

Targeted consultation on the 2022 Report on the Functioning of the Common Fisheries Policy

Fields marked with * are mandatory.

Introduction

This online questionnaire is part of a consultation to prepare a report on the functioning of the [common fisheries policy](#) (CFP), under Regulation (EU) No 1380/2013 (the CFP Regulation). The objective of this report is to address the functioning of the CFP and look at how we can strengthen its implementation. This questionnaire will provide the basis for more in-depth discussions at regional level starting in April 2022. The consultation process will end with an event before Summer 2022. The report will also build on the studies carried out in its support, and which are referred to in the corresponding chapters of the questionnaire.

The questions refer to each chapter of the CFP Regulation, ending with the topics raised in the [Mission letter](#) to Commissioner Sinkevičius as not sufficiently covered in the current policy framework and should be paid specific attention to (social dimension, climate adaptation and clean oceans). They are designed to identify what works well (or not), identify any evidence of shortcomings in how the CFP is implemented and highlight good practice or innovative tools or processes implemented by stakeholders or Member States. Please comment on any or all topics (you can skip questions if you have nothing to say) and provide any other information you think relevant.

This questionnaire does not cover the [technical measures regulation](#) nor the protection of sensitive species and habitats. They are covered in a parallel [consultation on the action plan to conserve fisheries resources and protect marine ecosystems](#) (launched 25 October with deadline 10 January 2022).

All information collected through this survey will be stored and handled in a confidential manner and in compliance with the [General Data Protection Regulation](#) (GDPR).

At the end of the survey, you can upload a document or position paper as your contribution (maximum size 3 MB) or provide a link to these documents if in html format, and provide additional comments or information.

To facilitate our assessment of the information, we encourage you to send any complementary information in English.

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech

- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Alexandre

* Surname

RODRIGUEZ

* Email (this won't be published)

alexandre.rodriguez@ldac.eu

* Organisation name

255 character(s) maximum

LDAC - EU Long Distance Advisory Council - Consejo Consultivo de Pesca de Larga Distancia en Aguas No Comunitarias - Conseil Consultatif de Pêche Lointaine de l'UE
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* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

Identification number: 905805219213-67

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|--------------------------------------|--|-------------------------------------|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |

- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan

- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela

- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena
Ascension and
Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

General aspects - overall functioning of the CFP (objectives)

Article 2 CFP Regulation – objectives

1. The CFP shall ensure that fishing and aquaculture activities are environmentally sustainable in the long-term and are managed in a way that is consistent with the objectives of achieving economic, social and employment benefits, and of contributing to the availability of food supplies.
2. The CFP shall apply the precautionary approach to fisheries management, and shall aim to ensure that exploitation of living marine biological resources restores and maintains populations of harvested species above levels which can produce the maximum sustainable yield.

In order to reach the objective of progressively restoring and maintaining populations of fish stocks above biomass levels capable of producing maximum sustainable yield, the maximum sustainable yield exploitation rate shall be achieved by 2015 where possible and, on a progressive, incremental basis at the latest by 2020 for all stocks.

3. The CFP shall implement the ecosystem-based approach to fisheries management so as to ensure that negative impacts of fishing activities on the marine ecosystem are minimised, and shall endeavour to ensure that aquaculture and fisheries activities avoid the degradation of the marine environment.
4. The CFP shall contribute to the collection of scientific data.
5. The CFP shall, in particular:
 - (a) gradually eliminate discards, on a case-by-case basis, taking into account the best available scientific advice, by avoiding and reducing, as far as possible, unwanted catches, and by gradually ensuring that catches are landed;
 - (b) where necessary, make the best use of unwanted catches, without creating a market for such of those catches that are below the minimum conservation reference size;
 - (c) provide conditions for economically viable and competitive fishing capture and processing industry and land-based fishing related activity;
 - (d) provide for measures to adjust the fishing capacity of the fleets to levels of fishing opportunities consistent with paragraph 2, with a view to having economically viable fleets without overexploiting marine biological resources;
 - (e) promote the development of sustainable Union aquaculture activities to contribute to food supplies and security and employment;
 - (f) contribute to a fair standard of living for those who depend on fishing activities, bearing in mind coastal fisheries and socio-economic aspects;
 - (g) contribute to an efficient and transparent internal market for fisheries and aquaculture products and contribute to ensuring a level-playing field for fisheries and aquaculture products marketed in the Union;
 - (h) take into account the interests of both consumers and producers;
 - (i) promote coastal fishing activities, taking into account socio-economic aspects;

(j) be coherent with the Union environmental legislation, in particular with the objective of achieving a good environmental status by 2020 as set out in Article 1(1) of Directive 2008/56/EC, as well as with other Union policies.

Q1. What are the specific fisheries conservation and management measures introduced by the CFP Regulation that work well and contributed to real change and/or progress in terms of sustainable EU fisheries?

3000 character(s) maximum

Regarding the external dimension of the CFP, progress has been made in terms of transparency of operations of EU fishing fleets, better accountability of use of public money through the sectoral support component of the SFPAs, AN higher relevance in presence and influence of the EU in all the RFMOs where the EU Member States have interests either as flag and/or coastal state.

Progress in the implementation of the IUU Regulation and the Fisheries Control Regulation, together with the entry into force of the SMEFF Reg., has provided legal certainty and “teeth” to work towards eradication of IUU fishing outside EU waters, being complementary with other international legislative texts such as FAO IPOA or PSMA. The enhanced role of EFCA has been important and had a beneficial effect to improve fisheries governance and control by pooling resources of EU members states via SCIPs/JDPs, providing technical expertise and representation at Control and Compliance Committees of key RFMOs such as NAFO or ICCAT. Progress has also been made on the increase of capacity building and coordinated training missions in third countries to improve use of MCS tools and systems.

The EC/EU should:

- Lead by example and show a consistent approach to its own standards when acting in RFMOs and under international conventions.
- Improve coherence between RFMO measures and other international frameworks to provide a strong legal framework for the protection and conservation of sensitive species and habitats.
- Translate critical CFP objectives (including plans for reduction of discards, data collection of bycatch, precautionary and ecosystem-based approach, and other sustainability principles) in all future SFPAs.
- Embed in SFPAs a requirement for coastal States to improve transparency (i.e., number of vessels, catches, bycatch) beyond the sole EU fleets by publishing other access agreements (private and public), as well as information on joint ventures and chartering arrangements in line with Article 238 of the 2019 UNGA Resolution 74-18.
- Fully implement with MS SMEFF Regulation and create a user-friendly database that makes it possible to find fishing authorisations of EU vessels in non-EU waters from 2018.
- Improve with MS transparency of the activities of the EU external fishing fleet and make public the information on beneficial ownership of EU flagged vessels as well as activity of EU citizens under non-EU flags.
- Apply with MS a zero-tolerance policy towards IUU fishing in the EU market and waters, by EU vessels or citizens.
- Better align with MS the ED of the CFP with the EU trade policy, for example by using the option to suspend preferential tariffs if an IUU yellow card is issued.
- In SFPAs, the EC and the MS must ensure the non-discriminatory treatment of EU fleet vis-à-vis other foreign fleets.

Q2. For the areas fished by vessels from your country, region or sea basin, do you believe that the objective has been achieved

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	Fully	Partly	Not at all
1. The CFP shall ensure that fishing and aquaculture activities are environmentally sustainable in the long-term and are managed in a way that is consistent with the objectives of achieving economic, social and employment benefits, and of contributing to the availability of food supplies.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
2. The CFP shall apply the precautionary approach to fisheries management, and shall aim to ensure that exploitation of living marine biological resources restores and maintains populations of harvested species above levels which can produce the maximum sustainable yield. In order to reach the objective of progressively restoring and maintaining populations of fish stocks above biomass levels capable of producing maximum sustainable yield, the maximum sustainable yield exploitation rate shall be achieved by 2015 where possible and, on a progressive, incremental basis at the latest by 2020 for all stocks.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3. The CFP shall implement the ecosystem-based approach to fisheries management so as to ensure that negative impacts of fishing activities on the marine ecosystem are minimised, and shall endeavour to ensure that aquaculture and fisheries activities avoid the degradation of the marine environment.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
4. The CFP shall contribute to the collection of scientific data.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
5. The CFP shall, in particular: (a) gradually eliminate discards, on a case-by-case basis, taking into account the best available scientific advice, by avoiding and reducing, as far as possible, unwanted catches, and by gradually ensuring that catches are landed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(b) where necessary, make the best use of unwanted catches, without creating a market for such of those catches that are below the minimum conservation reference size	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(c) provide conditions for economically viable and competitive fishing capture and processing industry and land-based fishing related activity	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(d) provide for measures to adjust the fishing capacity of the fleets to levels of fishing opportunities consistent with paragraph 2, with a view to having economically viable fleets without overexploiting marine biological resources	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(e) promote the development of sustainable Union aquaculture activities to contribute to food supplies and security and employment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(f) contribute to a fair standard of living for those who depend on fishing activities, bearing in mind coastal fisheries and socio-economic aspects	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(g) contribute to an efficient and transparent internal market for fisheries and aquaculture products and contribute to ensuring a level-playing field for fisheries and aquaculture products marketed in the Union	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(h) take into account the interests of both consumers and producers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(i) promote coastal fishing activities, taking into account socio-economic aspects	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

(j) be coherent with the Union environmental legislation, in particular with the objective of achieving a good environmental status by 2020 as set out in Article 1(1) of Directive 2008/56/EC, as well as with other Union policies



Q3. What are the specific measures introduced by the CFP Regulation that have worked well to keep or make aquaculture sustainable?

