



# AAC Recommendation for a Vision for Aquaculture in 2040

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*Recommendation for a Vision for Aquaculture in 2040*

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## **I. Introduction**

The Aquaculture Advisory Council (AAC) welcomes the Vision for Agriculture and Food 2040, but the AAC does not support the drafting of a shared vision for fishery and aquaculture.

The AAC underlines that aquaculture, as a primary food-producing sector, is more comparable to agriculture (farming activity) than fisheries (hunting activity).

The AAC reiterates its concern that the EU has a Common Agricultural Policy and a Common Fisheries Policy but not a Common Aquaculture Policy and refers to the AAC's recommendation on a reform of the EU's aquaculture policy<sup>1</sup> aimed at increasing Member State policymakers' commitment to develop sustainable aquaculture by placing aquaculture on an equal policy footing with agriculture and fisheries.

A 'shared' vision for fishery and aquaculture implies a continuation of the current EU policy, where aquaculture continues to be managed as an 'appendix' to the fisheries policy.

The AAC finds that aquaculture must have a stand-alone vision not entangled with fishery to recognise the sectors' strategic contribution to food autonomy, food security and resilience.

Long-term, the AAC favours a Common Food Policy that aligns supply- and demand-side policies. The Commission's decision to develop separate visions for agriculture and fisheries indicates that the Commission intends to maintain siloed primary food policies.

The AAC notes that the Vision for Agriculture and Food does not refer to the Farm to Fork Strategy or a legislative framework for a sustainable food system and concludes that the Commission has abandoned these initiatives.

## **II. Background**

A healthier food system needs to deliver nutritionally adequate, safe, affordable, sustainable and animal-welfare-friendly food for all. Aquatic food should play a key role in this shift.

Food systems affect people, animals and the planet. There is an urgent need to foster sustainable food systems that benefit people, including fostering livelihoods for farmers and producers and catering to consumer demands; the planet, through sustainable food production; and the animals, fostering the highest level of animal welfare and promoting the development of welfare-friendly animal and plant-based foods.

Farming and food, including aquaculture, are strategic sectors for the Union, providing safe, high-quality food to 450 million Europeans and playing a key role in global food security and sustainability.

Aquatic food as a source of protein for food and feed has the potential of having a low-carbon footprint and the sector has an important role to play in building a sustainable food system.

The AAC regrets that the Commission has abandoned its policy initiative on a legislative framework law for sustainable food systems, as it was expected to foster the transition to a healthy, fair and environmentally friendly food system, centring healthy diets with 'less and better' animal products,

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<sup>1</sup> Aquaculture Advisory Council, 2024. Recommendation for an Aquaculture Policy Reform <https://aac-europe.org/en/publication/aac-recommendation-for-an-aquaculture-policy-reform/>



which would benefit all actors in the value chain. It also emphasised the need for a holistic approach to food systems, highlighting the interconnection between healthy people, the healthy planet and animal welfare, in line with growing consumer priorities.

The need to shift towards sustainable consumption and production practices has also been recognised at the international level, most recently by the UN COP28 scientific advisory committee paper<sup>2</sup> published early 2025.

The Vision for Agriculture and Food holds the opportunity to achieve the farm to fork ambition to create a sustainable, competitive and resilient agrifood system. For this vision to be holistic, it must be supplemented with a vision for aquaculture to address the different situations in the EU's supply of agricultural and aquatic products.

Global agricultural production has increased for decades, but food insecurity is growing globally.<sup>3</sup> In 2023, 733 million people were affected by malnutrition, and 2.8 billion people were unable to afford a healthy diet. The trend towards increasing food insecurity is driven by climate change, conflict, rising food prices, rising income inequality and a rapidly rising global population.

EU food policies have been siloed, leading to prices that do not reflect the true cost of food.

EU production rose from 642,000 tonnes in 1980 to 1,315,000 tonnes in 2000<sup>4</sup> but has since stagnated despite successive Union strategies, and the current policy framework has not proven efficient in unlocking the potential of the EU aquaculture sector to grow and satisfy EU demand.

