



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,
MARE/D3/AB

Dear Mr Brouckaert, dear Mr Skau Fisher,

I would like to thank the North Western Waters (NWWAC) and North Sea (NSAC) Advisory Councils for the advice 02-2324 of 21 December 2023 in relation to generational renewal in fisheries. Kindly find below some remarks that I would like to share with you on the ongoing work on the different topics discussed in this advice at the level of the European Commission.

Generational renewal

As President Von der Leyen said: “The best investment in our future is the investment in our people.” In that regard, the Fisheries and Oceans package ⁽¹⁾ acknowledges that generational renewal is key if we want to make sure that the EU fishing, aquaculture and processing sector and coastal communities have a viable future. It can only happen if the sector is perceived as attractive, if difficult working conditions are improved through innovation, if the marine environment is kept biodiverse, clean, and healthy, and if our societies recognise fishers and aquaculture producers for the professionalism and service they provide. The chance to work in an outdoor environment or opportunities for innovative working arrangements, such as linking production to direct sales or tourism, should also be emphasised.

⁽¹⁾ COM(2023)100 final, COM(2023)101 final, COM(2023)102 final, COM(2023)103 final

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Against this backdrop, we are now focusing on the implementation of the actions included in the package, which aim to address the key challenges for Europe's fisheries today, including generational renewal.

Social data collection is important in this aspect: we want to be able to understand how much renewal is taking place, across which basins. It is one of the elements that the Scientific, Technological, Economic Committee for Fisheries (STECF) is looking into in its development of social indicators. The Commission has also launched the EU-wide participatory foresight project "Fishers of the Future" in November 2023. This project wants to look ahead and understand how fishers envisage their future. An important underpinning element of the study is to look into the profiles of current fishers, what drives them and current trends. This will also provide us with a better understanding of the trends, challenges and drivers affecting the next generations of fishers up to 2050.

Modern technology

Technological innovation is key to developing new business opportunities and promoting economic diversification. Digital technology can provide a competitive advantage to fishers and aquaculture farmers, while also enhancing data collection, control and enforcement, traceability and consumer information and creating a new generation of jobs. It makes fisheries and aquaculture more efficient, facilitates direct sales and fosters transparent, efficient, and user-friendly fisheries control and monitoring. Some examples are remote electronic monitoring systems, such as closed-circuit television and sensors, artificial intelligence ⁽²⁾, automated data analysis, continuous measurement and recording of engine power, and drones to ensure surveillance. Digital technology also presents opportunities for collecting a broader range of data to inform the scientific and decision-making processes, simplifying processes, and reducing the administrative burden on operators in the data collection process. This is key to fostering a level playing field and providing a constant stream of quality information on fish stocks, consumer preferences and environmental conditions.

In concrete terms, the European Maritime, Fisheries and Aquaculture Fund ⁽³⁾ (EMFAF) can support the development of new solutions for the fleet through innovation and test of new technologies such as trials of energy efficient propulsion. It can also support investments in mature technology to modernise the fleet (e.g. investments on board to improve gear selectivity, safety on board, energy efficiency and ergonomics).

In addition, we recently published a [call for proposals](#) for a demonstrator project of a retrofitted fishing vessel to foster energy transition in fisheries. The call for proposals is funded under the EU Pilot Project Funds with a budget of EUR 2.2 million and will be open from 20 February until 11 June 2024. This call for proposals seeks to finance a pilot project on a demonstrator fishing vessel that will be retrofitted with alternative propulsion technologies and other solutions to improve energy performance, cut emissions and reduce underwater noise.

⁽²⁾ See project https://oceans-and-fisheries.ec.europa.eu/news/fisheries-management-artificial-intelligence-makes-difference-2023-11-07_en

⁽³⁾ Regulation (EU) 2021/1139 of the European Parliament And Of The Council of 7 July 2021 establishing the European Maritime, Fisheries and Aquaculture Fund

Horizon Europe can also provide funding for modernisation of vessels through an action ⁽⁴⁾ related to energy efficiency (with explicit reference to small-scale fisheries) and an action in the EU Mission ‘Restore our Ocean and Waters by 2030’, on green and energy-efficient small-scale fishing fleets ⁽⁵⁾.

Working & social conditions

Working and social conditions, including safety assurance, are key to a modern and flourishing fisheries sector. The EMFAF and its community-led local development, provides significant financial support for the improvement of safety and working conditions, development of skills, sharing of knowledge and making the sector more resilient overall.

