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NWWAC ADVICE

Part 1: Strategic advice - CFP Regulation Evaluation

17 April 2025

Background

On 27 January 2025, the European Commission launched a public consultation regarding the evaluation of the Common Fisheries Policy (CFP) regulation. The public consultation runs for 12 weeks until 21 April 2025, with the Commission expecting to receive a wide range of contributions from stakeholders, experts, and citizens. The feedback collected will be used to shape the evaluation of the Common Fisheries Policy regulation, which the Commission aims to present early 2026.

The North Western Waters Advisory Council (NWWAC) welcomes the opportunity to provide advice on the “CFP Regulation Evaluation”. The seafood sector has continually worked on improving its sustainability performance with a multitude of initiatives and improvements implemented over the years, including improved fisheries management at sea, more effective marine conservation measures. The sector is highly regulated, and its members persistently strive to address the balance between the three pillars of sustainability through individual, collective, national or trans-national initiatives. However, the NWWAC acknowledged that margin to further improve regulation, and for this reason, the NWWAC members provide recommendations to support ongoing advancements in sustainability and governance.

The multiple-choice format of the questions included in the public consultation was not conducive to providing an NWWAC specific advice, as the survey seems to be more tailored to individual stakeholders, enterprises and OIGs. The NWWAC felt that a more traditional advice format would be more appropriate to collate members’ contributions. In the following document (Part 1 – Strategic Advice), the NWWAC would firstly like to highlight key points that AC Members consider a priority for the evaluation of the CFP. In a second document (Part 2 – Public Consultation), the NWWAC answers to the survey following the structure of the public consultation questionnaire. NWWAC recommendations are distributed according to the specific topics identified in the structure of the consultation: 1) effectiveness of the CFP Regulation; 2) Efficiency of the CFP Regulation, 3) Governance: 4) Effectiveness and Efficiency; 5) Relevance of the CFP Regulation. For each section, different questions are addressed to assess the impact, challenges, and areas for improvement in the CFP, ensuring a comprehensive evaluation of its overall performance.

KEY PRIORITIES

The preparation of the Common Fisheries Policy (CFP) evaluation requires careful planning and must be based on studies, assessments, and inputs of Members States and stakeholder. As the main CFP stakeholder advisory bodies, the ACs have a very important role to play, and the NWWAC stands ready to contribute to this work. These key priorities are listed in no particular order.

1. Recognising the positive impacts of Advisory Councils (ACs)

ACs have played a crucial role in shaping EU fisheries policy through stakeholder-driven advice and consensus-building processes for the past 20 years. They have a proven track record of providing balanced advice developed across a wide range of stakeholders.

Valuable advice and sound legislation can only emerge as a result of synergies from continuous engagement and contact with the stakeholders. ACs are best placed for such synergies to occur and for providing balanced advice based on compromise, given their diverse composition comprising the whole fisheries and aquaculture value chains (from catching/harvesting, to processing, trading, retail and exporting) as well as other interest groups including environmental and other NGOs. This collaborative work brings an added value to the contributions submitted by individual organisations.

The CFP must emphasise the further integration of ACs' expertise into decision-making structures, reinforcing their role in bridging science, policy, industry and civil society interests. The NWWAC strongly encourages continued support for and commitment by the Commission to the work of the ACs ensuring their continued capacity for effective contributions to the future of EU fisheries governance.¹

2. Addressing social and economic imbalances within EU fisheries

The CFP recognises environmental, social, and economic sustainability as equally important, but in practice, the fishing sector has perceived that social and economic aspects have been secondary to environmental goals. While eliminating overfishing and safeguarding our ocean are crucial, CFP objectives must balance biological, socio-economic, and conservation needs, ensuring equal consideration of long-term fisheries sustainability, marine conservation, food security, and fair livelihoods for fishing communities. To achieve this, the NWWAC believes that all major policy changes should be accompanied by socio-economic impact assessments, where fishing operators and stakeholders are more involved in the decision-making process. This approach should also be applied to agreements such as the Trade and Cooperation Agreement (TCA) EU-UK, to fully assess their impact on the sector.

