



**EUROPEAN COMMISSION**  
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

**The Director-General**

Brussels,  
MARE D3/ADV

Mr. Marc-Philip Buckhout  
Vice-Chair of the AAC  
Rue de la Science, 10  
B – 1000 Brussels  
Belgium

**Subject: AAC position paper on level playing field**

*Your ref.: email of 28 September 2018*

Dear Mr. Buckhout,

I would like to thank you for providing DG MARE with your Advice on Level Playing Field and for sharing detailed information on the difficulties encountered by the sector. While a level playing field is essential to promote fair competition between operators, not all the examples quoted in your advice do necessarily relate to this issue, and some of them seem rather structural conditions that should be tackled from other angles.

Some solutions lie within the sector itself and within the Member States, for example communication and promotion of the products, competitiveness, EMFF spending. Others, such as risks, fraud, non-respect of regulatory measures - are more a matter of enforcement of legislation. Finally, some issues like new labelling requirements for fish products are linked to a very recent legislative framework or the still ongoing process of consolidation within the sector (creation of Producers Organisations). The implementation is therefore on its way and problems related to these issues should be solved through the application and enforcement of the legislation.

Let me also take this opportunity to recall that sanitary controls on imports do exist and ensure that any product entering the EU market meets these requirements. Regarding production rules applicable in third countries exporting to the EU, while the EU cannot impose the same production standards applicable in the EU to third countries, the EU is closely involved in ongoing work at international level on the promotion of more sustainable aquaculture worldwide, such as in the context of the FAO or in the regional context of the GFCM.

Furthermore, the EU intends to increase its communication on the high standards of EU aquaculture to consumers.

The Commission is committed to working on both fronts and to tackling fraud issues that, while concerning both EU and imported products, have a detrimental effect on consumer confidence and safety, as well as on the image of the sector.

I thank you again for your position paper and invite you to contact Ms Pascale COLSON, coordinator of the Advisory Councils ([pascale.colson@ec.europa.eu](mailto:pascale.colson@ec.europa.eu); +32.2.295.62.73), should you have any question on this reply.

Yours sincerely,

  
João AGUIAR MACHADO