



# MAC-AAC Recommendation on the alignment of import requirements on animal welfare for a level-playing field

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## I. Background

The EU is the largest market of aquatic products in the world, with a self-sufficiency rate of around 30%. Yet, among the aquaculture products consumed in the EU, only about 37% are produced within the EU<sup>1</sup>.

A significant concern for the EU aquaculture sector is that, despite the current lack of comprehensive welfare standards for farmed aquatic animals within the EU, many third countries the EU trades with apply even weaker or no welfare rules at all, further exacerbating unfair competition. The update of animal welfare legislation must therefore also ensure the application of mirror measures to imported products, in order to prevent unfair competition with European producers<sup>2</sup>. It would provide consumers with greater assurance that all products on the European market, regardless of origin, respect comparable ethical and welfare standards. Import control mechanisms are a key component in ensuring that mirror measures on animal welfare are effectively implemented. Without them, the welfare regulations to come will only increase the unfair competition.

The main supplier countries for fishery and aquaculture products in 2023 were Norway, China, Morocco and Ecuador. Salmon is the EU's largest imported aquaculture product, with import volumes increasing modestly while their value has grown substantially. Shrimps are the second most imported species, primarily from Ecuador, while other major suppliers of fishery and aquaculture products to the EU include Norway—mainly salmon, herring, and cod—Morocco—primarily octopus, squid, and fishmeal—and the United Kingdom, largely fresh salmon<sup>3</sup>. It is important to keep in mind that existing requirements on animal welfare, either regulatory or standards, concern only aquaculture products.

## II. Justification

Introducing basic rearing and husbandry standards for farmed aquatic animals and applying these standards to imports would not only prevent unfair competition within the EU, but also help to address unfair competition from third countries the EU exports from, which would have to comply with such rules. In the case of imports of organic products, there are some animal welfare requirements that apply to aquaculture products<sup>4</sup>.

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<sup>1</sup> EPRS, "EU Aquaculture: State of Play," 2024, [https://www.europarl.europa.eu/thinktank/en/document/EPRS\\_BRI\(2024\)762336](https://www.europarl.europa.eu/thinktank/en/document/EPRS_BRI(2024)762336).

<sup>2</sup> On 8 July 2025, the MAC adopted [advice](#) on "Legislative proposal on the protection of animals during transport and related operations: considerations on the EU market of fishery and aquaculture products", particularly focusing on post-aquaculture production transport and on the transport of decapods.

<sup>3</sup> EUMOFA, "The EU Fish Market," 2025, <https://eumofa.eu/market-analysis#yearly>

<sup>4</sup> See the species-specific maximum requirements on density foreseen in Annex II of [Commission Implementing Regulation \(EU\) 2020/464](#), and the animal welfare requirements under point 3.1.6. of Annex II of [Regulation \(EU\) 2018/848 on organic production](#).

With regards to imported species which the EU produces in small quantities or does not produce at all, the EU remains in a legitimate position to encourage these countries to continuously improve their animal welfare practices, in line with internationally recognised scientific guidelines. Only by continuously promoting equivalent standards can the EU position itself as a leader in sustainable aquaculture, in line with the ambitions of the Strategic Aquaculture Guidelines.

This revision is further important to meet citizens' expectations, with the 2025 Eurobarometer on agriculture revealing that 88% of Europeans believe imports should comply with EU environmental and animal welfare standards<sup>5</sup>. Specifically, for farmed aquatic animals, 91% of EU citizens want better protection for fish, and 93% would like to buy higher welfare fish products. However, the main consumer's drivers continue to be price, appearance (e.g. freshness) and country of origin<sup>6</sup>.

### III. Recommendations

The MAC and the AAC consider that, in the context of the ongoing revision of EU animal welfare legislation, if aquatic animals are to be integrated in the scope, the European Commission should:

- Ensure that farmed aquatic food products imported into the EU meet comparable animal welfare requirements to those demanded for EU-produced aquaculture products, based on internationally recognised standards, while also considering that certain adaptations might be necessary in view of the specificities of certain production systems in third countries as well as respect for the World Trade Organisation's non-discrimination principles;
- Explore phased approaches to ensure that objective, auditable welfare indicators and compliance data can be recorded and exchanged using interoperable digital traceability standards, where technically and economically feasible – recognition of internationally aligned digital aquatic food traceability standards can support consistent implementation;
- Consider as well post-harvest handling and transport processes, to ensure coherence, where possible, between applicable EU and non-EU requirements based on international standards;
- Ensure that, prior to the implementation of any import requirements, comprehensive impact assessments are conducted to ensure that any measures are realistic, auditable, and certifiable by recognised third parties, ensuring they do not create

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<sup>5</sup> Eurobarometer, "Europeans, Agriculture and the CAP," 2025, <https://europa.eu/eurobarometer/surveys/detail/3226>.

<sup>6</sup> EUROBAROMETER. EU Consumer habits regarding fishery and aquaculture products <https://europa.eu/eurobarometer/surveys/detail/3213>



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disproportionate technical barriers to trade.



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