

ADVICE

<u>Towards A New Generation of Sustainable Fisheries Partnership Agreements</u> (SFPAs)

Date of adoption: 16th October 2025 Ref: R-01-Ej.19 (2025-2026)/WG4

1. Background and objectives

This advice reflects the outcomes of discussions among LDAC members, held in focus group meetings on 27th January, 11th March, 5th May 2025 and 9th September concerning the future of Sustainable Fisheries Partnership Agreements (SFPAs).

Discussions on the future of SFPAs have also been held during the LDAC seminar in Vigo on 13th & 14th May¹, with the participation of LDAC partners COMHAFAT and AFRIFISH-Net, which are also reflected here.

2. General considerations

The LDAC recognises the progress made in strengthening the governance and development impact of SFPAs over the years. Moving forward, a continued, inclusive, and transparent dialogue with partner countries, as well as with both EU and third country stakeholders, is crucial to ensure SFPAs deliver mutually beneficial outcomes and genuinely become a central part of EU ocean diplomacy and the future strategic approach to EU fisheries external action.

In that context, SFPAs are acknowledged by LDAC members as key instruments to:

- Promote the sustainable exploitation of marine resources in partner countries, by EU fleets and other fleets, with the view of establishing a level playing field for EU fleets, aligned with high environmental and social standards.
- Support the development of a sustainable fisheries sector in partner countries, in line with the partner country's priorities, maximising long-term benefits for the local populations, in particular coastal fishing communities.
- Provide a stable long-term framework for the activity of the EU long-distance fleet and maintain associated employment, in Europe and in third countries, as well as the competitiveness of the fleet.
- Ensure the viability of sustainable food systems to supply both the European market and partner countries market contributing to local and EU food security.

¹ LDAC Seminar on "The Evaluation Of The Common Fisheries Policy (CFP): External Dimension"



In light of evolving global dynamics and emerging challenges, LDAC members also collectively acknowledge:

- The importance of enhancing coherence between SFPAs, RFMO discussions, EU trade, social and development policies, and international commitments (e.g., SDGs, fight against IUU fishing, BBNJ, free trade agreements...).
- The need to adapt SFPAs to a changing geopolitical and economic landscape, with increased competition from non-EU distant-water fishing fleets and countries offering alternative arrangements to partner countries, characterised by less stringent governance frameworks.
- The number of SFPAs affects not only the EU own (sea)food security but also the food security of nations depending on EU fleet catches. In today's world, marked by geopolitical instability, armed conflicts, and climate change, food including fish is no longer just a basic necessity; it becomes a tool of global politics. Disrupted supply chains, rising prices and limited access to food are increasingly used as pressure tool on vulnerable regions. The consequences are severe: growing famines, forced migration, and destabilising of already fragile areas. In this context, keeping or growing the level of fish catches by the EU fleet is very important.
- The LDAC stresses that the discussion on the future of SFPAs should be part of a larger exercise, looking at all legislations applying to EU external fleets, to define a European Commission strategy that will ensure these fleets, operating according to high social and environmental standards, survive and thrive in the future, in a context where they are increasingly facing unfair competition from fleets that do not respect such standards.

3. Areas for improvement for the new generation of SFPAs and recommendations

3.1. Ensuring Policy Coherence

There needs to be more coherence between SFPAs and the EU's development policy

- SFPA objectives should be formally aligned with EU Development Priorities: there is a need to maximise how SFPAs contribute to local food security, poverty reduction, marine resource sustainability, and respect artisanal fishers' access to resources and markets, in line with the EU's Global Gateway Strategy, the Agenda 2030 (SDGs), and the African Union's Blue Economy Strategy. In this regard, EU fishing activities under SFPAs should be oriented first and foremost toward supplying fish for human consumption, both in partner countries and in Europe, rather than for non-food uses. This should receive high-level political support from both Fisheries Ministers and Development Cooperation Ministers. We urge DG MARE to include in the upcoming strategic approach an annual high-level meeting of Fisheries Ministers and



Development Cooperation Ministers to ensure this political commitment results in concrete actions and increased coordination.

