

POSITION PAPER

On the European Commission's Evaluation of the Common Fisheries Policy Regulation

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BACKGROUND

On April 30th, the European Commission published its evaluation of the Common Fisheries Policy (CFP) Regulation 1380/2013, covering the decade from 2014 to 2024¹. This document assesses the effectiveness, efficiency, relevance, coherence, and EU added value of the CFP. The evaluation is intended to inform potential reforms and serve as the foundation for the Commission's forthcoming 2040 Vision for Fisheries and Aquaculture.

The Federation of European Aquaculture Producers (FEAP), representing the EU's fish farming sector, has conducted a thorough analysis of the evaluation. While this federation acknowledges the considerable effort invested in assessing capture fisheries, it is compelled to express profound concern regarding the marginal and fragmented treatment of aquaculture, despite the sector being explicitly included within the CFP's scope.

The 2011 impact assessment of the previous 2002 CFP Regulation concluded that aquaculture production had not increased in the previous 15 years and that aquaculture employment had decreased by 16%. The current CFP introduced the mechanism of policy coordination, including non-binding strategic guidelines, Multi-annual National Strategic Plans for Aquaculture (MNSPAs), and the Open Method of Coordination (OMC), precisely to rectify these problems. As the present evaluation confirms, these objectives have not been achieved.

ANALYSIS OF THE EVALUATION

FEAP's analysis of the CFP's evaluation reveals a structural imbalance, a reliance on ineffective governance tools, and a failure to connect the stagnation of EU aquaculture with critical challenges such as food security, climate adaptation, and strategic autonomy. The following issues have been identified as problematic in the evaluation:

1. Structural imbalance between fisheries and aquaculture: The evaluation's intervention logic (Chapter 2.1) is built around three dimensions – environmental, economic/social, and governance – but the logic schemes (Figures 1, 2, and 3) overwhelmingly focus on capture fisheries. Aquaculture is mentioned only in passing. The evaluation lacks a dedicated intervention logic

¹ Evaluation of the Common Fisheries Policy (CFP) Regulation [https://ec.europa.eu/transparency/documents-register/detail?ref=SWD\(2026\)120&lang=en](https://ec.europa.eu/transparency/documents-register/detail?ref=SWD(2026)120&lang=en)

for aquaculture, resulting in a fragmented and incoherent assessment. While capture fisheries is an EU exclusive competence, aquaculture is a shared competence with Member States; this fundamental difference requires a separate analytical framework, not a footnote. The evaluation does not clearly distinguish between two very different economic activities that have distinct governance dimensions and practical operational realities.

2. Failure of non-binding governance tools: The evaluation acknowledges (paragraph 4.1.1, Impact 4) that mechanisms such as the MNSPAs and the OMC have had "*limited impact on complex licensing procedures and access to space.*" This is a critical admission, yet the evaluation draws no strong conclusion. After more than a decade of relying on voluntary cooperation, the result is sectoral stagnation. The evaluation neither proposes binding mechanisms nor questions whether the CFP's aquaculture governance framework is fit for purpose. The key message is clear: insufficient political attention at the national level has hindered the capacity to take necessary action, largely due to the complexities of implementing EU environmental policies at the Member State level. Yet the evaluation fails to draw this conclusion.
3. Food security and strategic autonomy disregarded: The evaluation correctly notes that EU self-sufficiency in fishery and aquaculture products has fallen from 46.1% (2014) to 38.1% (2023). For the five most consumed species, self-sufficiency is just 12%. The EU's trade deficit has risen to €21.6 billion in 2024. However, the evaluation does not connect this decline to the stagnation of EU aquaculture. While the catching sector faces challenges in stock recovery, aquaculture could and should fill the gap. Instead, the EU imports vast quantities of farmed salmon, European seabass, Gilthead seabream, shrimp, and other species from Norway, China, Türkiye, and Latin America. The evaluation mentions a "level playing field" (paragraph 3.2.5) but focuses almost exclusively on fisheries, ignoring the severely tilted playing field for EU aquaculture producers who face higher compliance costs. Furthermore, when considering out-of-home consumption, only about 50% of fishery and aquaculture product consumption is covered by the Common Market Organisation mandatory information requirements, undermining consumer choice and fair competition.
4. Environmental sustainability undermined by lack of harmonisation: The evaluation notes (paragraph 3.1.3) that most Member States have introduced measures to improve aquaculture's environmental performance, but then immediately undermines this by stating it "*remains difficult to assess the practical contribution of these measures*" due to the lack of common indicators or reporting obligations. This is a self-inflicted problem. The CFP Regulation does not mandate harmonised environmental reporting for aquaculture, and the Commission could have proposed such indicators years ago. This admission is an indictment of the Commission's own implementation choices. Without a common set of indicators, no meaningful assessment of environmental progress is possible.
5. Climate change adaptation ignored: The relevance section (paragraph 4.3) warns that rising sea temperatures, pollution, and changes in seawater composition are already altering the productivity of aquaculture farms, and notes that the lack of adaptation plans has been a weakness identified previously. Yet the evaluation does not propose any binding requirement for Member States to

develop aquaculture climate adaptation plans. The current framework relies on voluntary guidelines; the Commission's own evidence shows this is insufficient. Climate change is not a future threat; it is already impacting production.

