

**Ms Charlina Vitcheva**

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BELGIUM

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Subject: PelAC Contribution to the Evaluation of the 2013 Common Fisheries Policy

Dear Ms. Charlina Vitcheva,

Please find in the annex the Pelagic Advisory Council's contribution to the Evaluation of the 2013 Common Fisheries Policy.

We hope that you can take the content of this contribution into consideration,

Yours sincerely,



Esben Sverdrup-Jensen

Chair of the Pelagic Advisory Council





## Annex - PelAC contribution to the Public Consultation on the evaluation of the 2013 Common Fisheries Policy

The Commission's better regulation guidelines<sup>1</sup> indicate that an evaluation is an evidence-based assessment of the extent to which an intervention:

- is effective in fulfilling expectations and meeting its objectives;
- is efficient in terms of cost-effectiveness and the proportionality of actual costs to benefits;
- is relevant to current and emerging needs;
- is coherent (internally and externally with other EU interventions or international agreements); and
- has EU added value — i.e. produces results beyond what would have been achieved by Member States acting alone.

The Pelagic Advisory Council has carried out its own evaluation of Regulation (EU) 1380/2013. However, the conclusions as to the extent to which the Common Fisheries Policy requires intervention and amendment to improve effectiveness, efficiency, relevancy, coherence and has EU added value or should simply be repealed is left to the Commission's services.

### Is the Common Fisheries Policy effective in fulfilling expectations and meeting its objectives?

The first objective of the 2013 CFP is to *“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.”*

While the state of EU fish stocks has improved under the Common Fisheries Policy, meeting the objective of long-term environmental, economic and social sustainability has only been partially achieved. According the Annual Economic Report prepared by the Scientific, Technical and Economic Committee for Fisheries (STECF), the number of EU fishing vessels has reduced by 6% over the period 2013 to 2022, while the average age of the fleet has increased to more than 30 years and overall profitability across fleet segments has stagnated or reduced, The large-scale fleet has been most impacted, with vessel numbers reducing by 16%, engaged crew by 14%, gross value of landing by 8% and net profit by 62%. This is despite targeted support under the EMFF and EMFAF as well as additional supports to offset Covid, Brexit and the fuel crisis caused by the conflict in Ukraine. Additionally, there has been a lack of generational renewal with widespread difficulties across Member States in attracting and retaining crew. There has also been an increased reliance on cheap third country imports that now make up 70% of fish consumed in the EU, and undermine the competitiveness of the EU fleet

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<sup>1</sup> COMMISSION STAFF WORKING DOCUMENT - Better Regulation Guidelines:  
[https://commission.europa.eu/document/download/d0bbd77f-bee5-4ee5-b5c4-6110c7605476\\_en?filename=swd2021\\_305\\_en.pdf](https://commission.europa.eu/document/download/d0bbd77f-bee5-4ee5-b5c4-6110c7605476_en?filename=swd2021_305_en.pdf)





Despite improved fisheries management in the EU, regulatory reforms have not fully addressed overfishing or safeguarded the livelihoods of marine-dependent communities, partly due to conflicting policy objectives and limited focus on social outcomes. A more balanced allocation of fishing opportunities—emphasizing sustainability and broader participation in decision-making—is needed. Article 17 offers a framework for this shift but is hindered by vague definitions, inadequate reporting and differing interpretations and implementation by Member States.

The second objective in the CFP is to apply the precautionary approach to fisheries management, and ensure that exploitation of living marine biological resources restores and maintains populations of harvested species above levels which can produce maximum sustainable yield. This objective sets a first deadline in 2015 and a second deadline in 2020 to achieve the MSY fishing mortality rates. The Commission publishes a yearly Communication on Sustainable fishing in the EU, state of play and orientations. In its 2024 document, the Commission highlights that there are fewer stocks overfished in 2024 compared to 2003. However, this objective has only been partially met as not all stocks are being fished at MSY. MSY, while for some stocks the scientific data is insufficient to allow robust assessment. Moreover, the TACs for several important widely distributed pelagic stocks (mackerel, blue whiting and Atlanto-Scandian herring), are set in line with MSY, but due to the setting of inflated, unilateral quotas by some Coastal States, the sum of the actual catches exceed the TAC by 20-40%. This is due to the lack of comprehensive sharing arrangement between the Coastal States.

