



Ms Charlina Vitcheva
Director-General for Maritime Affairs and Fisheries
European Commission
Jozef II-straat 99
1000 Brussels
Belgium

Dun Laoghaire, 23 April 2024

Dear Ms Vitcheva,

Subject: Consultation of stakeholders on social data

Thank you for the opportunity to participate in the consultation regarding the following two actions included in the CFP Communication as per MARE D.3's letter from 06 February:

- The further development of social indicators to be used in the analysis of socio-economic reports with the help of the Scientific, Technical and Economic Committee for Fisheries (STECF).
- Discussions among Member States and stakeholders with a view to preparing a vademecum on the allocation of fishing opportunities to improve transparency, promote sustainable practices across the EU and support small-scale and coastal fishers.

Following internal discussions, the members of the North Western Waters Advisory Council concluded that the preparation of the vademecum lies within the remit of the Member States and therefore do not wish to provide advice on this action point at this time.

However, NWWAC members would like to contribute to the consultation on the first action point regarding the development of social indicators. In this regard, the AC would like to recall its previous advice on the Communication from the Commission "The common fisheries policy today and tomorrow: a Fisheries and Oceans Pact towards sustainable, science-based, innovative and inclusive fisheries management" COM(2023) 103 final submitted on 08 December 2023 ([link](#)) as well as its joint advice with the North Sea Advisory Council "on social aspects in fishers" from 20 December 2022 ([link](#)). The NWWAC and NSAC collaborated on two additional submissions, the joint "Advice on Recreational Fisheries" ([link](#)) and the joint "Advice on Generational Renewal" ([link](#)), both submitted on 04 January 2024. These submissions contain valuable supporting information in relation to this consultation.

Regarding the National Fisheries Profiles, the North Western Waters AC recommends:

- Profiles must be comparable, therefore flexibility regarding reliable data sources within each national context must be considered to allow appropriate data sourcing. Fisheries statistics and





information are required at the correct scale. Eurostat and national census data collection should be amended so that consistent local data level is available for analysis.

- Harmonisation and standardisation regarding data collected in the socio-economic context of fisheries management should be prioritised.
- Additional funding should be made available where needed to develop publicly accessible National Fisheries Profiles, hosting of which must be carried out by an independent organisation clearly stating ownership of the work. While the Scientific Technical and Economic Committee for Fisheries (STECF) could be one choice, the Joint Research Centre of DG MARE should also be considered as hosts.
- As part of the development of the National Fisheries Profiles, the NWWAC supports the development of community profiles as outlined in STECF 23-17¹ and emphasises the need for stakeholder involvement in this work.
- A clear strategy must be laid out to identify how often these National Fisheries Profiles are being updated, who will carry out these updates and how this work will be funded.

Regarding the social indicators, the North Western Waters AC recommends:

- Prioritisation of the seven identified indicators as follows:

Indicator	Priority
1. State of play	
a. What is the current socio-economic situation of fishers (working conditions, safety, type & number of contracts over a year, well-being, training & skills, social position in society, income, employment type, age, gender, etc)?	HIGH
b. How does the situation compare to other sectors (e.g. how much more dangerous? How much more difficult)?	HIGH
c. What is the level of awareness of sustainability issues (environment, social, economic)?	MEDIUM
d. What are the working conditions of the non-EU workers onboard EU vessels fishing outside EU waters (equal treatment, equal training / skills, etc)?	MEDIUM
2. Assessment of management measures	
What impact do EU conservation measures have on fishing communities in terms of employment, working conditions and potential for social conflict?	HIGH
3. Dependency	
a. How vulnerable are fishers (wages, contracts, social coverage, pension, predictability of business environment, financial position, work safety, etc.)? On which aspects specifically?	HIGH
b. How adaptable are they to the changes they are facing (business structure, polyvalence including other non-fishing activities, training & skills, duration of residence	MEDIUM

¹ Scientific Technical and Economic Committee for Fisheries (STECF) – Social Data in Fisheries (STECF 23-17) ([link](#))





