species name 'Mediterranean mussel', ASFIS species scientific name 'M. galloprovincialis'

Furthermore, the AAC notes that the data published by the FAO show that some European countries have recorded blue mussels and mediterranean as 'Sea mussel NEI', probably considering the possibility of hybridization between the two species.

Annex of the Regulation

The data covering the structure of aquaculture establishments shall be split according to Table 11 in Commission Delegated Decision 2021/1167.

Shellfish farming techniques

Table 11 provides insufficient identification of shellfish farming practises. The refinement stages specific to bivalve mollusc farming - taking place in semi-enclosed or enclosed water bodies - are used

for the final stages of production to improve product quality, flavour and safety through natural filtration and environmental interactions.

Recognising the refinement stages as a separate step within the production process allows for a more accurate representation of value creation, ecosystem services, and the effectiveness of public support measures.

Definition on recirculating aquaculture systems (RAS)

The Commission Strategic Guidelines for a more sustainable and competitive EU aquaculture⁵ promotes the development of recirculating aquaculture systems (RAS). However, the regulation on organic production⁶ (2018/848) prohibits the use of closed recirculation systems defined in Article 3 (34) as *'a facility on land or in a vessel where aquaculture takes place within an enclosed environment involving the recirculation of water and which depends on permanent external energy input to stabilise the environment for the aquaculture animals'*. An exception is given to hatcheries and nurseries producing species used for organic feed organisms.

The EGTOP has concluded⁷ that re-use of water is in line with organic principles and is to be encouraged. The EGTOP defines re-use of water as *'extensive recirculation in out-door systems with up to 70 % recirculation'*.

The annex to the proposed EFAS regulation stipulates that aquaculture establishments shall be split as specified in Table 11 in Commission Delegated Decision 2021/1167. The table defines recirculation systems *'as systems where the water is reused after some form of treatment (e.g. filtering)'* and the term 'reused' may lead to the conclusion that it excludes closed recirculation systems as defined in the organic regulation.

The AAC finds that it is important to collect data on the development of RAS and to distinguish between RAS compatible with organic farming (extensive RAS) and incompatible with organic farming (intensive RAS).

In this context the above definitions do not provide objective definitions on RAS, and they may be interpreted differently by member states and operators.

The AAC acknowledges that there is currently no common methodology for segmenting RAS facilities according to their degree of segmentation.

⁵ COM(2021) 236 final: Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030

⁶ Regulation 834/2018: On organic production and labelling of organic products

⁷ Expert Group for Technical Advice on Organic Production (EGTOP): Final report on aquaculture, 2014

Additional key elements

Exercise of delegation

Article 15 §5 mandates the European Commission to consult experts designated by each Member State before adopting a delegated act.

Number of aquatic animals

The number of aquatic animals produced – as opposed to the volume – is an important animal welfare parameter. The AAC finds that it would be too burdensome to include numbers of aquatic animals produced in the EFSA. The AAC notes that the European Market Observatory for Fisheries and Aquaculture Products (EUMOFA) uses conversion factors to convert net weight into live weight.

The AAC will consider developing conversion factors for converting volume of aquatic animals produced to number of aquatic animals produced.

Publication of statistics

There is a significant time lag in the publication of the statistical data on the production (weight of sales) and monetary value of the aquaculture production. This does not provide a valid platform for sectoral analyses and policy development. The publication of more timely data will significantly increase the value of the data collected to the benefit of all stakeholders.

The proposal calls for the weight and value by species to be split by environment and production method. More time will be required to split the data to ensure valid, reliable and high-quality statistics. However, finalising the first step on species (weight and value) should be possible within a shorter timeframe.

III. Recommendations

To the EU Member States

The AAC has the following recommendations to the proposed definitions in article 2:

Fisheries and aquaculture

1. The AAC reiterates its recommendation⁸ for the adoption at EU level of the FAO definition of aquaculture.
2. Establish separate and unique definitions on fisheries and aquaculture to avoid misunderstandings and misinterpretations.
3. The concept of 'first sale' should be better defined in relation to shellfish farming.

⁸ AAC recommendation on aquaculture definitions, 2022

Aquaculture establishments

4. Delete the term 'production lines' from the definition.

Hatcheries and juveniles

5. Include the production of larvae in the definition of hatcheries and add that the first juvenile stages, while dependent on species and national commercial practices, refers to juveniles sold in numbers.

Production versus weight of sales

6. Amend the definition on aquaculture production to 'weight of sales including production from hatcheries and nurseries'.

Fertilized eggs versus non-fertilized eggs sold as roe and caviar

7. Define roe as the mass of eggs inside a female fish (hard roe) or the sperm of a male fish (soft roe), used as food.
8. Amend the annex to distinguish between fertilized eggs (flows in production) and roe/caviar (for consumption).
9. Amend Commission Delegated Decision 2021/1167 to include weight of sales of roe and caviar to align EFAS and DCF statistics.

Shellfish species

10. In Table 11, 'oysters' should distinguish between cupped oysters (*Magallana gigas*) and flat oysters (*Ostrea edulis*).
11. In Table 11, 'clams' should distinguish between Manila clams (*Tapes philippinarum*) and grooved carpet shells (*Tapes decussatus*).
12. Use only the term "ASFIS species name 'Pacific cupped oyster', ASFIS species scientific name 'Magallana gigas'" for the Pacific oysters.
13. Combine all mussels into a single category.

The AAC has the following recommendations to the annex:

Shellfish farming techniques

14. Include in Table 11 a new shellfish farming technique of 'bivalve finishing areas' as '*semi-enclosed or enclosed coastal or inland water bodies, natural or artificial, used for the final stage of shellfish farming production and, possibly with other species, where organisms are temporarily placed to improve their quality, purification, and food safety before placing on the market*'.

Definition on recirculating aquaculture systems (RAS)

15. Include the collection of data on extensive and intensive RAS in the EFAS regulation and the data collection framework.



The AAC has the following additional recommendations:

Exercise of delegation

16. Consider the AAC's expertise and experience on data collection and aquaculture practices.

Publication of statistics

17. Include an article requiring Member States to publish data on production (weight of sales) and monetary value no later than six months after the end of the previous year.

To the European Commission

The AAC has the following recommendations to the annex:

Definition on recirculating aquaculture systems (RAS)

1. Ask the Aquaculture Assistance Mechanism to establish a methodology for segmenting RAS into extensive and intensive systems based on water intake and the amount of feed used.
2. Introduce the definitions on RAS in the relevant EU legal acts.
3. Include the collection of data on extensive and intensive RAS in the EFAS regulation and the data collection framework.



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