The third objective under the CFP, mandates the implementation of an ecosystem-based approach to fisheries management to ensure that negative impacts of fishing activities on the marine ecosystem are minimised and avoid the degradation of the marine environment. This objective has seen limited progress, even with the incorporation of EBFM into the scientific advice for some stocks. ICES publishes yearly Ecosystem Overviews that provide a state of play of an Ecoregion and that include wider ecosystem considerations. It has also started to publish non-fisheries conservation considerations suggesting measures to address other anthropogenic impacts. Work has been published on improving our understanding of marine ecosystems, however, including this science in stock assessment models has proven to be difficult. To address this, ICES published a Framework for Ecosystem-Informed Science and Advice (FEISA) that suggests concrete steps to implement EBFM in existing ICES publications (ICES advice, Ecosystem Overviews...). The PelAC recommends implementing ICES 's FEISA to improve the uptake of EBFM in ICES advice. PelAC also sees Management Strategy Evaluation and the establishment of Long-Term Management Strategies that consider ecosystem elements as a key tool to implement EBFM and ensure stability and additional predictability in catches of commercial stocks, while strengthening ecosystem health and resilience.

The fourth objective is the improvement in the quality of scientific data. The implementation of the CFP and the inclusion of dedicated measures in EMFF and EMFAF have ensured that data collection has intensified in the past 12 years. Moreover, ICES has had more and more data to improve its advice, increasing the number stocks with full analytical assessments. However, while funding for data collection has increased, the level of funding and capacity for analysis has reduced. To ensure that the data collected can be fully utilised, it is key to finance scientific research institutes to have the people, skills and time needed to analyse the data collected.

Discrepancies between fishers' perception of stocks and ICES advice remains a key challenge when it comes to the perception of fish stocks (e.g., boarfish). The better integration of fisher's information





is vital to understanding and better reflecting the current state of the marine environment in scientific advice.

The other objective set out in the CFP - to meet such as eliminating discards, contributing 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 and being coherent with the Union environmental legislation – remain relevant for the CFP going forward. Additionally, the market dimension of the CFP which is dealt with in a separate regulation, Regulation 1379/2013 (EU) is also under review and ensuring coherence with the CFP Basic Regulation is vital. A healthy and competitive markets are essential for the functioning of the CFP and a sustainable fishing industry.

### **Is the Common Fisheries Policy efficient in terms of cost-effectiveness and proportionality of actual costs to benefits?**

The PelAC is unable to comment on the cost-effectiveness of the CFP.

### **Is the Common Fisheries Policy relevant to current and emerging needs?**

The current CFP focuses on the environmental impact of fishing activities and plans to address them to limit their impact on the marine environment. However, it does not specifically address the increasing impact of climate change on marine ecosystems, even though it can be argued that it is implied in article 2.3, which states that the CFP shall implement the ecosystem-based approach to fisheries management, and in Article 3 (c), which calls for the establishment of measures in accordance with the best available scientific advice. The 2011-2020 decade was the warmest decade on record, with marine heatwaves becoming more and more frequent and intense: Approximately 60 % of the surface of the ocean experienced a heatwave over the 2011-2020 period<sup>2</sup>, with ocean temperature increasing, oxygen levels in the ocean drop, acidification increases intensifying the impact on all ocean trophic levels and on fish populations<sup>3</sup>. These rapid changes in Ocean conditions have an impact both on marine ecosystems, and on fishing which is dependent on environmental conditions. The current management system is based on management areas and quotas do not reflect changes in distributions and populations. Considering the increasing impact of climate change, and the expected impact it may have on fish stock distribution, the PelAC considers it key to ensure that a reformed CFP takes account of climate change, is resilient and is adaptable to react to the impacts in the future. In addition to climate change, pollution and biodiversity loss are also increasingly impacting on the ocean's resiliency. This best evidenced by the Baltic Sea as underlined in the Commission's communication: Sustainable fishing in the EU: state of play and orientations for 2025:

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<sup>2</sup> [https://library.wmo.int/viewer/68585/download?file=1338\\_Decadal\\_State\\_Climate-HG\\_en.pdf&type=pdf&navigator=1](https://library.wmo.int/viewer/68585/download?file=1338_Decadal_State_Climate-HG_en.pdf&type=pdf&navigator=1)

<sup>3</sup> <https://www.epa.gov/climateimpacts/climate-change-impacts-ocean-and-marine-resources>





*“The environmental situation in the Baltic Sea and its rivers is dramatically different from the situation in other sea basins, and it continues to affect fish stocks and their development. The Baltic Sea today faces multiple pressures, which have led to a decline in biodiversity. These pressures include eutrophication from nutrient inputs and persistently high levels of contaminants.”*

The CFP aims to “ensure that fishing and aquaculture activities are environmentally sustainable in the long-term”. However, in the case of the Baltic Sea, fisheries management measures will not be enough to ensure fishing and aquaculture activities are environmentally sustainable in the long term. Any change to the Common Fisheries Policy should address the dependency fisheries and aquaculture activities have to a healthy marine environment and ecosystem. The likelihood of a similar situation as prevails currently in the Baltic extending to other EU sea basins should be minimised as far as practicably possible outlined in the Commission's communication<sup>4</sup>.

Awareness of biodiversity loss has increased significantly since adoption of the CFP. The inclusion of EBFM in the CFP was the first step to include wider ecosystem considerations in scientific advice, including biodiversity loss. Addressing pollution and mitigating climate change will help reduce the impact of biodiversity loss.

To conclude, in 2013, the triple planetary crisis was relatively new, and its impact was relatively new as well. 12 years later, their impact is widely recognised and the impact on fishing activities is better understood. Fisheries can no longer be managed in a silo, nor can stocks be expected to rebuild, nor marine biodiversity to replenish without managing all activities impacting the marine environment. Sustainable fish stocks will only be possible if the impact of Climate change is limited, if pollution has been addressed and biodiversity restored.

### Third Country Agreements

In relation to third country agreements for managing widely distributed stocks, the CFP has failed to meet the commitment in Article 33, which states “Where no formal agreement is reached, the Union shall make every effort to reach common arrangements for fishing of such stocks with a view to making the sustainable management possible, in particular, concerning the objective in Article 2(2), thereby promoting a level-playing field for Union operators”. There have been no comprehensive sharing arrangements agreed for any stocks managed by the Coastal States and increasingly the EU has become isolated in these negotiations. The PELAC stresses the importance of the EU reminding the other Coastal States of their commitments to sustainable fishing, as obliged by the UN fish Stocks agreement. The Commission should also look to use all tools available including Regulation 1026/2012 (EU) to address unsustainable fishing practices by Coastal States and reaffirm this in a reformed CFP.

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<sup>4</sup> Commission Communication Sustainable fishing in the EU: state of play and orientations for 2025: *In particular the Nitrates Directive, the Urban Waste Water Treatment Directive, the Marine Strategy Framework Directive, the Water Framework Directive, the Habitats and Birds Directives, the Waste Framework Directive, the Maritime Spatial Planning Directive, the Single Use Plastic Directive, the Common Fisheries Policy Regulation, the integrated maritime policy and the common agricultural policy.*





The PelAC considers that the international fisheries governance in the Northeast Atlantic has changed significantly, and the CFP should be amended to reflect these changes.

### Inclusion of emerging societal changes

Animal welfare is mentioned in the recitals of the current CFP. From the PelAC perspective, there is a need to address data and knowledge gaps on how fisheries impact fish welfare. The PelAC is working on defining identifying knowledge gaps in pelagic Fish welfare and will share these findings with the Commission. This should be recognised in the CFP.

### A flexible CFP to adapt to changes in fish distribution, changes in (or lack of) Coastal States sharing arrangement and EU memberships

The issues faced by the sector in the past 10 years show the need to improve the agility of the CFP and associated regulations to adapt to substantial changes such as Brexit and climate change. The PelAC notes that there will be a need to ensure that fisheries management allow fishers to adapt to the changes in fish distribution. In this regard, the current sharing of quotas under relative stability needs to be reviewed given they are based on fishing patterns dating from the 1970s, making the adaptation to shifting fish stocks difficult.