(e.g., how long have they stayed in their current residence and therefore likeliness to accept moving), etc.), working rhythm?	
c. What impact does the employment of non-national fishers (EU) have on fishing communities?	MEDIUM
d. What impact does the employment of non-national fishers (non-EU) have on fishing communities?	MEDIUM
4. Mobility	
a. How many fishers have tried to work in the fleet of another EU country but couldn't? (link to mutual recognition, training)	MEDIUM
5. Immaterial value	
a. The Commission often hears and reads that “the social contribution of the fisheries sector outweighs its direct economic impact” – what is the perceived historical and cultural importance of the fishing community in the EU by different categories of the population?	MEDIUM
6. Generational renewal	
a. How attractive is the profession for the younger generation (working - conditions and safety for men and women, training & skills, safety, income, social coverage, pension, working hours, time away from home, employment type (self-employed, full time, part time, etc.), level of professionalization, use of IT/technology, integration of environmental	MEDIUM
b. How many fishers have “dropped” or discontinued the family business, and why (safety, income, hardship, family itself doesn’t want them to continue)?	HIGH
c. What could make the profession more attractive?	HIGH
7. Engagement & compliance	
a. Which fishing communities are more engaged in representing their activity?	MEDIUM
b. How are they represented in local/national decision bodies?	HIGH
c. What role do the producer organisations and fishers’ associations play?	HIGH
d. How do these organisations and associations perceive their role and impact in fisheries management decisions?	HIGH
e. How does the fishing community influence the level of compliance with rules?	HIGH

Additional recommendations:

- The NWWAC would like to emphasise the importance of recreational fisheries and the dependence of coastal communities on this activity and recommends to include this in any analysis and evaluation of the socio-economic aspects of fisheries.
- Achieve a level playing field between EU Member States in respect of ratification and enforcement measures of the IMO Cape Town Agreement and ILO C-188, as well as STCW-F Convention on standards of training, certification and watchkeeping for Fishing Vessel Personnel.
- The Common Fisheries Policy should include clearly identified social objectives in parallel with environmental objectives to ensure the continued attractiveness of the commercial and





recreational fishing sectors for younger generations, ensuring better protection and optimal working conditions.

- The framework for the capacities of fishing vessels – specifically the use of Gross Tonnage as a capacity indicator – as provided for by Regulation 1380/2013 is no longer adapted to today's technical and economic challenges since it freezes the structure of vessels to technical criteria which do not conform with the requirements of cyclical and even structural adaptations to today's issues. It is therefore necessary to review and possibly restructure the regulatory framework which allows the improvement of:
 - ship safety
 - ship stability
 - crew comfort
 - new energy technologies: Hybridization, LNG, H2
 - renewal of fleets
 - the attractiveness of the sector
 - generational succession
 - food security/sovereignty
 - environmental impacts.
- Small scale fisheries require a differentiated approach to indicator development as many indicators are not applicable to small vessels and operators. Therefore, the NWWAC recommends for STECF to consider the inclusion of the following high priority items under the relevant indicators:
 - State of play
 - Age profile of fishers and the extent of generational renewal
 - Indicators documenting the seasonal nature of small-scale fisheries
 - Dependency
 - Data collection specifically detailing the involvement of women in fisheries and their importance
 - Assessment of unemployment rates along with what social welfare supports are available to self employed share fishers.
 - Development of additional indicators regarding peripheral fisheries, including offshore islands, as these are often disproportionately due to a lack of infrastructure and geographic constraints.
 - Generational renewal
 - The move to full digitisation has the potential to disenfranchise those who may not be digitally literate. Indicators should assess capacity in this area so that no one is left behind.





The NWWAC continues its work on social aspects in fisheries particularly via the joint Focus Group with the North Sea Advisory Council which is currently drafting a statement on standardised training on safety and implementation of STCW-F.

On behalf of the NWWAC I thank you again for the opportunity to contribute to this consultation and look forward to your response and further engagement on this important aspect of the Common Fisheries Policy.

Yours sincerely,

Emiel Brouckaert
NWWAC Chair