3000 character(s) maximum

Q4. What are the key challenges in implementing the CFP?

3000 character(s) maximum

The credibility of the EU in promoting its interests and standards in the world goes hand-in-hand with its capacity to lead by example at home, and to abide by its commitment to policy coherence for development and rules-based global order.

Key challenges identified:

1. Achieving further consistency between the CFP and other EU policies, including environment, trade, health and labour.
2. Ensuring the effective and harmonised implementation of the CFP and of the relevant legal related instruments (e.g., Control, IUU and SMEFF regulations) as well as the adequacy of human resources.
3. Fostering greater transparency of the fisheries value chain, ensuring reliable and comprehensive fisheries data collection from fleets in terms of reporting and good data processing, analysis and supply to achieve robust scientific advice to inform policy and management decisions, in particular in fishing opportunities within the EU and in international waters (e.g. calculation of surplus on SFPAs, scientific surveys and data analysis submitted to RFMO Scientific Committees).
4. Enhancing policy coherence for development and use it as a reference framework when dealing with aspects related to international fisheries governance and ED of the CFP.
5. Promoting a culture of compliance by ensuring level playing field between EU and non-EU fishing vessels including a reinforced traceability surveillance and third countries audits, for imports of fishing products into the EU market
6. Identifying both good and bad practices and quantifying the value of the EU private investments in third countries, and its role on transfer of know-how, technology, training and upskilling, and creation of local employment and fixing of population.
7. Ensuring that the Union fishing activities outside Union waters are based on the same principles and standards as those applicable under Union law, in particular by providing incentives to those operators who fish more sustainably and provide the greatest benefits for local economies; and that the CFP shall be guided by coherence between the internal and the external dimension as a principle of good governance.
8. Update and focus on the feasible traceability procedures of all seafood products (incl. imports and processed and prepared products) that could sustain the EU operators competitiveness in a worldwide context, adding reinforced audits in third country controls and the use of digital tools in all vessels, ports and for documentation. The revised Control Regulation and the upcoming Sustainable Corporate Governance must ensure that seafood imports meet EU standards on sustainability, human rights and labour conditions.
9. Through the revised Control Regulation, MS should use the EU electronic database for catch certificates to prevent illegal fisheries products from entering the EU market.
10. Proposing additional legislation to tackle the use of flags of convenience by EU nationals and abusive reflagging.

Article 3 CFP Regulation - Principles of good governance

The CFP shall be guided by the following principles of good governance:

- (a) the clear definition of responsibilities at the Union, regional, national and local levels;
- (b) the taking into account of regional specificities, through a regionalised approach;
- (c) the establishment of measures in accordance with the best available scientific advice;
- (d) a long-term perspective;
- (e) administrative cost efficiency;
- (f) appropriate involvement of stakeholders, in particular Advisory Councils, at all stages - from conception to implementation of the measures;
- (g) the primary responsibility of the flag State;
- (h) consistency with other Union policies;
- (i) the use of impact assessments as appropriate;
- (j) coherence between the internal and external dimension of the CFP;
- (k) transparency of data handling in accordance with existing legal requirements, with due respect for private life, the protection of personal data and confidentiality rules; availability of data to the appropriate scientific bodies, other bodies with a scientific or management interest, and other defined end-users.

Q5. Are the principles of good governance, described in Article 3 of the CFP Regulation, sufficiently implemented in fisheries management under the CFP?

	Yes	Partly	No
(a) the clear definition of responsibilities at the Union, regional, national and local levels;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(b) the taking into account of regional specificities, through a regionalised approach;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(c) the establishment of measures in accordance with the best available scientific advice;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(d) a long-term perspective;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(e) administrative cost efficiency;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(f) appropriate involvement of stakeholders, in particular Advisory Councils, at all stages - from conception to implementation of the measures;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(g) the primary responsibility of the flag State;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(h) consistency with other Union policies;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(i) the use of impact assessments as appropriate;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(j) coherence between the internal and external dimension of the CFP;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(k) transparency of data handling in accordance with existing legal requirements, with due respect for private life, the protection of personal data and confidentiality rules; availability of data to the appropriate scientific bodies, other bodies with a scientific or management interest, and other defined end-users.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Fisheries management measures for conserving and sustainably exploiting marine biological resources

Multiannual plans

The CFP Regulation highlights the importance of establishing multiannual plans reflecting the specific features of the different regions and fisheries, recognising that the objective of sustainable exploitation of marine biological resources is more effectively achieved through a multiannual approach to fisheries management.

Stocks and fisheries are managed by means of such plans, which contain goals for managing fish stocks in line with the CFP objectives (maximum sustainable yield) and measures such as fishing effort restrictions, rules for setting total allowable catches, specific control rules and technical measures (such as specific rules for implementing the landing obligation) and review clauses and safeguards to trigger remedial action.

Articles 9 and 10 of the CFP Regulation establish the principles, objectives and content of such plans. Currently four multiannual plans have been adopted under the CFP:

- [Baltic plan](#) (see also the [first implementation report](#));
- [North Sea plan](#);
- [Western Waters plan](#);
- [Western Mediterranean Sea plan](#).

Q6. Specifying which plan you work with, are the multiannual plans effective tools for ensuring the sustainable exploitation of fish stocks? Are the plans sufficiently flexible, too flexible, or too rigid in operation?

3000 character(s) maximum

Q7a. Do the multiannual plans cater sufficiently for the regional characteristics of fisheries?

- Yes
 No

Q7b. Are the plans used to their full potential?

- Yes
 No

Landing obligation

This new element in the CFP Regulation contributes to the CFP objective of eliminating discards by encouraging fishers to fish in a more selective manner and avoid and reduce, as far as possible, unwanted catches in the first place, by obliging them to land everything they catch.

Discarding is a term specifically used for catches of species that are not kept, but returned to the sea. It constitutes a substantial waste of resources and negatively affects the sustainable exploitation of marine biological resources and marine ecosystems, as well as the financial viability of fisheries.

There has been increasing collaboration between stakeholders and scientists to improve knowledge about this issue, e.g. the Horizon 2020 projects [DiscardLess](#), [MINOUW](#) and [choke mitigation tool](#).

Significant efforts by all stakeholders have been made to facilitate implementation of the landing obligation, notably to avoid choke species (*a species for which the available quota is exhausted before the quotas of (some of) the other species that are caught together in a (mixed) fishery are exhausted*), and to improve control and enforcement, for example by providing [technical guidelines and specifications](#) for implementing remote electronic monitoring (REM) in fisheries.

However, control and enforcement of the landing obligation remain challenging and, overall, Member States have not adopted the necessary measures in this respect. Moreover, significant undocumented discarding of catches by operators still occurs. REM tools seem to be the most effective and cost-efficient way to monitor the landing obligation. The Commission has supported the use of such modern control tools in its [proposal for a revised fisheries control system](#) and will continue working with the the European Parliament and the Council to reach an agreement. As indicated by the Commission’s audits and the [initiatives by the EFCA](#), compliance remains weak.

The necessary increase in selectivity is also addressed in the recently published [report on the technical measures regulation](#), as well as in the ongoing [consultation on the action plan to conserve fisheries resources and protect marine ecosystems](#).