- SFPA's financial contribution should be increasingly earmarked (including through an increased sectoral support) for fisheries management, scientific stock assessments, value addition (infrastructure development to encourage landings, transformation, certification, and labelling for existing activities and processes, etc.), area-based management tools, including participatory managed marine protected areas, etc. The allocation of funds should take into account the needs of coastal communities, which should take an active part in identifying the priorities and in co-managing coastal areas. Synergies should be established between sectoral support funds and EU aid programs (including regional programs like WASOP², FISHGOV³, ECOFISH⁴/SWIOP⁵, or national programs, such PROMOPECHE⁶, etc.), in order to enhance the capacity of the EU to answer SFPA partners' requests for supporting initiatives that go beyond what sectoral support can offer.
- The EU should strengthen long-term local engagement in partner countries, taking inspiration from successful models from Member States and other nations (such as Japan), where dedicated representatives are embedded within recipient structures in the partner country to provide advice on implementation and sustained monitoring over several years.

There should be more coherence with market access conditions

- Through SFPAs, the EU has an important leverage for supporting legal and environmentally, economically and socially sustainable fish production conditions in partner countries, in a context where there is a need to ensure all products coming onto the EU market have been sustainably and legally produced. The EU should require high environmental, social and economic standards for all products placed on the EU market and be able to ban the imports of products from unsustainable and/or illegal

² West Africa Sustainable Ocean Programme (WASOP): aims to protect marine ecosystems and promote sustainable ocean resource use in West Africa by fostering inclusive economic growth (implemented in associated with, inter alia, the European Fisheries Control Agency (EFCA) and formerly known as "PESCAO" (2027-2024)).

³ FISHGOV: a European Union program that aims to improve fisheries governance in Africa. The program ran from 2018 to 2022.

⁴ ECOFISH: *to enhance equitable economic growth* by promoting sustainable fisheries in the Eastern Africa, Southern Africa and Indian Ocean region.

⁵ SWIOP: South-West Indian Ocean Programme.

⁶ PROMOPECHE: Création d'emplois décents et consolidation de l'emploi existant pour les jeunes et potentiels migrants dans le secteur de la pêche artisanale (Mauritania): https://trust-fund-for-africa.europa.eu/our-programmes/promopeche-creation-demplois-decents-et-consolidation-de-lemploi-existant-pour-les-jeunes-et-en



fleet activities (including fleets not respecting management measures in place for overfished and/or overexploited of fish stocks, forced labour, etc).⁷

- Fish consumption has health and climate benefits; it is therefore appropriate for the EU to aim to guarantee the availability of sustainably produced fish on the European market. The EU has developed a European Corporate Sustainable Framework⁸, and some segments of the European fleet have created a fishing model which provides evidence of compliance with best social and labour standards⁹, local investments¹⁰ and blue tech innovation. In order to enter the EU market, all fish products should meet the same sustainability criteria in terms of social responsibility and fisheries management and governance, including traceability standards. The European fleet, which adheres to high social standards, sets a good example for other fleets that do not, such as some Asian fleets¹¹. We encourage the EU to require environmental, social and economic standards from fishing products that can access the EU market.
- The EU should use its market as a tool to curb illegal, unreported and unregulated (IUU) fishing and drive and support reforms and improvements in countries with an SFPA, such as Guinea-Bissau a partner coastal State not entitled to export to the EU but from the waters of which fish exported to the EU is sourced by several EU and non-EU fleets. This situation highlights the critical importance of taking a holistic approach to SFPAs by also considering broader market-related aspects and trade interactions with nations fishing in the waters of partner countries. In that context:
 - In the Autonomous tariff quotas (ATQs), the EU should add social and environmental criteria which would mean that only sustainable products can benefit from tariff derogations, and should exclude countries with a yellow card.
 - The EU should encourage, in its SFPA dialogues with third countries to use the sectoral support funds, or other EU funds, to improve their fleet management and, in the future CATCH-IT (its uptake could be supported through such funds), to ensure that imports from high-risk flags are flagged and checked accordingly.

⁷ LDAC-MAC: Joint advice on the urgent need for effective implementation of EU import control rules across Member States, https://ldac.eu/images/EN LDAC-MAC Advice EU import control rules 27.06.2025.pdf

⁸ Omnibus regulation which includes: Corporate Sustainable Reporting Directive (CSRD); Corporate Sustainable Due Diligence (CS3D) and Taxonomy.

⁹ Social and labour standards as: having a contract, minimum wage, occupational risk prevention, healthcare on board, hospitalisation on land or repatriation...

¹⁰ Local investments as: employment opportunities on board, no transhipments at sea, utilization of local ports, shipyards..; contribution to local food security...

