



EU Transparency Register Id. No: 8900132344-29

## NWWAC ADVICE

### Part – 2: Public Consultation - CFP Regulation Evaluation

17 April 2025

In the following document, the 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.

#### Effectiveness of the CFP Regulation

##### 1. What impact do you think the CFP Regulation has had to?

- The contribution to the environmental sustainability and conservation of marine resources
- The contribution to the economic sustainability of people active in the fisheries and aquaculture sectors and consumers
- Contributing to the social conditions (fair standard of living; training) of people active in the fisheries and aquaculture sectors and of consumers

The CFP Regulation has had a significant impact on fisheries management by promoting science-based decision-making and fostering the long-term conservation of fish stocks. By establishing Total Allowable Catches (TACs) and implementing ecosystem-based management strategies, the CFP has contributed to mitigating overfishing and enhancing the sustainability of marine resources. However, the NWWAC acknowledges **several shortcomings on the CFP effectiveness**.

In this perspective, the NWWAC **advocates for a more balanced approach** to the various objectives of the CFP to effectively achieve its goals across all three pillars of sustainability: environmental, economic, and social. It recommends an interdisciplinary approach to fisheries management, integrating relevant data from these three pillars while incorporating social and economic research. Overall, while the CFP has laid a strong foundation for sustainable fisheries, further adaptations are needed to address emerging challenges, including climate change, generational renewal and the evolving economic landscape. Strengthening stakeholder engagement, improving data collection, and integrating innovative management approaches will be key to ensuring that the CFP continues to support a thriving and resilient European fishing sector and to ensure food security and sustainable food systems.



**1a. What impact do you think the CFP Regulation has had on the contribution to the environmental sustainability and conservation of marine resources**

The NWWAC acknowledges the fact that the **CFP Regulation has played a significant role in promoting environmental sustainability** and the **conservation of marine resources**. By implementing science-based fisheries management, the CFP has contributed to the recovery of some fish stocks by setting catch limits in line with the best available scientific advice. This has helped mitigate overfishing and support the regeneration of marine ecosystems. Additionally, the CFP has emphasised ecosystem-based management, incorporating conservation efforts such as habitat protection and implementation of more selective fishing methods. However, the **effectiveness of these measures depends on robust data collection and fully documented fisheries, which remain insufficient in some cases, posing challenges to effective management decisions.**

**Ensuring high-quality data collection** must be a top priority, as data deficiencies complicate decision-making regarding métiers, species, and habitats most in need of biodiversity-focused action. A strong scientific foundation is essential for **balancing objectives across all three pillars of sustainability**, enabling both the protection of vulnerable ecosystems and the continued competitiveness of the European fishing industry. Moreover, **involving stakeholders in the decision-making process** is critical to ensuring that management measures are fair, inclusive, and effective.

The NWWAC emphasises that **preserving sensitive habitats requires tailored management plans for each protected site**, ensuring that the specific ecological features and species for which they are designated receive appropriate protection. Before adopting and implementing conservation measures, it is essential to establish clear methodologies for achieving the set objectives. A **more robust scientific baseline** should be developed to assess the species and habitats in need of protection. Given that marine habitats vary in sensitivity, resilience, and ecological significance, conservation rules and measures should be adapted accordingly. Additionally, **synergies between fisheries management and conservation efforts should be maximised** to enhance overall sustainability.

**1b. What impact do you think the CFP Regulation has had on the contribution to the economic sustainability of people active in the fisheries and aquaculture sectors (owners, workers, employers, operators) and consumers, specifically on contributing to profitable activities in the fisheries catching sector.**

The many strains and pressures on the European fishing sector have led to a reduction in fleet size and vessel numbers over the past 20 years. The current CFP's measures have not been able to halt this decline or meaningfully assist in maintaining this vital contributor to the EU's food security and the economic sustainability of coastal communities. While the CFP has aimed to balance environmental, economic, and social objectives, its impact on the profitability of the fisheries catching sector has been mixed. While measures such as Total Allowable Catches (TACs), quota allocations, and subsidies have helped some businesses remain viable, the



**overall trend has been one of financial strain**, particularly for small and medium-sized enterprises who face increasing regulatory burdens and market competition. Many communities are linked to, or even dependent on, restricted fishing zones, but due to various factors—including climate change and fleet displacement for economic reasons—coastal communities and the very fabric of local economies are increasingly at risk. The CFP's economic policies, while designed to ensure sustainability, have sometimes favoured larger industrial operators, leaving small and medium-sized enterprises struggling to compete.

The CFP must **ensure socio-economic resilience** by recognising the **cultural and economic significance of fisheries, throughout all the value chain**. Support mechanisms, including financial aid, training programs, and incentives for innovation, should be expanded to help fishers and coastal businesses adapt to environmental and market changes. **Investment in modernising fleets** with sustainable technology and ensuring access to fair market conditions is crucial to improving profitability across the sector. Additionally, **strengthening policies that secure fair wages, stable employment, and safe working conditions** will contribute to the long-term sustainability of those active in the industry.

- **What impact do you think the CFP Regulation has had on supporting modernisation and innovation in the fisheries sector:**

According to the NWWAC, the CFP Regulation has had only a **modest impact on fostering modernisation and innovation in the fisheries sector**. A key issue is that many fishing vessels remain outdated, with little progress made in upgrading or replacing them with more advanced, energy-efficient models. Despite efforts under the regulation, 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.

Secondly, 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.

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.<sup>1</sup>

- **What impact do you think the CFP Regulation has had on the contribution to:**

Ensuring availability of food supplies at reasonable prices for consumers; Supplying aquatic food to processors and consumers with adequate level of information; Improving stability of the fishery and aquaculture market; Ensuring fair competition conditions, between stakeholders of the fishery and aquaculture sector on the EU market.

The NWWAC deems appropriate to recognise that EU fish products are not necessarily priced affordably for consumers. This is due to the EU's commitment to maintaining high standards of quality, freshness, and safety, with robust traceability systems ensuring transparency throughout the supply chain. Although the availability of information for consumers is improving, there remains considerable work to be done in terms of fully **educating the public on the benefits and sustainability of EU fisheries**.

