



## **ETF/Europêche position paper on the Common Fisheries Policy**

### **Replying to the call for evidence as part of the consultation of the European Commission**

Brussels, 12 September 2024

The Fisheries European Social Partners ETF and Europêche wishes to respond to key questions raised by the European Commission in its evaluation process of how the current Common Fisheries Policy Regulation (CFP) is performing in relation to its objectives, as well as addressing existing and emerging needs.

#### **1) To what extent has the CFP been effective in meeting its objectives and in the current context?**

The CFP has been effective in meeting its environmental objectives, particularly in terms of increasing the number of fish stocks managed at sustainable levels. The number of fish stocks at Maximum Sustainable Yield (MSY) has grown significantly, indicating progress towards environmental sustainability. However, it has been less effective in achieving its socio-economic objectives. The fishing fleet has shrunk by 28%, profitability has stagnated, and the number of full-time fishers has decreased by 33%, suggesting that the policy has not delivered on its promises for the socio-economic well-being of the fisheries sector.

#### **2) To what extent has the CFP been efficient in terms of the cost-effectiveness and the proportionality of actual costs to benefits?**

While the CFP has achieved huge progress in environmental goals, the socio-economic costs, such as the reduction in fleet size and fishing jobs, raise concerns about cost-effectiveness. The benefits in terms of environmental sustainability seem to have come at the expense of socio-economic objectives. The decline in fleet capacity and stagnation in income suggests that the costs might not be proportionate to the benefits, indicating inefficiency in balancing environmental and economic outcomes. Furthermore, the growing number of rules, controls and stricter sanctions reflects an underlying issue of institutional mistrust in the sector, even criminalised, which contributes to worsen the image of the sector, its operators and its workers and needs to be addressed.

#### **3) To what extent is the CFP relevant to current and emerging needs?**

The CFP remains relevant in addressing environmental concerns, particularly in sustainable fishing practices. Nonetheless, some policies must be revised such as the landing obligation and fishing capacity, particularly in light of the decarbonisation strategy. It is equally important to simplify the growing number of rules and reduce bureaucracy.

The current CFP does not sufficiently address the decline in domestic production and the reliance on imports, which could become increasingly critical as global demand for aquatic food rises. The CFP does not address major societal concerns such as climate change, Brexit, the Green Deal, the energy crisis, lack of generational renewal, a growing number of fisheries area closures, the expansion of off-shore renewable energy sites and the energy transition.

In particular, effective strategies have not been put in place to address the problem of generational renewal, which is one of the main challenges faced by the EU fishing sector. There is not only an urgent need to reduce the average age of professionals in the sector, but also the necessity to provide a new qualified and trained generation with the necessary means so that they can apply all the benefits that technology/digitalisation offers to develop sustainable fishing practices in its three dimensions: environmental, economic and social. To meet this challenge, the CFP needs to be adapted in line with the objectives of the European Green Deal as well as Sustainable Development Goals (SDG) 5 and 8, with explicit objectives in terms of generational renewal of the workforce.

The Common Fisheries Policy's relevance to emerging needs such as food security and socio-economic sustainability is questionable. Therefore, there is a need for the CFP to adapt to these emerging challenges to remain relevant and recognise the pivotal role of fishers as food providers.

#### **4) To what extent is the CFP coherent internally and externally with other EU actions (Better Regulation)?**

Internally, simplifying regulations is essential to reduce the bureaucratic burden on fishers. Specifically, the landing obligation should be revised, highlighting the concrete reasons why it failed and its notable socio-economic consequences. Fishing capacity measurement should also be addressed not only to incentivise the energy transition, but also to offer safer and better working and living conditions on board, by excluding from the calculation of the fishing capacity the space strictly reserved for the crew.

Externally, the EU must strengthen its role in the international arena. Ensuring a level playing field is crucial, allowing EU operators to compete fairly with those from non-EU countries. Additionally, the EU should continue leading efforts against Illegal, Unreported, and Unregulated (IUU) fishing, ensuring that no IUU-sourced products enter the EU market. Equally, effective measures need to be taken to ban products produced in proven situations of labour abuses and forced labour.

Furthermore, the CFP's focus on environmental sustainability lacks coherence with other relevant policies. While the Commission has dedicated huge efforts in bridging gaps between the CFP and environmental legislation, little or no efforts have been made in integrating fisheries policies with wider and strategic objectives (SDGs) such as socio-economic development, trade or food security. The current fleet decline trend does not only impact food production but dependent sectors (processors, scientific entities, transport, services, high-tech, ancillary industries, etc.) and coastal communities, combating depopulation in rural areas.

The increase in imports from countries with lower environmental and social standards contradicts the EU's own regulatory framework, suggesting a need for better integration and coherence with other EU actions and policies. Moreover, the EU's principle of "leading by example" has often placed its fishing fleet at a competitive disadvantage, particularly since this principle does not extend to imports. For instance, the EU's environmental legislation, such as the Nature Restoration Law, surpasses the international targets set at the Kunming-Montreal COP15. Likewise, the EU keeps jeopardising an international level playing field by advocating standards in the international arena such as RFMOs that only affect EU vessels, without addressing real concerns with third countries' fisheries deficiency of controls and regulations.

#### **5) To what extent does the CFP add value and does it produce results beyond what would have been achieved by EU countries alone?**

The CFP has added value in terms of environmental sustainability, as individual EU countries may not have been able to achieve the same level of fish stock management alone, particularly for shared stocks. However, in socio-economic terms, the added value is less clear. The decline in the fishing fleet and the stagnation in income indicate that the CFP has not provided significant socio-economic benefits. Therefore, while the CFP has had a clear environmental added value, its socio-economic contribution is less evident.