



## **LDAC STATEMENT**

**Inter AC Roundtable discussion with Commissioner Kadis and DG Vitcheva**

**Preparation of December Council AGRIFISH on Fishing Opportunities for 2025**

**Venue: CCAB - Brussels, 3 December 2024 - 11:00-12:30h CET**

***Attendees (in person only): Iván López (Chair) and Vanya Vulperhorst (First Vice Chair)***

### **FIRST SECTION – ORAL STATEMENT AT THE MEETING (pages 1-3)**

#### **Introduction**

On behalf of the EU Long Distance Advisory Council (LDAC), I would like to congratulate you for your recent approval by the European Parliament as Commissioner for Fisheries and Oceans, and wish you a smooth start of your mandate, for which you can count with our cooperation. It is particularly appreciated that you want to meet with the eleven Advisory Councils to exchange views ahead of the December meeting of the Council.

The LDAC is currently made up of 54 members from 12 EU coastal states, comprising fishing sector organisations (including catching, processing and marketing sectors, and trade unions), and other groups of interest (environmental NGOs, consumers and civil society).

Through the CFP, the EU is committed to ensure that the distant water fleets activities are based on the same principles and standards as those applicable under Union law, whilst promoting a level playing field. The LDAC is uniquely placed to monitor this commitment. Moreover, we are affected by some decisions related to conservation and management of fishing resources and allocation of fishing opportunities on those transboundary stocks that are shared with third countries such as Norway and UK (both bilaterally and trilaterally).

#### **Access agreements with North Atlantic countries**

The LDAC is concerned about the ongoing negotiation for the renewal of the agreement with Norway both in the small pelagics and the demersal stocks. In the last years, there has been an uneven application of the principle of reciprocity when coming to access to waters and fishing resources from EU vessels in Norway. The longstanding situation on Arctic Cod and snow crab in Svalbard or the imposition of trading fees when unloading EU catches on Norwegian ports are only two examples of this tense bilateral relations. We think that the EU might consider using its market force and impose restrictions in the worst case scenario that no agreement is reached, or unilateral impositions occur. Regarding other countries, we are happy to see that the protocol of the sustainable fisheries partnership agreement with Greenland has been renewed for five years from 2025 and we would also be interested in promoting more dialogue to reactivate the SFPAs with other countries such as Faroes or Iceland should there be genuine will from both parties.



## **Governance in the North East Atlantic**

There is a clear need in our view to enhance the role of the EU as champion of sustainability in a multilateral context. As indicated in our advice from 2022 with a decalogue of recommendations to reposition the EU role in the NEA fisheries negotiations in a post-Brexit Scenario[1], we feel we have lost both strategic weight and influence in the region. It is also of concern the current mismanagement of NEAFC in terms of ensuring conservation of key commercial stocks as a result of unilateral quotas and Coastal States arrangements for NEA main pelagic, demersal, and deep-sea stocks. While agreements like the EU-UK TCA provide negotiation frameworks, annual fishing limits depend on international talks, which often fail to ensure sustainable exploitation. Disagreements, such as on mackerel, have led to unilateral quotas exceeding scientific advice, resulting in overfishing.

To address this, the EU must uphold CFP obligations by ensuring fishing limits align with scientific advice and promote and ecosystem-based management. Transparent negotiations, long-term management plans, and robust monitoring are essential. The EU should lead by example, tackling overfishing and advocating for the precautionary approach, biodiversity conservation, and ecosystem health. Resolving allocation issues for key pelagic stocks and fostering multilateral collaboration remain critical priorities.

In more details, the LDAC has produced on September a dedicated advice in preparation for the 43<sup>rd</sup> NEAFC Annual Meeting[2] with recommendations on work areas such as:

- Assisting to implement an Ecosystem based approach to fisheries management
- Promoting Spatial management through Marine Protected Areas (MPAs), Other Effective Conservation Measures (OECMs) and Vulnerable Marine Ecosystems (VMEs) that are compatible with sustainable fishing activities.
- Including climate change considerations for decision making processes to better mitigate, prepare for, and respond to climate change impacts.
- Providing feedback on the NEAFC Performance Review to be completed in 2025.

