



AAC Recommendation on the evaluation of the Common Fisheries Policy

AAC 2026-10

June 2026



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





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I. Background

The AAC welcomes the Commission Staff Working Document (SWD (2026) 120 final) on the evaluation of Regulation (EU) 1380/2013 on the Common Fisheries Policy (CFP).

The AAC regrets the structure of the document as it does not clearly distinguish between capture fisheries and aquaculture. Capture fisheries and aquaculture are very different economic activities with unique governance dimensions and operational realities. The evaluation takes the view of fisheries, and it is difficult to get a clear picture on the document's findings on aquaculture.

The evaluation is largely framed from a fisheries perspective, making it difficult to obtain a clear understanding of the findings relating to aquaculture.

Capture fisheries fall under the exclusive competence of the Union, whereas aquaculture falls under shared competence between the Union and the Member States. The evaluation does not sufficiently reflect this distinction nor identify potential avenues for policy improvement based on its findings.

The coherence analysis does not sufficiently assess the interaction between aquaculture and other relevant EU policies, including the Nature Restoration Regulation, the Biodiversity Strategy 2030 and the Birds Directive.

In addition, the evaluation does not assess how aquaculture governance interacted with emerging health and animal welfare objectives, although recital 16 of the CFP Regulation recognises these considerations and despite the growing strategic relevance of these issues in EU and national aquaculture policy discussions.

The evaluation aims to assess whether the CFP is still fit for purpose in today's context. It concludes that despite the strategic planning of actions introduced by the CFP Regulation (Strategic Guidelines and Multiannual National Strategic Plans) obstacles remain linked to national matters (administrative complexity in licensing and insufficient allocation of space) but it does not conclude whether the CFP Regulation's aquaculture governance framework remains fit for purpose.

This recommendation extracts what the AAC considers to be the most important findings on aquaculture related to the mechanism of policy coordination introduced in 2013, and it presents the AAC's answer to the key question: Should the CFP Regulation remain unchanged or be amended?

II. Justification

The current CFP Regulation was intended to address the shortcomings identified in the 2002 CFP Regulation. These are summarised in the 2011 impact assessment (SEC(2011) 891 final) as follows:

- The main challenge for EU aquaculture is that production has not increased in the last 15 years.
- Stagnation is mostly due to limited space available for further development, efforts necessary to meet the requirements of EU environmental and sanitary legislation, and insufficient levels of innovation to compete on the global market.
- Aquaculture employment decreased by 16% in the period 1996 – 2007.
- Aquaculture is becoming increasingly technologically efficient. Unless there is a very significant increase in EU production, the increase in capital intensity would likely exert downward pressure on employment in the future

The impact assessment notes that most of the aquaculture related problems go beyond the scope of the 2002 CFP regulation.

How has the situation evolved over the evaluation period?

Most Member States have taken measures to improve the environmental performance of the aquaculture sector, but no conclusion can be drawn as indicators and reporting obligations to assess progress have not been established (page 33).

Aquaculture **production remains** stagnant with a modest 2% volume increase since the last CFP reform, and the overall number of **licences** has decreased (page 35).

The real terms net **profit** of the aquaculture industry has risen by 104% between 2014 and 2022 due to an increase in the farming of higher-value fish species (page 37).

The EU's **trade deficit** has risen to €21.6 billion in 2024 and the EU's self-sufficiency in fisheries and aquaculture products has declined since the 1990s to only 38.1% in 2023 (page 38).

The **EU's sustainability standards** remain higher than many other environmental and social standards around the globe (page 39).

When considering out-of-home consumption only about 50% of the consumption of fisheries and aquaculture products is covered by CMO **mandatory information requirements** (page 41).



Total **employment** has not increased, and the average wage remains around 72% below the average EU wage (page 42) reaching in 2022 an average of €25,800 versus €35,400 for agriculture. This trend is not consistent with the objective set out in Article 39 TFEU on ensuring a fair standard of living by increasing the individual earnings per person.

The CFP Regulation does not include substantive provisions on animal welfare (page 77). This governance gap is increasingly relevant as the Council has highlighted the need to consider animal welfare in order to strengthen the sustainability of aquaculture and has encouraged to propose animal welfare indicators for the sector.

Evaluation findings

Contribution to long term food security (page 62, 63)

Stagnation of production is due in large part to complex licensing procedures and limited access to suitable production areas. Additionally, aquaculture has not received sufficient political attention at national level.

Mechanisms like the Strategic Guidelines, Multi-annual National Strategic Plans for aquaculture and the Open Method of Coordination have had limited impact on licensing procedures and access to space. This has resulted in an uneven playing field for producers in different Member States. All these elements discourage investment in the sector.

Future growth strategies should ensure alignment with environmental sustainability and evolving consumer expectations regarding fish welfare and responsible farming practices.

A growing share of products competing on the EU market are not subject to equivalent information requirements, which can affect comparability across products and consumers' ability to make informed choices.

Improved livelihoods of coastal and inland communities (page 64)

Aggregated employment has remained broadly stable since 2016, youth employment has declined markedly since 2017, nominal wage growth has not kept pace with inflation, and relative wages remain well below national averages. The development does not meet the CFP objectives of contributing to employment and a fair standard of living.

III. Recommendations

The evaluation suggests that the CFP Regulation has neither rectified the problems identified in the 2011 impact assessment nor achieved its objectives on aquaculture.

The AAC concludes that the evaluation aligned with and substantiates the AAC's analysis and



arguments for a reform of the EU's aquaculture policy as presented in our recommendation for an aquaculture policy reform published in July 2024.

The AAC supports the objectives in the current CFP Regulation and the Commission's Strategic Guidelines for aquaculture. The AAC underlines that the Council, the European Parliament, the Economic and Social Committee and the Committee of the Regions also support the Strategic Guidelines.

In this regards, the AAC finds that the key message in the evaluation is that insufficient political attention at national level has hindered the capacity to take the necessary actions to support growth in the aquaculture sector and meet the TFEU/CFP objectives.

The AAC considers that insufficient political prioritisation and resource allocation at Member State level have been major factors contributing to the persistent stagnation of the sector.

AAC recommendation:

To the European Commission

- Amend the CFP regulation by reforming the EU's aquaculture policy as previously proposed by the AAC.



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