



# Oceana´s contribution to the European Commission public consultation on the CFP regulation evaluation

April 2025

Oceana welcomes the opportunity to contribute to the European Commission’s public consultation on the evaluation of the Common Fisheries Policy (CFP). This consultation plays an important role in gathering evidence, insights, and perspectives from a wide range of stakeholders to assess the effectiveness of the current CFP regulation. In this submission, Oceana provides its assessment and rankings of the different policy elements identified by the Commission, these appear in black text throughout the document, while Oceana’s responses and supporting explanations are clearly indicated in blue. Our contribution reflects Oceana’s longstanding engagement in European fisheries policy and aims to support a thorough and balanced evaluation of the CFP. We hope our input will be considered in the Commission’s analysis and help ensure that this vital policy continues to advance sustainable fisheries, healthy marine ecosystems, and the long-term resilience of coastal communities.

## Effectiveness of the CFP Regulation

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### 1. What impact do you think the CFP Regulation has had to?

	Very positive	Positive	Neutral	Negative	Very negative	No opinion /No answer
The contribution to the environmental sustainability and conservation of marine resources	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The contribution to the economic sustainability of people active in the fisheries and aquaculture sectors and consumers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Contributing to the social conditions (fair standard of living; training) of people active in the fisheries and aquaculture sectors and of consumers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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**1a. What impact do you think the CFP Regulation has had on the contribution to the environmental sustainability and conservation of marine resources**

	Very positive	Positive	Neutral	Negative	Very Negative	No opinion /no answer
Helping to keep fish stocks at healthy levels or bring them back to those levels	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contributing to healthy marine ecosystems (protecting young fish, the seabed, sensitive species such as marine mammals and seabirds and Natura 2000 sites and other marine protected areas and)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contributing to international ocean governance in support of environmental sustainability	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting animal health and welfare	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any specific points you want to raise clarifying your above ranking

The implementation of the CFP has had a notable positive impact on the environmental sustainability and conservation of marine resources. One of its key achievements has been reducing overfishing in the Northeast Atlantic and the Mediterranean, where overfishing rates are the lowest in decades. This progress has led to an increase in fish biomass. However, further efforts are needed, particularly in the Mediterranean, to trigger greater progress and comply with the CFP's binding objective to recover and/or maintain all fish stocks above levels capable of producing MSY.

Beyond stock recovery, the CFP has also contributed to ecosystem health, but significant breakthroughs are still lacking. There is ample room to better implement the CFP to enhance coherence with broader EU environmental obligations, particularly to ensure the timely adoption of fisheries management rules to support biodiversity related targets. Following the entry into

force of the revised CFP in 2014, multiple complementary fisheries legislative and non-legislative acts were adopted, such as the Regulation on the conservation of fisheries resources and the protection of marine ecosystems through technical measures, the Regulation establishing specific conditions for fishing for deep-sea stocks in the north-east Atlantic, EU Multiannual Management Plans, the Control Regulation, the Regulation on the sustainable management of external fishing fleets, the EU Marine Action Plan, as well as implementing and delegated acts. However, the overall negative impacts of fishing on marine ecosystems and species remain widespread in EU waters, measures in place are often inadequate and insufficient, and environmental objectives are not yet met. Similarly, more efforts are needed to apply an ecosystem-based approach to sustainably exploiting marine resources and move away from adverse practices.

On a global scale, the CFP has positioned the EU as a leader in international ocean governance, advocating for sustainability measures in Regional Fisheries Management Organizations (RFMOs). For instance, between 2012 and 2021, nearly half of the proposals presented to the Indian Ocean Tuna Commission (IOTC) originated from the EU and over the past five years, it accounted for 99% of proposals in the General Fisheries Commission for the Mediterranean (GFCM). While the ambition, quality, and alignment of these proposals with sustainability objectives have varied (in the IOTC, for example, some EU proposals have been criticized for prioritizing fleet interests over scientific advice and the needs of coastal developing states), the EU has overall shown leadership in proposing science-based conservation measures. This has influenced global fisheries policies, demonstrating the progressive nature of the CFP. Lastly, the CFP is bound by Article 13 of the Treaty on the Functioning of the European Union, which mandates that fisheries policies, among others, must consider animal welfare. Additionally, Recital 16 of the CFP emphasizes the need to account for animal health, welfare, and food and feed safety where relevant. Though progress in the areas of animal health and welfare across EU fisheries has been limited or inexistent, there are examples of some progress: such as since 2021, electrofishing has been banned in the EU under Regulation 2019/1241 on the Conservation of Fisheries Resources and the Protection of Marine Ecosystems Through Technical Measures, and this prohibition should be maintained.

**1b. What impact do you think the CFP Regulation has had on the contribution to the economic sustainability of people active in the fisheries and aquaculture sectors (owners, workers, employers, operators) and consumers specifically on contributing to profitable activities**

	Very positive	Positive	Neutral	Negative	Very negative	No opinion /No answer
in the fisheries catching sector	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
in the fisheries processing sector	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

In the fisheries marketing sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
in the aquaculture sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

**What impact do you think the CFP Regulation has had on supporting modernisation and innovation:**

	Very positive	Positive	Neutral	Negative	Very negative	No opinion /No answer
in the fisheries catching sector	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
in the fisheries processing sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
In the fisheries marketing sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
in the aquaculture sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

**What impact do you think the CFP Regulation has had on the contribution to:**

	Very positive	Positive	Neutral	Negative	Very negative	No opinion /No answer
Ensuring availability of food supplies at reasonable prices for consumers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supplying aquatic food to processors and consumers with adequate level of information	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improving stability of the fishery and aquaculture market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring fair competition conditions, between stakeholders of the fishery and aquaculture sector on the EU market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please add any specific points you want to raise clarifying your above ranking

The economic sustainability of the fisheries sector is intrinsically tied to the health of marine resources and ecosystems. A thriving industry depends on a well-managed and resilient marine environment, reinforcing the need for environmental sustainability to remain the foundation of all fisheries management decisions.

