



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,
MARE A.2/JGB

Subject: AAC Recommendation on Aquaculture Sturgeon and CITES

Dear Mr. Thomsen,

Thank you very much for your recommendation regarding the management and trade of farmed sturgeon under CITES.

I am aware that this topic is of great importance to the EU farmers of sturgeon, as it directly affects sustainable trade, regulatory compliance, and the protection of wild sturgeon populations.

In this reply, I will address the different aspects of the recommendation.

- *The European Commission is called upon to simplify procedures to facilitate trade of farmed sturgeon 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/re-packers through simple declarations, thereby reducing delivery times.*

The Commission takes note of the proposal and recognises the objective of facilitating legitimate trade while maintaining a high level of protection against illicit activities.

The Commission recalls that, under [Council Regulation \(EC\) No 338/97](#), the issuance of CITES permits and certificates falls within the competence of the national Management Authorities of the Member States. In accordance with that Regulation, Member States may also maintain or adopt stricter domestic measures. Consequently, any operational simplification of permitting procedures would require agreement and implementation at Member State level. At this stage, the Commission is examining the issues raised and

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

will seek an exchange of views with the Member States within the relevant [Expert Group](#), in order to discuss the suggested approach.

All *Acipensiformes* spp. (sturgeons and paddlefish) are included in Appendix II of CITES and Annex B of [Council Regulation \(EC\) No 338/97](#); except the species included in Appendix I of the CITES Convention and Annex A of the Regulation (*Acipenser brevirostrum* and *Acipenser sturio*). As per Article 4 of this Regulation, for Annex B species, the import permit may be issued only when the competent scientific authority, after examining available data and considering any opinion from the Scientific Review Group (SRG), is of the opinion that the introduction into the EU would not have a harmful effect on the conservation status of the species or on the extent of the territory occupied by the relevant population of the species, taking account of the current or anticipated level of trade. This opinion shall be valid for subsequent imports as long as the abovementioned aspects have not changed significantly. Any permit (or proposed annual licence) must therefore be conditional on a positive SRG opinion and must be explicitly revocable if the SRG opinion or the factual basis underpinning it changes. There are three formalised types of SRG opinions – positive, negative or ‘SRG referral’ – and all SRG opinions are publicly accessible at www.speciesplus.net.

- *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.*

The Commission acknowledges the need to ensure that implementation of the CITES Convention keeps pace with developments in aquaculture and international trade while preserving the protections in place for wild sturgeon populations.

The Commission recalls that any amendment to CITES provisions or global guidance on the treatment of farmed sturgeons would require consideration and agreement at international level, in accordance with the established CITES procedures. Such processes are, by nature, multilateral and may take a considerable amount of time. In this context, the Commission has already indicated above that the issue may be raised for exchange of views within the relevant [EU Expert Group](#).

The Commission further notes that the EU Scientific Review Group (SRG) considers that captive breeding is not of conservation concern when the information provided is comprehensive, based on a case-by-case assessment of the relevant facility. This evaluation already relies on information obtained through contacts with the competent authorities of the relevant third countries. This existing cooperation contributes not only to ensuring appropriate oversight of facilities and the reliability of source information in individual cases but also provides an important basis for any broader reflection on the possible evolution of the approach towards farmed sturgeons, taking into account differences in legislative and administrative frameworks among CITES Parties.

In addition, the Commission [Guidance document on live animals bred in captivity under the EU Wildlife Trade Regulations \(2022/C 306/02\)](#) is intended to help EU Member States and stakeholders implement the EU Wildlife Trade Regulations in relation to live

animal specimens born and bred in captivity, in cases where they are brought into the EU, re-exported from the EU, or traded internally within the EU.

I am looking forward to continuing our cooperation and engaging further on this and other important issues. Your ongoing support and expertise are essential to ensuring that the EU's approach to farmed sturgeon trade remains both effective and sustainable, balancing sector development with the protection of wild species.

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-europe.org >; secretariat@aac-europe.org;