### Is the Common Fisheries Policy coherent (internally and externally with other EU interventions or international agreements)?

Since 2013, the European Union has since published the European Biodiversity strategy, the “Fit for 55” Package following the publication of the European Green Deal, and the Maritime Spatial Planning Directive, the Nature Restoration Law, the Renewable Energy Directives (REDI, II & III) and others.

At international level, the EU has ratified the Kunming-Montreal Global Biodiversity Framework (GBF), the Agreement under the United Nations Convention on the Law of the Sea on the Conservation and Sustainable Use of Marine Biological Diversity of Areas beyond National Jurisdiction (BBNJ Agreement) and the World Trade Organisation Fisheries Subsidy agreement. Finally, the EU has signed with the United Kingdom a Trade and Cooperation Agreement following the withdrawal of the UK from the European Union.

It is vital that a reformed CFP is coherent with this legislation and that the EU fleet is not displaced to such an extent by environmental legislation that it becomes unviable.

### Green transition

Transitioning away from fossil fuel became a priority for the EU following the publication of the 2019 European Green Deal and the Fit for 55 package. These packages set the sector’s objective to reduce their CO2 emissions by 55% in 2030 and with the ambition of being carbon neutral by 2050. It is





important to note that the sector has reduced its emissions by 55% since the 1990s. Moreover, pelagic fish species can generally be considered as ‘low carbon’ food according to a report from BIM<sup>5</sup>.

Following the publication of the Commission Communication on the Energy transition of the EU fisheries and aquaculture sector in February 2023, the Commission has launched the Energy Transition Partnership for the Fisheries and Aquaculture sector (ETP) in June 2023. The objective of the ETP is to help the fisheries sector reduce their carbon footprint and to publish a roadmap to achieve climate neutrality by 2050. The PelAC published a dedicated advice on the energy transition available [here](#).

More recently, the PelAC would like to underline the importance of pursuing the discussion on how to reduce CO<sub>2</sub> emissions through broader changes than by changing to alternative fuels. Discussions on improving fishing gears, optimizing catches, finding the best steaming route to reduce fuel consumptions should be explored. The PelAC would also welcome a review of existing fisheries legislation with the aim of identifying environmental-friendly legislations that would lead to reductions of carbon emissions or of environmental footprint. This could be done as a part of the CFP evaluation process or in a separate process.

When discussing the green transition, the issue surrounding capacity is the first constraint limiting the transition to alternative fuels. The PelAC would like to underline that capacity ceilings management is a Member States prerogative and that differences in terms of management, implementation and capacity available exist between them. However, there is a need to ensure that capacity does not constitute a regulatory constraint to the green transition and in a wider setting for safety and social space needs. A similar discussion should be held on the Common Fisheries Policy, assessing how innovation and modernisation can be streamlined and better supported.

The PelAC notes that the limits in capacity are not dealt equally between Member States and that capacity ceilings are key to limit fishing efforts in fisheries that are not subject to TAC and quotas. The PelAC would welcome an assessment of the benefits of constraining fishing activities through capacity. This exercise would include a detailed report on how capacity is reported, how the reports are being used and the costs and benefits of limiting fishing efforts through capacity. The PelAC wishes to see a discussion on the added benefit of limiting capacity on single species fishing vessels. Finally, It is also noted that switching to alternative fuels will also bring in new ways of measuring capacity, both in terms of gross tonnage and kilowatts.

### The impact of the withdrawal of the United Kingdom from the European Union

Since the 1<sup>st</sup> of January 2021, the United Kingdom have left the European Union. The EU-UK Trade and Cooperation Agreement includes provisions on fishing activities, leading to yearly negotiations on 85 TACs. The access to UK waters is guaranteed until 2026 but will be subject to negotiations in the following year.