The implementation of the landing obligation, and its challenges, was also recently addressed in a [European Parliament Initiative report](#) and a recently published [study](#) contracted by DG MARE and the European Climate, Infrastructure and Environment Executive Agency (CINEA).

Q8. To what extent (scale 1 to 5) is the objective of eliminating discards met?

	1. Not at all	2. Poorly	3. Moderately	4. Incompletely	5. Fully	I don't know
1.	<input type="radio"/>					

Q9. What challenges do you experience in implementation and control of the landing obligation? You may select more than one

- None
- Difficult to detect discards because of insufficient observers or electronic monitoring tools
- Not possible to detect discards by small (under-12m) vessels
- Difficult to gather legally adequate evidence of discarding needed to make a successful prosecution
- Level of fines too low to deter fishers from discarding
- Not enough resources (inspectors, ships or aircraft) to enforce this obligation
- Obstruction by fishers, preventing observation of discards
- Implementation rules are unclear
- Not possible to detect where exemptions apply
-

Not possible to detect where permissible discard limits are exceeded (for de minimis exemptions)

- Logbook records of discards are inaccurate or cannot be checked for verification
- Undersized fish are still being landed and marketed for purposes for direct human consumption
- Increased selectivity is hard to attain in specific fisheries (name the fisheries)
- Other - please specify in the text box below

Q9a. Which good practice or innovative tools could address these challenges in implementation and control?

3000 character(s) maximum

Q9b. What further pilot projects (if any) should be conducted to explore methods for avoiding, minimising or eliminating unwanted catches?

3000 character(s) maximum

Q9c. Which incentives in the CFP Regulation are the most relevant and successful?

With incentives we mean, including those of economic nature such as fishing opportunities) that promote fishing methods which contribute to more selective fishing, the avoidance and reduction (as far as possible) of unwanted catches and fishing with low impact on the marine ecosystem and fishery resources.

3000 character(s) maximum

Q9d. How do you see your role and the role of other stakeholders in implementing and monitoring the landing obligation?

3000 character(s) maximum

Scientific Advice

As highlighted in the CFP Regulation, fisheries management and conservation measures must be adopted that take into account the best available scientific, technical and economic advice. Sound advice requires harmonised, reliable and accurate data sets.

As outlined in recital 49 of the Regulation, policy-oriented fisheries science should be strengthened by means of:

- nationally-adopted, regionally-coordinated scientific data collection
- research and innovation programmes implemented in coordination with other Member States and within EU research and innovation frameworks.

When proposing new fisheries rules and regulations or reviewing those existing ones, the European Commission seeks the best available scientific advice from several scientific bodies. Data collected by EU countries under the [data collection framework](#) form the basis for the work of these **scientific advisory bodies**. This framework outlines the EU countries' obligations to collect, manage and make available a wide range of fisheries and aquaculture data needed for scientific advice.

Short-term needs for additional knowledge can be addressed through Commission-funded scientific advice studies (through calls for tenders and calls for proposals). Long-term research projects related to fisheries management receive support under EU research framework programmes. The new funding programme [Horizon Europe](#) includes a new approach – a mission on healthy oceans, seas, coastal and inland waters. The scientific advisory bodies consist of:

- the Scientific, Technical and Economic Committee for Fisheries ([STECF](#))
- the International Council for the Exploration of the Sea ([ICES](#))
- the Regional fisheries management organisations ([RFMOs](#))
- regional fisheries bodies, e.g. the General Fisheries Commission for the Mediterranean ([GFCM](#)).

The advisory councils may help, in close cooperation with scientists, to collect, supply and analyse the data necessary for developing conservation measures. Better cooperation between stakeholders and scientists is important to foster. Moreover, the Commission processes and manages data to support knowledge-based decision making ([EMODNET](#) and [Atlas of the Seas](#)).

Q10. Do you see a need to further strengthen the scientific basis for fisheries management? (you may tick more than one)

- No, the current level of science advice is adequate
- No, we already spend too much on science advice and give it too much importance
- We should widen and simplify access to fisheries data
- Yes, we need more precise measurement of fish stocks
- Yes, we need better knowledge of collateral impacts of fishing
- Yes, we need better measurement of mixed fisheries questions
- Yes, we need more coverage of science advice (more fleets, more areas, more species)
- Yes, we need a better survey of fishers' opinions.
- Other – please explain in the text box below.

Q10a. If ticked yes, please specify the specific data needs or governance questions that would need to be covered for this further strengthening

3000 character(s) maximum

The availability of different scenarios of stocks rebuilding or long term management may help decision makers and stakeholders to agree on best options from an environmental and socio-economical points of view. There is a growing body of literature that uses stylized modes to show the potential for bio economic models to highlight the role of gear, multiple species, and stock characteristics in the development of management plans that ensure rebuilding while minimizing economic losses from reduced harvesting. We encourage to scale up the developing and implementation of specific bio-economic model in fisheries management in EU.

Q11. Do you see any opportunity to use new technologies or know any good practices (e.g. in governance) or innovations that could help improve data collection and help deliver best available scientific advice?

- Yes
 No

Please explain

3000 character(s) maximum

Fishing opportunities

Articles 16 and 17 of the Regulation describe **how fishing opportunities are allocated**. In particular, Article 16(6) sets out that each Member State must decide how the fishing opportunities that are available to it, that are not subject to a system of transferable fishing concessions, may in turn be allocated to vessels flying its flag.

Furthermore, Article 17 stipulates that when allocating the fishing opportunities available to them, Member States must use transparent and objective criteria including those of an environmental, social and economic nature.

Q12. Do you consider that Member States implement the requirements set out in Articles 16 and 17 in a satisfactory manner? Please explain.

- Yes
 No

Please explain

3000 character(s) maximum

Partly – an environmental criterion is for vessels to provide data for scientific purposes – in the new SFPA with Mauritania, those vessels refusing to embark observer as per the SFPA have to stay at port ('no data, no fish').

Management of fishing capacity

This aspect is included in the list of conservation measures (Article 7 of the CFP Regulation). Under Article 22 of the Regulation, Member States must adjust their fleet's fishing capacity to their fishing opportunities over time to achieve a stable and long-term balance between them. For this, Member States assess the capacity of the national fleet and all its segments. This assessment is made in line with [Commission guidelines](#) and is presented in an annual report sent to the Commission by 31 May each year.

Where the assessment clearly demonstrates an imbalance, the Member State prepares an action plan for the fleet segments with identified structural overcapacity. This plan sets out the adjustment targets and tools to achieve a balance and a clear time frame for its implementation.

Annually, as part of the Communication launching the consultation on fishing opportunities, the Commission presents a report on the balance between the fishing capacity of the Member States' fleets and their fishing opportunities

Capacity ceilings

Furthermore, Article 22(7) of the CFP Regulation stipulates that the capacity ceilings (in overall gross tonnage and kilowatt) set out in Annex II of the Regulation must not be exceeded. An important instrument to prevent fishing capacity from increasing is the entry/exit scheme (Article 23) which sets out that the entry into the fleet of new capacity without public aid is compensated for by the prior withdrawal of capacity without public aid of at least the same amount.

The Commission [evaluated](#) the scheme in 2019. Moreover, fishing capacity corresponding to the fishing vessels withdrawn with public aid must not be replaced (Article 22(6)). For more information on the EU fishing fleet, see the [EU fishing fleet register](#).

Q13. Is the current annual assessment and reporting provided for by Article 22 of the CFP Regulation effective in achieving a stable and long-term balance between the capacity of national fleet segments and the fishing opportunities available to them?

- Yes
- No

What could be improved within the current legal framework?

3000 character(s) maximum

Often technical improvements to the vessels, including requirements set out in social legislation, come with the need of more space on board. However, the definition in the CFP for capacity can make this difficult. By restricting the definition to a vessel's tonnage in Gross Registered Tonnage and measuring its power in Kilowatts, improvements on board which do not increase fishing capacity but are designed to improve safety and habitability are hampered. Some examples are habilitation of larger cabins and separate accommodations for the crew, leisure rooms, separate restrooms for women and men, space to install hydrogen engines, etcetera. Furthermore, the adaptations required for the vessels to comply with the discards ban and environmental legislations (storage of debris and burning, compacting) are seen as increasing the fishing capacity when this not the case.

This also creates problems for vessel builders and naval engineers. The only possibility to stay within the

allowed volume ceiling while ensuring decent social standards is building a vessel with a smaller storage capacity. Whilst the catch remains the same, this will result in vessels making more journeys between the fishing ground and ports, increasing fuel consumption leading to an increase on fixed costs and in the carbon footprint. Furthermore, they might eventually cause stability problems in some big vessels as the fish is stored unevenly. Not to mention the increased time crew has to spend on board, all the more need for better working and living conditions.

