

Ms Charlina Vitcheva

Director General
Directorate General Maritime Affairs
and Fisheries
Rue de la Loi 200
1049 Brussels
BELGIUM

Date: 2 December 2022

PelAC reference: 2223PAC13

Subject: Pelagic AC contribution to call for evidence for energy transition in the fisheries and aquaculture sector

Dear Ms. Charlina Vitcheva,

On behalf of its members, the Pelagic Advisory Council (PelAC) appreciates the opportunity to respond to the Commission's call for evidence for the initiative on "Energy transition in the fisheries and aquaculture sectors", launched on 7 November 2022.

Firstly, the PelAC wishes to point out that the consultation period (of less than one month) limits the ability for the PelAC to submit a detailed position at this point in time. During this consultation period it is not feasible to hold in-depth discussions with the members and to finalise our internal advice approval procedures. Nevertheless, through this letter the PelAC wishes to highlight the importance it attributes to this key topic, as well as its commitment to deliver on this discussion with the Commission.

The issue of energy transition in the fisheries and aquaculture sectors, as outlined in the Commission note shared with the ACs during the Inter-AC meeting on April 29 2022, has subsequently been defined as a key priority issue for PelAC in its work programme. As such, the PelAC intends to deliver detailed input following a workshop foreseen in April 2023, which sets out to address the implications of energy transition in the pelagic fleet. Through the workshop, the PelAC aims to gather knowledge at the technical level as regards the state of play of research and ongoing projects relating to decarbonisation of the maritime/fishery sector, alternatives to fossil fuels (such as LNG, hydrogen or ammonia sources), and how more energy efficient technologies can be accommodated onboard pelagic vessels. The main objective of the workshop is to identify the key issues for the pelagic industry in the transition to cleaner energy sources, as well as the current gaps in research and development.

The PelAC welcomes the Commission's initiative described in the call for evidence, aimed at developing a strategy and a roadmap for energy transition in fisheries and aquaculture sector. In light of the EU Green Deal and the recent urgency of reducing the EU's dependency to fossil fuels, the PelAC considers this initiative timely and relevant. Particularly, the PelAC embraces the emphasis placed by the Commission on multi-stakeholder consultation, and its intent to feed the input from stakeholders into the strategy and roadmap. The PelAC is keen to contribute to these developments and underlines the importance of securing engagement with stakeholders throughout the entire process.





Further, in the call for evidence the Commission notes that existing input from stakeholders will be considered when shaping the initiative on energy transition, such as the AC positions received during the targeted consultation on the review of the CFP launched earlier this year. In this respect, the PelAC reiterates its previous comment included in its response to this consultation, raising the potential conflicts that exist between certain fishing capacity rules in the CFP and the ability to meet GHG reductions targets by implementing new technologies. This is especially the case with regard to the provisions set out in article 22 and Annex II of the CFP, that don't consider the search for profitable or improved vessel efficiency. The capacity ceilings as set in Annex II of the CFP hinder the ability for shipowners to satisfy the transition to the use of innovative, greener engines (LNG, hydrogen, etc.) that require larger vessels/engines to accommodate dedicated storage volume onboard. The PelAC strongly believes that such regulatory hurdles should be addressed when the Commission strategy for energy transition is being prepared.

Given the very tight deadline for this consultation, the PelAC considers this submission an initial reaction to the Commission call for evidence, assuming there will be ample opportunity to provide more detailed advice as the Commission strategy and roadmap take concrete form, such as through the envisaged specific targeted consultation with Member States and Advisory Councils mentioned in the call for evidence document. The PelAC would welcome more details regarding the foreseen timeline for this consultation, considering that the output generated from the PelAC workshop planned in April 2023 is expected to form an important basis for the PelAC's contribution.

Thanking you in advance for your consideration, and looking forward to your response,

Kind regards,

Sean O'Donoghue
Chairman Pelagic AC