Vid. Guillotreau P, Antoine S, Bistoquet K, Chassot E, Rassool K. 2023. <u>How fisheries can support a small island</u> economy in pandemic times: the Seychelles case. Aquat. Living Resour. 36: 24

¹¹ Vid. https://ejfoundation.org/resources/downloads/North-Korean-labour-Chinese-vessels-briefing-2025.pdf



- Several SFPA partner countries flag vessels that have been engaged in frequent reflagging and that hide their ownership. Some SFPA partners are also featured on the International Transport Workers Federation's flag of convenience list¹². To help tackle this challenge, as committed to by the EU in the Ocean Pact, we encourage the EU to support the collection of data on beneficial ownership by SFPA partner countries and to exchange information of EU-owned vessels with the partner country.
- The EU should implement the recommendations formulated in the LDAC-MAC advice on the urgent need for effective implementation of EU import control rules across Member States, adopted on 27 June 2025¹³.
- The list of authorised vessels, managed by DG SANTE, should be more complete including, for example, the vessel IMO numbers. If the vessel is eligible for an IMO number, this number should be mandatory information in order to be able to appear on the DG SANTE list. An IMO number is free and available for any fishing vessel over 100 GTs or support vessels.
- From a consumer perspective: there is a lack of information on certain fishing products, particularly transformed, preserved and prepared products: such as the species (scientific name), catch area, fishing vessel's flag and the type of gear.

3.2. Strengthening the implementation of governance clauses in SFPAs

Human rights and respect for democratic principles are essential elements of SFPAs. The Common Fisheries Policy (CFP) Regulation introduced provisions in SFPA and/or their implementing Protocols underpinning the quality of the governance framework, including: the non-discrimination clause, the transparency clause, the exclusivity clause, and the human rights clause.

A better implementation of the **transparency and non-discrimination clauses** is essential to maintain a level playing field.

The EU should also make sure that both the annual Joint Committees, as well as the ex-ante/expost SFPA evaluations, look in detail at how the transparency and non-discrimination clauses have been implemented.

To improve transparency through SFPAs, a priority should be to publish SFPAs Joint Committee reports and Joint Scientific Committee reports and related documentation in a systematic and standardised way, excluding data that are covered by privacy laws, as well as on-going cases of suspected (not confirmed) compliance issues and other confidential elements. A precedent

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¹² https://www.itfseafarers.org/en/issues/flags-of-convenience/current-registries-listed-focs

¹³ See footnote 5.



exists in this area: in the case of free trade agreements signed by the EU with third countries, the reports of the joint committees are all published. It should be the same for SFPAs.

These actions would enable stakeholders and citizens, both European and from the partner country, to see how the transparency and non-discrimination clauses are being implemented. These publications are also the basis for informed participation of EU and partner country stakeholders in the negotiations and during the implementation of SFPAs protocols. On the EU side, participation could be ensured through the consultation of a balanced LDAC delegation. In the partner country, the participation of consultative committees/stakeholder groups through adequate consultation (that assemble local fishers, scientists, etc.) should be encouraged. For SPFAs, DG MARE should scope how to create a mechanism that would go further than promoting the involvement of existing consultative committees / stakeholder groups. In trade agreements, a Domestic Advisory Group (DAG) is set up in the EU and in the partner country or countries to advise on the implementation of the trade agreement or parts of it. That could be reproduced for SFPAs. Stakeholders' consultation should be a sine qua non condition of SFPAs — as is the transparency clause — and the modalities for such participation should be agreed upon and stipulated in advance during the negotiations of the parties.

The transparency clause should explicitly require the publication of key documents, including all access arrangements (including joint ventures and chartering), the state of resources, comprehensive vessel license lists, landings, license costs, control and enforcement plans, etc. This information should be accessible through an open-access database. Connected to transparency, SFPA protocols should always include requirements for participatory monitoring of IUU fishing.¹⁴

As part of the implementation of transparency clauses, the EU should also require more transparency in the operations of fishmeal/fish oil factories and their suppliers (quality/amount/species used) to ensure compliance with CECAF's recommendation that only fish processing waste will ultimately be processed, not whole fish.

In cases of overfished species, the EU should make sure scientific recommendations are followed up under the protocols. For example, CECAF recommended "retaining a ban on the catch and use of sardinella species for fishmeal throughout the subregion". The EU should ensure all its SFPAs of the concerned region include these provisions.