Q14. How do you consider current fishing capacity compared to the available fishing opportunities in each of these areas?

Enter 1= far too low, 2 = too low, 3 = about right, 4 = too high, 5 =far too high; or 'I do not know'

	Pelagic fisheries	Demersal fisheries
Baltic Sea and Kattegat		
North Sea, Skagerrak and Channel		
Celtic Seas		
Bay of Biscay		
Macaronesia (Canaries)		
Macaronesia (Azores)		
Western Mediterranean		
Central Mediterranean		
Eastern Mediterranean		
Black Sea		

Q15. Member States can decide themselves on how to design the entry/exit scheme at national level. Please indicate whether:

- The situation should remain unchanged
- More guidance is needed from the Commission on the best ways to implement the scheme

Please explain

3000 character(s) maximum

The Commission could provide further guidelines to MS on fishing capacity and into possible alternatives or solutions to increase vessels habitability without increasing capacity, which would not require a complete revamping of the approach taken in the CFP and other legislation. STECF could be commissioned to support the aforementioned.

There are already examples that can be drawn off from other parts in the world, for example Norway and Iceland, which exclude from the calculation of the measurement those areas set aside for relaxation, comfort, leisure and working space, based on factors such as allocated quota or size of vessel.

Aquaculture

Aquaculture, unlike fisheries, is not an exclusive EU competence. However, the EU is still involved, applying rules to aquaculture activities such as those ensuring environmental protection or human and animal health.

In addition, in 2013, the Commission adopted non-binding strategic guidelines for the sustainable development of EU aquaculture. These served as the basis for EU countries to develop specific national strategic plans for aquaculture. The Commission works with EU countries through the 'open method of coordination' to promote the exchange of good practice among EU countries, including through technical seminars.

In 2021, the Commission adopted new [strategic guidelines](#) and EU countries reviewed their national strategies in light of the new guidelines. The [European Maritime, Fisheries and Aquaculture Fund](#) (2021-2027) will continue to make funding available for EU aquaculture.

Q16. Has the system of strategic coordination established in Article 34 of the CFP Regulation, and in particular the [strategic guidelines for a more sustainable and competitive EU aquaculture](#) and the multi-annual strategic plans, contributed to the sustainable growth of EU aquaculture as set out in Article 34 of the CFP Regulation?

- Yes
- No

Q17. How can the [strategic guidelines for a more sustainable and competitive EU aquaculture](#) adopted in 2021 be effective in further pursuing

the sustainable growth of EU aquaculture in line with the objectives of the European Green Deal?

3000 character(s) maximum

Regional cooperation on conservation measures – Regionalisation

The CFP recognises that dialogue with stakeholders has proven to be essential for achieving the CFP objectives. The 2013 CFP reform introduced a regionalised approach for the CFP. This entails a bottom-up approach to governance enabling:

- consultations with stakeholders via the advisory councils;
- enabling stakeholders to become involved in and take ownership of the CFP implementation process via the Member States (regional and expert groups), and the regional coordination groups under the [data collection framework](#).

In addition, the CFP Regulation aims to ensure more control at regional and national level. Regionalisation allows EU countries with a management interest to propose detailed measures, which the Commission can then adopt as delegated or implementing act and transpose them into EU law (Article 18 of the CFP Regulation).

In 2018, the Commission published [guidance on Article 11](#) of the Regulation on adopting conservation measures for Natura 2000 sites and for the purposes of the Marine Strategy Framework Directive, providing for good practices already to be considered in this process.

Technical Measures Regulation

This topic has already been extensively discussed with you as a stakeholder in the context of the recently published Commission [report on the implementation of the Technical Measures Regulation](#). This report specifies that the Technical Measures Regulation introduced results-based approaches supported by 'regionalisation', setting out the general rules that apply to all EU waters, and provided for the adoption of technical measures that respond to the regional characteristics of fisheries.

This results-based regionalisation approach was conceived under the CFP in order to bring decision-making closer to the fishers. It also encourages Member States and the fishing sector to play an active role in making and implementing decisions. The variety of joint recommendations already put forward demonstrates that regionalisation can be effective and suitable for providing targeted and tailor-made technical measures.

Member States have demonstrated that regional cooperation can be swift and efficient. However, improvements are needed in terms of speed and ambition when it comes to developing and agreeing joint recommendations on measures aimed at improving selectivity or restricting fisheries in order to contribute to EU environmental legislation.

Overview of regionalisation

Another initiative in which the advisory councils and the Member States regional groups have been consulted is a study currently being carried out by DG MARE and CINEA to provide a comprehensive overview of how the regionalisation process works under the CFP. This initiative also covers the joint recommendations put forward by Member States specifying the details of how the landing obligation is being implemented, as well as the conservation measures necessary for compliance with obligations under EU environmental legislation.

Specifically raised in Article 3 of the CFP Regulation on principles of good governance was:

- the appropriate involvement of stakeholders, in particular advisory councils, at all stages – from conceiving to implementing the measures;
- the importance of taking into account the regional characteristics, through a regionalised approach.

While the regionalisation approach under the CFP has been applied to shaping and refining regional measures within the EU, it does not include third countries (e.g. Norway, United Kingdom, southern Mediterranean countries such as Morocco and Algeria) in this decision-making process. This can pose particular challenges for the Commission who represents the EU in international consultations and negotiations for fisheries both in terms of timing and content.

Q18. To what extent (1 to 5) have the changes to a more regionalised approach to EU decision and policy making improved the CFP’s implementation?

	1. Not at all	2. Poorly	3. Moderately	4. Incompletely	5. Fully	I don't know
On collecting data on commercial fish stocks	<input type="radio"/>					
On monitoring incidental catches of sensitive species and impacts on habitats	<input type="radio"/>					
On implementing the landing obligation	<input type="radio"/>					
On implementing the technical measures	<input type="radio"/>					
On implementing Natura 2000 areas and other measures under the Habitats Directive	<input type="radio"/>					
On implementing measures under the Marine Strategy Framework Directive	<input type="radio"/>					
Other - please explain	<input type="radio"/>					

Q19. Would you see the need for further improving the decision-making process?

- Yes
- No

Q20. How can regionalisation feed into consultations with neighbouring third countries where necessary to take effective measures for stocks of common interest? Please give examples of good practice that you have encountered.

3000 character(s) maximum

An analysis has shown that increased information sharing, even if one of the countries had only limited capacity for reciprocity, will increase a State's ability to enforce fisheries laws and lead to improvement in fish stocks in both countries. Therefore, the information and experiences learnt from EU's internal regionalisation approach should be shared with neighbouring third countries.

Furthermore, there are successful regional approaches (e.g PESCAO, FISH-I-Africa) that could be used as examples of information and intelligence sharing generating strong results in the fight against IUU and cross-country capacity building and coordination at regional level.

External dimension

International ocean governance agenda

In 2016, the European Commission and the EU's High Representative for Foreign Affairs and Security Policy presented a joint communication on international ocean governance. This is an agenda for the future of our oceans, specifying 50 actions for safe, secure, clean and sustainably managed oceans in Europe and around the world under 3 policy pillars. The communication is an integral part of the EU's response to the United Nations' 2030 Agenda for Sustainable Development, in particular Sustainable Development Goal 14: 'to conserve and sustainably use the oceans, seas and marine resources' (SDG14). It also contributes to the European Green Deal. We will revamp the 2016 International Ocean Governance Agenda by tabling a Joint Communication setting out an action plan on international ocean governance, addressing key threats such as pollution, climate change impacts and biodiversity loss. It will send a strong message that the EU is leading on the implementation of global commitments, as set out in the 2030 Agenda on Sustainable Development Goals.

In 2020, the EU launched the International Ocean Governance (IOG) Forum and a targeted consultation, to assess development needs and options for action in light of today's challenges and opportunities in international ocean governance. The Commission recently published a [summary of this consultation](#).

There are no questions in this questionnaire regarding international ocean governance. However, the EU has continued to implement its agenda on international ocean governance for the conservation and sustainable use of oceans and seas. Some of its central components are the promotion of sustainable fisheries beyond EU jurisdiction in international fora and bodies and through bilateral relations, and the fight against illegal, unreported and unregulated (IUU) fishing. It is based on international rules and obligations, and CFP principles and objectives, together with some specific objectives, such as policy coherence and promoting a level playing field.