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<sup>5</sup> <https://bim.ie/wp-content/uploads/2023/02/BIM-Carbon-footprint-report-of-the-Irish-Seafood-Sector-1.pdf>







Brexit has led to the loss of quota for all EU fishers leading to decommissioning plans in Member States most dependent UK waters: Ireland, Denmark, France and the Netherlands. This change has also yet to be included in the remit of Advisory Councils in the CFP regulation.

Having a level playing field between parties, countries and fishing vessels is key to ensuring the competitiveness of EU fisheries, in line with Article 2.5 of the current CFP. As it stands, the PelAC is of the opinion that the current CFP must be adapted to the new context following Brexit.

### Change to the use of Maritime Space: Publication of the Maritime Spatial Planning Directive in 2014 & Kunming Montreal Agreement.

On the 23<sup>rd</sup> of July 2014, the Commission published Directive 2014/89/EU establishing a framework for Maritime Spatial Planning. This directive suggested the drafting of maritime plans per Member States to organise the deployment of Maritime activities and make the most of European EEZ. Following the publication of the directive, Member States developed these plans, dedicating specific areas to Offshore Renewable Energy and to Marine Protected areas, in line with the objectives of the Renewable Energy Directive or the EU biodiversity strategy.

Fishers were part of these plans, with MSP objectives being to contribute to its sustainable development and as much as other Maritime sectors. The implementation of these plans has had limited consultations with fishers, leading in some Member States to the closure of access to the windfarms, limiting access to certain fishing grounds.

The ratification of the objective for the protection of 30 % of EU waters objective is also a change of paradigm on the use of maritime space. This objective was also followed by the publication in June 2024 of the Nature Restoration Law, setting concrete restoration objectives for 2030, 2040 and 2050. The impacts of these pieces of legislation on the fishing industry need to be fully considered and coherence with the CFP ensured.

### The ratification of the Lisbon Treaty in 2012

In 2012, the ratification of the Lisbon Treaty recognised the role of the European Parliament as a co-legislator. The approval of the 2013 CFP was already well advanced in the process to allow Advisory Councils to advise the European Parliament in their new role. Considering the importance of the European Parliament on designing European legislation, The PelAC recommends that the ACs be allowed to advise and interact with the European Parliament in any future change to the CFP.

### Simplification considering the Commissioner's mission letter

Since the entry into force of the 2013 CFP, the fishing sector has seen an increase of regulations and directives impacting their operations, and the sustainable use of the Oceans. This has led to a lack of clarity on the coordination between environmental regulations (Marine Strategy Framework Directive's Threshold values, the restoration targets of the nature restoration law, the Marine protected areas objectives from the EU biodiversity strategy). Similarly, the provisions of the







technical measures' regulation, the revised control regulation and the CFP offer multiple obligations for a similar objective of managing fisheries. Under the Commissioner's mission letter, President von der Leyen vowed to reduce administrative burden and to simplify EU regulations. Building on the past 12 years of implementation, the CFP could benefit from assessing overlapping provisions in the light of the evaluation and of future fisheries regulations. Finally, with the implementation of Remote Electronic Monitoring and other measures embedded in the control regulation, which fully document catches, PELAC would contend that many technical rules, and targets relating to fishing capacity contained in the CFP would be no longer needed, once REM is fully operational and other relevant provisions of the Control regulation are fully implemented.

### **Has the Common Fisheries Policy had EU added value compared to what Member States could provide alone?**

In the context of EU fisheries, and the exclusive competence on Fisheries included in the Treaty on the Functioning of the European Union, the CFP has had added value in ensuring a level playing field between Member States to a large degree.

However, there are concerns about the interpretation of rules by Member States, particularly in implementing elements of the control and technical measures regulations. This has led to tensions between Member States that would not exist if the level playing across all regulations was achieved. To improve harmonisation and implement a level playing field in control measures, the European Commission created the European Fisheries Control Agency. The PelAC sees the work of EFCA as key to ensure a level playing field between Member States and to harmonise control. Their recent work on the issues of weighing will prove key to ensuring a level playing field.

The PelAC would like to underline the importance of ensuring that inspection regimes carried out aboard third country vessels in EU waters are in line with what EU vessels need to comply with. This will be even more important with the implementation of REM provisions in 2028 following the entry into force of the revised control regulation.

