

Ms Charlina Vitcheva

Director General
Directorate General Maritime Affairs and Fisheries
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PelAC reference: 2526PAC57

Subject: PelAC letter on the current state of play on the Multiannual Financial Framework

Dear Ms. Charlina Vitcheva,

Please find attached the Pelagic Advisory Council's advice on the next Multiannual Financial Framework.

We hope that you will take the content of this advice into consideration.

Kind regards,



Esben Sverdrup-Jensen
Chair of the Pelagic Advisory Council





Annex 1: PelAC letter on the current state of play on the Multiannual Financial Framework.

Background

The Pelagic Advisory Council (PelAC) acknowledges the European Commission's new proposal for the Multiannual Financial Framework (MFF) 2028–2034, which aims to support the sustainability, competitiveness, and resilience of the EU's fisheries, aquaculture, and blue economy sectors.

As it stands, the proposal includes a minimum of 2 billion euros ringfenced for fisheries, a significant reduction (some €5.311 billion) compared to the 6.1 billion euros allocated under the previous EMFAF, if only the amounts under shared management are considered. The amount reserved for fisheries and aquaculture will decrease by almost 70 percent compared to the amount previously allocated under the EMFAF with the likelihood of important issues (e.g. energy transition, bycatch reduction, added value product development) being significantly underfunded or not funded at all.

The Commission has indicated that significant increase in amounts available are expected to come from the:

- National and Regional Partnership Plans (NRPPs)
- EU Facility
- European Competitiveness Fund
- Horizon Europe
- Global Europe instrument

The new arrangement with fewer programmes implies that the fisheries sector will compete with other sectors for the allocation of funds. In this context, it should be emphasised that the situation for the fisheries industry is likely to vary between Member States depending on national priorities as well as the scope and number of applications for funding in each Member State. The new implementation methodology risks further disrupting the level playing field, both between Member States and between fisheries sectors across different Member States. In particular, those where the seafood industry is not a priority may find themselves at a disadvantage and less competitive.

The competition between the fisheries sector and other sectors for funding under the new MFF extends to competition between fisheries scientific institutes and other sectoral institutes. In its previous advice¹, the PelAC has highlighted a series of scientific priorities that must be addressed to improve knowledge of EU stocks, ensure the sustainability of fisheries and the uptake of Ecosystem-based Fisheries Management.

In the context of changing environmental conditions due to Climate Change, pollution and reduction in biodiversity, reducing funding allocated to understanding the marine environment will be detrimental. With MSPD entering its third implementing phase, with targets of MPA and ORE

¹ https://www.pelagic-ac.org/wp-content/uploads/2025/10/2526PAC02-PelAC_Fishing_Opportunities_2026.pdf
https://www.pelagic-ac.org/wp-content/uploads/2026/01/PelAC_MIRIA_Statement_2026_final.pdf





deployment being set, collecting data and investing in models to understand them is key to meeting the European Union's climate and environmental goals and objectives.

Funding science remains a priority for the EU, as EU guidelines for good decision-making process highlight the importance of evidence-based approaches and using Best Available Science to guide decision making.

Ring-fenced budget for Data Collection, backbone of the Common Fisheries Policy

The PelAC underscores the vital need for a ring-fenced budget for fisheries data collection in the 2028–2034 EU funding framework. The Data Collection Framework (DCF), established under the Common Fisheries Policy (CFP), is the scientific backbone for stock assessments, ecosystem-based management, and policy evaluation. Without dedicated funding, long-term data series, regional cooperation, and Member States' ability to meet legal obligations are at risk.

Current funding is already insufficient to address new policy demands—such as those from the Marine Action Plan and Ocean Pact—which require expanded data types, higher resolution, and new technologies.

Long-term datasets are essential for identifying risks, supporting innovation, and ensuring the economic and social sustainability of the fishery sector. Predictable funding through EMFAF has enabled regional coordination, harmonized methodologies, and multi-annual planning, all of which are critical for delivering coherent scientific advice and maintaining compliance with EU and international commitments.

Moving DCF activities to non-ring-fenced funding would introduce uncertainty, disrupt long-term planning, and risk breaking essential time series. Increased co-financing burdens could overwhelm Member States, leading to reduced data coverage and quality, and undermine decades of progress in building a robust data system. **The PelAC calls for the preservation of ring-fenced budgets to safeguard regional coordination, long-term surveys, and high-quality data, ensuring the CFP remains grounded in transparent, science-based decision-making.**

Ring-fenced budgets for the Advisory Councils, backbone of Fisheries Stakeholder involvement in EU policy making

As foreseen in Article 43 of the CFP, the ACs provide the Commission and Member States with valuable recommendations/advice on fisheries, aquaculture, and markets management, considering socio-economic, and environmental aspects. The ACs are stakeholder-led, comprising representatives of the fisheries and aquaculture value chain (e.g., primary producers, processors, retailers, trade unions) and Other Interest Groups (e.g., environmental and development NGOs, consumer groups, NGOs for animal welfare, recreational fishers, women in fisheries and aquaculture).

The PelAC has consistently provided advice to the European Commission and Member States on science and management of pelagic resources in the EU for the past 22 years. The PelAC has contributed to the drafting of long-term management strategy and to providing feedback to the





European Commission and Member States on improving ICES advice. Over the past 5 years, the PelAC has produced an average of 21 advices to the European Commission and Member States. All PelAC advices are available on the [PelAC website](#).

The work of the ACs fall directly in line with the priorities set by President von der Leyen to Commissioner Kadis in his mission letter of instilling “a true and lasting culture of participative democracy”.

Furthermore, the performance of Advisory Councils under the current framework is based on the work programme sent to the Commission by the ACs. The work programme provides a list of advice and meetings that the AC plans to hold during its next functioning year. The Commission's proposal to establish a performance framework for the next MFF only sets the number of advices as the result indicator.

The PelAC is of the opinion that the performance of an Advisory Council cannot be measured solely based on the number of recommendations published. The formal and informal exchanges between members of the ACs that take place during the meetings are highly valuable for members, and for observers of the meetings: Commission personnel, Member States representatives. Furthermore, the ACs provide input to the Member States during the Member States Regional Group meetings and to ICES on scientific matters.

ACs are currently funded under the European Maritime Fisheries and Aquaculture Fund, under the Commission’s direct management. To ensure continuity in the advice provided by ACs and in fisheries stakeholder engagement in the EU, **the PelAC recommends ringfencing the current amount of funding allocated to ACs in the future MFF and to extend the result indicators to also include the number of meetings held and other quantitative and qualitative criteria.**

Recommendations

The PelAC recommends ringfencing funds for:

- Regional coordination, long-term surveys, and high-quality data, ensuring the CFP remains grounded in transparent, science-based decision-making. Funds allocated to supporting genetic analyses to differentiate fish populations should also be a priority.
- The functioning of ACs in the future MFF.
- The implementation of the control regulation.
- The implementation of EBFM, the conservation and restoration of marine ecosystems, bycatch reduction and to support the energy transition of the fishing fleet.

The PelAC is currently unable to provide exact figures for the amount of money to be ringfenced for the fisheries and aquaculture sector. The funds should allow for the implementation of the Common Fisheries Policy Objectives. The PelAC would suggest that at the least the current available amounts adjusted with inflation rates should be ensured.