In addition to ecosystem health, the economic performance of the EU fisheries sector is intricately linked to multiple factors, including resource availability, fishing effort, operational costs, and external economic pressures. Between 2008 and 2019, the fishing industry saw overall improvements with higher first-sale prices for key commercial species and increased landings per unit of effort and overall profits. The CFP has played a crucial role by fostering healthier fish stocks and enhancing market stability. Science-based management measures, such as Total Allowable Catches (TACs) and quotas aligned with Maximum Sustainable Yield (MSY), have helped rebuild fish populations, leading to more stable and predictable catches. Fleet segments fishing sustainably managed stocks experienced higher profitability and wages, while those targeting overexploited stocks faced weaker economic performance. In 2016 and 2017, net profit margins reached record highs of 14% and 12%, respectively, reflecting the sector's strong financial performance.

The recovery of fish stocks under the CFP has also strengthened the sector's ability to better withstand external shocks, including the COVID-19 pandemic and the economic disruptions caused by inflation, particularly the surge in fuel prices following Russia's invasion of Ukraine. Without the CFP's framework ensuring sustainable fisheries management, these crises would have had an even greater economic impact on the sector. The swift intervention of public authorities in providing financial support has also helped alleviate some of these economic pressures. Encouragingly, the latest Annual Economic Report now casts estimate that the EU fishing fleet's economic performance has further improved in 2023 and 2024, largely due to a decline in fuel prices.

Energy costs have consistently represented a significant share of the EU fleet's operational expenses. Between 2013 and 2022, fuel costs accounted for an average of 16% of total costs annually (for some segments such as bottom trawlers this percentage is up to 30-40%), second only to personnel costs, which made up 33%. The sector's profitability is affected by energy costs, reinforcing the importance of accelerating the transition to low-impact fishing and alternative energy sources. The Commission's communication on the energy transition of EU fisheries and aquaculture will be a compass to support the EU fleet in making the transition to energy efficient fishing vessels and reduced dependence on fossil fuels.

The CFP has contributed to the stability of fisheries markets by promoting the recovery and maintenance of stocks at healthy levels, which in principle prevents drastic year-on-year fluctuations in fishing opportunities, reducing sudden economic disruptions. However, in practice, there have been cases where significant variations in fishing opportunities from one year to the next have disrupted market stability. These fluctuations have primarily resulted from decision-makers failing to adhere to scientific advice in previous years, leading to prolonged overfishing and, ultimately, the need for drastic reductions in catch limits when stocks reached

critical conditions. Additionally, some fluctuations have been caused by changes in stock assessments, such as new scientific benchmarks or improved data collection, leading to revised biomass estimates. Addressing these challenges requires continued commitment to science-based decision-making and adaptive management strategies to smooth market disruptions and ensure long-term stability in fishing opportunities. The CFP already contains the necessary tools in this regard.

The EU's distant-water fleet (DWF) also contributes to the sector's economic footprint by operating in international waters, under Sustainable Fisheries Partnership Agreements (SFPAs) or other access arrangements with third countries. These agreements provide economic benefits to both the EU industry and partner countries while ensuring legal access to fishing opportunities. However, challenges remain in ensuring full transparency and compliance with sustainability and labour standards across all agreements. Strengthening transparency in beneficial ownership and access arrangements, as well as reinforcing science-based decision-making, will be key to maintaining the long-term viability and fairness of the EU's external fisheries policy.

The EU fleet operates under better environmental and labour standards than many non-EU - country fleets, benefiting consumers by ensuring more responsibly harvested seafood. However, imported seafood often does not meet the same requirements, creating unfair competition. Stronger regulations on imported seafood—particularly regarding sustainability, traceability, and labour conditions—are needed to uphold the EU's high standards, ensure a level playing field and improve the competitiveness of the EU seafood sector.

The CFP puts in place one of the strongest legal frameworks globally to prevent illegally caught seafood from entering the EU market and to trace seafood. Traceability and consumer information requirements for fresh, frozen, and smoked seafood products within the EU are strong, requiring key information to be passed along the supply chain all the way to consumers. However, there are areas for improvement. Consumer information for processed seafood is still lacking, including seafood sold in restaurants. There is also currently no information on the flag state or the sustainability of seafood products, sometimes making it difficult for consumers to make informed purchasing decisions. The Common Organisation of the Markets (CMO) in fisheries and aquaculture, which sets seafood consumer information requirements, must be revised to enhance transparency and ensure that consumers receive the same level of information for processed seafood as they do for fresh and frozen products. Furthermore, the restaurant, hotel, and catering sector must not be exempt from requirements on consumer information. Strengthening consumer information will enable more informed and responsible choices by EU citizens.

**1c. What impact do you think the CFP Regulation has had on contributing to the social conditions of people active in the fisheries and aquaculture sectors. Specifically, on ensuring a fair standard of living for the people active in the fisheries and aquaculture**

**sectors (owners, workers, employers, employees, operators), including through a fair and stable income and decent working conditions**

	Very positive	Positive	Neutral	Negative	Very negative	No opinion /No answer
in the fisheries catching sector	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
in the aquatic food processing sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
In the aquatic food marketing sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
in the aquaculture sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

**What impact do you think the CFP Regulation has had on the following social aspects?**

	Very positive	Positive	Neutral	Negative	Very negative	No opinion /No answer
Ensuring a fair allocation of fishing opportunities to fishers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting small-scale fishers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting small-scale aquaculture farmers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Supporting coastal communities dependent on fishing and aquaculture	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Taking into account the interests of consumers by ensuring the availability of food supplies at reasonable prices, enabling informed choices and promoting responsible consumption	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any specific points you want to raise clarifying your above ranking

The EU fleet capacity of active vessels has gradually decreased over the period 2013-2022, with the number of vessels steadily declining since 2018 (-5% between 2018 and 2022). The active fleet

also saw a 3% reduction in kilowatts (kW) and gross tonnage (GT) compared to 2013. However, despite this decline in vessel numbers and capacity, technological advancements in fishing gear, fish-finding equipment, and vessel modernization have offset these reductions, maintaining or even slightly increasing the overall capacity to fish. These developments highlight the importance of continuous monitoring and management of effective fishing effort.