Preventing harmful fishing practices

The international dimension of the CFP focuses on three areas:

- to **prevent, deter and eliminate illegal, unreported and unregulated fishing** ([IUU Regulation](#)). By doing this, it actively supports the reforms of fisheries controls by partner countries to effectively fight against IUU fishing in line with their international obligations to ensure compliance with conservation and management measures.
- Through **sustainable fisheries partnership agreements** (SFPAs), the EU gives support to fisheries management and control in partner countries in exchange for fishing rights. As a member of the World Trade Organization, the EU remains strongly committed to reaching an agreement to prohibit harmful fisheries subsidies.
- The EU, represented by the Commission, plays an active role in the **regional fisheries management organisations** (RFMOs). These organisations regulate regional fishing activities in the high seas.

In 2021, a public and targeted stakeholder [consultation](#) was conducted for the SFPAs and therefore they are not covered by this questionnaire.

Beyond its involvement in RFMOs and SFPAs, the EU is also bound by Article 33 of the CFP Regulation to engage with third countries on stocks of common interest in order to ensure that those stocks are managed in a sustainable manner. In particular, the EU will endeavor to establish bilateral or multilateral agreements with third countries on joint management of stocks, including:

- the establishment, where appropriate, of access to waters and resources and conditions for such access
- the harmonisation of conservation measures
- the exchange of fishing opportunities.

Each year, the Commission, on behalf of the EU, engages in such bilateral or multilateral negotiations, e.g. with Norway, the United Kingdom, the Faroe Islands and other coastal countries.

Q21. How could the EU further improve the performance of the RFMOs in sustainably managing fisheries resources?

3000 character(s) maximum

- Foster dialogue and work within RFMOs towards harmonization of access agreement conditions between coastal and flag states in the management and resource allocation of straddling stocks.
- In order to fight IUU fishing and enhance transparency, ask RFMOs to follow the best practices of ICCAT and GFCM in creating a public annual reporting system for all access agreements. To require that coastal states report on foreign-flagged vessels fishing in waters under their jurisdiction for species managed by that RFMO, and from flag states whose vessels fish in waters under the jurisdiction of another member for species managed by that RFMO.
- Contribute to establish inter RFMO regional coordination mechanisms, based on dynamic exchange of information, to ensure consistency of applicability of measures related to cross-cutting issues within the caveat of their regulatory frameworks.
- Showcase RFMOs as “testing laboratory” to promote a regional approach to MCS, through the coordination and setup of regional observer programmes at sea (such as the one for bluefin tuna in ICCAT or transshipments in IOTC) and port control and inspections schemes (for example, NAFO resolution supporting implementation of FAO PSMA).
- In terms of transparency, propose to carry out a benchmark exercise between performance reviews within RFMOs to verify alignment with the UNCLOS provisions and related instruments such as UNGA

Resolutions of Sustainable Fishing.

- Defend the role of RFMOs in reinforcing mechanisms to fight against IUU fishing, such as collaborative work on information exchange regarding IUU vessels lists, submission of information to the FAO Global Record of Fishing Vessels or the compulsory allocation of IMO numbers for distant water fishing vessels.
- Continue efforts to expand the requirement in RFMOs for states to verify and take appropriate action when nationals are found to be otherwise benefiting from or supporting the activities of IUU vessels through for example, the provision of services. These measures are also in line with Article 39 of the EU IUU Regulation.
- Table and support proposals in RFMOs aiming at improved transparency standards, particularly regarding the beneficial ownership of vessels, potentially taking as a starting point the example of the IOTC which adopted, in 2019, a conservation and management measure mandating states to submit information on beneficial owners of authorised vessels.
- Continue actively promoting the constitution of new RFMOs or other regional arrangements where they do not exist, in particular for managing sustainably shared stocks like the small pelagic and demersal stocks in West Africa; the Arctic; or the Southwest Atlantic; amongst others.
- Promote research (through studies, establishment of working group) on the socio-economic impacts of resources exploitation, on coastal communities, local job creation, and food security .

Q22. To what extent (1 to 5) are RFMOs well equipped to face the challenges of climate change and protection of ecosystems, pollution, alien species, etc.? All these new factors are influencing the management of fisheries.

	1. Not at all	2. Poorly	3. Moderately	4. Incompletely	5. Fully	I do not know
Q22.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain

3000 character(s) maximum

To date, there have been few efforts to address the potential geographic shift due to change in migration patterns for species managed by certain RFMOs. As these bodies are designed to manage species that are already transboundary in nature, they should have and adaptive design to address such changes. However, that has not yet been the case. Identification of dynamic area-based closures and discussions about improving science and understanding on estimations of shifting transboundary stocks would better prepare RFMOs for this reality.

- The EU approach in RFMOs to allocation of access discussions should be in line with the CFP, which calls for taking into consideration environmental and social criteria, as well as contribution to local economies, when allocating access to resources. The EU should support in RFMOs allocation of access systems that rewards/does not penalise those who fish most sustainably and contribute most to local economies. Example: https://ldac.eu/images/documents/publications/LDAC_Advice_ICCAT.pdf

- On the latter, the EU should support efforts by RFMOs to collect, compile and assess information regarding socio-economic indicators for all fleet segments, including but not limited to: socio-economic contribution to the fisheries, economic dependence on fish stocks, contribution to national food security needs, income from exports, employment conditions and interactions between fleet segments
Example: https://ldac.eu/images/advices/ldac_recommendation_on_terms_of_reference_for_the_creation_of_an_iotc_working_group_on_socio-economic_and_labour_aspects_of_fisheries.pdf

- EU behaviour on catch/quota management in the RFMOs should follow the requirements of the CFP.

EU delegations have often agreed to catch limits that do not immediately end overfishing, with an explanation that in an international forum, they are not capable of solely determining the management outcome. While this is the case, the EU should actively advocate for catch limits that immediately end overfishing and recover overfished stocks as quickly as possible.

- Transition to management using harvest strategies developed through management strategy evaluations (MSE). Effective long-term management of the world's fish stocks requires science, stakeholder engagement and advanced planning. Harvest strategies combine those elements, providing fisheries managers a science-based framework for determining precautionary measures for fish stocks;
- Take stronger action to implement an ecosystem-based approach to fisheries management. Roadmaps that take RFMOs forward in a stepwise way toward implementing an ecosystem approach should be developed (e.g., experience of NAFO). RFMO science processes and decision-making should consider how fisheries can mitigate impacts of fishing on target and non-target species and help ensure resilient ecosystems and fisheries in the face of threats such as climate change;

Q23. Do the SFPAs ensure that the CFP objectives are achieved?

- Yes
- No
- Partly

Please explain

3000 character(s) maximum

- SFPAs are based on best available science to target, in mixed SFPAs, the surplus of resources. In that sense, SFPAs improve the level playing field (LPF) for local coastal fisheries. SFPAs also contribute to reinforce the capacity of the partner country to manage its fish resources sustainably, through the use of sectoral support for various management and sustainable development initiatives. In some recent SFPAs, a clause for ensuring transparency as well as a 'non-discrimination clause', under which the third country should offer similar financial and technical conditions to other distant water fleets have the potential, if they were applied properly, to establish an even LPF. However, these clauses are not fully implemented as often documents are not published (fully) by the third country. The efficiency of the sectoral support is not always maximised. Scientific data to estimate surplus often do not exist, is patchy or obsolete (e.g. small pelagic stocks in West Africa).
- SFPAs are also a suitable instrument to be used by the EU to encourage third countries to create capacity building, enhance the sustainable development of fisheries in the partner countries and promote social standards – including by providing training facilities for local fishers and setting up a mechanism to employ these well-trained fishers. This contributes to improving the global LPF. Coherence with ETA/FTAs is important as these may include provisions on trade and sustainable development that focus on promoting decent work conditions and environmental protection, but they are often placed in a non-binding section of the SFPAs. By extension, coherence and synergies with other EU actions and policies relevant to these issues is equally fundamental; with an emphasis on supporting local sustainable fishing communities and promoting the role of women.
- The LDAC has identified as implementation issues related to establishing both an internal and external LPF: (i) lack of effective implementation of the transparency (when it exists) and non-discrimination clauses; (ii) issues with reporting on all (public and private) fishing agreements with other non-EU countries operating in the EEZ of partner countries which are particularly relevant to avoid overexploitation of stocks; and (iii) need for urgent efforts to ensure policy coherence for development, coordination and transparency

across relevant EU policies and agencies to maximise the beneficial outcomes under SFPAs, and for action from partner countries, including in terms of participation and data reporting at RFMOs. The EU evaluation methodology should be revised to allow a better understanding of local fisheries development dynamics, to ensure efficient actions key to the sustainable development of fisheries in partner countries.