The PelAC would also like to recall the importance of implementing existing EU environmental regulations across all 27 EU Member States. The differences in implementation led to the Baltic Sea being in a poor environmental state, and this should be avoided for other sea basins. The CFP's added value compared to what member states could provide alone is undeniable, up to a point where similar regulations could be introduced to address pollution, mitigate climate change and reverse the marine biodiversity losses.

The EU's added value can also be seen through the implementation of Regionalisation. Article 18 of the CFP created a bottom-up approach to developing regulations at the level of the sea basin under Regionalisation. Member States Regional Groups can come forward with joint recommendations for changes to regulations which are adopted by the Commission in a delegated act. This inclusion was a positive change to the previous regulation, allowing a regional approach and allowing member States to regulations that are adapted to specific fisheries and that are co-built with other Member States and Stakeholders via the Advisory Councils. However, engagement with the different Member States Regional Group has proved to be challenging for the ACs. The Member States groups have not lived up to their commitments to engage in meaningful consultations with the ACs. This should be





addressed in a reform of the CFP and the legitimacy of the ACs to input into these joint recommendations fully recognised and copper fasten.

Additionally, in the case of the PelAC, implementation of regionalisation has proved doubly challenging due to the lack of a pelagic specific Member States Regional Group. As it stands, the PelAC must follow 3 Member States Regional Group making it challenging to engage with all three and to provide relevant advice and feedback to their work. A dedicated Member States group dealing with pelagic stocks is required.

Regionalisation in the Northeast Atlantic Fisheries has been diminished following from Brexit. Now more than 100 stocks of importance to EU Member States operating in the Northeast Atlantic are negotiate directly between the EU and the UK administrations, while other pelagic and demersal stocks are agreed under the Northern Agreements Coastal States, EU-NO, EU-NO-UK) also. The Role of the Member States in these negotiations has been diluted and lessen even further the extent to which the ACs can input into these negotiations which are vital to the fishing industry. The PelAC stresses that an update of regionalisation is needed to address the operation of regionalisation going forward. Finally, the EU added value comes through the publication of the European Maritime Fisheries and Aquaculture Fund and its previous iteration, the European Maritime and Fisheries Fund. By organising a dedicated funding framework for all EU fisheries, the Commission has had added value in funding and supporting the fishing sector. EMFAF and EMFF have been funding the implementation of the CFP. Moving to a single funding mechanism as muted by the Commission under a single MFF would be a retrograde step for the fisheries sector as it is likely the funding available to the sector would be diminished. Considering this, the PelAC would like to underline the need to further support the competitiveness of the sector and its resilience to the multiple challenges faced.

## Conclusion

In conclusion, the PelAC would like to underline that the objectives of the CFP have been partially met, particularly relating to fishing stocks at or below MSY levels. However, balance still needs to be found between the three pillars of sustainability, to ensure that EU fishing fleets remain profitable and that a new generation enters the industry.

The implementation of EBFM is still on its way, with ICES's FEISA paving the way to adapting current advice systems to include EBFM. Collection of data has significantly increased leading to an improvement in the quality of the underlying data used to set fishing opportunities and monitor performance of the CFP. However, there is a need to increase the capacity and means allocated to data analysis to make the most of the robust and effective data collection framework. In terms of cost effectiveness, the PelAC is unable to comment.

On the CFP's relevancy, the effects of climate change and pollution, as well biodiversity loss are being clearly seen in EU waters and by transitivity EU fisheries. While it's crucial to integrate these aspects into the scientific advice that underpins the CFP, it's equally important to consider their inclusion in the CFP's implementing regulations. Recognizing their significance, fisheries management should incorporate flexibility and adaptability to become resilient to challenges such as climate change, pollution, and biodiversity loss. This is even more important when key stocks can migrate and change the balance in the abundance and distribution of stocks.