This trend in fishing vessels due to overcapacity has had an impact on employment. Employment in the EU fishing sector remained stable during the initial years of the CFP's implementation, but has shown a continued decline since 2017, both in total jobs and full-time equivalent (FTE) positions. Between 2018 and 2022, total employment declined by 4.8%, while FTEs decreased by 15.8%, with more than half of these reductions occurring between 2021 and 2022. Despite this downward trend, those remaining in the sector have experienced a modest increase in wages. However, wage figures should be interpreted with caution due to inconsistencies in data collection and calculation methods across Member States.

The CFP has had mixed results in improving the social conditions of those working in fisheries to ensure a fair standard of living for the people active in the fisheries. The CFP's provisions, such as Article 17, could support fishers, but Member States have failed to implement them effectively. Small-scale and artisanal fishers remain underrepresented in decision-making processes, despite some progress in their participation within Advisory Councils. Structural challenges persist, with an ongoing decline in both the number of fishing vessels and fishers.

CFP Article 2 calls for 'a fair standard of living for those who depend on fishing activities, bearing in mind coastal fisheries and socio-economic aspects. To support this, Article 17 establishes a strong, transparent framework for allocating fishing opportunities based on environmental, social, and economic factors, unlike the 2002 CFP, which gave Member States broad discretion without clear criteria. However, Member States have largely neglected their ability to use fishing opportunity allocations as a tool to support employment and improve working conditions, particularly for small-scale and coastal artisanal fishers. The continued reliance on historical catch-based allocations – accounting for 100% of allocation decisions in some Member States, without meaningful incentives for sustainability, has contributed to the concentration of fishing rights among larger operators. As a result, smaller operators face limited access to opportunities, reducing their overall profitability. Despite making up most of the fleet and half of the engaged crew, small-scale fishers receive only 7% of the quota, disadvantaging them and artisanal fishers, despite their crucial role in coastal economies.

Ensuring a fair standard of living for those employed in the fisheries sector, particularly those working aboard vessels, requires stronger commitments to stable and fair incomes, as well as decent working conditions. Nothing in the CFP basic regulation prevents this, but a lack of political will and strategic investment by the EU and Member States have prevented progress in this regard.

Ensuring a fair standard of living and decent working conditions is also key given that the majority of the seafood consumed in the EU is imported. To address this, transparency throughout the seafood supply chain should be strengthened. In addition, imported seafood products should be



required to meet minimum environmental and social sustainability standards equivalent to those applied to EU-sourced products. This is essential to prevent unfair competition, ensure that imports do not contribute to overfishing, environmental degradation, or human rights abuses, and to guarantee that all seafood on the EU market is held to the same high sustainability standards.

Additionally, the CFP plays a key role in addressing consumer interests by ensuring stable food supplies at reasonable prices, improving product information, and promoting responsible consumption. However, as commented previously, traceability and consumer information should be strengthened to cover processed seafood, to include flag state information as well as sustainability information (e.g. status of the stock, impact of the fishing gear on the seabed). Consumers should also have the right to adequately obtain information when consuming seafood in restaurants, hotels, and in the catering sector.

## Efficiency of the CFP Regulation

A reminder: The CFP regulation’s objectives

“Long-term environmental sustainability” includes the sustainable exploitation of marine biological resources (through the use of maximum sustainable yield) as well as preserving marine habitats and sensitive species.

“Economic benefits” includes increased productivity, stable markets, availability of food supplies, reducing the Union market's dependence on food imports, reasonable prices for consumers, economic development in coastal areas and overall smart, sustainable and inclusive growth.

“Social and employment benefits” includes a fair standard of living for the fisheries sector including small- scale fisheries, improvement of safety and working conditions for fishing operators, direct and indirect job creation, as well as preservation of traditional fishing activities in dependent coastal communities.

### 2. How you would rate the contribution of the following elements of the CFP Regulation to achieving its objectives?

Contribution of **Maximum sustainable yield** on:

	Very positive	Positive	Neutral	Negative	Very negative	No opinion/No answer
Environmental objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Social objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Contribution of the **landing obligation** on:

	Very positive	Positive	Neutral	Negative	Very negative	No opinion/No answer
Environmental objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Contribution of **Fleet capacity limits** on:

	Very positive	Positive	Neutral	Negative	Very negative	No opinion/No answer
Environmental objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Contribution of **the multiannual plans** on:

	Very positive	Positive	Neutral	Negative	Very negative	No opinion/No answer
Environmental objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Contribution of **regional cooperation on conservation measures via joint recommendations by the Member States** on

	Very positive	Positive	Neutral	Negative	Very negative	No opinion/No answer
Environmental objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Economic objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Contribution of **adopting conservation measures necessary for compliance with obligations under EU environmental legislation** on:

	Very positive	Positive	Neutral	Negative	Very negative	No opinion/No answer
Environmental objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Contribution of **adopting Commission (conservation) measures in case of a serious threat to marine biological resources** on:

	Very positive	Positive	Neutral	Negative	Very negative	No opinion/No answer
Environmental objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Contribution of **Member State emergency measures** on:

	Very positive	Positive	Neutral	Negative	Very negative	No opinion/No answer
Environmental objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Contribution of **professional organisations, incl. producer organisations** on:

	Very positive	Positive	Neutral	Negative	Very negative	No opinion/No answer
Environmental objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Contribution of **allocation of fishing opportunities** on:

	Very positive	Positive	Neutral	Negative	Very negative	No opinion/No answer
Environmental objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Contribution of **Sustainable Fisheries Partnership Agreements** on

	Very positive	Positive	Neutral	Negative	Very negative	No opinion/No answer
Environmental objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Contribution of the **international and regional Fisheries management agreements** on:

	Very positive	Positive	Neutral	Negative	Very negative	No opinion/No answer
Environmental objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Contribution of the **management of stocks shared with third countries** on:

	Very positive	Positive	Neutral	Negative	Very negative	No opinion/No answer
Environmental objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Contribution of the Commission strategic guidelines and Member States' multi-annual national strategic plans on aquaculture on:

	Very positive	Positive	Neutral	Negative	Very negative	No opinion/No answer
Environmental objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Economic objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Social objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Contribution of the **open method of coordination of Member States on aquaculture** on:

	Very positive	Positive	Neutral	Negative	Very negative	No opinion/No answer
Environmental objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Economic objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Social objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Contribution of the **marketing standards** on:

	Very positive	Positive	Neutral	Negative	Very negative	No opinion/No answer
Environmental objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Social objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Contribution of **consumer information/ labelling rules** on:

	Very positive	Positive	Neutral	Negative	Very negative	No opinion/No answer
Environmental objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any specific points you want to raise clarifying your above ranking

The MSY objective has driven progress toward sustainable exploitation levels, with an increasing number of stocks being fished in line with MSY levels. However, delays in implementation, weak enforcement, and exemptions have slowed its full effectiveness, leaving many stocks overexploited. Stocks fished at or below MSY exploitation rates provide higher long-term yields, leading to more stable fishing opportunities and increased profitability. However, short-term economic trade-offs have been a challenge for fleets transitioning to MSY-compliant fishing practices. Achieving MSY should contribute to greater long-term employment security in the sector, but the uneven implementation across stocks and Member States has created disparities.

The landing obligation was intended to reduce wasteful fishing practices and encourage more selective fishing, but its implementation has been highly problematic, with low compliance and loopholes, multiple exemptions and lack of enforcement. Fishing patterns have not substantially changed and discarding still seems to persist, undermining the policy’s conservation and economic sustainability goals.

Capacity ceilings on engine power and tonnage aim to prevent fleet overexpansion and excessive fishing pressure. While these capacity indicators remain useful, they do not account for technological advancements, which can lead to increased fishing capacity without exceeding nominal limits. Furthermore, widespread underreporting and fraud related to engine power undermine the effectiveness of capacity restrictions. Systematic fraud of vessels exceeding declared engine power have allowed for increased fishing effort beyond what is legally permitted, exacerbating pressure on fish stocks. Weak enforcement and verification mechanisms have contributed to this issue, creating unfair competition and undermining sustainability objectives. Particularly, limiting engine power is key to achieving a sustainable fleet. Engine power directly translates into propulsion capacity, which results in higher maximum navigation speeds and allows for the use of heavier and larger fishing gear. Despite these challenges, fleet capacity restrictions have contributed to balance fishing effort and available resources, preventing economic instability caused by overcapacity. However, stricter compliance measures, better enforcement, and improved monitoring of actual engine power are necessary to ensure that these limits serve their intended purpose.

Multi-annual plans (MAPs) have largely focused on exploitation targets, often neglecting the broader sustainability objectives of the CFP and their intended aim of providing region-specific management to achieve the common objectives set out in the CFP basic regulation. In some cases, MAPs have weakened conservation measures by lowering management standards for 'non-target' stocks. MAPs have resulted in missed opportunities to support fleet adaptation and long-term economic resilience. The neglect of social objectives has meant that MAPs have not effectively addressed distributional impacts, particularly for small-scale fishers who struggle to compete with larger, quota-holding fleets.

Regionalization has strengthened cooperation among Member States, allowing for more tailored conservation measures. However, decision-making has continued to favour short-term economic interests over long-term conservation goals. Improved regional coordination has facilitated more adaptive fisheries management, benefiting economic stability in some cases. However, inconsistencies across regions and a lack of transparency in decision-making processes have sometimes led to ineffective measures. The decentralization of decision-making has increased stakeholder engagement, but the benefits have been unevenly distributed, with large-scale operators often having greater influence than small-scale fishers or other interest groups.

While Oceana's overall assessment of adopting conservation measures necessary for compliance with obligations under EU environmental legislation is positive, recognising the policy as a robust and effective framework for the sustainable management of EU fisheries, there remain important areas where implementation must be improved. One such area is the alignment of fisheries management decisions with broader environmental policies remains weak, often to the detriment of environmental policies that are dependent on the CFP. For instance, in the context of the implementation of the Nature Directives (Habitats and Birds Directives), the EU 2030 Biodiversity Strategy, and the Marine Strategy Framework Directive, it is necessary to adopt appropriate fisheries measures to limit the impacts of certain fishing gears or fishing activities on vulnerable marine habitats, sensitive marine species and to conserve key marine ecological processes. Critical gaps remain, as evidenced by the continued fishing of endangered species like European eel or the widespread occurrence of destructive fishing, such as mobile bottom contacting gears, in EU marine protected areas, particularly those designated for habitat protection. A 2024 meta-analysis found that 86% of the area of the 4,858 EU MPAs showed low protection levels from harmful human activities such as destructive fishing gears (Aminian-Biquet et al., 2024). In some cases, the intensity of fishing with destructive gears is higher inside EU MPAs than outside (Dureuil et al., 2018). Since 2014, too little progress has happened, most EU MPAs remain unprotected against the impacts of destructive fishing practices, and where fisheries management measures were proposed and adopted under the CFP Article 11, they were generally inadequate or insufficient. Progress to adopt Joint Recommendations for MPAs has been very slow since 2014, and uneven across EU sea basins. In 2024, only about 24 Natura 2000 sites had CFP Joint Recommendations in place in the Baltic and North Sea which is considerably low in comparison to the almost 5,000 EU MPAs (of which 3,000 are Natura 2000 sites). Some regions like the Mediterranean Sea do not have any Joint Recommendation in place for MPAs.