Q24. To what extent (1 to 5) is the EU position in its negotiations with third countries like Norway or the UK aligned with the CFP principles?

	1. Not at all	2. Poorly	3. Moderately	4. Incompletely	5. Fully	I do not know
Q24.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain

3000 character(s) maximum

There are many fish stocks caught by EU fishers which are shared or straddling ones. This means they move between EU and non-EU waters, such as those of Norway, the Faroe Islands and the UK – these are so-called third countries that make their own fisheries management decisions unilaterally, bilaterally and multilaterally. Data from the Commission and from technical observers show that stocks shared with such countries are more likely to be overfished. That reality indicates that the process of agreeing on sustainable limits can be more difficult when third countries are involved in decision-making.

Overcoming obstacles to sustainable management when working with non-EU countries is critical, particularly post-Brexit, with the EU and UK negotiating new joint management arrangements. Governance of widely distributed stocks in the North-East Atlantic is complex and requires stable collaboration based on shared principles of sustainability and science-based decision-making to secure good management and to allow the EU to meet its CFP commitments.

The EU must show leadership in international negotiations to bring management of shared stocks in line with shared commitments, and particularly the obligations under the UN Law of the Sea, and to ensure that third countries are scrutinised on their policies.

The LDAC has issued a recent advice on the role of the EU in the fisheries negotiations in the North East Atlantic including a decalogue of recommendations that can be read here: https://ldac.eu/images/EN_LDAC_Advice_on_EU_NEA_governance_16Feb2022.pdf

Market and trade (common market organisation)

The common organisation of the EU’s fisheries market strengthens the role of the actors on the ground: consumers receive information on the products sold on the EU market, and operators apply the same rules, regardless of the product’s origin. The [Common Market Organisation Regulation](#) covers five main areas:

- 1) organisation of the sector
- 2) marketing standards
- 3) consumer information
- 4) competition rules
- 5) market intelligence.

As regards market intelligence, the Commission set up the [European Market Observatory for Fishery and Aquaculture](#) products to contribute to market transparency and provide market intelligence to all actors across the sector including policy makers.

The Commission must provide a report on the results of the application of the Common Market Organisation Regulation by 31 December 2022, and will be covered separately from the 2022 CFP report. There is also a [separate consultation](#) on this subject.

Structural policy and support: EU funding

By 2024, the Commission will have evaluated the 2014-2020 [European Maritime and Fisheries Fund](#). Therefore, no specific questions on this fund are included in this questionnaire.

The 2021-2027 [European Maritime, Fisheries and Aquaculture Fund](#) (EMFAF) is a key instrument for implementing the CFP and achieving its objectives. The EMFAF has 4 priorities:

- 1) fostering sustainable fisheries and restoring and conserving aquatic biological resources
- 2) fostering sustainable aquaculture activities, as well as processing and marketing fishery and aquaculture products, therefore contributing to food security in the EU
- 3) enabling a sustainable blue economy in coastal, island and inland areas, and fostering the development of fishing and aquaculture communities
- 4) strengthening international ocean governance and ensuring seas and oceans are safe, secure, clean and sustainably managed.

The EMFAF is currently in its programming phase, with Member States finalising their national programmes. This phase has been accompanied by the [regional sea basin analysis](#). This document aims to provide Member States with a sea basin perspective of the key CFP challenges that need addressing through EMFAF funding.

Q25. Can you share examples of good practices or projects supported by the EMFF or that could be supported by the EMFAF to help achieve the objectives of the [European Green Deal – ‘fit for 55 delivering EU’s 2030 climate targets’](#)?

3000 character(s) maximum

Q26. How do you see the role of public investment encouraging innovation and strengthening resilience in fisheries and aquaculture, in particular at local level?

3000 character(s) maximum

Q27. Can you suggest projects that the EMFAF could support to facilitate generational renewal in the fishing and aquaculture sector?

3000 character(s) maximum

Blue Economy

The European Green Deal and the Recovery Plan for Europe will define the EU economy for many years, or even decades to come; and the EU's blue economy is fundamental to the efforts of both.

The blue economy, like every other sector, adheres to the European Green Deal, and is also indispensable in order to meet the EU's environmental and climate objectives. After all, the ocean is the main climate regulator we have. It offers clean energy and sustains us with oxygen, food, and many critical resources. To fully embed the blue economy into the Green Deal and the recovery strategy, the Commission has adopted [a new approach for a sustainable blue economy in the EU](#).

Many activities take place in Europe's seas. At any given time, fishing, aquaculture, shipping, renewable energy, nature conservation, touristic activities and other uses compete for maritime space. Various initiatives under the European Green Deal and the biodiversity strategy affect the (future) use of the sea, for example:

- the [EU strategy on offshore renewable energy](#)
- the [strategic guidelines for a more sustainable and competitive EU aquaculture](#)
- the extension and effective management of [marine protected areas](#).

That is why the EU has a [Directive on Maritime Spatial Planning](#) which provides transparency and stability, and encourages investment and cross-border cooperation, including in relation to offshore wind energy developments. It lays down minimum requirements for the planning process and the maritime spatial plans, including stakeholder and transboundary consultation requirements.

The [European Maritime Spatial Planning Platform](#), financed by the EMFAF, provides information on existing practices, processes and projects, carries out technical studies, and has a question and answer service.

Synergies between different human activities at sea come together in initiatives such as a European Blue Forum, as announced in the new approach for a sustainable blue economy.

Q28a. In what way do you see the synergies between the different human activities at sea, specifically between those activities falling under the CFP Regulation and the Maritime Spatial Planning Directive?

3000 character(s) maximum

28b. Does the current EU legislation framework encourages such synergies to take place?

- Yes
- No

Is there anything missing?

3000 character(s) maximum

Q29. Is the current legislative framework sufficient to ensure that maritime space is used in such a way that helps achieve the objectives of the European Green Deal (e.g. sustainable seafood, sustainable energy, nature conservation and restoration)?

3000 character(s) maximum

In December 2019, the European Commission published its action plan to make the EU's economy sustainable, the European Green Deal, which will have an important effect on fisheries management and seafood trade. Its main objectives are no net emissions of greenhouse gases by 2050, economic growth decoupled from resource use, and the promise of leaving no person or place behind.

The EU CFP must be embedded in the delivery of the EU's Green Deal, Biodiversity Strategy and other international commitments. The EU seafood sector has continually worked on improving its sustainability performance with initiatives and improvements implemented over the years, including improved fisheries management at sea as well as increased resource efficiency in seafood processing. The sector is highly regulated, and its members persistently strive to address the balance between the three pillars of sustainability through individual, national or trans-national initiatives. Though seafood has a lower carbon footprint on average compared to land-based animal protein production, and the sector has been steadily decreasing its CO2 emissions for at least the past 10 years, the sector recognises the importance of continual improvement regarding its environmental performance. However, it is important to note that the impact of fishing on carbon rich ecosystems like seagrass meadows, which are essential in the fight against climate change, are not taken into account when calculating the footprint of fish protein.

When looking at EU seafood imports, several cases of human rights violations can be highlighted, including the violations of labour rights by some industrial fishing fleets that supply fish for the EU market, or the imports of fishmeal and fish oil from West Africa that threaten the right to food of African populations. As the EU market is the most important and lucrative market for fish products globally, a future legislation that would ensure products placed on the EU market are free from human rights violations in their supply chains, as suggested by the Farm to Fork Strategy, would be an opportunity to address these concerns in the EU, but also to lead the way in global fisheries. At the same time, it is important that the environmental sustainability of imported products is ensured in the interest of EU consumers and to guarantee a level-playing field for the EU seafood sector 16, in accordance with the current EU control, import and trade measures in force.

Our aim is to fully transition to more sustainable and low impact seafood systems - and is committed to ensuring the long-term sustainable performance of the sector. This will also allow to safeguard its contribution to a healthy marine environment, nutritious food production, and resilient coastal communities.

For more information, you can read the Multi AC advice on this subject adopted in December 2020: https://dac.eu/images/EN_Multi-AC_advice_Blue_Economy_09Dec2020.pdf

Q30. What kind of impact have you experienced as a result of spatial planning initiatives or other human activities?