The NWWAC reiterates that, as a primary sector, the fishing sector provides sustainable food to EU citizens with the lowest carbon footprint of all healthy and nutritious protein sources as recognised in the EU's Farm to Fork Strategy. The seafood supply chain also plays a vital part in the EU's food security. While the sector remains strongly committed to meeting environmental objectives to ensure fishing activities become more sustainable, it also needs to remain workable and profitable to ensure it can keep providing sustainable and healthy animal-source protein to EU citizens. In this regard, the NWWAC also highlights the inconsistency between the EU's ambitions to strengthen its food self-sufficiency and the introduction of measures that it would be incapable of demanding and controlling when applied to imported products. The AC calls on the Commission to highlight the importance of promoting European seafood as part of sustainable, climate-neutral food consumption.<sup>2</sup>

However, when considering **EU seafood imports**, several critical concerns arise, particularly regarding **human rights violations**. Notable issues include the violation of labour rights by certain industrial fishing fleets supplying fish for the EU market, as well as the importation of fishmeal and fish oil from some non-EU countries, which threatens the right to food of local populations. Given that the EU market is one of the largest and most lucrative for fish products

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<sup>1</sup> 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](#))

<sup>2</sup> 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](#))



globally, future legislation that **ensures products entering the EU market are free from human rights violations** in their supply chains—such as the proposal in the Farm to Fork Strategy—would provide an opportunity to address these issues. Such measures could not only resolve concerns within the EU but also serve as a global benchmark for ethical fisheries practices.

In terms of market stability, challenges persist. A key issue lies **in ensuring a level playing field between EU and non-EU products**. Non-EU fleets operating in the same fishing areas often adhere to different regulations, which can undermine fair competition and disrupt market stability. Achieving greater regulatory alignment between EU and non-EU fleets is essential for fostering a more equitable and stable market environment. At the same time, it is crucial that the **environmental sustainability of imported products is ensured**, both in the interest of EU consumers and to maintain fair competition within the EU seafood sector, in line with existing EU control, import, and trade measures.

Additionally, many consumers tend to favour the same species of fish, often those that are most commonly available. However, there is an **increasing need for education on the importance of diversifying consumption to include lesser-known species**, which are sometimes also more affordable. Encouraging the consumption of these alternative species can help reduce pressure on overfished populations and promote a more balanced, sustainable market.

**1c. What impact do you think the CFP Regulation has had on contributing to the social conditions of people active in the fisheries and aquaculture sectors**

The NWWAC recognises that the CFP regulation has certainly **contributed to improved social conditions for people** active in the fisheries and aquaculture sectors. It has played a key role in **fostering better working conditions and supporting social standards** within the industry.

However, despite these advancements, **challenges remain in ensuring a fair and stable income** as well as decent working conditions across the entire sector, particularly in the fisheries catching sector. While the CFP has introduced measures to promote better working conditions, these do not always directly translate into guaranteed fair pay or job security for all workers. In many cases, operators continue to face economic pressures due to fluctuating market conditions, limited quotas, external competition, spatial competition with ORE, and climate change. As a result, a **stable income remains elusive for many, women and men, and decent working conditions are still not always guaranteed**.

Moreover, a significant concern is the **aging demographic of the fishing industry**, with the majority of fishing operators being older. The lack of **generational renewal** within the industry is becoming increasingly evident. While experienced fishers bring invaluable knowledge and expertise gained over decades, the arrival of a younger generation is essential to the future of EU fisheries. Fostering intergenerational exchange will be **key to ensuring the future of the sector** and achieving fisheries that are sustainable in environmental, economic, and social terms. The **fundamental requirement for any sector's attractiveness is the assurance of long-term viability**, fair conditions, stable income opportunities, and a clear path to career development and support for investments or the takeover of a vessel. This requires adjustments to the EU



taxonomy, such as recognizing sustainable fisheries as green investments, facilitating generational transitions, supporting vessel innovation, and incorporating socio-economic sustainability criteria to improve financing opportunities. Yet many **European fishers currently lack confidence in the future** due to uncertainty surrounding quotas and fishing opportunities. Although progress has been made to address these concerns, further improvements in working and social conditions are necessary to attract new generations—who place greater emphasis on safety, health, comfort, inclusivity, and equality. Additionally, **integrating modern technology, sustainable innovations, and digital advancements on board will not only enhance safety but also increase the sector’s appeal to the next generation.**

- **What impact do you think the CFP Regulation has had on the following social aspects?**

Ensuring a fair allocation of fishing opportunities to fishers; Supporting small-scale fishers; Supporting coastal communities dependent on fishing and aquaculture; Taking into account the interests of consumers by ensuring the availability of food supplies at reasonable prices, enabling informed choices and promoting responsible consumption

In terms of ensuring a fair allocation of fishing opportunities, the NWWAC recognises that the CFP has made progress by introducing measures to distribute quotas and fishing rights more equitably. The NWWAC calls for a continued improvement in scientific data collection to ensure more informed decision-making on Total Allowable Catches (TACs) and quotas, ultimately leading to more sustainable and effective management of fisheries resources. The implementation of fishing opportunities has not always been flawless, and **challenges remain, especially for small-scale fishers who often face difficulties in accessing sufficient resources.**

Regarding coastal communities, the CFP has aimed to support those dependent on fishing and aquaculture by promoting sustainable practices that ensure the long-term viability of these industries. However, the ongoing pressures of climate change, market instability, land-based pollution, IUU fishing continue to impact these communities. To further support them, the NWWAC recommends **enhancing investments in infrastructure such as fleets, port activities, and marine-based aquaculture systems**, which are crucial for ensuring resilience in the face of climate change and other challenges.

When considering the interests of consumers, the CFP plays an important role in ensuring the availability of high quality and secure food supplies at while promoting responsible consumption. However, as the sector faces increased pressures, **consumer prices can fluctuate, and access to seafood may become more difficult for many families.** It is essential to continue working on **improving consumer awareness and promoting sustainable seafood choices and diversification.** A key aspect of achieving the policy’s social objectives is **addressing public perceptions of the fishing sector, which is often negatively shaped by stereotypes**, despite the sector’s significant efforts and ongoing commitment to sustainability. These perceptions influence seafood consumption and the sector’s attractiveness to workers, which in turn impacts coastal communities.





## Efficiency of the CFP Regulation

### 2. How would you rate the contribution of the following elements of the CFP Regulation to achieving its objectives?

- Contribution of **Maximum sustainable yield** on Environmental objectives, Economic objectives, Social objectives.

Although Maximum Sustainable Yield (MSY) is a valuable principle in fisheries management, it is important to recognise that **reference points can be volatile**. As many management decisions are based on these reference points, such volatility should be considered to ensure the sustainable and optimised use of fisheries resources.