There has not been any progress on implementation of CFP Article 8 where EU Member States could establish networks of fish stock recovery areas to protect essential fish habitats (e.g. nurseries, spawning grounds). To our knowledge no joint recommendations related to article 8 and no single Fish Stock Recovery Areas (FSRA) has been reported to the European Commission. This provision, for which data exist already, had a strong potential to reconcile conservation and fisheries management interests. We recommend further scaling up and strengthening its implementation through a more stringent approach, such as a new legal proposal introducing specific binding targets on FSRA.

Emergency measures by Member States or by the European Commission in case of a serious threat to marine biological resources have been too rare, and often not used at all (in the case of habitats protection for instance, despite enough scientific evidence available).

The current allocation system has not contributed to achieving environmental sustainability, as quota distribution remains based on historical catches rather than environmental performance. The allocation of fishing opportunities has had a neutral impact on economic objectives, maintaining stability for some fleets while limiting access for others, particularly small-scale operators who struggle with a low share of fishing opportunities. Social objectives have not been prioritized in quota allocation, despite CFP provisions encouraging the use of environmental and social criteria. As a result, the social dimension has often been disadvantaged, exacerbating inequalities within the sector.

While SFPAs include sustainability clauses, their enforcement has been inconsistent. Some agreements have contributed to better fisheries governance in partner countries, but concerns remain about the impact of EU access on local stocks. SFPAs provide EU fleets with access to valuable fishing grounds, supporting their economic viability. However, their benefits are not always equitably distributed between the EU and partner countries. While these agreements support employment in the EU fleet, they have been criticized for not sufficiently benefiting or going against local fishers in partner countries. Capacity-building efforts have been made, but their effectiveness varies. Furthermore, there is a need for greater transparency in the allocation of sectoral support, the implementation of the transparency and non-discrimination clauses, and better implementation of clauses to ensure that both the EU fleet and local communities benefit fairly from these arrangements. In addition, there are SFPAs where EU citizens own locally flagged vessels, which are currently not being sufficiently controlled by Member States, especially if these partner countries function as a flag of convenience. It is essential that additional transparency is put in place for these beneficially owned vessels in non-EU countries.

EU engagement in regional fisheries management organizations (RFMOs) has contributed to stronger international conservation measures, although implementation remains uneven. Their effectiveness is often undermined by conflicting interests, particularly from less-developed countries seeking to develop their fleets while more developed regions, including the EU, continue to push for high catch quotas for their fleet, sometimes disregarding scientific advice on stock status. While the EU's efforts to secure favourable quotas for its fleet are important for its economic viability, they should not come at the expense of sustainable fish stock management or



the legitimate interests of less-developed countries, whose local communities depend on these resources for their livelihoods. Moreover, considerable progress has been made on reducing illegal, unreported, and unregulated (IUU) fishing, but challenges persist, and the EU should lead by example. In all RFMOs where the EU is a member, the EU should propose measures to improve beneficial ownership transparency. This includes requiring member countries to disclose the beneficial owners of vessels operating under RFMO authorized vessel lists and ensuring that ultimate ownership information is made publicly available for vessels included on IUU lists.

The management of shared stocks with third countries has been inconsistent, with agreements often prioritizing short-term exploitation over long-term sustainability. Cooperation with non-EU countries has sometimes led to lower environmental standards.

Negotiated agreements help maintain access to shared stocks, supporting economic stability for EU fleets. However, disputes over quota allocation for some fish stocks (such as mackerel) and management approaches have led to uncertainty in some fisheries.

As pointed out by a report from the STECF, the Marketing Standards failed to deliver on environmental objectives of the CFP, and given the current labelling scheme, the sustainability of seafood products present on the EU market remains unclear for most consumers.

## Governance

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### A reminder: Governance

The CFP regulation states that the management of fisheries should be guided by principles of good governance, including principles such as:

- Decision-making based on best available scientific advice;
- Broad stakeholder involvement, in particular advisory councils\*, in all stages of the decision-making process;
- Taking into account regional specificities through a regional approach;
- Transparency and coherence between the internal and external dimension of the CFP.
- The clear definition of responsibilities at the Union, regional, national and local levels;

\*Advisory Councils are stakeholder-led organisations that provide the Commission and EU countries with recommendations on fisheries management matters.

### 3. How effective is the governance system of the CFP Regulation towards reaching environmental, social or economic sustainability?

	Very effective	somewhat effective	Neutral	Somewhat ineffective	Not effective at all	No opinion /No answer
Environmental sustainability	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
social sustainability	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic sustainability	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any specific points you want to raise clarifying your above ranking

The EU has a well-established and robust system for obtaining scientific advice to inform fisheries management decisions. However, while decision-making is informed by science, measures are not always established in accordance with the best available scientific advice, as per the principle in Article 3(c) of the CFP regulation, nor with key objectives such as the application of precautionary management or the ecosystem-based approach (Articles 2(2) and 2(3), respectively). To ensure the long-term sustainability of fisheries, decisions should adhere to the best available scientific advice, including respecting the precautionary principle as enshrined in EU Treaty (Article 191(2)). While social and economic considerations must be incorporated into fisheries management, it is crucial to recognize that environmental sustainability is the foundation upon which the economic and social dimensions rely. Healthy marine ecosystems and abundant fish stocks are essential for the viability of the fishing industry—without them, there can be no sustainable fishing activity.