Similarly, for a better implementation of the non-discrimination clause, it should more explicitly define what constitutes discrimination, both financially and technically, including: discriminatory fees, taxes, or licensing conditions (zoning, gears, reporting, etc.), unfair sanctioning practices, etc. A complaint mechanism where fishers or stakeholders can report cases of discrimination should be established.

¹⁴ See Annex 3: https://www.iuuwatch.eu/wp-content/uploads/2025/06/FINALSFPA-POSITION-DIGITAL-edited.pdf



In discussions with SFPA partner countries, the Commission should promote the elaboration and implementation of national legislation for reporting on beneficial owners, as agreed by the OACPS¹⁵, an organisation of which all SFPA partner countries (apart from Greenland) are members of. The EU should document whether or not these measures are properly implemented, and if this is not the case, promote it, including providing help through the financial contribution. The EU should promote beneficial owners' transparency at a regional level.

Financial support should be conditional upon compliance with agreed SFPA provisions (e.g., license lists, Environmental Impact Assessment (EIA), costs of licenses).

Accountability and robustness of data collection is also necessary. There should be better data reflecting the environmental, social and economic conditions of the fishing operations. There is a need to focus EU support through SFPAs on data collection and sharing (including socioeconomic data), and to make good use of data from the fishing sector. Regional scientific cooperation and shared data collection should also be reinforced and better supported through various EU programs (INTPA, etc.).

Observers on board are essential and effective operational observer schemes should be ensured, considering any demand for flexibility in light of alternative measures (i.e. onboard monitoring, observers at landing, alternative control measures, etc.), in order not to affect the quality, quantity and robustness of data provided.

3.3. Social and labour conditions

In new SFPA protocols, an entire chapter is now dedicated to the employment of fishers on board EU vessels. This chapter covers topics such as the number of seafarers and the requirement for basic training in safety at sea, as well as measures to ensure transparency, particularly in the payment of wages, and fight against corruption.

To facilitate the implementation of this clause, a renewed effort should be made to support fishers' training through the SFPAs sectoral support.

Without prejudice to existing laws and process, and without undermining local competition, it would be worth considering promoting a local register of certified fishing agents commonly established by the EU and the partner country, whose tasks and rates would be clearly established, and enjoining vessels fishing under SFPAs to use those on the register exclusively¹⁶.

¹⁶ Vid. <u>LDAC</u> advice on the role of fishing agents hired by the EU fleets targeting straddling stocks and highly migratory species within the framework of SFPAs

¹⁵ https://www.oacps.org/wp-content/uploads/2022/05/Declaration -7thMMFA EN.pdf



A clause on Human rights¹⁷ abuses should be included and effectively enforced, in line with the <u>Samoa Agreement</u>.

3.4. The role of joint ventures under SFPAs¹⁸

SFPA clause on joint ventures should be more explicit.

3.5. The recognition and support for the role of women in fisheries

Women play a key role in fisheries¹⁹, particularly in small-scale fisheries in all the countries with which the EU has signed a SFPA; therefore, their role should be promoted through EU policies, in particular through the sectoral support of the SFPA.

The LDAC-AFRIFISH-NET joint advice on "Addressing the role of women in fisheries – example of EU SFPAs", highlighted specific recommendations on this matter, such as facilitating better access to raw fish material for processing and/or selling, improving working and living conditions for women in fisheries²⁰, and addressing the lack of visibility and representation in decision-making processes. EU funds should be used to improve existing facilities, improve port infrastructure and landing facilities (to facilitate processing), and provide training, in order to promote EU landings.

The EU and African partner third countries should continue to **critically assess**, **on a SFPA-by-SFPA and a species-specific basis**, **the extent to which mandating or incentivising a part of landings is appropriate**, and, where possible and relevant to do so, include relevant provisions in future Protocols.

¹⁷ Vid. Point 3.7.1 on the human rights clause of the Final Report of the <u>Evaluation and analysis of the Sustainable</u> <u>Fisheries Partnership Agreements (SFPAs) between the EU and third countries including an in depth analysis of the sectoral support component of the SFPAs</u>: « *The CFP Regulation provided in its Article 31.6 that SFPAs should include a clause concerning the respect for democratic principles and human rights, which constitutes an essential element of such agreements, and also an essential element governing the EU external relations in any domain (e.g. cooperation, trade)* »

¹⁸ Vid. <u>LDAC advice on improving transparency of fishing joint ventures in third countries</u> and <u>LDAC advice on advancing sustainability in EU-linked Fishing Joint Ventures</u>.

