



Ms. Charlina Vitcheva
Directorate-General for Maritime Affairs and Fisheries
European Commission
Rue Joseph II, 99B-1000
Brussels, Belgium

Dun Laoghaire, 30 October 2025

Dear Ms Vitcheva,
Dear Energy Transition Partnership Assistance Mechanism,

Subject: NWWAC contribution to the Energy Transition Partnership Document integrating Advisory Councils' Recommendations

The North Western Waters Advisory Council (NWWAC) wishes to express its appreciation for the valuable work undertaken by the Energy Transition Partnership (ETP) in developing a roadmap towards the energy transition of the fisheries and aquaculture sectors. The NWWAC welcomes the consideration given to its advice on the Energy Transition Partnership for EU Fisheries and Aquaculture¹, submitted on 19 June 2025, to contribute to the preparation of the ETP roadmap and acknowledges the Commission response received on 17 September 2025². Furthermore, the NWWAC takes note of the summary document prepared by the ETP Assistance Mechanism, compiling the recommendations provided by the various Advisory Councils (ACs) and shared by email on 24 June 2025. The NWWAC appreciates that this summary was presented and discussed during the webinar with the ACs on 14 July 2025, which served as an opportunity to gather additional input on the recommendations already submitted.

With reference to the ETP Assistance Mechanism's request for additional contributions from the ACs by the deadline of 31 October 2025, the NWWAC would like to reiterate those recommendations which, in its view, are not yet fully reflected in the current ETP paper compiling ACs' recommendations. For your information, you can find as an attachment to this letter the NWWAC's previously adopted and submitted advice of 19 June 2025.

- **Ensure regulatory visibility for investment confidence:** The NWWAC also points out the need for clear and stable regulatory visibility to build investment confidence in the Fisheries sector and their energy transition. Significant investments in new technologies and fleet modernisation require a predictable, transparent, and long-term policy framework that reduces financial risks and supports planning. Without regulatory clarity and commitment, investor uncertainty grows, slowing the adoption of low-carbon solutions. Ensuring consistent regulations that protect early adopters and align with climate goals is essential to unlock the funding and innovation needed for a resilient, competitive, and sustainable EU fishing fleet.
- **Adapt the CFP for flexibility and coherence:** Adaptability of the regulatory framework is essential to support the decarbonisation and modernisation of the fishing sector, especially as technologies and environmental challenges continue to evolve. While the Common Fisheries Policy (CFP) offers a solid foundation, its governance system must become more responsive

¹ [NWWAC advice on the Energy Transition Partnership for EU Fisheries and Aquaculture](#)

² [Commission response to NWWAC advice on the Energy Transition Partnership for EU Fisheries and Aquaculture](#)





and forward-looking. It is important to note that the current Technical Measures Regulation does not allow for innovations to be used. Prioritising the revision of CFP regulations to incorporate greater flexibility, stronger stakeholder engagement, and objective-driven policymaking will allow the sector to adopt innovative solutions, reduce emissions, and remain competitive. Moreover, ensuring coherence with broader EU policies on energy efficiency – for example the FuelEU Maritime framework, maritime transport decarbonisation strategies or similar regulatory structure – is crucial. Aligning fisheries governance with these frameworks will strengthen the sector's contribution to the EU's environmental goals and ensure access to relevant funding and support measures.

- **Revision of capacity limits to enable decarbonisation:** The NWWAC recalls that regulatory constraints to the energy transition of EU fishing vessels also remains. The Common Fisheries Policy imposes limitations on the tonnage and power of EU vessels (capacity limit). It is a shared opinion among fishing professionals that vessel tonnage capacity, as currently defined and regulated, is poorly suited to the energy transition challenge, particularly because the installation of alternative propulsion systems and energy-efficient technologies such as hybrid engines, batteries, hydrogen storage, or methanol tanks require additional space and structural adaptations. These innovations often lead to increased vessel volume and weight, even when fishing capacity remains unchanged and they minimise the sector's environmental footprint. The framework for the capacities of fishing vessels as provided for by Regulation (EU) 1380/2013 is no longer adapted to today's technical, environmental and economic challenges. By freezing vessel structure through outdated technical criteria, the current capacity limits block meaningful adaptation – preventing vessels from becoming safer, cleaner, and more energy-efficient. The regulation inadvertently penalises those who aim to modernise and decarbonise. It is therefore imperative to review and amend the regulatory framework to reflect the realities of today and to remove administrative barriers to innovation and the implementation of new energy technologies. This revision should explicitly accommodate the space, energy, and weight requirements of new energy technologies including hybridisation, methanol, ammonia, and H₂. It should also consider the broader structural improvements needed for enhanced ship safety, operational stability, and the well-being of crews. Such adaptations are critical not only for improving energy performance, but also for boosting the attractiveness of the sector and supporting generational renewal and getting aligned with the EU's broader climate and sustainability goals. Furthermore, greater flexibility in vessel design is essential to ensure long-term food security and sovereignty, by future-proofing the fleet in a rapidly changing climate and market environment. As mentioned during the consultation on the evaluation of the CFP, social and economic aspects such as crew accommodation, onboard safety, working conditions, and sufficient storage capacity should not be treated as secondary – but as core considerations in vessel design and regulation.
- **Further support innovation in vessel and gear design:** The fisheries sector has made and continues to make significant efforts in improving vessel design and gear design in relation to reducing direct effects on the seabed. Alleviating the physical contact between the gear and the seabed is certainly going to reduce fuel consumption, which contributes both to lower emissions and more cost-efficient operations for fishers. However, these developments require significant financial investments in research, testing, and retrofitting. If the sector is to maintain