Stakeholder engagement in fisheries governance is fundamental to democratic decision-making and good governance principles. The EU provides numerous opportunities for stakeholder involvement, including consultations like this one. In the fisheries sector, Advisory Councils (ACs) play a central role in facilitating stakeholder input by providing advice to the European Commission and Member States. However, due to their structure and functioning, ACs are dominated by representatives of the fishing industry, leading to recommendations that primarily reflect industry interests. This imbalance discourages participation from other stakeholders, including small-scale and artisanal fishers, environmental NGOs, and groups representing broader societal interests. Additionally, the actual influence of ACs on final policy decisions remains unclear, raising concerns about their effectiveness as advisory bodies, and the costs and benefits of participation for their members.

Regionalization was introduced in the CFP to allow for more tailored, region-specific fisheries management decisions, which, in principle, should enhance the effectiveness of conservation measures and ensure policies are adapted to local conditions. However, in practice, regionalization has often been used to weaken the overall objectives and principles of the CFP rather than to achieve their implementation. This has led to inconsistencies in environmental

management, with some regions adopting less ambitious conservation measures, undermining sustainability goals. Some regions struggle to effectively implement agreed-upon policies, leading to gaps in enforcement that further hinder the overall effectiveness of the CFP. The social implications are also significant—while regionalization could provide an opportunity to better address the needs of small-scale fishers and coastal communities, it has been shaped by industry-dominated processes, limiting its positive impact on these groups. As a result, local communities often find their concerns overlooked in favour of larger, more powerful industry players.

Transparency in decision-making is essential to ensure accountability and public trust in fisheries management. While the EU is promoting progress in improving transparency, decision-making processes often remain opaque, particularly in the Council of Ministers, where key political decisions such as on fishing opportunities are made behind closed doors and where deviations from the scientific advice and policy requirements are not openly substantiated in publicly accessible information.

Moreover, there is a notable lack of coherence between the internal and external dimensions of the CFP. While the EU has established strong sustainability principles for its own waters, these standards are not consistently applied in its external fisheries policies. In negotiations with third countries and through Sustainable Fisheries Partnership Agreements (SFPAs), EU fleets sometimes operate under weaker sustainability requirements than those applied within EU waters.

In addition, EU nationals continue to conduct or benefit from fishing activities under non-EU flags, including flags of convenience. While it is now illegal for an EU company or individual to benefit from fishing activities conducted under the flag of a ‘red-carded’ country, there is currently no mechanism to enforce this legal obligation. It is also prohibited for EU nationals to engage in or support IUU fishing vessels. To strengthen transparency and compliance, the EU should require Member States to collect information on their nationals involved in fishing activities under non-EU flags and create a public register for this data. This would not only strengthen transparency in the seafood sector but also level the playing field with EU fleets, which have to adhere to stricter standards and are subject to more severe sanctions. These inconsistencies not only weaken the EU’s credibility as a global leader in sustainable fisheries but also creates an uneven playing field for EU fishers, as different standards apply depending on where they operate. Aligning internal and external policies more closely with the sustainability principles of the CFP would enhance the EU’s role in promoting responsible fisheries management globally.

How effective is the CFP Regulation’s governance system in achieving the following:

	Very effective	somewhat effective	Neutral	Somewhat ineffective	Not effective at all	No opinion / unfamiliar with topic
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In collecting scientific advice	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
In using scientific advice to inform its policy decisions	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
In involving stakeholders at all stages of the policy-making process	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
In empowering stakeholders through professional organisations, in particular producer organisations, to implement the CFP	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
In managing EU fish stocks in a sustainable way	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
In managing shared fish stocks in a sustainable way	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
In managing fish stocks at international level in a sustainable way contributing to international ocean governance	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
In managing aquaculture in a sustainable way	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
In contributing to healthy marine ecosystems (protecting young fish, the seabed, Natura 2000 sites and other marine protected areas, sensitive species such as marine mammals and seabirds)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
In providing sufficient flexibility to adapt to						

regional differences: in the European sea basins (Baltic Sea, North Sea, North Western Waters, South Western Waters, Mediterranean Sea, Black Sea)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In providing sufficient flexibility to adapt to regional differences: in the outermost regions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
In ensuring transparency in decision making?	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any specific points you want to raise clarifying your above ranking

The CFP has established a solid scientific advisory system, relying on institutions such as the International Council for the Exploration of the Sea (ICES) and the Scientific, Technical, and Economic Committee for Fisheries (STECF). These bodies provide high-quality assessments of fish stocks and ecosystem health, forming the backbone of evidence-based fisheries management. However, challenges remain for some data limited stocks and certain regions where stock assessments are incomplete. More investment in data collection, including on non-target species and ecosystem interactions, is needed to strengthen the scientific foundation of fisheries management. This could be achieved in a cost-effective manner with more recourse to technology and fully documented fisheries.

While scientific advice plays a crucial role in fisheries policy, it is not always followed in decision-making. The setting of fishing opportunities, for instance, often involves political negotiations that result in quotas exceeding the scientifically recommended limits. This tendency, particularly in cases where short-term economic interests override long-term sustainability, has slowed progress toward rebuilding all stocks above levels capable of producing MSY. Strict adherence to scientific recommendations is needed to ensure fisheries management is sustainable and precautionary.