#### Example:

In the case of North Western Waters demersal fisheries, which are highly dynamic, variable, and mixed in nature, ecosystem changes often result in shifts in the distribution of fish species. As well as changes in trophic relationships. Various forms of pollution undoubtedly play a major role in the decline in recruitment of several species. This adds complexity to managing these fisheries.

The NWWAC acknowledges that TACs are the most direct way of limiting fishing mortality in commercial fisheries. However, a single-species TAC management approach in mixed fisheries can be problematic, especially when TACs for bycatch species restrict fishing opportunities for target species. This issue highlights the importance of considering the implications of using FMSY (Fishing Mortality at MSY) ranges, as provided by the Western Waters Multiannual Plan (WW MAP), in a mixed fisheries context. While these ranges offer some flexibility for stocks, they may be constrained by other more limiting stocks.

#### Example:

In the Celtic Sea mixed fishery, advice for haddock has increased compared to the previous year, while the advice for cod remains at zero-catch.

In particular, this metric, derived from fisheries science, describes the level of exploitation that maximises the productivity of an exploited stock. On this basis, it is agreed by construction that the profitability of fisheries exploiting stocks at MSY level should increase (the resources required to catch the same quantity of fish being lower due to the greater abundance of stocks).

This theoretical vision can be adapted to certain fisheries exploiting a particular stock (monospecific fisheries) as long as environmental conditions remain stable. However, it is far from being a reality for mixed fisheries that exploit several species in a given biogeographical area or in degraded environmental conditions (pollution, global warming). Without considering the complex relationships between species (trophic relationships) and the different ways in which fisheries are exploited, the definition of individual management objectives for each stock seems illusory.



The NWWAC proposes adapting MSY targets to better reflect stock interactions and environmental variations, ensuring that requests from the European Commission to ICES fully incorporate an ecosystem-based approach. Additionally, all management measures, including fishing opportunities, should be supported by a comprehensive socio-economic analysis, taking into account the role of STECF in assessing the broader impacts on the sector.

Finally, the MSY is difficult for fishers to understand because it is a scientific methodology based on complex biological and mathematical models. These models involve stock assessments, recruitment rates, and environmental variables that are not always intuitive to those relying on traditional fishing knowledge. As a result, **fishers may struggle to grasp how MSY calculations determine quotas and why restrictions are necessary, especially when fish appear abundant in their daily experience.**

- Contribution of the **landing obligation** on: Environmental objectives, Economic objectives, Social objectives.

Since its introduction by the CFP, the Landing Obligation has presented various challenges for the sector. The NWWAC recommends facilitating the implementation of the Landing Obligation by ensuring effective use of exemptions, flexibilities, and other available mechanisms. The NWWAC acknowledges the importance of declaring all catches for effective stock management but highlights significant challenges in implementing the Landing Obligation. The requirement to land undersized fish contradicts the EU's responsible food policy and hampers stock survival. Additionally, the complex process of developing discard plans requires considerable human and financial resources, often with uncertain outcomes and at the expense of other pressing fisheries management issues. While the Landing Obligation initially encouraged improved selectivity, its rigid framework and the difficulties in justifying exemptions make it challenging to apply effectively. Flexibility mechanisms remain underutilised, limiting their potential to address restrictive fishing conditions. A more pragmatic and adaptive approach is needed to ensure sustainable fisheries management.

In economic and social terms, the landing obligation seems to have neglected these dimensions. This is reflected in the limited consideration given to the economic and social costs associated with the LO that industries and fishermen have to face (increased time and workload associated with processing catches that cannot be marketed, reduced time off on board vessels, reduced storage volumes allocated to marketable catches by the tonnage limits, etc.), as well as the difficulty in ensuring that the relevance of the socio-economic costs argument is recognised when assessing the de minimis exemptions. Given the challenges of renewing fleets and generations, it seems essential for the LO to take a better account of these socio-economic factors.

Additionally, consideration should be given to adapting the list of stocks covered by TACs and quotas to reduce restrictive conditions in mixed fisheries, thereby improving the practicality and sustainability of fisheries management.





In 2018, the NWWAC identified the **issue of choke species as the main obstacle to the implementation of the Landing Obligation in its remit area**. The NWWAC recognises that the existing measures in the current Discard Plan are needed and have been helpful in avoiding choke situations in the NWW. Our advice on the Joined Recommendations of the NWW Member State Group dated in June 2021 (Discard Plan and Technical Measures), in which we stipulated that **priority should be given to avoidance measures that aim at unwanted marine organisms not entering the gear in the first place, remains valid when commenting on the implementation of the Landing Obligation**.

At the same time the NWWAC recommends the **continuation of the quota-exchange pool** as mentioned in the Fishing Opportunities Regulations since 2019 **to cover unavoidable by-catches by Member States that have no quota for such stocks**. This also covers stocks with zero catch advice for which bycatch provisions are foreseen to avoid premature closures of mixed fisheries. In this respect, the NWWAC fully accepts that directed fishery on such stocks remains prohibited.

Ultimately, the NWWAC recognises that if the **choke issues** are to be resolved in the long-term, all stocks need to achieve a healthy state, as stated in our 2021 advice on "Addressing choke risk in the NWW after exemptions". An important part of this would be **to address data gaps and ensure proper monitoring**. This is crucial to demonstrate the extent to which progress has been made or highlight where progress is still lacking (e.g., in 3 the context of the new Technical Conservation Measures Framework), and to provide a sound basis for informed adjustments to address potential shortcomings in the future. In this respect, the NWWAC has previously recommended to address the objective to reach "Fully documented fisheries". It is important to recognise the role of Article 14 of the CFP, stating that, in order to facilitate the introduction of the obligation to land all catches, Member States may conduct pilot projects. These should be based on best available scientific advice and take into account the opinions of the relevant ACs, with the aim of fully exploring all practicable methods for the avoidance, minimisation and elimination of unwanted catches in a fishery. This has incentivised research on more selective fishing methods and promoted the prioritisation of measures which minimise the number of unwanted catches, ensuring survivability of fish escaping the net.

The NWWAC would like to mention the control issue relating to article 27 of the Technical Measures regulation ((EU) 2019/1241), which deals with catch composition and mesh sizes, as against the obligation to land catches stipulated in article 15 of the CFP. In particular, article 27 has to be examined in conjunction with Annex VI of the same regulation (for the North Western Waters) as it provides catch composition rules. According to these rules, if a fisher has a certain percentage of a particular species in his/her catches, he/she can use a smaller mesh size than what is allowed as the general mesh size. Article 27 makes it clear that these mesh size and catch composition rules are without prejudice to the landing obligation. Hence, a number of operational and enforcement issues arise since for fishers it is virtually impossible to comply with both these regulations. Given the relevance this issue has for our members and following the discussions held during the dedicated meeting in September 2021, the NWWAC encourages dedicated work towards a pragmatic and workable solution.