The EU imports more than twice as much seafood as it produces, and recent data show a decline in the production of all major species, except seabream and seabass.<sup>5</sup>

Clean and healthy water is the basis of sustainable aquaculture production. However, only 37% of Europe's surface water bodies have a good or high ecological status<sup>6</sup>, and a high proportion of the assessed marine species and habitats have an unfavourable conservation status.<sup>7</sup> Climate change, biodiversity loss and pollution are increasingly threatening the resilience of aquatic environments and local communities.

Aquaculture producers face increasing input costs<sup>8</sup>, with only moderate increases in farm gate prices.<sup>9</sup> Simultaneously, they face competition from cheap imports produced with lower animal welfare,

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<sup>2</sup> [https://www.unfoodsystemshub.org/docs/unfoodsystemslibraries/sac/sac-theme-2-policy-brief.pdf?sfvrsn=73a9da4e\\_1](https://www.unfoodsystemshub.org/docs/unfoodsystemslibraries/sac/sac-theme-2-policy-brief.pdf?sfvrsn=73a9da4e_1)

<sup>3</sup> <https://thedocs.worldbank.org/en/doc/40ebbf38f5a6b68bfc11e5273e1405d4-0090012022/related/Food-Security-Update-113-February-14-2025.pdf>

<sup>4</sup> A strategy for the sustainable development of European aquaculture, COM(2002) 511 final.

<sup>5</sup> The European Fish Market 2024, EUMOFA, 2024.

<sup>6</sup> <https://www.eea.europa.eu/en/newsroom/news/state-of-water>

<sup>7</sup> <https://www.eea.europa.eu/publications/europes-marine-biodiversity-remains-under-pressure>

<sup>8</sup> Aranda, M, Oanta, G, Le Gallic, B, Sobrino-Heredia, JM, Arantzamendi, L, Andrés, M, Iriondo, A & G Gabiña 2024, Research for PECH Committee – Policy options for strengthening the competitiveness of the EU fisheries and aquaculture sector, European Parliament, Policy Department for Structural and Cohesion Policies, Brussels. [Link](#)

<sup>9</sup> EUMOFA Price Structure in the Supply Chain Case Studies. 2024, European Seabass, [Link](#). 2023, Large Trout, [Link](#). 2022, Gilthead Seabream, [Link](#). 2021, Portion Trout, [Link](#).



environmental and social standards. Farmers transitioning to more sustainable production models face limited demand for their products.

Young farmers are particularly vulnerable among primary producers and are conscious that innovative solutions are required for production systems to adapt to climate change and food sustainability.<sup>10</sup> They identify barriers that keep peers away from aquaculture, including complex bureaucracy, poor reputation for profitability and fair competition, and a lack of available training, support and funding.

Some aquaculture systems contribute to biodiversity in wetlands and aquatic habitats and provide ecosystem services in addition to healthy aquatic food products. The environmental benefits of these systems are not recognised or compensated for. This introduces a competitive disadvantage, and their production continues to decline.

Small-scale aquaculture producers face more challenges with administrative burdens and price competition.<sup>11</sup> They are also vulnerable, as large retailers prefer one-stop sourcing from wholesalers and processing firms, who in turn prefer to source from a limited number of large-scale farms to guarantee volumes, prices and a wide range of foods.

The EU legislative framework on aquaculture is complex, and less bureaucratic applicable legislation, including on agriculture and food, is not specific to the aquaculture sector.<sup>12</sup>

Climate change impacts European aquaculture, and farmers must implement adaptation and mitigation measures, but persistent barriers hinder adaptation. Regulatory and administrative procedures delay investments, access to space and water prevent relocation of facilities and authorisation procedures limit the availability of veterinary medicines, etc.

Some key strategies for the environment at the member state level have not taken aquaculture into account properly, including marine strategies, river basin management plans, implementation of the Maritime Spatial Planning Directive and Natura 2000 action frameworks.<sup>13</sup>

Countries may have multiple authorities managing administrative procedures on licensing,<sup>14,15</sup> and there is a lack of targets and indicators to efficiently target EU financial support for aquaculture.<sup>16</sup> In addition, aquaculture is given a lower policy priority than agriculture and fisheries.