- Positive
- Negative
-

I do not know

Please explain

3000 character(s) maximum

The Commission has ambitious plans to increase the share of renewable energy produced by offshore wind farms in the next decades. The distant water fishing sector is, in principle, not opposed to the installation of offshore wind farms, but valid concerns on the impact such installations have on fisheries are often disregarded. In most cases, offshore wind farms are installed in rich fishing areas and access to fishers is banned, forcing fishers to undertake longer fishing trips, to avoid areas attributed to offshore wind farms. This results in more fuel consumption, more trips, longer working hours, and more fatigue for the crew with the risks that go along with it. The Commission should take into account the very justified concerns the sea fisheries social partners have on this topic.

Clean (& healthy) oceans

This matter is linked to the [targeted consultation on the action plan to conserve fisheries resources and protect marine ecosystems](#) requesting the involvement in shaping the plan. The above-mentioned consultation will gather information and evidence on the current state of the conservation of sensitive species and habitats, and the availability and potential of innovative, more selective fishing gears and techniques. In addition, respondents are asked for input and suggestions on actions that could improve the way the relevant fisheries and environmental legislation are managed, implemented and governed.

Clean oceans are oceans free from any type of pollution. Main types of pollution are:

- eutrophication (excess of nutrients pollution/ agricultural runoffs)
- contaminants (pesticides, heavy metals, toxins) underwater noise (oil drilling, shipping)
- ocean acidification (atmosphere CO₂ dissolving in ocean)
- marine litter (plastic, wood, metal etc.).

To restore ocean health, the EU aims to regenerate and recover European marine ecosystems through actions to achieve cleaner marine waters, restore their rich biodiversity and make our blue economy climate friendly. The 2030 biodiversity strategy under the European Green Deal and the upcoming EU nature restoration instrument play a key role in triggering these actions on the ground.

To help our oceans become clean and healthy, the CFP helps protect the marine environment, sustainably manage all commercially exploited species, and in particular achieve good environmental status for EU waters in line with the Marine Strategy Framework Directive's requirements. Clean oceans also mean more healthy and nutritious fish for people's plates.

More specifically on management measures under the CFP, the EU's efforts focus on, e.g.:

1. regulating fisheries to ensure fishing takes place at a sustainable level and to minimise negative impacts of fishing and aquaculture activities on marine ecosystems
2. [banning certain single-use plastic items and reducing the use of plastic in fishing gears](#)
3. encouraging ship operators to [deliver all waste to ports](#)
4. [improving the rules on reporting of lost fishing gear](#)
5. ensuring that the development of aquaculture in the EU does not significantly harm ecosystems and biodiversity.

Synergies between different human activities at sea come together in initiatives such as a European Blue Forum, as announced in the new approach for a sustainable blue economy.

Clean oceans at international level

The Commission is also stepping up its commitment to the fight against marine litter at international level, including in the UN, G7, G20 and other international fora. It promotes regional cooperation with Regional Sea Conventions.

The Commission drives research to create innovative and impactful solutions for clean and healthy oceans. The [European Maritime, Fisheries and Aquaculture Fund](#) (EMFAF) also includes as a priority, helping to strengthen international ocean governance and enabling seas and oceans to be safe, secure, clean and sustainably managed. The EMFAF provides support to develop solutions for restoring and maintaining ocean health and tackling marine litter. The fund compensates fishermen for bringing ashore waste caught in their nets rather than dumping it back into the sea.

Questions related to how the CFP contributes to environmental legislation, and to implementing the [Technical Measures Regulation](#) and protecting sensitive species and habitats are not covered in this questionnaire. They are covered in the [consultation on the action plan to conserve fisheries resources and protect marine ecosystems](#) running in parallel.

Q31. What is the impact of pollution on the fishing- and aquaculture community?

Please select first which sector you want to answer for (both possible)

- Fishing community
- Aquaculture community

Q32. How do the fishing community and/or the aquaculture producers work on to protect oceans (from pollution)?

Please select first which sector you want to answer for (both possible)

- Fishing community
- Aquaculture producers

Q33. What further initiatives and actions could be taken, within the CFP's current legal framework, to support the objectives of ensuring clean oceans within fisheries and aquaculture management? Do you have any examples of good practice that you would like to share?

3000 character(s) maximum

Social dimension

Under its objectives, the CFP Regulation sets out that ‘... *fishing and aquaculture activities....are managed in a way that is consistent with the objectives of achieving economic, social and employment benefits (...)*’, and that the ‘...*CFP shall, in particular, ... contribute to a fair standard of living for those who depend on fishing activities, ... taking into account socio-economic aspects*’.

The collection of specific social data began in 2019. This resulted in a [first report](#) by the Scientific, Technical and Economic Committee for Fisheries on social data in the EU fisheries sector. The report covered, in particular, the profiles of the EU fleet’s workforce in terms of age, nationality, education and gender. The next report will be published in 2022 and should pave the way for a more refined analysis of the social dimension of EU fisheries. It should also provide the tools to better take into account social aspects when proposing measures on fisheries management.

The social dimension in fisheries also comes to the forefront in initiatives taken by the [EU social partners](#) such as the agreement which led to the International Labour Organization’s ‘Work in Fishing Convention’ being introduced into EU law (Directive 2017/159). Other aspects concern:

- the training of fishers
- safety of vessels
- the attractiveness of the sector for young fishers
- the international dimension.

Q34. What key social aspects should be taken into consideration when proposing/adopting fisheries management measures?

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The current Common Fisheries Policy (CFP) focuses on economic and environmental sustainability, leaving aside social sustainability. Addressing the issues not sufficiently covered in the current CFP is crucial, as highlighted in the mandate given to the Commissioner for Environment, Oceans and Fisheries, Mr. Sinkevičius. Some of the problems currently faced by the sector have already been highlighted in the European Parliament report ‘Fishers for the future’ as well as the European Economic and Social Committee (EESC) opinion on the social dimension of fisheries . Furthermore, President von der Leyen, during the state of the Union 2021, has been very clear on the need to “ban [...] products in our market that have been made by forced labour. Human rights are not for sale – at any price,” and this is particularly relevant for fish products.

In May 2021, a joint advice was issued by stakeholders represented by the LDAC and the EU Social Partners, underlining the importance for the international community and the EU to adopt international fisheries standards that promote safety and good working conditions for fishers, training, and responsible fishing operations.

1. Despite socio-economic issues featuring in the CFP’s objectives (e.g. a fair standard of living for those who depend on fishing activities), the social dimension of EU fisheries is generally overlooked. The CFP notably calls for the improvement of safety and working conditions for fishing operators, however this must be better implemented in order to attract young fishers by offering good prospects for the future, better protection and optimal working conditions across the sector.
2. Social indicators and targets in fishery instruments such as fishing opportunities and multi-annual plans are largely missing. Adequate funding to achieve these objectives can be provided by placing the social dimension as a strong pillar within the European Maritime, Fisheries and Aquaculture Fund (EMFAF).
3. The socio-economic sustainability of the fleet has not been fully achieved despite a steady and constant decrease in the number of vessels and fishers over the last 20 years. (source: STECF Annual

Economic Reports). There has also been a substantial reduction in employment in EU fisheries, with a steady reduction in fleet capacity of small vessels, with a concentration of quota and profits in big fishing companies.

4. The fisheries policies need to be more explicitly linked to social and safety goals (crew safety, economic sustainability...), similarly as multi annual fisheries plans make cross-references to the objectives of the MSFD.

5. While fisheries limits are marked by biological and ecological conditions of the stocks, it is advised to use best available social and economic data, as an ad-hoc bio-economic model, to ensure best socio-economic performance within the management targets and time framework.

Q35. What initiatives should be taken to further strengthen the CFP's social dimension within its current legal framework?

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Wild capture fisheries are widely recognised as one of the most hazardous professions in the world. According to FAO's 2020 The State of World Fisheries and Aquaculture report, "fishing remains one of the most dangerous occupations in the world, with high accident and fatality rates in most countries" and "conservative estimates of fishing fatalities have increased to more than 32 000 people annually. The numbers of fishers injured or suffering from work-related".

The EU legal framework is severely lacking in this area. For example, many Member States have failed to ratify the 2012 International Maritime Organization (IMO)'s Cape Town Agreement on Fishing Vessel Safety, the only international instrument dedicated to fishing vessel safety and those working onboard. To date only 8 Member States have done so, despite a Council decision authorising them to do so by 2016.