The CFP provides extensive opportunities for stakeholder involvement at multiple levels, including through public consultations, Advisory Councils, and regional cooperation mechanisms. Stakeholder input helps shape policy and ensures diverse perspectives are considered. However, while the system is inclusive in principle, power imbalances persist, particularly in Advisory Councils, where industry representatives have greater influence than small-scale fishers and environmental groups. Addressing this imbalance would further strengthen stakeholder engagement.

Producer Organizations (POs) play a significant role in implementing the CFP by managing fishing activities, market access, and resource distribution. However, the empowerment of stakeholders

through these organizations remains uneven, with small-scale fishers often lacking sufficient representation or organizational capacity. Strengthening the role of POs for small-scale fisheries and ensuring that they promote sustainability rather than reinforcing vested interests would enhance the CFP's effectiveness in this area.

The CFP has made progress in recovering fish stocks, particularly in the North-East Atlantic, where many stocks are now managed in line with MSY exploitation levels. However, significant challenges remain, particularly for severely overfished stocks in the North-East Atlantic and for many Mediterranean and Black Sea fish stocks that remain subject to high overfishing levels. The slow implementation of key conservation measures and remedial measures hinder further progress. Greater commitment to reducing fishing pressure and improving enforcement is necessary to ensure the sustainable management of EU fish stocks.

The EU's approach to managing shared stocks, including those jointly exploited with third countries, has been generally science-based but subject to political trade-offs. Brexit negotiations highlighted the complexities of stock-sharing agreements, with new challenges arising in ensuring sustainability beyond EU waters. The CFP's framework allows for cooperation, but securing long-term sustainability in shared stocks requires better coordination with non-EU partners and stronger commitments to follow scientific advice. In this line, the EU plays an active role in international fisheries governance, advocating for sustainable management in Regional Fisheries Management Organizations (RFMOs) and bilateral agreements. While the EU has promoted measures such as catch limits and improved monitoring, its influence is sometimes limited by competing interests from other nations. Additionally, Sustainable Fisheries Partnership Agreements (SFPAs) with third countries often prioritize access for EU fleets rather than focusing primarily on long-term sustainability and benefits for local communities. Furthermore, there is a need for greater transparency in the allocation of sectoral support and better implementation of clauses to ensure that both the EU fleet and local communities benefit fairly from these arrangements. Strengthening environmental and social safeguards in international fisheries agreements would improve their impact.

The CFP has introduced a framework to protect sensitive habitats and species, such as Natura 2000 sites and other marine protected areas (MPAs), and to reduce unwanted catches through the landing obligation. However, implementation has been weak, and compliance with measures to protect vulnerable species and habitats remains inconsistent and largely insufficient. For instance, the process to adopt fisheries management in MPAs, defined by article 11 of the CFP, is not transparent, nor inclusive to stakeholders, particularly environmental groups or scientists, as discussions are taking place bilaterally between EU Member States having a fishing interest or within regional groups (e.g. Scheveningen Group, BALTFISH). Because of this bias in actors involved, the proposed Joint Recommendations often lack scientific basis, fail to apply the precautionary principle, and are aligned to the lowest common denominator countries could agree to. In some cases, this even led to the adoption of weaker fisheries restrictions than those initially proposed by the initiating Member States. The European Court of Auditors, in 2020, specifically stated about the CFP article 11: *"We consider that this procedure is not able to ensure timely protection from fishing for a large number of Natura 2000 MPAs"* (European Court Of

*Auditors Report Special Report 26/2020*). The weak implementation of CFP Article 11 has been a main barrier to the adoption of proper fisheries management in offshore MPAs. This is the result of issues related to the Article 11 process, roles and responsibilities and issues related to conflicts of interest. (Kingma, I et al. 2021). The STECF, involved in the scientific evaluation of proposed Joint Recommendations, was often unable to fully assess the extent of the expected results of the measures, given the data gaps, and also pointed out the insufficiency of the “habitats-by-habitats approach”, which could result in non-compliance with the legal obligations of the Habitats Directive to have all necessary measures in place within 6 years at the most after site designation. (Solandt, J et al (2020)). Fisheries management decisions are still not fully integrated with broader environmental policies, leading to a disconnect between fisheries and marine conservation goals. Greater alignment with EU environmental legislation and their obligations, including the Marine Strategy Framework Directive and the Nature Restoration Law, would enhance the CFP’s contribution to ecosystem health and regeneration, in support of healthy marine resources.

The CFP provides a framework for regional adaptation through multiannual plans and regionalized conservation measures. While this allows for some level of tailoring to specific sea basins, the effectiveness of regionalization has been mixed. In some cases, regional flexibility has been used to dilute conservation objectives rather than enhance them. A stronger commitment to sustainability within regionalization is necessary to ensure that flexibility does not come at the expense of environmental objectives. Related to that, it should be highlighted that the outermost regions face unique challenges due to their geographical isolation and ecological sensitivity. The CFP provides some flexibility through specific derogations and support mechanisms, but these measures are not always sufficient to address the socioeconomic and environmental needs of these regions. A more tailored approach that integrates fisheries management with local socio-economic development and ecosystem protection is needed to improve the effectiveness of the CFP in these areas.

While the CFP has improved transparency in some areas, such as access to scientific advice and information on fishing activities in third countries and international waters, decision-making processes, particularly within the Council of Ministers, remain opaque. The negotiations on fishing opportunities take place behind closed doors, often leading to decisions that deviate from scientific advice without sufficient public scrutiny. Enhancing transparency in these negotiations and improving public access to decision-making processes would strengthen accountability and trust in the CFP.