- Contribution of **Fleet capacity limits** on: Environmental objectives, Economic objectives, Social objectives.

The NWWAC highlights that the 1992 CFP reform's limitations on vessel tonnage and propulsive power are outdated, especially as they do not account for the modern challenges of vessel construction, which involves considerations of profitability, crew comfort, and the integration of environmental technologies.

Example from Belgian fisheries:

Belgian fisheries are participating in the research project Fishing Vessel of the Future, which explores alternative fuels for more sustainable fishing. A major challenge is the limited capacity of vessels to store fuels like methanol.

Additionally, fishing effort and fishing capacity should no longer be used as indicators for fishing limitations. The tonnage of a vessel, expressed in GT (gross tonnage), and its power, expressed in kW (kilowatts), as defined in Articles 4 and 5 of Council Regulation (EEC) No. 2930/86, have become outdated and obsolete with the implementation of TACs and quotas by species, stock, area, country, and vessel.

- Contribution of **the multiannual plans** on: Environmental objectives, Economic objectives, Social objectives.

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 highlights concerns about the Western Waters (WW) MAP's broad scope. The plan covers a vast area, including North Western Waters, South Western Waters, and CECAF zones around Madeira and the Canary Islands, encompassing diverse fisheries and most demersal and deep-sea stocks. **By grouping these areas under one plan, the WW MAP disregards regional distinctions** set in Article 4 of the Basic Regulation and does not differentiate between NWW and SWW stocks and fisheries. Furthermore, overlaps exist between the WW MAP and the North Sea MAP (NSMAP), with stocks like megrim and hake included in both, while others such as haddock, saithe, and anglerfish are divided between the two. The rationale behind this distribution is unclear, and for straddling stocks, it is crucial that management measures remain coherent across adjacent regions.

The NWWAC suggests that **MAPs could be more effective if they incorporated an ecosystem-based approach, considering factors beyond fishing pressure, such as climate change and pollution**. The Baltic MAP, implemented in 2016, illustrates the limitations of focusing solely on

fisheries, as stock depletion has continued despite the plan, leading to permanent fishery closures. Expanding MAPs to include ecosystem-based measures at a regional level could enhance their effectiveness in sustainable fisheries management.

Secondly, when it comes to the landing obligation regulated by the Western Waters Multi-Annual Plan (WW MAP), the NWWAC recognises that significant challenges remain, such as the risk of choke stocks. The plan has proven too rigid in some aspects, as the list of targeted stocks (Art. 1.1) has not been updated, despite environmental changes like warming seas affecting stock distribution (e.g., Cod VII). Additionally, the WW MAP is not fully implemented, as ICES has not been asked to assess conditions under which Article 4.5 (a) and (b) could apply.

The NWWAC advises strengthening multiannual management plans as a key instrument for implementing the CFP, ensuring that an ecosystem-based approach is effectively applied while also addressing economic and social considerations. Additionally, the principle of regionalisation should be adapted to enhance the governance of these plans, ensuring meaningful participation from the fisheries sector and civil society at an appropriate scale.

- Contribution of **regional cooperation on conservation measures via joint recommendations by the Member States** on: Environmental objectives, Economic objectives, Social objectives.

The lack of flexibility in the legal framework at the EU, regional, and national levels can hinder adaptation to evolving challenges such as climate change, Brexit, and international crises. The NWWAC calls on the CFP to **enhance regionalisation efforts while ensuring cohesive policy implementation**, as this could help bridge above gaps. Additionally, challenges in implementing regionalised fisheries measures to meet environmental obligations must be addressed through improved coordination and stakeholder engagement.

The NWWAC understands that the Habitats Directive does not have provisions requiring public consultation on the designation of Natura 2000 sites. However, the Commission has also underlined in its 2022 Staff Working Document on Criteria and Guidance for Protected Areas Designations ([link](#)) that Member States should involve all relevant stakeholders, including sea users, local communities and NGOs in the identification, designation and management of new protected areas, in a fair and participatory way, in line with the Aarhus Convention and in accordance with national procedures. Unfortunately, in various Member States there seems to be little to no stakeholder participation or consultation as part of the designation process and no transparency on the site selection and delineation. The only option available to stakeholders for input is to lodge an objection which is counter-productive to a joint up approach that builds trust and support from stakeholders for the implementation of these measures. In addition, regional cooperation regarding implantation of these measures seems to be completely absent.

- Contribution of **adopting conservation measures necessary for compliance with obligations under EU environmental legislation** on: Environmental objectives, Economic objectives, Social objectives.

The CFP Regulation has improved fisheries management by promoting science-based decisions and long-term fish stock conservation. Through Total Allowable Catches (TACs) and ecosystem-based strategies, it has helped combat overfishing and support sustainability. However, the NWWAC highlights shortcomings in its effectiveness. (Please see above bullet point)

- Contribution of **adopting Commission (conservation) measures in case of a serious threat to marine biological resources** on: Environmental objectives, Economic objectives, Social objectives.

The CFP Regulation has improved fisheries management by promoting science-based decisions and long-term fish stock conservation. Through Total Allowable Catches (TACs) and ecosystem-based strategies, it has helped combat IUU fishing and support sustainability. However, the NWWAC highlights shortcomings in its effectiveness.

- Contribution of **Member State emergency measures** on: Environmental objectives, Economic objectives, Social objectives.

Member State emergency measures have played a crucial role in supporting fishing enterprises amid challenges posed by the COVID-19 pandemic and the consequences of the Russia-Ukraine war. From an economic perspective, these measures provided essential financial aid to mitigate revenue losses, stabilise the sector, and ensure business continuity during periods of market disruption and rising operational costs. On a social level, they helped sustain coastal communities by limiting damages in for one's jobs and livelihoods, preventing further socio-economic decline in regions heavily dependent on fisheries.

Overall, these emergency measures have been instrumental in maintaining the resilience of the fishing sector in the face of unprecedented crises.

- Contribution of **professional organisations, incl. producer organisations** on: Environmental objectives, Economic objectives, Social objectives.

