

## Mandate

### Implementation Dialogue on EU Aquaculture Policy (30 June 2026)

Brussels, 29 June 2026

#### 1. Background

In 2025, the Commission launched the Implementation Dialogues<sup>1</sup>. The main aim is to strengthen and boost European competitiveness by seeking feedback from stakeholders to facilitate the implementation of EU policies and the simplification of EU rules and spending programs.

On 30 June 2026, Commissioner Kadis will hold an Implementation Dialogue on EU Aquaculture Policy. Following an invitation from DG MARE, the MAC will be represented by the Chair, Yobana Bermúdez. The first part of the dialogue will be dedicated to the “overall EU legislative framework applicable to aquaculture”, while the second part will be dedicated to the “use of alien and locally absent species in aquaculture; organic aquaculture”. Each invited participant will have approximately three minutes to make a statement on Part I, and three minutes on Part II.

#### 2. Intervention on behalf of the MAC – Part I

Thank you for inviting us. To supply the EU market, the potential of EU aquaculture must be unlocked, allowing for additional sustainable protein.

The CFP calls for increased aquaculture productivity. While, worldwide, aquaculture reached record production, the EU sector stagnated due to administrative requirements, limited access to space and water, and trade and governance challenges. National implementation has not

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<sup>1</sup> [https://commission.europa.eu/law/law-making-process/better-regulation/simplification-and-implementation/implementation-dialogues-0\\_en](https://commission.europa.eu/law/law-making-process/better-regulation/simplification-and-implementation/implementation-dialogues-0_en)

delivered significant economic benefits. Employment, company numbers, and farm surface area declined. Some segments contracted over the past 20 years. Social conditions remain underdeveloped.

Consumption of fishery and aquaculture products recently decreased, while household expenditures increased. Recent crises drove steep cost increases, but operators made significant efforts to prevent further price increases. Strong standards provide benefits for operators, consumers and society, but operators, mostly microenterprises, must adapt to the cost implications. Consumer awareness campaigns are needed to promote sustainable consumption and social recognition.

The EMFF and the EMFAF supported modernisation and innovation, providing for a lighter environmental footprint, but have not significantly improved economic performance or employment. The upcoming MFF should ensure a dedicated fund, at least maintaining the existing allocation, to support sustainability, competitiveness, resilience, and domestic production.

Producer Organisations and Interbranch Organisations play a key role in the CFP implementation. Considering the limited number of aquaculture POs, efforts should be made to raise awareness about their advantages and to increase attractiveness. The Commission should provide clear and simple rules on the applicable exemptions and ensure a simplified framework for their establishment and operation. Under the next MFF, financing should be strengthened, for example through ring-fencing. The level-playing-field in the financial support to POs across the EU should be improved.

Traceability rules benefit operators and consumers. However, the Control Regulation, including the concept of “unique fishing trip identification number”, was designed from the perspective of fisheries. The Commission should develop sector-specific guidance. As the sector is mainly

composed of SMEs, the Commission should monitor the challenges and costs in the implementation of digital traceability.

The EU should ensure a level-playing-field in the EU market and fair trade. As trade instruments play a role in supplying the market, the EU should continue dialogue with third countries and provide targeted support to strengthen environmental and social practices.

The reuse targets for fish boxes under the Packaging and Packaging Waste Regulation present operational and economic challenges, such as new logistical chains, sanitary issues, insufficient thermal insulation of reusable boxes, and a potentially higher environmental footprint. The Commission should study the mentioned impacts and promote recyclability.

### **3. Intervention on behalf of the MAC – Part II**

Concerning the implementation of legislation on organic products, in our view, there is a weak market demand and low consumer awareness, including some confusion between organic aquaculture products and wild caught products. At the moment, the market provides insufficient price premiums to cover the higher production costs in comparison with conventional aquaculture farming - nature positive production methods also lack market recognition.

Concerning the legislation on alien and locally absent species in aquaculture, we would like to highlight that farmed fish escapes are a major concern regarding genetic biodiversity and natural ecosystems. As the topic receives significant media attention at local, national and international level, it plays a potentially significant role in negatively shaping consumer's perspective on the sustainability of aquaculture in the EU and in other regions of the world. Escapes are also linked to detrimental impacts on economic sustainability.

On the other hand, the molluscan shellfish sector suffers from the reverse phenomenon: predation by invasive alien species, such as the blue crab in Italy and across the Mediterranean

Sea. Their management should be properly addressed, so that shellfish farmers are not left to bear this ecological and economic burden alone.

Policy action is needed to address this challenge, in order to favourably impact the EU industry's social license as well as for the market to reward companies that undertake investments in environmental sustainability.

In our view, Regulation 708/2007 should ensure clarity for consumers concerning transgenic aquatic animals, as these can fall under the regulation's definition of "alien species". In that sense, a more explicit inclusion of transgenic / genetically-modified animals in the mentioned definition would be useful. Furthermore, we take the opportunity to recall the application of the precautionary principle concerning the non-authorisation of GMO animals for human consumption in the EU.

## **Annex**

### **Potential references of interest**

- [Advice on “European Year of Skills” \(30 March 2023\)](#)
- [Advice on "Packaging and Packaging Waste Regulation: Impacts of the package reuse targets for the EU, fisheries, aquaculture and fish processing industries" \(18 March 2025\)](#)
- [Letter on the future of the Multiannual Financial Framework \(15 April 2025\)](#)
- [Advice on “Producer Organisations under the Common Market Organisation in Fishery and Aquaculture products” \(7 May 2025\)](#)
- [Advice on “Evaluation of the Common Fisheries Policy \(2014-2024\)” \(8 July 2025\)](#)
- [Advice on “Vision for Fisheries, Aquaculture and their Market in 2040” \(15 July 2025\)](#)
- [Advice on "Competitiveness of the EU Market of Fishery and Aquaculture Products – Simplification and reduction of administrative burden" \(24 March 2026\)](#)
- [Advice on "Upcoming EU Strategies for Coastal Communities and for Islands" \(24 April 2026\)](#)
- [Advice on “Competitiveness of the EU Market of Fishery and Aquaculture Products – Upcoming studies on the Fisheries Control Regulation” \(26 May 2026\)](#)