On coherence, the policy environment around fisheries and the Ocean has changed since 2013. Mitigating the impacts of climate change through CO2 emissions reductions has become a priority, the withdrawal of the UK from the EU and the need to organise maritime space have completely changed the approach to fishing and the access to fishing grounds. The PelAC is of the opinion that there is a need to ensure that capacity does not limit the sector's energy transition all the while investigating alternative options to reduce its emissions. For Brexit, including the changed fishing grounds will be needed in the future, as well as rethinking the hierarchy of maritime sectors' access to maritime space considering food security. Furthermore, the changes following the ratification of the Lisbon treaty should be included in future fishery regulations.

It is undeniable that the CFP has had added value compared to what Member States could provide alone. The level of harmonisation in terms of control could only be achieved through EU level guidance. The level of support that has been allocated to the fishing sector through EMFF and EMFAF have benefited from the Commission's coordination and harmonisation. The sector's competitiveness will need to have a level playing field with third country vessels fishing competing with EU vessels.

To conclude, any changes to current and future fisheries regulations must be adapted to the current state of the EU fishing fleet, in terms of contribution to coastal communities' development, contribution to EU catches and impact on the marine environment.

## Recommendations

Considering the previous text, to boost the implementation of the current CFP and to reflect on how to improve future fisheries regulations, the PelAC recommends to:

- Implement ICES's FEISA for EBFM, the PelAC is ready to work on a first pelagic case study: North Sea herring
- Improve data collection, data modelling, move beyond having a single stock assessor in a single scientific institute and invest in new data collection methods such as the use of DNA to delimit fish stocks
- In light of the issues faced by the EU in the discussions with Coastal States on mackerel, herring and blue whiting sharing arrangements, re-thinking the definition of common arrangements, adopt the revision of Regulation EU 1026/2012 as early as possible and denounce the unlawful practices of Coastal States quotas being higher than what ICES advises.
- To adapt to the impacts of Climate Change, assess the importance of having a flexible approach to fisheries management and to setting fishing opportunities. Climate Change will have profound implications on the distribution of fish stocks, it is needed to plan and adapt current implementing regulations, as well as continuing to improve scientific advice in fisheries management to ensure fishers will be able to access fish stocks.
- Initiate a discussion on improving fishing gears, optimizing catches, finding the best steaming route to reduce fuel consumptions. Review existing regulations to identify environmental-friendly legislations that would lead to reductions of carbon emissions or of environmental footprint.





- On Capacity, assess the necessity of constraining fishing activities through capacity in the context of single species fishing vessels and in the light of the implementation of the revised control regulation. This exercise would include a detailed report on how capacity is reported, how the reports are being used and the costs and benefits of limiting fishing efforts through capacity.
- Set in the 2026 review of the Trade and Cooperation Agreement between the EU and the UK the MSY approach as a binding principle.
- Reflect on the coherence between Restoration Objectives, Marine Protected Areas objectives, Offshore Renewable objectives and fishing activities in the context of the Maritime Spatial Planning Directive.
- Open the reflection on the role of the ACs in advising all European Union officials, including the European Parliament.
- Assess the overlap of Technical Measures Regulation with Remote Electronic Monitoring provisions in the Revised Control Regulation.
- Address the impact of pollution on the Ocean by implementing existing EU environmental legislation. The update of the Water Framework Directive and the future evaluation of the Marine Strategy Framework Directive should be included.
- Support the creation of a pelagic specific Member State Regional Group. This group would oversee drafting joint recommendations for pelagic species.
- Review and refine the current regionalisation process to reflect the changes to the decision-making process in the Northeast Atlantic following from Brexit and giving a more meaningful role for Member States and ACs in these negotiations.
- Support through future iterations of fisheries specific structural funds the competitiveness and resilience of European large scale fishing fleets.
- Explore the implementation of Article 17 on quota allocation and tailor management to include socio-economic impacts such as employment, contribution to food security, and cultural contributions alongside environmental criteria. A tailored management approach should emphasise sustainable practices that contribute to achieving environmental goals and social stability. Ensuring transparency and accessibility in the distribution process by fully disclosing the criteria for allocation and maintaining public registers of the mechanisms and outcomes of quota distribution by Member States is essential for enhancing fairness and accountability in the management of fishing opportunities.