momentum in gear innovation and vessel optimisation, continued and enhanced support through targeted funding, regulatory flexibility, and knowledge-sharing frameworks is essential.

- **Integration of artificial intelligence (AI):** Artificial intelligence (AI) within the fisheries sector should be further developed and implemented, as it has the potential to significantly support the fisheries sector by easing the demanding nature of fishers' daily work while promoting energy efficiency and decarbonisation. Through smart technologies such as predictive analytics for weather and fish stock movements, AI can help optimise fishing routes, reducing fuel use and lowering emissions. Automated monitoring systems and onboard decision-support tools can also enhance safety, reduce manual tasks, and support compliance with sustainability regulations. By embracing AI-driven innovations, the sector can modernise operations, improve livelihoods, and contribute to a more resilient and environmentally responsible future for fisheries. To implement the use of this, adequate training and development of skills is essential. However, it is important to note that AI is still in early stages of development for application on fishing vessels and has yet to be widely implemented in operational contexts. These systems require substantial training using relevant fisheries data, and questions remain around their energy consumption and data storage needs on board. While AI might ease the daily workload of fishers, it is not a replacement for human decision-making. Effective use of AI systems still relies on the fishers themselves, who must interpret and act on AI-generated insights. To implement the use of this, comprehensive support, including investment in user-friendly technologies, and adequate training and development of digital skills, is essential to ensure meaningful integration and long-term success.
- **Improving refrigeration and cold chain efficiency:** Regarding the promotion of energy-efficient on-board refrigeration technologies and cold chain logistics, the NWWAC notes that to lower the carbon footprint of processed seafood, fishing vessels could adopt energy-efficient on-board refrigeration technologies such as variable speed compressors, advanced insulation materials, and solar-assisted cooling systems. These innovations significantly reduce fuel consumption while maintaining product quality. In parallel, optimising cold chain logistics – from landing ports to processing facilities – through real-time temperature monitoring, smart routing, and AI-based demand forecasting minimise spoilage, reduce energy use during transport, and streamline distribution. While such innovations may ultimately lead to reduced operational costs and lower fuel consumption, the initial implementation requires serious upfront investment. Given the average age of the European fishing fleet, many vessels are not equipped to accommodate new systems without major modifications. For small- and medium-sized enterprises, these costs can be prohibitive without targeted financial support, grant schemes, or incentives. Supporting these investments is crucial to ensure that energy-efficient practices become accessible and scalable across the sector, both across small and large-scale fisheries.
- **Share common goals in term of energy efficiency with non-EU countries importing in EU:** Furthermore, as the European fishing sector advances towards greater energy efficiency and decarbonisation, the NWWAC believes it is essential that in the future imported fish products are held to shared goals in terms of energy transition. Common goals would help prevent unfair competition from products originating in regions with lower environmental obligations, protecting both EU fishers and the integrity of sustainability efforts. This would also encourage





global improvements in fishing practices and contribute to reducing the overall carbon footprint of the seafood supply chain. In parallel, educating consumers about the comparatively lower carbon footprint of seafood – particularly in relation to other animal-based proteins – will further support responsible markets and reinforce the EU's leadership in climate-conscious and ethical food production.

- **Build trust and engagement for a resilient fisheries sector:** In conclusion, in the context of decarbonisation, modernisation, and evolving marine policies, strengthening trust among fishing operators is fundamental. The NWWAC believes that clear communication, transparency in decision-making, and inclusive stakeholder engagement are key to ensuring that fishers feel heard, respected, and actively involved in shaping the future of their sector. Trust fosters collaboration, encourages the uptake of new technologies and practices, and reduces resistance to change. Building a culture of collaboration – between fishers, policymakers, scientists, and industry partners – is essential to deliver effective, fair, and lasting solutions for a sustainable and resilient fisheries sector

The NWWAC remains fully committed to contributing constructively to the Energy Transition Partnership and stands ready to provide any additional clarification or input that may support the completion of this important work.

Yours sincerely,

Alexandra Philippe
NWWAC Chair