At EU level, working conditions onboard fishing vessels is covered by several directives, the predominant one being Directive 2017/159 implementing C188 Convention on work in fishing, which is currently undergoing compliance assessment to make sure Member States have transposed it properly in national law. Furthermore, Directive 2015/1794 extended the personal scope of relevant Directives ⁽⁶⁾ to include the various types of seafarers that were, or could be, excluded. Regarding the inspection of working conditions, this depends on the flag of the vessel. For EU flagged vessels, the primary responsibility rests with the flag States. More broadly, the Commission has proposed a voluntary parallel system of port state control for fishing vessels of over 24 metres in length to be developed in cooperation with the Paris Memorandum of Understanding on port State control. This will build upon the long-established practice and experience of port State control of merchant vessels to allow for the enforcement of international conventions applicable to larger foreign-flagged fishing vessels (including those related to working and living conditions on board) through a harmonised and targeted port State control regime. Provisional political agreement on this proposal, which forms part of a text amending of Directive 2009/16/EC on port State control, was recently reached in a trilogue on 27 February 2024.

Beyond the CFP, EU legislation follows ambitious international standards on safety and working conditions in the fisheries sector; efforts to eradicate modern slavery, illegal, unregulated and unreported (IUU) fishing and promoting the development of social standards worldwide. These efforts foster international cooperation and contribute to a global level playing field and fair competition with non-EU countries. They also promote a high level of ambition for the sustainable development of fisheries and aquaculture markets in free trade agreements.

Training & certification

⁴ HORIZON-CL6-2024-FARM2FORK-02-6-two-stage Minimising climate impact on fisheries: mitigation and adaptation solutions for future climate regimes: <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/topic-details/horizon-cl6-2024-farm2fork-02-6-two-stage>

⁵ This topic is currently open for applications: <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/topic-details/horizon-miss-2023-ocean-01-05>

⁽⁶⁾ Directive 2008/94/EC (insolvency of the employer), 2009/38/EC (European Work Councils), 2002/14/EC (informing and consulting employees), 98/59/EC (collective redundancies) and 2001/23/EC (transfer of undertakings)

Working conditions are strongly linked to training as mentioned several times in your advice. Training is one of the keys to providing an improved working environment that younger generations feel attracted to and want to work in.

The European Maritime and Fisheries Fund⁽⁷⁾ and the EMFAF both refer to the importance of investing in training, as an "investment in human capital plays an essential role in the competitiveness and economic performance of the fishery, aquaculture and maritime sectors"⁽⁸⁾. The EMFAF contributes to professional training, lifelong learning and the dissemination of knowledge.

Under EMFF (2014-2021), 21 M€ was allocated to training through shared management for 1,176 operations and a 10.9 M€ contribution to blue careers/skills through direct management via Blue careers calls. The EMFAF has 7.5 M€ allocated to blue careers/skills through direct management (Blue careers calls in 2023).

The Commission welcomes the standards proposed by the Catching the Potential project launched and funded under the EMFAF "Blue careers" calls. Its triple concept of the three Ps (People, Planet, Profit) is in line with ecosystem-based management, which is at the heart of the CFP. The Commission also welcomes the project's collaboration with the International Maritime Organisation (IMO) to incorporate some of the standards into the revised International Convention on Standards of Training, Certification and Watchkeeping for Fishing Vessel Personnel (STCW-F).

Regarding the STCW-F Convention specifically, and as per the Commission's commitment in the Fisheries & Oceans Package, we have started preparations for the potential implementation of the revised convention into EU Law. This preparatory work will feed into our reflections to set up harmonised standards for fishers' training and certification across the EU. This also includes preliminary exchanges and scoping of the state of training requirements and certification procedures across the EU. We aim to ensure that we have evidence for future policy decisions after the revised convention is adopted in May 2024.

Training is also a key element that will allow fishers to find alternative occupation opportunities, which you also mention in your letter. The EMFAF finances lifelong learning, individual advisory services, professional training (including to design business plans for new activities) and promotes sharing of knowledge and experience⁽⁹⁾.

Certainty & stability of sector linked to stable fishing opportunities.

A high degree of stability is important for the sector, including for generational renewal. Science-based fishing opportunities provide part of this stability with a view to having economically viable fleets without overexploiting marine biological resources in the long term.

Article 17 of the CFP regulation requires Member States to use transparent and objective criteria for the allocation of fishing opportunities, including those of an environmental,

⁽⁷⁾ Regulation (EU) No 508/2014 of the European Parliament and of the Council of 15 May 2014 on the European Maritime and Fisheries Fund

⁽⁸⁾ See EMFAF regulation, recital 25.