Similarly, the ILO Work in Fishing Convention (ILO C188) has only been ratified by 7 MS. Furthermore, the European Commission has not included in its work programme a proposal for a European Directive to incorporate the IMO Convention on Standards of Training, Certification and Watchkeeping for Fishing Vessel Personnel, 1995 (STCW-F 95) into the *acquis communautaire*. We call on the European Commission to adopt a Directive on compliance and enforcement of C188.

We reiterate that ratification of international instruments is fundamental to guarantee a safe environment for all workers in the fisheries sector internationally and a level playing field. Particularly on bringing into force the Cape Town Agreement, we are now at a critical junction with 16 ratifications out of the minimum 22 and c. 1,900 vessels out of 3,600 required to bring it into force. The European Commission should alert again Member States as well as EU's international partners' in order to obtain more ratifications.

Environmental objectives are not necessarily separated from social objectives: instead an improvement of the social dimension can lead to better environmental protection. For example if fishers have good working conditions, are well trained and well equipped, fewer mistakes are made, which can contribute to reduce (the chance of) accidents with serious environmental consequences.

The narrowing down of the CFP's social dimension in fishing to just levels of employment, which has a downward trend of 2% per year, disregard other important considerations such as fishing vessel safety, training of fishers, and working and living conditions of fishers, the viability of the value chain and the effect of technical measures on fishers' safety, health, and income. These factors are not consistently included in the development of fishing rules, or funding provisions, for the industry.

So far poorly implemented, art 17 of the CFP should be used to incentivize and support better social practices by using more criteria of a social nature in the distribution of fishing opportunities.

Climate change

The ocean-climate nexus is essential for the EU and forms an integral part of our policies, particularly the European Green Deal and the EU Agenda on International Ocean Governance. Both aspects i.e. mitigation and adaptation are crucial.

Strongly reduced greenhouse gas emissions need to be coupled with sustained and robust adaptation actions. The Commission proposed the EU's first ever Climate Law which enshrines our commitment to reaching climate neutrality by 2050. The EU also agreed to reduce greenhouse gas emissions by at least 55% by 2030. With regards to adaptation, the ocean is an integral part of our new [adaptation strategy](#), including fisheries and aquaculture.

From a fisheries and aquaculture perspective, climate change should then be looked at having in mind the two following objectives:

1. adapting the fisheries and aquaculture sector, as well as the overarching regulatory framework, to changes in climatic and environmental conditions
2. reducing greenhouse gas (GHG) emissions from the fisheries and aquaculture sector, to mitigate the scope of climate change.

DG MARE and CINEA contracted two studies on this topic to be delivered in 2022. The purpose of the first study is to:

- assess the resilience of the fisheries system to climate driven stress and investigate whether the current management regime under the CFP is robust
- evaluate to what extent fishing strategies for rebuilding stocks can help improve energy use and efficiency
- assess the potential for reducing fisheries GHG emissions by technical means.

The purpose of the second study is to:

- explore, via a case study approach, whether the value chain (post-harvest) can be made more resilient to impacts of climate change
- identify how operators in the value chain can improve their resource efficiency and reduce their emissions of GHG.

Another study DG MARE is launching will assess the potential of shellfish and algae to recycle nutrients and to estimate the greenhouse gas emissions generated by their production. With increasing changes in climate, there is still little understanding of the short and long term impacts on (commercial) fish stocks. However, any guidance must take into account potential changes in geographical distribution, change in biomass reference points, change in species relationships, changes in the abundance and diversity of non-indigenous species, as well as changes in productivity of a fish stock.

Q36. What challenge(s) do you face or are you aware of in relation to climate change in EU fisheries and EU aquaculture?

Please select first which sector you want to answer for (both possible)

- EU fisheries
- EU aquaculture

Q37. What are the possible solutions for fisheries and aquaculture to adapt to the changing environment, including in terms diversifying activities? Are there any good practices/ innovations that could help you overcome the challenges you mentioned above?

Please select first which sector you want to answer for (both possible)

- Fisheries
- Aquaculture

Please answer Q37 for fisheries

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The EC should fully take into consideration the remarkable cuts of greenhouse gas emissions in the EU distant water fishing sector over the last 30 years and the low environmental impact compared with other land-based animal protein producers.

Q38. How can the fisheries sector and the aquaculture sector further reduce their emissions? Are there any good practices/innovations that could help you overcome the challenges you mentioned above?

Please select first which sector you want to answer for (both possible)

- Fisheries sector
- Aquaculture sector

Q39. What initiatives should be taken to further strengthen the CFP's climate dimension within its current legal framework?

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Climate change has already had a remarkable impact in changing the distribution patterns of several pelagic and demersal stock, heading further north and east for the case of the Atlantic. This has socio-economic consequences for affected fleets as well as it affects historical fishing rights moving between EEZs of third countries and international waters (e.g., case of mackerel in NEA, or northern hake in North Sea). It also affects to bilateral and multilateral negotiations between the EU and other flag and coastal states of the NEA such as Norway, UK, Iceland or Faroe.

Climate change will exacerbate any and all issues impacting EU fisheries. For example, rising water temperatures will stress already sensitive fish populations while simultaneously increasing coastal communities' reliance on marine foods, making it harder to manage issues like overfishing or IUU fishing.

The EU should be taking steps to implement an ecosystem-based approach to fisheries management. In particular, it should be doing all it can to ensure that fish populations are healthy and resilient to the increasing climate-driven changes, for example in the Northeast Atlantic and the Arctic, and that these species can maintain its key role in the ecosystem. Adopting and sticking to this approach is all the more urgent as scientists have highlighted several species' changing spatial distribution as a potential example of climate-driven shifts.

Managers should draw on the best available science from the International Council for the Exploration of the Sea (ICES) to address these challenges by requesting that ICES factor more precautionary ecosystem and climate considerations into its advice.

Any further comment?

Is there any further comment / information that you would like to share with us?

- Yes
- No

Please elaborate in the text box below, or upload a document

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TIMING AND RELEVANCE OF EU ONLINE PUBLIC/TARGETED CONSULTATIONS:

In light of the assurances made by DG MARE at the Inter-AC coordination meeting between European Commission and Advisory Councils held on 19 January 2022 regarding the format and timeline for Advisory Councils to respond to public consultations, the LDAC suggests that this arrangement be formalised so that the engagement of the ACs in these consultations is fully transparent specifically regarding any deadlines and the weight and relevance of their responses is considered given the wide/diverse constituency and membership over responses from individual citizens or organisations.

ADDITIONAL CONSIDERATIONS ON SFPAs:

There must be a consistent approach of the SFPAs with the principles embedded in the Green Deal when applying technical measures such as spatial management (coastal management, exclusive access for coastal communities of certain fishing grounds closer to shore "zoning") related to achievement of environmental and socio-economic performance indicators that can be subsequently evaluated.

Emphasis should be on positive incentives promoting preferential access for sustainable fishing practices rather than blunt or overall prohibition or exclusion of single fishing gears per se.

SFPAs include an article promoting cooperation between fishing operators of both the EU and third countries as contracting parties, including under joint ventures. However, it does not stipulate the conditions under which such EU fishing investments are to be sustainable. In many partner countries, the legislative framework and implementing measures for the establishment and for controlling the operations of such enterprises set up with foreign companies is weak and opaque in many cases.

The EU should showcase examples of good practices of EU investments in third countries in terms of beneficial impact in training, education, employment, value addition, generation of wealth, and fixing of

population.

ROLE OF WOMEN IN FISHERIES

The EU should seek coherence and synergies with other EU actions and policies relevant to the role of women in fisheries (incl. development for cooperation) is equally fundamental. There should be an emphasis on supporting local sustainable fishing communities, and visibility and promotion of the role of women on them.

It is also paramount to adopt strategies for women to work aboard fishing vessels, especially as bridge and engine room officers. This approach requires that privacy of women and men can be guaranteed on board of the vessel. This means separate cabins and sanitary facilities and that means increase of volume (= gross tonnage) which the CFP in its present form hampers.

FARFISH POLICY BRIEFING ON CFP EXTERNAL DIMENSION:

The LDAC has coordinated a policy brief under the Farfish H2020 project formulating recommendations:

<https://www.farfish.eu/2021/10/21/policy-brief-on-the-external-dimension-of-the-common-fisheries-policy/>

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