Consumer demands have not been sufficiently considered. According to the 2025 Eurobarometer<sup>17</sup> on fishery and aquaculture products, after cost, consumers prioritise most the quality and freshness of a

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<sup>10</sup> AAC Recommendation on promoting the involvement of young professionals in aquaculture. AAC 2023-12. <https://aac-europe.org/en/publication/aac-recommendation-on-promoting-the-involvement-of-young-professionals-in-aquaculture/>

<sup>11</sup> STECF. 2021. Criteria and indicators to incorporate sustainability aspects for seafood products in the marketing standards under the Common Market Organisation (STECF-20-05).

<sup>12</sup> Regulatory and administrative framework for aquaculture. Commission Staff Working Document 2024. [Link](#)

<sup>13</sup> European Court of Auditors. 2024. EU aquaculture policy: Stagnating production and unclear results despite increased EU funding. Special report 25. [Link](#)

<sup>14</sup> European Commission. 2022. Access to space and water for marine aquaculture. [Link](#)

<sup>15</sup> European Commission. 2024. Access to space and water for freshwater and land-based aquaculture. Commission Staff Working Document. SWD(2024) 281 final. [Link](#)

<sup>16</sup> European Court of Auditors. 2024. EU aquaculture policy: Stagnating production and unclear results despite increased EU funding. Special report 25. [Link](#)

<sup>17</sup> <https://europa.eu/eurobarometer/surveys/detail/3213>



product, origin, labels and environmental, social and ethical impact when purchasing aquatic food products.

A 2023 Eurobarometer<sup>18</sup> survey found that 6 in 10 Europeans look for labels identifying products sourced from animal-welfare-friendly farming systems when buying food products. The latest Eurobarometer on animal welfare<sup>19</sup> further highlights that over 8 in 10 Europeans believe that the current situation where imports of animal products do not need to respect EU animal welfare standards must change, either by imposing import requirements or a very strict labelling system.

However, as highlighted by the inception impact assessment of the sustainable food system framework initiative,<sup>20</sup> there are insufficient policy mechanisms to promote the supply of healthy and sustainable foods, including aquaculture, and to guide them towards criteria important to them.

EU aquaculture is supported by the European Commission, especially through the non-binding Strategic Guidelines for a More Competitive and Sustainable EU Aquaculture for 2030.<sup>21</sup> The guidelines highlight that the EU aquaculture sector has a particular role to play in contributing to the transition to sustainable food systems. They further outline that moving further towards competitive sustainability offers the sector a significant economic opportunity, notably considering the increasing attention paid by the public to the environmental footprint of products in the market and to animal welfare.

The European Maritime, Fisheries and Aquaculture Fund can support member states in fostering a healthy and sustainable supply of aquaculture products.

The Vision for Agriculture and Food recognises that aquaculture shares the same challenges as the rest of the food system but also has unique challenges, such as import dependency. It highlights that the Commission will make sure that future legislative proposals on animal welfare apply the same standards for products produced in the EU and imported from third countries, also addressing enforcement issues and concerns expressed by EU citizens.

The vision includes several actions to remedy these challenges, which should apply to aquaculture. It also takes stock of the future vision for the fisheries and aquaculture sector with a 2040 perspective to ensure its long-term competitiveness and sustainability, which should encompass complementary measures to support the aquaculture sector's role in a sustainable and competitive food system.

### **Vision for aquaculture in 2040**

Several generic measures in the Vision for Agriculture and Food can be included in the vision for aquaculture. This reflects that farming can take place on land and in an aquatic environment, whereas fishery as a hunting activity faces different enabling conditions.

The agri-food vision is also applicable to aquaculture, with an insertion related to aquatic food supply and security. The vision refers to the EUR 70 billion trade surplus on agri-food products and the

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<sup>18</sup><https://www.eurogroupforanimals.org/news/special-eurobarometer-animal-welfare-eu-citizens-give-strong-impetus-deliver-all-animal>

<sup>19</sup> <https://europa.eu/eurobarometer/surveys/detail/2996>

<sup>20</sup>[https://food.ec.europa.eu/document/download/efad46c1-0813-443f-8670-83e278206084\\_en?filename=f2f\\_legis\\_iaa\\_fsfs\\_5902055.pdf](https://food.ec.europa.eu/document/download/efad46c1-0813-443f-8670-83e278206084_en?filename=f2f_legis_iaa_fsfs_5902055.pdf)

<sup>21</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2021:236:FIN>



Union's dependency on imported aquatic food products. The Union's trade deficit in 2023 amounted to EUR 22 billion.<sup>22</sup> Aquaculture is key to reducing trade deficits and contributing to aquatic food supply and security, and this should be reflected in the vision.