⁽⁹⁾ See https://oceans-and-fisheries.ec.europa.eu/news/training-future-seafarers-2023-04-26_en

social and economic nature. It specifically suggests Member States to provide the local economy and the fisheries sector with incentives for deploying selective gears and fishing techniques that reduce environmental impact, including for reduced energy consumption. The Commission is working with Member States and the STECF to assess the approach in Member States for allocating their fishing opportunities, to address outstanding concerns on transparency and encourage the use of criteria that can foster sustainable fishing practices and support small-scale and coastal fishers, including through incentivising a reduced environmental impact. Recently on this topic, all Advisory Councils have received a more detailed letter ⁽¹⁰⁾ including a survey with deadline for reply 15 April 2024, where we seek further engagement with you.

Occupational risk prevention

Fishing is one of the most dangerous activities in the EU, based on data from Eurostat ⁽¹¹⁾. Important risks mentioned in the "European guide for risk prevention in small fishing vessels" ⁽¹²⁾ include the safety state of fishing vessels, dangerous work environments, fishing gear, hazardous substances, lack of qualification and training and inappropriate work organisation.

A large body of EU legislation exists in the field of occupational safety and health to prevent occupational risks. The Framework Directive 89/391/EEC sets the basic legal requirements on occupational safety and health in the EU and is applicable to all sectors including the fishing sector and relevant related Directives ⁽¹³⁾. Specific pieces of EU occupational safety and health law also target specific risks ⁽¹⁴⁾ and are also applicable to the fishing sector. These Directives set minimum requirements and Member States are allowed to adopt or maintain more stringent protective measures. EU directives must be transposed into national law and implemented by the Member States, and it is the national competent authorities, such as the labour inspectorates, that are primarily responsible for enforcing the implementation of national provisions transposing the directives. The so-called OiRA tool helps micro and small companies to carry out risk assessments ⁽¹⁵⁾. Every five years, the Commission evaluates the implementation of these Directives in terms of their relevance, of research and of new scientific knowledge to determine if any initiatives are needed to improve the operation of the regulatory framework.

Remuneration/wages

Based on the Treaties and case law, the EU cannot intervene directly on the level of pay, so as not to interfere with the competence of Member States and autonomy of social

⁽¹⁰⁾ Our reference Ares (2024)889794

⁽¹¹⁾ See e.g. the incidence rates by NACE Rev. 2 economic activity sector of the data collection "European Statistics on Accidents at Work", table [Fatal Accidents at work by NACE Rev. 2 activity \[hsw_n2_02_custom_10213424\]](#).

⁽¹²⁾ <https://op.europa.eu/en/publication-detail/-/publication/e64b1594-1b60-11e7-aeb3-01aa75ed71a1>.

⁽¹³⁾ such as in particular the Medical Treatment on Board Vessels Directive 92/29/EEC and the Fishing Vessels Directive 93/103/EC, the latter only applicable to fishing vessels with a length of more than 15 or 18 metres, depending on the circumstances.

⁽¹⁴⁾ See for example the Personal Protective Equipment Directive 89/656/EEC, the Manual Handling of Loads Directive 90/269/EEC, the Chemical Agents Directive 98/24/EC, the Biological Agents Directive 2000/54/EC, the Vibrations Directive 2002/44/EC, the Noise Directive 2003/10/EC, the Work Equipment Directive 2009/104/EC.

⁽¹⁵⁾ <https://oira.osha.europa.eu/en>

partners in this field. The objectives of the Directive on Adequate Minimum Wages (2022/2041/EC), also applying to fishers, is to improve the adequacy of statutory minimum wages, increase collective bargaining in all Member States and better enforcement and monitoring of the EU provisions.

On gender issues

It is crucial to enhance and increase recognition of the important role of women throughout the EU seafood value chain, from the generation of wealth and employment to the sustainable use and conservation of aquatic resources. To further promote gender balance in the fisheries sector, it is necessary to invest in more data collection and analysis on women working in the sector. Ways forward are currently being assessed by STECF expert working group on social data in fisheries ⁽¹⁶⁾.

The EMFAF supports projects in line with the objectives of the EU Gender Equality Strategy. Financial support takes account of gender and builds on projects and actions to enhance the contribution of women to the sector supported under the previous EU fisheries funds. In this context, following the EMFAF call for proposals on Women in the Blue Economy, the European Climate, Infrastructure and Environment Executive Agency has awarded EU grants to two projects with the objective of bridging the gender gap in the blue economy ⁽¹⁷⁾. These two projects run until 2025 and 2026.

I look forward to our continued fruitful cooperation on these very important issues. Should you have any further questions on this reply, please contact Ms Julia Rubeck, our Advisory Councils coordinator, via the functional mailbox MARE-AC@ec.europa.eu.

Yours sincerely,

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⁽¹⁶⁾ Latest report STECF 23-17, https://stecf.ec.europa.eu/final-reports/economic-and-social-analyses_en

⁽¹⁷⁾ https://cinea.ec.europa.eu/news-events/news/women-blue-economy-projects-ready-start-think-big-go-blue-2023-05-02_en