¹⁹ The sector employs an estimated 62 million people in primary production alone – approximately 24 percent women. (FAO. 2024. <u>The State of World Fisheries and Aquaculture 2024</u>. Blue Transformation in Action. Rome, FAO)

²⁰ "Millions of lives and livelihoods are supported by aquatic food systems. Yet, many small-scale producers, especially women, are vulnerable with precarious working conditions. Building their resilience is key to sustainability and equitable development" (FAO. 2022. The State of World Fisheries and Aquaculture 2022. Towards Blue Transformation. Rome, FAO)

[&]quot;Some 500 million people rely on small-scale fisheries for their livelihoods, including 53 million involved in subsistence fishing – 45 percent of whom are women". (FAO. 2024. The State of World Fisheries and Aquaculture 2024. Blue Transformation in Action. Rome, FAO)



3.6. How to approach dormant agreements?

Currently, because of the exclusivity clause included in SFPAs, EU vessels cannot fish in a partner country's EEZ without a protocol, even when this absence of protocol is not linked to fisheries resource availability.

In addition to dormant agreements, the EU has a policy that impedes the renewal of an expired protocol when the partner country has been yellow-carded. This disadvantages the EU fishing fleet and affects its competitiveness (as non-EU fleets continue to fish and may export the catch to the EU market).

Some members suggest either reducing the exclusivity clause scope, especially in cases where protocols have remained dormant for extended periods, or denouncing the dormant agreements, in order to avoid market distortions and ensure access opportunities. Possibilities to reduce the exclusivity clause scope, whilst maintaining the high SFPAs standards on sustainability, should be explored for fleets that are meeting similar requirements to those required under an SFPA protocol, through RFMOs (reporting requirements, etc.).

Some members favour maintaining the exclusivity clause to ensure data exchange, monitoring, and prevent less sustainable arrangements

3.7 Developing a regional approach to SFPAs

A strong support exists for a regional approach to SFPAs, especially to develop regional resource evaluations on shared stock, mutualise observer programs or facilitate control, monitoring and surveillance measures that are compatible between coastal states. SFPAs' protocol conditions are already very similar, also thanks to the SMEFF that applies equally to all EU-flagged vessels. Differences are mainly due to the partner countries' different regulations and context, and their expectations and demands during negotiations. To progress towards harmonisation, it is important that the EU supports and participates, including as an observer, in regional initiatives of minimum terms and conditions being developed by partner countries' groupings (SRFC, COMHAFAT, AU).

The EU should promote regional cooperation between its partners to ensure better governance and control over foreign agreements, like in the case of small pelagics in West Africa²¹.

Synergies resulting from SFPAs should also be leveraged to foster cooperation in RFMOs.

²¹ Vid. LDAC Advice on Regional Efforts in West Africa towards Sustainable management of small pelagic stocks



3.8 Improved scientific assessments for SFPAs, especially for non-tuna or tuna like stocks

The EU should continue to contribute to the production of knowledge and information through various research initiatives at national or regional levels. Such research should not be only about the fish resources targeted by EU vessels, but continue to be as well on resources that are of key importance for local populations, like the small pelagics in West Africa.

The scientific report of the last CECAF working group²² on the state of small pelagic resources off the coast of North-West Africa, held in July 2024, shows that the situation of small pelagics in the region is alarming: five out of nine small pelagic stocks - sardine (in Area C), round sardinella, flat sardinella, Atlantic horse mackerel and ethmalose (bonga) - are overexploited. The report also highlights that sardinella stocks are in a critical situation, heavily overexploited and with very low biomass levels.

The recommendations included in the LDAC's recent advice on regional efforts in West Africa Towards sustainable management of small pelagic stocks are relevant here especially R3.

Increased investments to ensure robust stock assessments for non-tuna species are essential. The poor state of some of the pelagic stocks paired with the weak implementation of the non-discrimination and the transparency clause make it difficult to assess the complete footprint of all the fishing activities in the waters of SFPA partner countries, putting at risk the sustainability claims for some Agreements.