In 2022, the EU imported 2.2 million tonnes and produced 1.1 million tonnes of aquaculture products.<sup>23</sup> Increasing the EU's aquaculture production by 75,000 tonnes per year will (*ceteris paribus*) reduce import dependency by 50% and thereby contribute to the Union's objective of greater food autonomy, food security and resilience.

The vision should align the sectors' economic viability with environmental, social and animal welfare requirements and align support schemes to agriculture and aquaculture.

The ongoing mid-term assessment of the strategic guidelines reveals three critical policy implementation failures, as identified and detailed in the AAC's recommendation on the second draft report<sup>24</sup>:

- a) Data on aquaculture production (baseline and post-guidelines for aquaculture production).
- b) Access to space and water and the regulatory and administrative framework.
- c) Member States Multiannual National Strategic Plans (MNSP).

Implementation failures have persisted for more than a decade, and this is not the first time the Commission has drafted a vision for aquaculture. The Union's ambitions for aquaculture have failed since 2002, as detailed in the AAC's recommendation for policy reform. The underlying reason for this is persistent implementation failures.

A new 2040 vision will have no impact unless implementation failures are acknowledged and solved.

The AAC recalls several additional recommendations in recent years that address important issues that remain unsolved and that must be considered in the vision. These include, for example:

- Fish feed circularity.
- Low-trophic aquaculture (LTA) and low-impact aquaculture (LIA) and their ecosystem services.
- Organic aquaculture.
- The Animal Health Law.
- Welfare of aquatic animals.
- Valorisation of aquaculture by-products.

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<sup>22</sup> The EU fish market 2024, EUMOFA.

<sup>23</sup> Ibid.

<sup>24</sup> Aquaculture Advisory Council, 2025. Recommendation on the second draft report on the mid-term assessment of the Strategic Guidelines for EU Aquaculture and the Multiannual Strategic Plans <https://aac-europe.org/en/publication/aac-recommendation-on-the-second-draft-report-on-the-mid-term-assessment-of-the-strategic-guidelines-for-eu-aquaculture-and-the-multiannual-strategic-plans/>



- Consumer information in the HORECA sector.
- Norovirus in shellfish farming.
- Level playing field.
- The Ocean Pact.
- Mid-term assessment of the strategic guidelines.

The strategic guidelines include several Commission actions on supportive measures, such as developing non-binding guidance documents and best practices. This reflects the fact that member states have competence in most issues related to aquaculture and the use of strategic coordination to achieve the CFP objective across member states.

The delivery of a new ambitious and impactful vision for aquaculture will require different services from the Commission and a reorganisation. The AAC foresees the need to establish a DG MARE aquaculture policy unit with strong links to other relevant DGs to deliver the vision.

The AAC reiterates the need to establish binding, quantified and progressively increasing Union targets for the supply of sustainable aquaculture products considering the various types of EU aquaculture. This calls for the involvement of policy makers and not authorities, scientists and other non-policy stakeholders.

The AAC finds that the proposed vision for aquaculture in 2040 marks an important milestone in the Commission's ambitions on aquaculture. EU aquaculture strategies based on non-binding measures have failed since 2002 and the Union's self-sufficiency on aquatic foods has decreased since 2014. Doing the same thing repeatedly and expecting different results are not viable strategies.

### III. Recommendations

#### Recommendations

##### To the European Commission:

1. Use the Vision on Agriculture and Food as a framework template for the aquaculture vision.
2. Adapt and amend the agri-food vision to aquaculture as follows (*bold text*):

The Union of 2040 must be a place where **aquaculture** production thrives across our continent in all **its** diversity. A place where **aquaculture** is attractive for future generations, and the sector is competitive, resilient, future-proof and fair. **The Union of 2040 produces more aquatic food from aquaculture than it imports.**

3. Ensure that aquaculture is encompassed in all the actions set out in the Vision on Agriculture and Food, where relevant, including but not limited to:
  - A Unity Safety Net to protect the agri-food sector in the face of global challenges.
  - A European Climate Adaptation Plan.
  - A legal proposal to strengthen the role of public procurement. This proposal should aim to foster mandatory social, environmental and animal welfare criteria.



