



Recommendation on the report on the mid-term assessment of the Strategic Guidelines and the Multiannual Strategic Plans

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Index

| | |
|---------------------------|---|
| Index | 2 |
| I. Background | 3 |
| II. Justification | 3 |
| III. Recommendations..... | 6 |



I. Background

The Aquaculture Advisory Council (AAC) welcomes the report on the mid-term assessment of the Strategic Guidelines and the Multiannual Strategic Plans.

The report assesses the progress in implementing the Strategic Guidelines and the efficiency in achieving the Strategic Guidelines' objectives, with the possibility of adapting actions accordingly. The report will also contribute to the evaluation of Article 34 of the Common Fisheries Policy (CFP) Regulation.

Contrary to the interim evaluation of the Open Method of Coordination (OMC)¹, the report does not include specific recommendations based on its findings.

Article 34 establishes non-binding Strategic Guidelines to promote sustainability and contribute to food security and supplies, growth, and employment. The Strategic Guidelines form the basis of the Member States' Multiannual Strategic Plans (MNSPs), and the EU and Member States provide financial support for the implementation of the Strategic Guidelines and national strategic plans. This leads to the following value chain, where the AAC, the Aquaculture Assistance Mechanism and the European Reference Centre for animal welfare for Aquatic animals (EURCAW-Aqua) deliver supportive activities:

Strategic Guidelines + MNSP + Financial support => Sustainability/food security/growth/employment

II. Justification

The AAC notes that the Strategic Guidelines do not establish quantified targets or outcome benchmarks against which progress can be assessed. Instead, the Guidelines are accompanied by the Annex to the European Commission's Communication COM(2021)236, which sets out a list of activities to be undertaken by the Commission and Member States. As a result, the mid-term assessment primarily evaluates whether actions have been implemented, rather than whether those actions have delivered progress towards sustainability, food security, growth or employment. This structure limits the ability of the report to assess effectiveness or EU added value.

Sustainability, food security, growth and employment

Based on the interim evaluation, it is too early to observe impacts on enhanced sustainability, food security, growth and employment. However, the mid-term assessment assesses progress primarily through economic and productivity indicators. A comprehensive

¹ Study on an interim evaluation of the Open Method of Coordination (OMC) for the sustainable development of EU Aquaculture, Final Report 24 April 2019

assessment of impacts across environmental, social and animal welfare objectives is limited, as indicators for other suitability dimensions foreseen under the Strategic Guidelines have not been introduced. Without such indicators, it is not possible to determine whether actions undertaken since 2021 have been effective, particularly in relation to environmental sustainability, animal welfare and social acceptance.

The mid-term assessment report only considers economic **sustainability**. Declines in the key indicators such as EBIT, ROI, FEI, labour productivity and capital productivity show that economic sustainability has not been enhanced. Also, it is imperative to establish indicators of other sustainability aspects including, but not limited to, per example animal welfare and ecosystem services to assess the overall impact on sustainability. With respect to the data presented on economic performance, the AAC notes significant limitations. The report relies heavily on Member State reporting, which it acknowledges to be highly variable in terms of detail and coverage. Recent production and employment data are incomplete, with figures available only up to 2022. Despite this, trends are reported without sufficient methodological transparency, meaning that conclusions on economic performance should be treated with caution. These factors significantly limit the reliability of trend analysis and the ability to assess impacts or EU added value.

The mid-term report does not consider developments in **food security**. The 2025 European Market Observatory for Fisheries and Aquaculture Products (EUMOFA) report on the EU fish market² highlights that a clear downward trend in the EU's self-sufficiency regarding aquatic products emerged in 2018, driven by the continuous reduction in domestic production from both fisheries and aquaculture. Total self-sufficiency decreased from 44.6 % in 2017 to 38.1% in 2023, and aquaculture has not contributed to increased food security for aquatic products.

The mid-term report concludes that there is insufficient information to estimate the **growth** in production and the development in **employment** during the 2021–2024 period. The AAC does not support this conclusion. Data from EUMOFA reports, Scientific, Technical and Economic Committee for Fisheries (STECF) reports and Eurostat show that EU aquaculture production has dropped in terms of volume and employment since 2016.

In addition, the Commission's summary of the multiannual national aquaculture objectives until 2020 targets an increase in production of over 300,000 tonnes to a total amount of more than 1.5 million tonnes³. The objectives were not met, with Eurostat indicating that 2020 production was 1.1 million tonnes.