6. Incoherence with other EU policies: The coherence analysis (paragraph 4.1.3) examines environmental, development, trade, and maritime policies but barely mentions aquaculture. Crucially, the evaluation does not address the impact on aquaculture of the Nature Restoration Regulation (entered into force August 2024), the Biodiversity Strategy 2030, or the Birds Directive. This omission is inexcusable given the direct spatial and operational constraints these policies impose on aquaculture producers. Coherence between aquaculture policy objectives and EU environmental directives must be actively improved rather than ignored.
7. Inefficiency by design: The efficiency section (4.1.2) admits that *"it is difficult to quantify the costs associated with implementing the Open Method of Coordination (OMC) under the CFP Regulation."* This is not an excuse; it is a failure of the evaluation. After over a decade, the Commission has not developed appropriate metrics. This admission, combined with the acknowledgement that the OMC *"has not, to date, delivered the expected growth,"* suggests that the CFP's aquaculture governance framework is inefficient by design. Total employment in the sector has not increased; youth employment has declined markedly since 2017; nominal wage growth has not kept pace with inflation; and relative wages remain well below national averages and below agricultural wages.
8. Limited EU added value: The EU added value section (4.2) states that for aquaculture, the CFP Regulation *"does not lay down detailed, harmonised rules"* for authorisation, establishment, and operation, and that the main requirement is the preparation of MNSPAs. This is a frank admission that the CFP provides limited added value to the EU in the area of aquaculture. Member States retain almost complete control over licensing, spatial planning, and operational rules, resulting in a fragmented, uneven playing field. The evaluation identifies this problem but does not propose a solution.

CONCLUSIONS

Based on the analysis set out above, the Federation of European Aquaculture Producers concludes the following:

1. The Commission's evaluation is structurally biased against aquaculture. Despite aquaculture being explicitly included in the CFP Regulation's scope, the evaluation treats the sector as a marginal afterthought. The lack of a dedicated intervention logic for aquaculture has produced a fragmented, incoherent assessment that cannot serve as a reliable foundation for the 2040 Vision. The Commission must take the evaluation back to the drawing board and provide a coherent assessment of the aquaculture sector under the CFP, including a dedicated intervention logic.
2. Non-binding governance tools have failed, and the Commission must propose binding mechanisms. The evaluation acknowledges that MNSPAs and the Open Method of Coordination have had limited impact on licensing and access to space, yet draws no strong conclusion. After a decade of stagnation, voluntary

cooperation has proven insufficient. The Commission must propose binding requirements for Member States to simplify licensing procedures and allocate space for aquaculture development. The CFP Regulation should be amended to replace the Open Method of Coordination with a more effective, accountable governance mechanism.

3. The decline in EU food security is directly linked to aquaculture stagnation, yet the evaluation fails to connect them. With EU self-sufficiency falling from 46.1% to 38.1% and just 12% for key species, aquaculture represents the only viable avenue for reversing this trend. The Commission must propose measures to rebalance the playing field against imports produced under lower environmental and social standards. This should include extending Common Market Organisation mandatory information requirements to cover a greater proportion of out-of-home consumption.
4. The environmental assessment of aquaculture is impossible due to the Commission's own failure to mandate harmonised indicators. The evaluation's admission that it cannot assess the practical contribution of Member State measures is a self-inflicted problem. The Commission must propose binding, harmonised environmental reporting obligations for aquaculture under the next CFP reform. A common set of environmental, economic, social, and animal welfare indicators must be established without further delay.
5. Climate change adaptation for aquaculture cannot remain voluntary. The evaluation warns that climate change is already impacting production, yet proposes no binding requirements for adaptation plans. The Commission must mandate Member States to develop and implement aquaculture-specific climate adaptation plans.
6. Coherence with other EU policies must be assessed in full and actively improved. The evaluation ignores critical interactions between aquaculture and the Nature Restoration Regulation, Biodiversity Strategy 2030, and Birds Directive. This is a serious omission that must be rectified in any future assessment. The Commission must improve coherence between aquaculture policy objectives and EU environmental directives as part of the next reform.
7. The current governance framework for aquaculture is inefficient. The Commission's admission that costs cannot be quantified and that the OMC has not delivered expected growth is an indictment of the CFP's design. The next reform must replace the OMC with a more effective, accountable governance mechanism. The Commission should establish a binding Performance and Evaluation Framework for aquaculture, including quantitative targets for production and sustainability indicators.
8. The CFP provides insufficient EU added value for aquaculture. Member State control over licensing, spatial planning, and operational rules has created a fragmented, uneven playing field. The Commission must propose minimum harmonisation standards for aquaculture authorisation and operation to restore genuine EU added value. This should include the establishment of an Aquaculture Sustainability Regulation and a Common Market Organisation for aquaculture products, as well as amendments to the legal framework for Producer Organisations to better serve the aquaculture sector.



The European Commission's evaluation has identified many of the problems facing EU aquaculture but has failed to draw the necessary conclusions or propose solutions. The 2040 Vision for Fisheries and Aquaculture represents a critical opportunity to correct these structural imbalances. FEAP calls on the Commission, the European Parliament, and the Council to move beyond voluntary guidelines and non-binding tools, and to deliver a reformed CFP that treats aquaculture as the strategic, food-producing sector it is, with binding governance, harmonised standards, and a genuine commitment to EU strategic autonomy, fully aligned with the objectives of Article 39 TFEU (which establishes the foundational objectives of the EU's Common Agricultural Policy and applies as the guiding framework for the Common Fisheries Policy).

The Federation of European Aquaculture Producers is an organisation that represents the European fish farming profession and is based in Brussels. FEAP is composed of 24 national fish farming associations from 23 countries, both EU and non-EU. The combined yearly production of FEAP members surpasses 2,5 million tonnes of nutritious, safe, delicious and environmentally sustainable fish.