¹ Please also see: Joint-AC letter on ACs stakeholder input ([link](#)); Joint-AC letter on contributions from Advisory Councils in Commission public consultations ([link](#)); Inter-AC letter AC promotion ([link](#))



3. Adapting fisheries management in the post-Brexit landscape

In the context of the CFP, the NWWAC would like to highlight that Brexit has significantly altered the dynamics of fisheries management, introducing new challenges that must be addressed. With 75 shared fish stocks—most of which are in the North Western Waters (NWW)—EU-UK bilateral consultations have become essential for setting Fishing Opportunities. These negotiations add complexity by requiring a balance between sustainability goals, economic interests, and political considerations. Differences in management approaches, quota allocations, and stock assessments between the EU and the UK create uncertainties that can affect stock conservation and the stability of fishing communities.

The NWWAC calls for harmonisation of technical measures, that should be proportionate, non-discriminatory and based on the best available scientific advice. To ensure continued progress in sustainable fisheries, the NWWAC emphasises the need for enhanced cooperation, transparency, and adaptive management in EU-UK fisheries governance. Strengthening data quality, improving compliance with conservation measures, and adapting to emerging challenges such as climate change and pollution will be crucial for maintaining sustainability and a level playing field. The NWWAC urges EU institutions to prioritise these efforts to mitigate the risks posed by the post-Brexit landscape and ensure that sustainability objectives remain at the core of fisheries management.

Finally, for regionalisation to work as intended under the CFP, as part of evaluation, ways to ensuring that Member States and stakeholders have a clearer role in the decision-making process under Brexit should be explored. This includes the upcoming review of the TCA and the potential contributions by ACs as any changes could potentially have significant consequences for fisheries in the NWW. The NWWAC is particularly concerned regarding the end of the transitional provisions on access to fishing waters by 30 June 2026, following which access to fishing waters could then be subject to annual negotiation.

4. A stronger implementation of ecosystem-based approach and regionalisation for the Western Waters Management Plan

Multiannual Plans (MAPs) are essential for managing EU fisheries by setting objectives, targets, and rules for target stocks and by-catches. While they clarify MSY implementation, the rigid stock list lacks clear criteria, and in some cases, scientific data is insufficient to justify MSY advice. Fishing exploitation ranges (FMSY) should integrate ecosystem indicators to refine target fishing mortality. A key weakness of current MAPs is the absence of measures for stocks below B_{lim} , underscoring the need for clear rebuilding plans with defined targets and timeframes based on scientific advice. For both target and non-target stocks, multi-year strategies under the TCA should adopt pragmatic operational metrics aligned with agreed management measures. The NWWAC calls for an ecosystem-based approach to fisheries management that considers all pressures on the environment, including climate change. This must result in a more adaptive and flexible approach to MSY.

The NWWAC highlights concerns about the Western Waters (WW) MAP's broad scope, covering diverse areas (NWW, South Western Waters (SWW), and Fisheries Committee for the Eastern Central Atlantic (CECAF) without considering regional distinctions outlined in Article 4 of the Basic Regulation. Overlaps with the North Sea MAP create inconsistencies in stock management, particularly for straddling stocks like megrim and hake. Strengthening the ecosystem-based approach in MAPs by incorporating climate and environmental factors would enhance sustainability. Additionally, regionalisation should be improved to ensure meaningful stakeholder participation.

The Landing Obligation remains a challenge, particularly regarding choke stocks, especially in mixed fisheries. The WW MAP is overly rigid, failing to update its target stock list despite environmental changes affecting distribution (e.g., Cod VII). Implementation gaps persist, as the International Council for the Exploration of the Seas (ICES) has not been tasked with assessing conditions for Article 4.5 (a) and (b). The NWWAC calls for a review of the WW MAP to ensure it reflects changing environmental conditions and supports effective, regionally tailored fisheries management as well as coherence with discard plans.

5. Addressing challenges of the landing obligation

The NWWAC acknowledges the principle of the landing obligation and the need for catch declarations but highlights major challenges with the Landing Obligation². Requiring the landing of undersized fish contradicts EU food policy and harms stock survival. Discard plans consume resources with uncertain results, while rigid rules and complex exemption processes hinder effective implementation. Underused flexibilities further limit its practicality.

