



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,  
MARE.A.2/LDC

**Subject: AAC Recommendation on the report of the mid-term assessment of the Strategic Guidelines and Multiannual Strategic Plans**

Dear Mr Brian Thomsen,

I would like to thank you for the “*Recommendation on the report of the mid-term assessment of the Strategic Guidelines and Multiannual Strategic plans*” sent on 31 January”.

In this recommendation, the AAC shares the views of its members on the limitations of this report prepared by the Aquaculture Assistance Mechanism, as well as their conclusion that the Open Method of Coordination for aquaculture established under Article 34 of the Common Fisheries Policy Regulation (currently under evaluation) has not delivered on the objectives of this Regulation of sustainable development of aquaculture in the EU providing food security, employments and economic development. Finally, the recommendation calls the Commission to establish a new Union policy framework for aquaculture.

As you know, the report on the mid-term assessment acknowledges that, despite some progress being made by Member States in implementing recommendations under the *Strategic Guidelines for a more sustainable and competitive EU aquaculture for the period 2021-2030*, overall, actions have failed so far to deliver on two key and longstanding obstacles to the sustainable growth of aquaculture in the EU. These obstacles are complex and long licensing procedures, and difficult access to space and water for aquaculture to grow.

The Commission published three Staff Working documents (SWDs) related to these issues in 2024 (the last one in December). Therefore, by the time the evaluation was conducted (2025), it was too early to assess how effective these SWDs are in supporting progress in the areas they cover and, thereby, the sustainable growth of EU aquaculture.

Mr. Brian Thomsen  
Chairman of the AAC  
Email : [brian@danskakvakultur.dk](mailto:brian@danskakvakultur.dk)  
Rue de la Science, 10  
B – 1000 Brussels  
Belgium

Commission européenne/Europese Commissie, 1049 Bruxelles/Brussel, BELGIQUE/BELGIË - Tel. +32 22991111  
Office: J-99 05/014 - Tel. direct line +32 229-50483

[charlina.vitcheva@ec.europa.eu](mailto:charlina.vitcheva@ec.europa.eu)

Regarding the limitations of the report, as you know, the AAM report was largely based on the replies by the Member States to a survey launched in July 2024. This is the first “edition” of an annual monitoring mechanism on the implementation of the strategic guidelines and the national strategic plans for aquaculture. The Commission shared a proposal for the second edition of this survey with the Member States at the technical seminar of aquaculture experts on 3 and 4 of February 2026, and the Commission is expecting written comments from the Member States by 31 March 2026. We will take into consideration the comments in your recommendation when preparing the definitive version of this survey.

In the context of the ongoing evaluation of the CFP Regulation, the Commission has taken duly into consideration the report on the implementation of the strategic guidelines and multiannual strategic plans on aquaculture, as well as the feedback from stakeholders (including the AAC) received in the context of the call for evidence and open public consultation in the context of the CFP evaluation. The Commission expects to publish the results of this evaluation as a SWD by May.

The Commission takes also into consideration this information and feedback in the context of the preparation of the Vision 2040 on fisheries and aquaculture. I would like to thank again the AAC for its recommendation of September last year regarding this Vision. I encourage the AAC and its members to participate in the call for evidence launched on 20 February on the future Vision with the deadline of 24 March ([Fisheries and aquaculture – Vision 2040](#))

I am looking forward to our continued fruitful cooperation. Should you have further questions on this reply, please contact Ms Julia RUBECK, coordinator of the Advisory Councils ([MARE-AC@ec.europa.eu](mailto:MARE-AC@ec.europa.eu) ; +32.2.296.88.89), who will forward them to relevant colleagues.

Yours sincerely,

Charlina VITCHEVA

c.c.: Cynthia Benites: [Cynthia.benites@aac-europe.org](mailto:Cynthia.benites@aac-europe.org) ; [secretariat@aac-europe.org](mailto:secretariat@aac-europe.org);