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- A review of the unfair trading practices directive and common market organisation regulation.
  - An annual food dialogue with food system actors.
  - Review the legal framework on public procurement to align supply- and demand-side policies.
  - A review of the EU school scheme.
  - An update to the EU animal welfare legislation, including the application of environmental and animal welfare standards to imported products.
4. Ensure that the EU initiative on sustainable aquaculture announced in the Ocean Pact is aligned with the vision for aquaculture and introduces binding animal welfare standards.
  5. In parallel with the preparation of an aquaculture vision for 2040, prepare an EU action plan for Blue Foods, including all types of aquaculture, to strengthen the EU aquatic food system.
  6. Introduce provisions from the foreseen Framework law for sustainable food systems, including:
    - A holistic sustainability and nutritional labelling system that considers the impact on health, biodiversity, pollution and animal welfare of a food product.
    - Participatory guarantee schemes as a function of producer organisations and inter-branch organisations, based on locally relevant sustainability criteria.
    - Research funding programme for farmer-led collaborations with research institutes within the most ecologically integrated and animal-welfare-friendly aquaculture systems.
    - EU quality schemes, which include robust environmental, animal welfare and tighter traditional process requirements, to make them easily accessible to small producers.
    - A requirement for healthy diet plans from member states that include aquaculture.
  7. Introduce a binding post-2030 Strategic Aquaculture Action Plan to guide member states towards the production of healthy, sustainable and animal-welfare-friendly aquaculture products.
  8. Ensure the new funding scheme replacing EMFAF for the Common Fisheries Policy, the Ocean Pact and the Union's maritime and aquaculture policy support member states to produce healthy, sustainable and animal-welfare-friendly aquaculture products.
    - This proposal should tie the disbursement of funding to social, environmental and animal welfare criteria and reward farmers and producers that meet these criteria and develop production that fosters ecosystem regeneration.
    - It should also aim to prevent the development of production systems that harm the environment and animals.
  9. Strengthen sustainability clauses in trade agreements, including:
    - Ensuring imported products comply with the same rules as EU products under updated social, environmental and EU animal welfare legislation, in line with WTO rules.



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- Only granting mutually preferential market access in free trade agreements (FTAs) to animal products fulfilling social, environmental and animal welfare standards applied to EU products and reassessing current FTAs to this end.
10. Include a reform of the EU's aquaculture policy in the 2040 vision, as previously proposed by the AAC.<sup>25</sup>
  11. Solve persistent barriers, referred to in page 5, that limit farmers' adaptation to climate change.
  11. Include the establishment of a DG MARE aquaculture policy unit with increased staffing and resources in the vision for aquaculture.

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<sup>25</sup> Aquaculture Advisory Council, 2024. Recommendation for an Aquaculture Policy Reform <https://aac-europe.org/en/publication/aac-recommendation-for-an-aquaculture-policy-reform/>

## Opinion of the Market Advisory Council (MAC)

In accordance with point 1 of Annex III of the Common Fisheries Policy Regulation, the area of competence of the AAC corresponds to “aquaculture, as defined in Article 4”<sup>26</sup>, while the area of competence of the MAC corresponds to “all market areas”.

According to paragraph 2 of Article 44 of the mentioned Regulation, “if an issue is of common interest to two or more Advisory Councils, they shall coordinate their positions with a view to adopting joint recommendations on that issue”.

The present AAC document on a “Vision for Aquaculture in 2040”, particularly recommendations 3) (public procurement, unfair trading practices, common market organisation, EU school scheme, standards for imported products), 6) (sustainability and nutritional labelling, professional organisations, EU quality schemes, diet plans), and 9) (sustainability clauses in trade agreements), touches on matters under the area of competence of the MAC.