To improve fisheries management, the NWWAC calls for better use of exemptions and flexibilities, adaptation of Total Allowable Catch (TAC) and the list of species to which the landing obligation applies to ease restrictions in mixed fisheries, and prioritisation of avoidance measures to reduce unwanted catches. The quota-exchange pool should continue for stocks to prevent premature closures. Long-term solutions must focus on rebuilding stocks, improving data collection, and enhancing monitoring. Fully documented fisheries and pilot projects under Article 14 of the CFP should be explored to minimise unwanted catches. Additionally, conflicts between the Landing Obligation and the Technical Measures Regulation require urgent resolution to ensure a workable and effective approach.

6. Strengthening data collection and stakeholder involvement for effective fisheries management

The NWWAC acknowledges the fact that the CFP Regulation has played a significant role in promoting environmental sustainability and the conservation of marine resources. However, the effectiveness of these measures depends on robust data collection (socio-economic, fisheries,

² Please also see NWWAC letter to DG MARE on difficulties with the landing obligation ([link](#))



marine environment, other pressures on the maritime space) and fully documented fisheries, which remain insufficient in some cases, posing challenges to effective management decisions. With the aim of strengthening the regionalisation approach, involving stakeholders in the decision-making process is crucial to building trust and ensuring that management measures are fair, inclusive, and effective. The NWWAC refers to its requests regarding greater stakeholder involvement in ICES and STECF work and welcomes the Commission's engagement, in particular the initiative of adding the Advisory Council's to the preparation and follow up of the annual Meeting between ICES and Requesters of ICES Advice (MIRIA).³

7. Modernisation and decarbonisation for an energy efficient EU fishing fleet

NWWAC members feel that the CFP Regulation has had only a modest impact on fostering modernisation and innovation in the fisheries sector. The NWWAC highlights that there is a clear need for further development in areas such as vessel renewal, the adoption of sustainable fishing technologies, on board improvements (ship safety, ship stability, crew comfort), and the integration of digital tools to enhance operational efficiency and better working conditions. While the CFP Regulation has laid some groundwork, it has not yet achieved the level of transformation needed to truly modernise the sector and encourage innovation on a larger scale. Much more support, investment, and flexibility in the regulatory framework are required to bring about meaningful change in the fisheries industry, such as the construction of new vessels. The NWWAC believes that the EMFAF does not have the necessary scope to include this objective in that, as it remains limited to the repowering- subject to conditions - of vessels of less than 24 metres. Upgrading the engine on a fishing vessel can reduce greenhouse gas emissions by saving fuel, however, it is not deemed effective or efficient if the vessel itself is not efficient in terms of its other components.⁴

The NWWAC emphasises that the fisheries sector plays a crucial role in providing low-carbon, high-value protein, and must actively contribute to decarbonisation. Technological advancements, such as the use of alternative energy sources (e.g., solar, wind, hydrogen), offer promising solutions, but further development is needed. EU funding for the sector should focus on supporting these innovations, addressing as well logistical challenges related to infrastructure while ensuring crew training.⁵

³ Please also see: Joint NSAC-LDAC-PeIAC-NWWAC-SWWAC-BSAC Advice on stakeholder engagement in ICES advice request formulation ([link](#)); DG MARE's reply to the multi-AC Advice on stakeholder engagement in ICES advice request formulation ([link](#)); Joint-ACs advice on stakeholder engagement in Scientific, Technical and Economic Committee for Fisheries (STECF) processes ([link](#)); Commission response to the Joint-ACs Advice on stakeholder engagement in the STECF processes ([link](#))

⁴ NWWAC advice on Consultation of stakeholders on social data ([link](#))

⁵ Please also see: NWWAC advice On the Communication from the Commission "On the Energy Transition of the EU Fisheries and Aquaculture sector" COM(2023) 100 final ([link](#)); NWWAC feedback on the public initiative "CO2 emissions of engines - methodology for their reduction" ([link](#))