NWWAC members have continually contributed and will continue their work supporting the implementation and reaching of environmental, economic and social objectives. Their work on for example improving selectivity at sea, support of the establishment of closure areas, data collection and advocating for fully documented fisheries in an ecosystem-based management approach have contributed to the recovery of stocks in the North-East Atlantic to the current level where the majority of stock are fished at MSY. Producer organisations (PO) as members of the Advisory Council are an invaluable tool for the inclusion of all vessels and fishers in the continued improvement of the sector's sustainability. Additionally, it is fundamental to maintain and

strengthen POs as they create a sense of community within coastal communities, and support a joined-up approach regarding the implementation of measures.

- Contribution of **allocation of fishing opportunities** on: Environmental objectives, Economic objectives, Social objectives.

Following the answer provided in the section 1c of this document, the NWWAC would also like to highlight that the impact of Brexit has inevitably altered the dynamics of achieving sustainable fisheries. EU-UK bilateral consultations now play a crucial role in determining Fishing Opportunities for the 75 shared fish stocks, the majority of which are in the NWW. While the NWWAC acknowledges and welcomes the significant long-term progress made toward more sustainable EU fisheries, particularly in the Northeast Atlantic, it also recognises that the post-Brexit landscape presents both new perspectives and major challenges that cannot be overlooked.

- Contribution of **Sustainable Fisheries Partnership Agreements** on: Environmental objectives, Economic objectives, Social objectives.

N/A – not part of the remit of the NWWAC

- Contribution of the **international and regional Fisheries management agreements** on: Environmental objectives, Economic objectives, Social objectives.

N/A – not part of the remit of the NWWAC

- Contribution of the **management of stocks shared with third countries** on: Environmental objectives, Economic objectives, Social objectives.

As a consequence of Brexit, the dynamics in terms of achieving sustainable fishing have inevitably changed. EU-UK bilateral consultations have become a key step towards setting Fishing Opportunities for the 75 shared fish stocks, the majority of which are in the NWW. These negotiations introduce additional complexities, as they require balancing sustainability goals with economic and political interests on both sides. Differences in management approaches, quota allocations, and stock assessments between the EU and the UK have led to uncertainties that can impact stock conservation efforts and fishing communities. Therefore, while the NWWAC recognises and welcomes the long-term progress made overall towards more sustainable EU fisheries, specifically in the North East Atlantic, it also considers that the post-Brexit landscape is bringing new perspectives and great challenges to sustainable EU fisheries, which cannot be ignored. Addressing these challenges requires enhanced cooperation, transparency, and adaptive management to ensure that sustainability objectives remain at the forefront of EU-UK fisheries governance.



- Contribution of the **Commission strategic guidelines and Member States’ multi-annual national strategic plans on aquaculture** on: Environmental objectives, Economic objectives, Social objectives.

N/A – under the remit of the Aquaculture Advisory Council

- Contribution of the **open method of coordination of Member States on aquaculture** on: Environmental objectives, Economic objectives, Social objectives.

N/A - under the remit of the Aquaculture Advisory Council

- Contribution of the **marketing standards** on: Environmental objectives, Economic objectives, Social objectives.

N/A – under the remit of the Market Advisory Council

- Contribution of **consumer information/ labelling rules** on: Environmental objectives, Economic objectives, Social objectives.

N/A – under the remit of the Market Advisory Council





## Governance

### 3. How effective is the governance system of the CFP Regulation towards reaching environmental, social or economic sustainability?

The governance system of the CFP plays a crucial role in achieving sustainability, but its effectiveness in reaching this goal is mixed. While the CFP is based on strong objectives and principles, some elements require amendments to ensure proper implementation. The focus should shift towards prioritising objectives over management tools, allowing for greater flexibility and adaptability. **Expertise from those directly involved in the industry should be leveraged more effectively to support the policy's success, and the North Western Waters Advisory Council (NWWAC) stands ready to contribute in this regard.**

Since its last reform a decade ago, the context in which the CFP operates has changed significantly due to factors such as climate change, Brexit, and global crises like the COVID-19 pandemic and the Ukraine crisis. These **challenges have introduced new pressures on fisheries management, requiring a governance system that can respond effectively to evolving conditions.** While progress has been made in improving stock management and reducing overfishing, external disruptions and shifting economic and environmental conditions demand a more adaptable approach.

The CFP must balance the need for sustainability with the economic stability of fishing communities, ensuring that conservation efforts do not come at the cost of livelihoods. Rising fuel prices, market uncertainties, and geopolitical disruptions have placed additional strain on the sector, making it essential for the policy to be flexible and resilient. The current governance framework should be reviewed to determine whether it is fit for purpose in addressing these evolving challenges. Moreover, **while the CFP provides a solid foundation, its governance system needs to evolve to remain effective in today's rapidly changing landscape. A stronger emphasis on adaptability, stakeholder involvement, and objective-driven policymaking will be key to ensuring long-term sustainability.**

Ultimately, the **interconnection between the Oceans Pact and the CFP should be clarified by the Commission.** It must ensure that the CFP evolves in response to scientific evidence and socio-economic realities, ensuring sustainable fisheries while maintaining the competitiveness of EU fleets. Flexibility should be built into the CFP to accommodate emerging challenges such as climate-induced stock shifts and technological advancements. A balanced approach is needed to align conservation objectives with the socio-economic well-being of fisheries-dependent regions and food security. The NWWAC will expand on the CFP in the framework of the consultation specific on the issue.



#### **4. How effective is the CFP Regulation's governance system in achieving the following:**

In collecting scientific advice; In using scientific advice to inform its policy decisions; In involving stakeholders at all stages of the policy-making process; In empowering stakeholders through professional organisations, in particular producer organisations, to implement the CFP; In managing EU fish stocks in a sustainable way; In managing shared fish stocks in a sustainable way; In managing fish stocks at international level in a sustainable way contributing to international ocean governance; In contributing to healthy marine ecosystems (protecting young fish, the seabed, Natura 2000 sites and other marine protected areas, sensitive species such as marine mammals and seabirds); In providing sufficient flexibility to adapt to regional differences: in the European sea basins (Baltic Sea, North Sea, North Western Waters, South Western Waters, Mediterranean Sea, Black Sea); In ensuring transparency in decision making?

#### **Effective governance of the CFP relies on continuous engagement with stakeholders, ensuring that decision-making is informed by scientific advice and remains transparent.**

Advisory Councils play a key role in this process, acting as a bridge between fisheries stakeholders and policymakers by providing balanced, consensus-driven advice. Given their diverse composition—spanning the entire fisheries and aquaculture value chain as well as environmental and other interest groups—ACs are uniquely positioned to facilitate meaningful dialogue and cooperation. To optimise the efficiency of the consultation process, close communication between ACs, the European Commission, and Regional Member State Groups is essential.

