

Charlotte Epinay

Working Group 3 (Horizontal Issues) Chair
Aquaculture Advisory Council
Rue Montoyer, 31 - 1000 Brussels

Brussels, 1 July 2026

Subject: Organic Aquaculture

Dear Madam, Sir,

The Aquaculture Advisory Council¹ (AAC) has sent a Recommendation to the European Commission and Member States in July 2023 on Organic Aquaculture².

A response³ to this recommendation was received from the European Commission in August 2023, addressing several points directly and, in some cases, highlighting where further communication would be required to fully respond to the recommendations made by the AAC. In response to other points raised by the AAC recommendation, the AAC members feel that further clarification may be necessary coupled with direct communication with the Member State administrations.

Our questions refer to specific recommendations made by the AAC and the European Commission's subsequent response.

Make strategic and time-limited amendments to rules about introducing non-organic juveniles for species that are not commercially impactful and meet requirements of the European Vision for sustainable aquaculture alongside market incentives to produce these species under organic conditions⁴.

The European Commission's response noted the expiry of temporary permissions for non-organic aquaculture juveniles. The response referenced article 26 of 2018/848 relative to the responsibility for Member States to create a database on the availability of organic juveniles on the market. The EC's response indicated an intention for DG MARE and DG AGRI to 'follow up' on the use and content of these databases established by Member States. *The AAC requests further information on the publication of information contained within these Member States databases. More precisely, the AAC would like a diagnosis, based on the information provided by the databases, on the availability of organic juveniles across the EU and whether there are annual variations of fluctuations year on year.*

12. Commission a study to assess the position of organic production for different aquatic products. The study should include animal welfare and primary producer income per worked

¹ AAC website: www.aac-europe.org

² AAC recommendation on organic aquaculture, July 2023: https://aac-europe.org/wp-content/uploads/2023/07/10.-AAC-Recommendation-Organic-Aquaculture_2023_10.pdf

³ <https://aac-europe.org/en/publication/european-commission-reply-to-the-aac-recommendation-on-organic-aquaculture/>

⁴ AAC recommendation on organic aquaculture, July 2023: https://aac-europe.org/wp-content/uploads/2023/07/10.-AAC-Recommendation-Organic-Aquaculture_2023_10.pdf



hour, as well as an economic impact assessment describing the value for society delivered by farming activities as the foundation for reimbursement to farmers⁵.

We thank you for considering such a study and for the invitation to discuss the content. In this matter we will contact Ms Julia Rubeck, coordinator of the Advisory Councils (MARE-AC@ec.europa.eu). Your answers can be sent to our secretariat, who will be happy to communicate them to the AAC membership: secretariat@aac-europe.org

With my best regards,

A handwritten signature in blue ink, appearing to read "C. Epinay".

Charlotte Epinay
Working Group 3 (Horizontal Issues) Chair
Aquaculture Advisory Council

⁵ AAC recommendation on organic aquaculture, July 2023: https://aac-europe.org/wp-content/uploads/2023/07/10.-AAC-Recommendation-Organic-Aquaculture_2023_10.pdf