The tools to enhance compliance of EU vessels operating under SFPAs must be utilised more effectively:

- Electronic logbooks should be shared with partner countries in near real-time under SFPAs. The electronic logbook should be integrated into an electronic recording and reporting system (ERS). To allow for the transmission of ERS data to the partner country, in addition to the EU flag State, the sectoral support provided to partner countries should provide for the establishment of and/or supporting the operation of fisheries monitoring centres in partner countries or its integration to a regional one, the necessary IT equipment and software to automatically transmit ERS data and any relevant training.
- Vessel tracking data should be shared in near real-time with the SFPA partner countries. The Protocols of all active SFPAs also require EU vessels to be equipped with a VMS, though there are differences between Protocols in terms of the maximum frequency for transmission, fallback measures in the event of an interruption of transmission of VMS data and the transmission of instant messages for entry and exit of the partner country's EEZ or entry into ports. This VMS data should be shared in real-time with the

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https://openknowledge.fao.org/server/api/core/bitstreams/17b960e7-5980-417f-8a45-021b1503d6cc/content



coastal State as well as the European Commission and the European Fisheries Control Agency (EFCA)

3.9 Improved communication on SFPAs

The SFPAs still suffer bad perception in partner countries. To improve this, it is important to enhance the credibility of the EU not only vis-à-vis its partner countries, but also in global fisheries and ocean governance.

There are different reasons for this situation, including:

- Often, the EU has the same communication for tuna SFPAs and mixed species SFPAs. It communicates on tuna SFPAs mentioning that EU fleets 'access the surplus of resources', which is not adapted to describe the basis of a tuna SFPA. This creates confusion for third countries' stakeholders.
- The results delivered by the sectoral support are still too often invisible. Better communication on this includes publishing the partner country's annual reports on what has been done with the sectoral support monies. Enhanced inclusivity and participatory processes, both during the negotiation and implementation phases, would also help improve the situation.
- EU reflagged vessels under joint ventures are perceived by local stakeholders as EU vessels. While the EU or the Member States haves no flag state competence over vessels that do not fly the EU flag, EU nationals might be involved, which highlights the pressing need for a framework for joint ventures.
- There should be more systematic and proactive communication (by the EU in partner countries) about the findings of the SFPA evaluation, including the social and economic (jobs, landings, etc.) benefits of third-country stakeholders.

Finally, the LDAC notes that tackling disinformation is high on the agenda of the 2024-2029 College of Commissioners²³. The EU's external fisheries action, which includes SFPAs, must be an integral part of any initiatives in that respect.

3.10 Financial aspects of SFPAs

A criticism often encountered is that the EU should not use public funds to pay for the operation of private fishing fleets, including when fishing possibilities negotiated and paid for are not used at optimum level, and when SFPAs are not seen as 'value for money'.

There is a general consensus that the 'value' of the public money paid under SFPAs covers more than just the payment of fishing possibilities. The value of SFPAs should also be estimated according to the long-term tangible benefits they provide to the partner countries' populations

European Commission, Commissioner McGrath mission https://commission.europa.eu/document/download/27636865-211e-46fe-97fb-582b514c78f9_en?filename=mission-letter-mcgrath.pdf

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(sectoral support, infrastructures, employment, science, know-how, landings, etc). Increasing the 'value for money' should mean increasing the benefits for the partner country.

On the EU side, it is also highlighted that the value of SFPAs is also about having economic assets (EU fishing vessels and companies) that grant food security, strategic self-sufficiency, and provide healthy proteins to EU citizens at affordable prices.

Regarding the fact that fishing opportunities paid in advance in SFPAs are not used at optimum level, one reason is because DG MARE SFPA unit (B.3) does not consider the CMMs and catch limits that the RFMO unit (B.2) has agreed to at RFMOs. The EU fishing fleet has decreased while the EU has continued negotiating SFPA Protocols applying the same criteria and strategies that have become outdated.

Regarding the operators' payments under SFPAs, it has been underlined that EU fleets pay a fee for access similar to what is paid by other fleets of foreign origin, and taking into account their specific contribution to local development (landings, employment). These fees, while they must be fair, must also be economically viable for operators and ensure the sustainability of their business. License fees have increased exponentially compared to fish price, and are never reviewed downwards, which also influences the SFPA utilization.

Partner States should be encouraged to better implement the non-discrimination clause to align their licensing conditions across all foreign fleets, preventing certain fleets from undercutting the EU by paying lower fees or bypassing sustainability requirements.

The level of these fees should reflect sustainability considerations, the management costs incurred, and consider the impacts on the fleet's operations.

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