The LDAC is also interested in enhancing collaboration between NEAFC, ICES and OSPAR to achieve the above objectives and develop a practical approach for regional-scale ecosystem-based management, as stated in OSPAR 2030 Environment Strategy.

Last but not least, we are keen to work with the PELAC to explore and identify common scenarios to improve stakeholder engagement and access to information.



## **Trade flows and market access**

We are concerned about the steady increase of dependency of the EU market on imports of fishing products caught and processed in non-EU countries. In relation to Norway, we are adamant of the need to address sustainability concerns of fisheries and aquaculture production in EU-Norway trade relations, as reflected in a recent correspondence submitted earlier in the year[3].

On the positive side, we wish to congratulate the EU for its exclusion of Russia from the new regulation for preferential market access (Autonomous Tariff Quotas) in line with the sanctions following the Russian invasion of Ukraine. As a result, the EU denies Russia the right to enjoy duty-free treatment for its fisheries products. We hope that this measure also apply to Russian fishery products processed in other non-EU countries such as Norway or China having as an end destination the EU market.

In general, there is a clear need for stronger requirements for countries benefiting from the ATQ scheme in terms of sustainability and social standards. There are currently too few requirements to access the EU market tariff free and conditions should be put on access. This should include ratification of key international fisheries and ILO requirements and being a member of the relevant RFMO of the target species. In addition, key traceability information should be provided and passed through the chain as required for fresh and frozen products in the EU Control Regulation and access should not be provided to countries that have been yellow carded.

The EU's dependence on imported seafood and the lack of level playing field impacts the European fishing industry. There is a clear need for holistic import rules that would increase the environmental and social standards of the seafood products that arrive on the EU market. Especially now that the Framework for Sustainable Food Systems seems to be permanently paused, we are interested to hear from you what your plans are to concretely take this forward.

Dependency on import is a threat to the EU food security and might have also negative impacts on EU policy on decarbonisation and reduction of CO2 footprint. Furthermore, when global world capture fisheries stabilised in the last 30 years around 90 million tonnes (FAO SOFIA 2024), there is an increasing demand of the Chinese market in terms of fish supply as a result of the higher purchase power and per capita income of the middle class. In this respect, we would also like to refer to our concern on the expansion of the number of vessels of the Chinese distant water fleets coupled with higher capital investment of Chinese owned companies in strategic primary sectors and food business in Europe, Africa, South America.

Our advice jointly adopted with the MAC in December 2022[4], together with the EU Parliament report published this year, reflects several documented cases of IUU fishing from Chinese vessels and a lack of level playing field vis-a-vis European fishing fleets, companies, and investments in third countries. In this respect, we welcome the EC proposal of Regulation to ban products made using forced labour on the EU internal market, is an important instrument that should help to improve traceability of fish products along fisheries value chain.



## **Concluding remarks and way forward**

From the LDAC, we thank you for your attention and reiterate our commitment to continue working with your services to ensure a sustainable and responsible fishing both in international and EU waters, helping to make the International Ocean Governance.

In terms of way forward, we hope to be able to have a bilateral meeting soon with you and your Cabinet to introduce our work more in depth and exchange further views on other areas of interest such as tuna RFMOs or those indicated below.

## **SECOND SECTION – OTHER AREAS OF WORK (Not included in the oral statement)**

### **IUU fishing and associated abuses**

Concerning legal fisheries, the EU must continue to leverage its global leadership by collaborating with non-EU countries to promote transparency in the fisheries sector and enhance their systems for combating IUU fishing. At the same time, the EU must set a high standard at home by tightening the implementation of its regulations. Gaps in the EU's seafood import control system must be addressed, and due diligence must be exercised in cases involving suspected IUU activities linked to EU vessels and nationals, ensuring accountability. Furthermore, the Commission must continue to put more emphasis on the social dimension of the CFP and market-related measures should be taken to tackle imported fisheries products suspected of being made using forced labour, reinforcing the EU's commitment to ethical standards in global trade.