8. Ensuring a sustainable and inclusive future for the fisheries sector

The NWWAC believes that further efforts are necessary to ensure that all individuals involved in the industry, including the younger generation and women, can enjoy a fair standard of living, secure income, and safe working environments. It is particularly important to create conditions that attract and retain young people in the sector, offering them opportunities for career development (i.e. training courses), fair pay, and job security. This is vital not only to address the aging demographic of the industry but also to ensure the sector can meet the challenges of the future. The NWWAC highlights that these innovations could lead to further costs, including the need to invest in new vessels or equipment. Given the current financial challenges within the industry, many fishers may choose to exit the sector rather than adopt expensive and complex technologies. There are also unresolved safety and capacity issues that may arise with the introduction of new technologies.⁶ Enhancing investments supports for integrating modern technology, sustainable innovations, and digital advancements on board will not only enhance safety and better data collection, but also increase the sector's appeal to the young generation.⁷

9. A CFP that evolves to remain effective in today's rapidly changing landscape and emerging challenges

In the light of emerging challenges, the NWWAC encourages continued action to promote fair competition, social responsibility, consumer awareness, and the strengthening of the overall stability of the EU fisheries sector. To ensure long-term sustainability, the CFP must evolve to address recent challenges (such as climate change, Brexit, and international crises), with a focus on greater adaptability, regionalisation and cooperation, improved level-playing field between EU and non-EU fleets, enhanced stakeholder engagement, and policy driven by clear objectives.

The NWWAC recommends increased investment in key infrastructure such as fleets, port and supply chain activities, to bolster resilience against climate change and other pressures. By reinforcing the regulatory framework, investing in decarbonisation technologies, and improving the sector's attractiveness, the EU can safeguard the long-term sustainability and competitiveness of its fisheries and improve EU food security and sovereignty.

For the CFP to achieve its sustainability goals, the governance system must prioritise transparency, integrate scientific advice more effectively, and engage stakeholders more actively. Simplifying regulatory frameworks and ensuring consistent enforcement across Member States will reduce administrative burdens and create a fairer, more efficient system. Easier access to EMFAF funding will be essential to supporting CFP objectives and should remain a key priority for its future.

A key challenge remains in guaranteeing a level playing field between EU and non-EU products, ensuring that all seafood entering the EU market adheres to sustainability and ethical standards, including the prevention of human rights violations in the fisheries activities and supply chains.

⁶ NWWAC feedback to future fisher profiles by the "Fishers of the Future" foresight study ([link](#))

⁷ NSAC/NWWAC Advice on Generational Renewal ([link](#));

Additionally, consumer awareness on the quality and sustainability of EU seafood and their education on diversifying fish species consumption will be essential to enhance sustainability and affordability in the long term. Public perception of the fishing sector also needs to be addressed, as misconceptions and stereotypes can overshadow the industry’s significant efforts and commitment to sustainable practices.

The AC calls on the Commission to highlight the importance of promoting European seafood as part of sustainable, climate-neutral and healthy food consumption.⁸

10. Coexistence with other sectors of the blue economy and the role of the EU Ocean Pact

The EU and its Member States must prioritise the integration and coherence of the Blue Economy framework with other relevant governance frameworks, such as international ocean governance, climate, and biodiversity strategies. While integration is vital, the current EU approach tends to favour isolated expert groups focused on individual aspects, such as the Marine Strategy Framework Directive (MSFD), the EU Biodiversity Strategy, Marine Spatial Planning, Offshore Renewable Energy objectives, Marine Protected Areas missions and fisheries management. While fishing pressure in the EU has decreased over the past years, pressure on the marine environment overall has increased due to the increased multiple use of the marine space by different actors, e.g. offshore renewable energy and other blue economy entrants. Effective coordination under Marine Spatial Planning (MSP) among all the parties involved is therefore essential for managing competition and potential conflicts between different sectors of the Blue Economy. Mechanisms must be established to ensure that the cumulative environmental impacts—both direct and indirect, as well as nationally and cross-border—of various activities within the Blue Economy do not exacerbate the pressures of climate change on the ocean or negatively affect specific sectors, such as fisheries, their value chains, and associated onshore activities.

The NWWAC welcomes the development of the EU Ocean Pact with its intention to addressing this fragmented approach, and to ensuring a more unified and coordinated effort across all sectors of the blue economy.⁹

– END –

⁸ NWWAC 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 ([link](#))

⁹ NWWAC Advice on the EU Ocean Pact ([link](#))