**A well-structured advice feedback procedure is critical to maintaining stakeholder engagement. This would ensure that recommendations from ACs are acknowledged and considered in policy decisions, providing transparency on how stakeholder input influences final legislative measures.** While the Commission has improved its responsiveness to ACs, further efforts are needed to provide detailed feedback when final decisions diverge from AC recommendations, as required by Article 44(4) of the CFP. Without clear visibility on the impact of their contributions, stakeholder participation risks declining, undermining the regionalisation principle that underpins the CFP.

**In the context of post-Brexit fisheries governance, ACs must continue to be actively involved in the Specialised Committee on Fisheries (SCF) to ensure that stakeholder perspectives shape ongoing EU-UK fisheries management measures. The presence of Commission representatives at AC meetings remains vital, both for providing updates on regulatory developments and for fostering constructive dialogue with stakeholders.**

Secondly, **scientific advice is fundamental to sustainable fisheries management, yet gaps in data availability for certain stocks hinder effective stock assessments and management decisions.**

The NWWAC has specifically identified the following stocks in need of enhanced assessment and integration of all available data:

- Sole 7 h-k
- Whiting 7 b-c, e-k
- Plaice 7fg
- Lemon Sole 3a, 4, 7d.

The ICES Advisory Plan on quality assurance (2019) should be fully implemented to enhance the reliability of scientific advice, alongside the full implementation of the Data Collection



Framework to improve the availability of critical data. Furthermore, fisheries management must adopt a holistic, ecosystem-based approach, incorporating climate change impacts and socio-economic factors into decision-making. This transition should be supported through effective use of EMFAF funding and other financial instruments. Finally, **collaboration between fishers and scientists has proven to be an effective strategy for improving data collection and developing innovative management solutions.**

The NWWAC noted that the current Category 5 and 6 assessments are inappropriate for providing catch advice as they are based on very limited catch data that do not reflect accurately the actual state of the stocks. We would contend these current assessments are not fit for purpose in providing catch advice. We have therefore recommended in our recent advice on fishing opportunities that ICES adopts a phased approach to upgrading these assessments, moving Category 5 and 6 stocks toward Category 3 and, ultimately, Category 1. This transition would result in more reliable stock estimates, providing a stronger foundation for fisheries management. The AC recognises the methodological challenges and resource demands involved in shifting assessments to different categories within the ICES framework. However, members view it as essential to prioritise stocks that present urgent challenges to the industry and to enhance the assessment process by integrating all available scientific data. This approach would ensure that ICES advice is both comprehensive and resilient, thereby supporting sustainable fisheries management across the region.<sup>3</sup>

#### **5. To what extent has legal enforcement action at EU level (EU Pilots and infringements) contributed to ensuring compliance with the CFP Regulation?**

Legal enforcement actions at the EU level, including EU Pilots and infringement procedures, have been essential in ensuring compliance with the CFP Regulation. However, there is a **need for greater harmonisation among EU Member States in how these measures are implemented.** Differences in enforcement approaches and capacities across Member States can lead to inconsistencies in compliance, creating an uneven playing field for the fishing sector. A more coordinated and standardised enforcement framework would strengthen the effectiveness of the CFP, ensuring that conservation measures, Total Allowable Catches (TACs), and ecosystem-based management are uniformly applied.

**Greater harmonisation would also improve transparency and stakeholder confidence,** ensuring that enforcement actions contribute effectively to the long-term sustainability of fisheries and marine ecosystems while balancing economic and social objectives. **Additionally, control and compliance measures should be equally applied to third countries and imports to guarantee a level playing field.** In the context of European food security, the CFP should support the fisheries sector by recognising their sustainable products rather than allowing unsustainable or less sustainable imports to undermine EU products through unequal controls.

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<sup>3</sup> NWWAC Advice on stocks to prioritise for benchmark workshops by ICES ([link](#))



## Effectiveness and Efficiency

### **6. How would you rate the following elements that could challenge the successfulness of the CFP Regulation (i.e. achieving objectives)?**

Complexity of CFP legal requirements; Inconsistent or lack of control and enforcement; Lack of flexibility of the legal framework at EU level; Lack of flexibility of the legal framework at regional sea-basin level; Lack of flexibility of the legal framework at national level; Difficulties in implementing new technology and innovation to meet CFP objectives; Deviation from scientific advice when adopting fisheries conservation measures; Challenges in implementing regionalisation for fisheries measures to contribute to environmental obligations; Exemptions to the landing obligation; Lack of attractiveness of the sector: for workers; Lack of attractiveness of the sector for fishers and aquaculture producers; Lack of attractiveness of the sector: for investors; Unfair competition; Regional disparities within the EU

After thoroughly discussing each of the points mentioned above, the NWWAC has concluded that all of them should be considered equally important. This decision is based on the understanding that these issues are not isolated but rather interconnected, influencing one another in various ways. Addressing one aspect without considering the others could lead to an incomplete or ineffective approach. By treating all these elements with equal importance, the CFP can pursue a holistic and integrated approach, ensuring that management strategies are both comprehensive and effective in the long term. This perspective acknowledges the complexity of the ecosystem and the necessity of a balanced and well-informed decision-making process.

Concerning the challenges in implementing regionalisation, the NWWAC recommends repositioning regionalisation within a framework of robust regulatory proposals, particularly in relation to multiannual management plans. Advisory Councils should be supported in strengthening their connections with Member State Groups, the European Commission, and their potential contribution to the Specialised Committee on Fisheries (SCF) should be investigated. Additionally, resources should be adjusted to enable independent expert assessments by regional groups and Advisory Councils. To enhance the quality of scientific analysis, the functioning of the Scientific, Technical and Economic Committee for Fisheries (STECF) should also be adapted and funded to a greater extent to ensure increased participation and representation across the Member States as well as a more multidisciplinary approach.

### **7a. To what extent do you consider the compliance costs generated by the CFP Regulation, including administrative burden, as Compliance cost (all direct cost) in the catching sector; Administrative burden (reporting obligations, registration, labelling etc.) in the catching sector.**

The compliance costs generated by the CFP Regulation, including both direct costs in the catching sector and administrative burdens such as reporting obligations, registration, and labelling, represent a significant challenge for fishers. These costs can create a heavy financial and operational burden, especially for small and medium-sized enterprises in the sector.