### **Deep-sea mining**

Efforts to avert deep-sea mining (DSM) must be prioritised. The European Commission should reaffirm its strong opposition to deep-sea mining and actively engage with Member States and third countries to advocate for a global moratorium. In November, the LDAC, NWWAC, PELAC and SWWAC joined forces to express support for this position. We also expressed significant concerns about the potential negative impact of Norway's plans to advance exploration and exploitation activities on fisheries.

### **Strengthening DG MARE and the external dimension of the CFP**

On a more general note, the LDAC has long advocated for the strengthening of DG MARE and EFCA. We will continue to support this cause throughout your mandate. The success of ocean policies requires securing sufficient additional funding and staffing to enable effective implementation and enforcement across EU institutions and Member States. By the end of your mandate, we hope to see the external dimension of the CFP strengthened.



We would welcome information how the external dimension would be integrated into the Oceans Pact, and how the Advisory Councils will be consulted in this process. On the LDAC side, we will ensure the views of the partners countries stakeholders are taken into account through our partnerships with the COMHAFAT and AFRIFISH.

### **LDAC collaboration with ICES and STECF, and economic situation of the fleet**

The LDAC participates regularly in ICES annual coordination meetings, workshops and benchmarks. We are particularly active in the field of stakeholders' engagement. Our General Secretary was appointed co-chair in 2023 of a Workshop on Implementation of ICES Stakeholder Engagement Strategy.

This workshop produced a comprehensive report with a roadmap and 35 recommendations. We we have been co-authors of a Joint AC proposal to engage with MARE early in the year in formulation of requests for scientific advice to ICES.

The LDAC has been contributing significantly to the Distant Water Fleet Section of the STECF Annual Economic Report on the EU fishing fleet, for which our General Secretary acts as coordinator of the Expert Working Group on the different regional chapters dealing with RFMOs and regional arrangements (NAFO, NEAFC, ICCAT, IOTC, and CECAF).

### **ANNEX. Background information (for internal use if needed)**

The LDAC mission is to provide advice to your services on matters related to the External Dimension of the CFP, namely Fisheries Agreements with Third Countries, relations with Regional Fisheries Management Organizations (RFMOs) in which the EU is a contracting party, or with international organizations in whose waters the EC Fleet operates, as well as matters related to international ocean governance and horizontal topics such as fight against IUU fishing and level playing field between EU and non-EU fishing fleets and the products that enter into the EU market.

The LDAC also has an extensive network of collaborators and partners outside the EU. In particular, we have a fluid dialogue with FAO and have a MoU with ATLAFCO-COMHAFAT (the Ministerial Conference of African Coastal States in the Atlantic Ocean) and AFRIFISH-Net (the African Fisheries Non State Actors Platform) to support improvements in Africa-EU fisheries relations, fostering good practices at a regional and international level.

**-END-**



[1] [https://ldac.eu/images/EN\\_LDAC\\_Advice\\_on\\_EU\\_NEA\\_governance\\_16Feb2022.pdf](https://ldac.eu/images/EN_LDAC_Advice_on_EU_NEA_governance_16Feb2022.pdf)

[2] [https://ldac.eu/images/LDAC\\_Advice\\_NEAFC\\_2024\\_20Sept.pdf](https://ldac.eu/images/LDAC_Advice_NEAFC_2024_20Sept.pdf)

[3] [https://ldac.eu/images/EN\\_LDAC\\_Advice\\_Fisheries-Trade-Relations\\_Norway-EEA\\_10April24.pdf](https://ldac.eu/images/EN_LDAC_Advice_Fisheries-Trade-Relations_Norway-EEA_10April24.pdf)

[4] [https://ldac.eu/images/LDAC-MAC\\_Joint\\_Advice\\_China\\_Distant\\_Water\\_Fleets\\_13Dic2022.pdf](https://ldac.eu/images/LDAC-MAC_Joint_Advice_China_Distant_Water_Fleets_13Dic2022.pdf)