The growth objectives in the current MNSPs also point to an increase of approximately

² The EU fish market 2025, EUMOFA

³ Summary of the 27 Multiannual National Aquaculture Plans, European Commission, 2016

300,000 tonnes of aquatic products, but the mid-term report does not include any follow-up on the growth objectives.

Therefore, it can be concluded that the voluntary and non-binding OMC has not been a success and has not delivered on the CFP objectives.

Progress

The AAC agrees that the **European Commission** has made significant progress in implementing Strategic Guidelines actions.

The AAC also agrees on the need to make greater efforts in disseminating the content of different documents and tools made available as part of the implementation of the Strategic Guidelines. Furthermore, the **AAC** is committed to organising additional webinars on Strategic Guidelines deliverables.

The mid-term report reiterates previous findings according to which **Member States** have made some progress towards implementing the Strategic Guidelines; however this progress is insufficient in addressing long-standing obstacles, such as access to space and complex and long licensing procedures. In addition, the European Court of Auditors⁴ has concluded that significant obstacles remain, such as complex administrative procedures and a lack of integration with environmental policies, which hinder the sector's expansion.

The AAC estimates that **funding** provided by the EU and Member States to develop EU aquaculture since 2014 is in the order of EUR 2 billion, and it adds that the actual impact cannot be assessed due to a lack of sustainability indicators⁵.

Barriers and political will

The first Strategic Guidelines were finalised in 2013, and they identified the following four major **barriers** to growth:

- Excessive administrative burdens/licensing procedures
- The need to improve access to space and water
- Enhancing the competitiveness of EU aquaculture
- Promoting a level playing field for EU operators by exploiting their competitive advantages

Unfortunately, the four barriers remain valid in 2025.

⁴ Special report: EU aquaculture policy, European Court of Auditors, 25/2023

⁵ Ibid

The mid-term assessment report flags concerns about the lack of sufficient political attention to aquaculture in policy-making compared to other sectors, such as fisheries, agriculture and novel sectors. The report also concludes that the success of the OMC depends on the political will of Member States to allocate the necessary resources to develop aquaculture.

The interim study (2019) also notes that the success of the OMC depends on political commitment and its capacity to support and have a real impact on national reforms. Policy cooperation should be relevant and concrete, produce visible results, and reach stakeholders and policy-makers, including at higher political levels.

Difficulties in obtaining licences and finding available space are the first barriers to the development of aquaculture. These two barriers were pivotal issues in implementing the Strategic Guidelines for the period 2013-2020.

For example, the interim evaluation report notes, the following:

- The Commission organised seven technical seminars with national administrations over the 2015-2018 period.
- The Commission developed several guidance documents on EU legislation with an impact on aquaculture (e.g., the Water Framework Directive, the Marine Strategy Framework Directive, Natura 2000 etc.), aimed at providing a common interpretation of EU regulations.
- Technical guidance documents are not sufficient to address specific, concrete issues encountered in the implementation of EU regulations and transposed directives.

III. Recommendations

AAC recommendation:

To the European Commission

The AAC argues that the lack of sufficient political attention and resources to develop aquaculture in the Member States explains why the OMC is not:

- Effective: It has not improved policy coordination.
- Efficient: The resources used, including funding, have not generated tangible impacts.
- Coherent: There is no coherence with national policies on aquaculture.
- Relevant: It has not enhanced Member States' political attention toward aquaculture.

It is not possible to assess the OMC's impact on environmental and social sustainability due to a lack of data and indicators. However, the available data on economic sustainability,



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growth, employment and food security confirms that the OMC has not generated EU added value as foreseen in the CFP.

Hence, the AAC recommends to the European Commission the following:

- 1. Introduce a new Union policy framework on aquaculture, as previously proposed by the AAC⁶**

⁶ AAC recommendation for an aquaculture policy reform, AAC, July 2024. <https://aac-europe.org/wp-content/uploads/2024/07/4-AAC-Recommendation-for-an-Aquaculture-Policy-Reform.pdf>



Aquaculture Advisory Council (AAC)

Rue Montoyer 31, 1000 Brussels, Belgium

Tel: +32 (0) 2 720 00 73

E-mail: secretariat@aac-europe.org

LinkedIn: <https://www.linkedin.com/company/aquaculture-advisory-council/>
www.aac-europe.org