To address this, the NWWAC emphasises the importance of simplifying the delivery mechanism for financial instruments like the European Maritime, Fisheries and Aquaculture Fund (EMFAF). Simplifying the administrative processes would reduce the compliance burden and make the funding more accessible and efficient. This is critical for fostering investment in sustainable practices, as fishers face a high level of uncertainty regarding the future of their activity. Leveraging the EMFAF to support the implementation of CFP objectives is and should remain central to any future development of the CFP. The level of funding provided within the EMFAF is significant, but it is evident that additional funding will be required to assist the fishing industry adapt to the effects of climate change and to decarbonise fishing as well as the increased competition for space that is likely to displace fishermen from traditional fishing grounds or require adaptation of fishing gears and methods to continue fishing. Recognition of these issues and an evaluation of the level of finance that may be required would be important in the context of the evaluation.

**7b. According to your view, which areas of the CFP Regulation have potential for simplification and cost reduction?**

Measures for the conservation and sustainable exploitation of marine biological resources, Common market organisation, Aquaculture, Control and enforcement, Governance, External policy

The lack of visibility around future regulations and market conditions does not encourage the sector to invest in necessary innovations. **Without clear and stable support, fishers may be reluctant to invest in technologies and practices that improve sustainability.** Public support through EMFAF and other financial mechanisms is therefore essential in providing fishers with the confidence and resources to embrace innovation, adopt more sustainable practices, and contribute to the long-term goals of the CFP. **By reducing the administrative burden and improving the clarity and accessibility of public funding, the sector can be better supported in making the necessary transitions to more sustainable fishing practices while maintaining its economic viability.**

As expressed and advice in previous sections, according to the NWWAC, the CFP Regulation has significant potential for simplification and cost reduction, particularly in the areas of conservation and sustainable exploitation measures as well as control and enforcement mechanisms, without compromising sustainability objectives.



## Relevance of the CFP Regulation

### 9. To what extent do you agree that the objectives of the CFP Regulation have remained relevant over the past 10 years / implementation period?

Fostering “Long-term environmental sustainability of fishing and aquaculture activities”; Ensuring “Economic benefits” Ensuring “Social and employment benefits”; Contributing to the availability of food supplies; Pursue the objectives at international level; Are there specific needs missing in your opinion, that are not sufficiently addressed in the current CFP Regulation and its objectives, if so, which?

**The objectives of the CFP Regulation have remained relevant over the past 10 years, but adaptations are needed to address emerging challenges.** The framework must evolve to tackle new challenges, ensuring the sustainability of the sector and its broader goals. (See answer provided to question n.3). The regulation has successfully promoted long-term environmental sustainability through science-based decision-making, TACs, and ecosystem-based management. However, additional efforts are required to fully address climate change, pollution, and other pressures on marine ecosystems. While the CFP has supported economic and social benefits, more is needed to attract younger fishers, including improved working conditions and the integration of modern technologies. The regulation has contributed to food security by promoting sustainable fishing, but balancing environmental sustainability with economic needs is crucial for long-term viability. At the international level, the CFP has supported global sustainability efforts but requires stronger enforcement, where also non-EU countries need to align with regional and international strategies.

### 10. To what extent do you consider that the following challenges, raised in different stakeholder fora or recommendations, are sufficiently addressed today by the CFP Regulation

Brexit and its effect on the implementation; Governance of commonly shared or managed stocks; Impact of climate change / mitigation and adaptation (e.g. stock migration, natural disasters, invasive species, acidification, heatwaves); Impact of biodiversity loss including loss of ecosystem services; Pollution, including eutrophication of waters leading to oxygen-deprived marine areas (‘dead zones’); Unstable geopolitical context; International competition (eg. economic, market, technological, access to resources); Inflation and rising operational costs including energy costs; Investment capacity, including for the energy transition and modernisation of vessels and equipment; Unstable markets and price volatility; Digital transition; Behavioural changes and shift in consumption patterns; Labour shortage.

Brexit has introduced significant challenges in achieving the objectives of the CFP, particularly concerning the management of jointly managed stocks. The need for more complex decision-making and coordination with non-EU countries, especially in the post-Brexit context, makes overcoming obstacles to sustainable management even more critical. To ensure the EU meets its CFP commitments, stable collaboration with the UK is essential, and this must be rooted in shared sustainability principles and science-based decision-making. At the same time, it is crucial to avoid a situation of political polarisation where new rules and marine spatial planning are used under the argument of sustainability to justify restrictions on access. Ensuring meaningful stakeholder participation and integrating industry knowledge in decision-making





processes are essential to prevent such situations and promote balanced, science-based management. The NWWAC recommends fostering a level playing field between EU and UK industries, ensuring both adhere to high standards for sustainable resource exploitation.

Brexit has reshaped fisheries management in the NWW, necessitating the creation of new rules that reflect the changed relationship with the UK. Stakeholder participation will continue to be vital in shaping management and governance structures, and the NWWAC insists that engagement remains central to future EU-UK collaborations. The NWWAC is ready to contribute to the Specialised Committee on Fisheries and engage in bilateral meetings to ensure continued stakeholder input in decision-making.

The growing pressures on marine space, driven by expanding sectors such as offshore energy, aquaculture, nature restoration, and sea-based tourism, present new challenges for fisheries. The development of offshore renewable energy, crucial for climate neutrality, must be carefully managed to avoid conflict with fisheries and other marine activities. Environmental concerns related to offshore energy require further research, and the NWWAC recommends strengthening the link between fisheries regulations and environmental legislation, adopting a more integrated approach to policy and research. Effective stakeholder engagement is essential for ensuring that marine spatial planning (MSP) addresses the socio-economic, ecological, and political contexts, while also balancing the goals of the Blue Economy with the preservation of marine resources.

The NWWAC calls for coherence between the Blue Economy and other governance frameworks, particularly those addressing international ocean governance, climate, and biodiversity. The Commission and Member States must ensure that environmental impacts from Blue Economy activities do not exacerbate climate change effects on marine ecosystems or undermine fisheries. A coordinated approach that includes the weight of each economic activity in environmental impact assessments is essential. Furthermore, to ensure fair competition, the NWWAC stresses the importance of ratifying and implementing international legal instruments and conventions to maintain a level playing field between the EU and third countries. For this reason, the NWWAC welcomed the opportunity to provide advice to the European Commission on key aspects of the European Oceans Pact, focusing on the sustainable management of fisheries. In light of pressing environmental and socio-economic challenges, the NWWAC highlighted in its advice specific recommendations to ensure that the Oceans Pact delivers effective and balanced outcomes for marine ecosystems, fisheries, and coastal communities.