- Recommendation 3
  - Public procurement: The MAC supports the recommendations to strengthen the role of public procurement and to review the legal framework.
  - Unfair Trading Practices and Common Market Organisation Regulation: The MAC recalls that the ongoing evaluation of the Common Fisheries Policy<sup>27</sup> covers also the Common Market Organisation Regulation. The evaluation should appropriately cover both fishery and aquaculture products.
  - EU school scheme: The MAC supports the recommendation to review the EU school scheme.
  - EU Animal Welfare Legislation: The MAC supports the recommendation for an update to the EU animal welfare legislation<sup>28</sup>, which should, when appropriate, encompass also aquaculture products<sup>29</sup>. In the view of the MAC, all fishery and aquaculture products placed on the internal market should be expected to meet the same or equivalent production and sustainability standards.
  
- Recommendation 6
  - Sustainability and nutritional labelling: As previously expressed<sup>30</sup>, the MAC considers that the “Sustainable Food System Framework” would have been the most appropriate policy option for the incorporation of measurement and communication on environmental and social sustainability in fishery and aquaculture products,

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<sup>26</sup> According to the definition in Article 4, “aquaculture’ means the 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”.

<sup>27</sup> [MAC Advice on “Evaluation of the Common Fisheries Policy \(2014-2024\)”](#)

<sup>28</sup> [MAC Advice on “Revision of EU Legislation on Animal Welfare” \(30 March 2022\)](#)

<sup>29</sup> [MAC Advice on “Legislative proposal on the protection of animals during transport and related operations: considerations on the EU market of fishery and aquaculture products” \(8 July 2025\)](#)

<sup>30</sup> [MAC Advice on “Development of Fishery Sustainability Indicators by STECF” \(30 January 2025\)](#)

allowing consumers to make comparisons on sustainability across all food products placed in the EU market. The MAC supports the recommendation for provisions for nutritional labelling<sup>31</sup>.

- Producer Organisations and Inter-Branch Organisations: The MAC supports the recommendation for provisions on participatory guarantee schemes<sup>32</sup>.
  - EU quality schemes: The MAC supports the recommendations for provisions on quality schemes with robust requirements and easily accessible to small producers.
  - Healthy diet plans from Member States: The MAC supports the recommendation for a requirement for healthy diet plans.
- Recommendation 9
    - Imported products: The MAC supports the recommendation on ensuring that imported products comply with the same EU rules as EU products, but considers the possibility of recognising equivalence as a practical challenge. As previously mentioned, all fishery and aquaculture products placed on the internal market should be expected to meet the same or equivalent production and sustainability standards with imported products progressively aligning with these standards, in a realistic and collaborative manner. To support this, there should be a clear and consistent definition of what constitutes an acceptable level of compliance for non-EU operators, along with appropriate transition periods to allow adaptation. To help facilitate this process, the EU should work with global financial institutions to direct focused investments into partner countries, which will further foster sustainable growth and accelerate global standards convergence.
    - Free Trade Agreements: The MAC supports the recommendation on only granting mutually preferential market access to animal products fulfilling the standards applied to EU products. In the view of the MAC<sup>33</sup>, trade should be sustainable and prioritise products from responsible production. The EU should promote realistic transition periods that allow partner third countries to progressively align with EU standards on sustainability, food safety, and traceability, without causing major trade disruptions. Clear definitions of acceptable compliance levels for non-EU operators and collaborative support mechanisms would help ensure smooth alignment with EU requirements.

In respect of the abovementioned areas of competence, the MAC will not comment on the remaining recommendations. The MAC has previously adopted advice on a "Vision for Fisheries, Aquaculture and their Market in 2040"<sup>34</sup>.

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<sup>31</sup> [MAC Advice on "Public Consultation on Revision of EU Regulation on the Provision of Food Information to Consumers" 30 March 2022](#)

<sup>32</sup> [MAC-SWWAC Advice on "Producer Organisations under the Common Market Organisation in Fishery and Aquaculture products" \(7 May 2025\)](#)

<sup>33</sup> [MAC Advice on "Twentieth Session of the FAOs Sub Committee on Fish Trade" \(20 August 2025\)](#)

<sup>34</sup> [MAC Advice on "Vision for Fisheries, Aquaculture and their Market in 2040" \(15 July 2025\)](#)



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