#### **11. To what extent are the objectives of the current CFP Regulation coherent with the following policies?**

##### **a. In relation to other EU fisheries law:**

Control and monitoring; Fight against Illegal unreported and unregulated fishing; Rules on the external fleet; Scientific data collection.

The NWWAC calls for coherence between the CFP and other EU fisheries law and a coordinated approach that provides a level playing field, which ensures the collection of best available data

with the inclusion of stakeholders. On 05 February 2025, the North Western Waters Advisory Council (NWWAC) organised a joint workshop on the implementation of the revised Control Regulation, involving seven additional ACs. Following this workshop, the NWWAC is currently developing advice on this topic which will be submitted to the Commission in April 2025.

#### **b. In relation to other EU policies and laws:**

Habitats and Birds Directives; Nature restoration law; Water Framework Directive; Marine Strategy Framework Directive; Marine and inland waters; Maritime spatial planning; EU biodiversity strategy; Food loss and waste prevention; Food safety and Health; Common Agricultural Policy; Working conditions and labour standards.

The NWWAC calls for coherence between the CFP and other EU law impacting on and related to the seafood sector. A coordinated approach is essential for providing inclusivity and recognising the importance of the seafood sector's contribution to food security, cultural heritage, and keeping the social fabric of coastal community alive.

Both the European Commission and the Member States must put mechanisms in place ensuring that direct and indirect cumulative environmental effects of activities of the Blue Economy do not add to the pressure from climate change on the ocean or adversely impact one specific sector, for example fisheries, aquaculture, their value chains, and the onshore activities. A coordinated approach and standards to include in the environmental impact assessments the relative weight of each human induced economic activity in the marine environment is desirable.

It is vital to **ensure a level playing field between all actors of the Blue Economy** and implement both the same approaches – notably in respect of upholding sustainability principles – and levels of requirements, obligations, accountability and transparency across all sectors.

To effectively manage EU fisheries, a flexible, adaptive, well-informed and well-enforced management is needed, with incentives provided for innovations to cope with changing conditions, while also reducing the dependency of the fish catching industry on fossil fuels. In this regard, the NWWAC was pleased to read in the Commission's Communication "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 December 2023] that "To enhance the fishing fleet's use of new technologies and considering that some of them are heavier and require more space than the traditional ones, reflections are also needed regarding the volume on board, which is also an important parameter for improving safety and working conditions". Vessel gross tonnage is poorly suited to the economic, social, technical and environmental challenges that arise for the construction of today's vessels (including purposes of seeking better profitability, better crew safety & comfort and installation of technologies that minimise the sector's environmental footprint). A detailed NWWAC view on this topic was provided in the dedicated advice on the Communication on the Energy Transition COM(2023) 100 final ([link](#)).

The NWWAC reiterates that the maritime space is used by many different sectors and subject to various anthropogenic impacts (climate change, submarine cables, aggregate extraction,



dredging-immersion, concrete coastline, pollution, land-based pollution, recreational fishing, etc.). Therefore, **it is essential to ensure the application of a holistic approach to marine ecosystems management, taking into consideration all sources of disturbance to the environment and/or species.**

Example from Belgian fisheries:

Belgian examples on how the Belgian fleet also participates in initiatives to have a positive impact: At the same time, the fisheries sector also contributes to nature restoration efforts; for example, the Belgian fishing fleet participates in Belreefs to restore oyster beds and engages in Fishing for Litter to remove waste from the sea. Strengthening collaboration between the various marine sectors is crucial to achieving effective ecosystem management.

As a final remark, the NWWAC believes it is essential to consider the possible cumulative effects resulting from all policies addressing the marine environment and how these will impact the activity of the fishing sector and its profitability. For this reason, **the NWWAC agrees that it is important that the Commission addresses specific elements of the CFP and reviews these, in order to consider a different approach if needed, in collaboration with Member States, Advisory Councils and other stakeholders.**

**Pollution from land must also be integrated into an analysis of the pressures on sensitive habitats and species.** Land-based pollution of industrial, domestic or agricultural origin is introduced into the sea via waterways, either in a diffuse manner or in the form of large spills. Their impacts are poorly known, but achieving good ecological status of inland waters is a requirement for limiting these pressures. The European Environment Agency shows that 60% of these waters are still not in a good state and that the Water Directive has so far only allowed a relative improvement on this subject.

**c. In relation to international action:**

Synergy with development policy and recognition of developing countries' needs; Sustainable and fair trade; Protection of biodiversity; Promoting international ocean governance; On climate change; UN Agreement on Marine Biodiversity of Areas beyond national jurisdiction; UN Sustainable Development Goals; FAO Code of Conduct for Responsible Fisheries and FAO Guidelines for Sustainable Aquaculture.

To achieve a level playing field among Blue Economy operators and ensure compliance with international standards, the EU should strengthen the application and coordination of ex-ante and ex-post assessments of Blue Economy projects and strategies including environmental, social and economic impact assessments. The Common Fisheries Policy (CFP), which dates back to 2013, must be aligned with global processes to ensure a level playing field between EU and third-country operators. Since its adoption, significant milestones such as the Biodiversity Beyond National Jurisdiction (BBNJ) Agreement and the Global Biodiversity Framework (GBF) have been established, reshaping the global governance landscape for marine conservation and sustainable use. A coherent approach across international agreements is essential to maintaining competitiveness while upholding high environmental and social standards. NWWAC



believes that balancing conservation objectives with sustainable human activities is key to fostering resilience in both ecosystems and communities. Without this integration, conservation efforts risk failing to deliver their intended outcomes. Therefore, reassessing EU ocean-related policies to better account for the human dimension would contribute to achieving a balanced approach that supports both ecological and societal well-being. By aligning conservation goals with sustainable development priorities, marine resources can be safeguarded while ensuring the livelihoods of those who depend on them.

To achieve this, consistency must be ensured within both global and EU frameworks, including the GBF and the BBNJ Agreement. These initiatives provide a crucial foundation for reducing environmental threats while addressing human needs within planetary boundaries. The integration of these frameworks into EU decision-making, including the Ocean Pact, will help build a cohesive strategy that balances conservation with sustainable use. In addition, aquatic products play a vital role in achieving the Sustainable Development Goals (SDGs), offering nutritious, low-carbon food while supporting coastal communities. Recognising their contribution within global and EU frameworks will be essential for a fair and effective transition towards sustainable food systems.

**Have you any further comments on these questions? Or was there a topic regarding the CFP not yet covered?** N/A

– END –