**4. To what extent has legal enforcement action at EU level (EU Pilots and infringements) contributed to ensuring compliance with the CFP Regulation?**

- Very effective
- Effective
- Neutral
- not very effective

- ineffective
- No opinion/ unfamiliar with the topic

Please add any specific points you want to raise clarifying your above ranking

Legal enforcement actions at the EU level, including EU Pilots and infringement procedures, provide the European Commission with the tools to investigate and address potential breaches and compliance failures of EU fisheries law by Member States. However, their effectiveness has been inconsistent, with some significant enforcement gaps that undermine the credibility and sustainability objectives of the CFP. Some examples of infringement procedures include topics such as non-compliance with the EU’s IUU fishing regulation, insufficient measures to prevent the use of illegal driftnets, or failing to properly implement control measures, including logbook obligations and catch reporting requirements. Despite some successes, the effectiveness of legal enforcement actions has been undermined by selective enforcement and politically influenced decisions. One of the most recent examples is the decision to drop the infringement proceedings against several Member States for failing to enforce the landing obligation. These cases were silently closed without clear justification, despite persistent evidence of high discard rates and a lack of enforcement by national authorities. This decision weakens the credibility of the EU’s commitment to sustainable fisheries and its fight against IUU fishing, as it signals that systematic non-compliance can go unpunished.

Similarly, despite continued impacts of fishing activities on protected species and habitats, including in areas closed to destructive fishing to protect deep-sea ecosystems<sup>1</sup>, the Commission has initiated few infringement proceedings and concluded even fewer.

The failure to follow through on these infringement cases raises concerns about the Commission’s willingness to enforce the CFP effectively. Without robust legal action, supported by sufficient resources to ensure proper execution, Member States will likely continue to ignore key CFP rules, particularly those that impose short-term economic costs but are essential for long-term sustainability.

## Effectiveness and efficiency

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### 4. How would you rate the following elements that could challenge the successfulness of the CFP Regulation (i.e. achieving objectives)?

	Very important	Important	Neutral	Unimportant	Not important at all	No opinion / unfamiliar with topic
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<sup>1</sup> Victorero, L., Moffitt, R., Mallet, N., & Le Manach, F. (2025). Tracking bottom-fishing activities in protected vulnerable marine ecosystem areas and below 800-m depth in European Union waters. *Science Advances*, 11(3), eadp4353.



Complexity of CFP legal requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inconsistent or lack of control and enforcement	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of flexibility of the legal framework at EU level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of flexibility of the legal framework at regional sea-basin level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of flexibility of the legal framework at national level	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Difficulties in implementing new technology and innovation to meet CFP objectives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Deviation from scientific advice when adopting fisheries conservation measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Challenges in implementing regionalisation for fisheries measures to contribute to environmental obligations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exemptions to the landing obligation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of attractiveness of the sector: for workers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of attractiveness of the sector for fishers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

and aquaculture producers						
Lack of attractiveness of the sector: for investors	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Unfair competition	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional disparities within the EU	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contribution to food security	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of predictability for: Availability of fishing opportunities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of predictability for: Climate change and weather conditions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of predictability for: Market conditions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**7a. To what extent do you consider the compliance costs generated by the CFP Regulation, including administrative burden, as:**

Compliance cost (all direct cost):	High	Somewhat high	Acceptable	Somewhat low	Low	No opinion / unfamiliar with topic
in the catching sector	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
in the processing sector	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
in the aquaculture sect	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
for national public authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
For EU public authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Administrative burden (reporting, registration, labelling etc.)

Administrative burden (reporting obligations, registration, labelling etc.)	High	Somewhat high	Acceptable	Somewhat low	Low	No opinion / unfamiliar with topic
in the catching sector	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
in the processing sector	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
in the aquaculture sect	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
for national public authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
For EU public authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please justify your answer, in particular if you considered these costs high (or unreasonably) by specifying them

A major challenge to the success of the CFP is the inconsistent implementation and enforcement of its provisions across Member States. The policy itself is well-designed to ensure sustainable fisheries management and the long-term economic viability of the fishing sector, but its impact is undermined by poor enforcement. Weak implementation, particularly concerning the setting and transparent allocation of fishing opportunities, the landing obligation, the protection of sensitive habitats and species, and the control of fishing capacity jeopardize sustainability objectives. A more robust and harmonized approach to enforcement is necessary to prevent non-compliance from creating unfair advantages for certain fleets and undermining conservation efforts.

Scientific advice is a cornerstone of sustainable fisheries management. However, political decisions often override or weaken scientific recommendations, leading to overfishing, delayed recovery of stocks, and lack of environmental protection. This deviation challenges the CFP's objectives, as scientific advice is designed to help ensure the sustainable exploitation of resources. Aligning decision-making more closely with scientific recommendations is essential for the CFP's credibility and effectiveness.

The widespread use of exemptions to the landing obligation (LO) has significantly weakened this provision's intended impact. Rather than encouraging improved selectivity and reducing unwanted catches, exemptions allow continued discarding, undermining the LO's purpose. This creates a major loophole in the CFP's sustainability framework, reducing incentives for fishers to adopt more selective fishing gear and techniques.

The CFP introduced regionalization to adapt management measures to specific sea-basin conditions. However, Member States have largely failed to use key legal provisions, such as Articles 11 and 13 of the CFP, to introduce conservation measures necessary to comply with EU environmental legislation. This has resulted in a disconnect between fisheries management and broader marine conservation goals, limiting progress toward ecosystem-based management and

the continued degradation of marine ecosystems due to fishing activities in some instances. Strengthening cooperation among Member States, based on rigorous science-based processes and ensuring they take full advantage of available legal tools is necessary to improve environmental outcomes.

The fisheries sector faces significant labour shortages, driven by harsh working conditions, low wages in some cases, and an aging workforce. Additionally, negative public perception, both from within and outside the industry, discourages new entrants and investment. This threatens the long-term viability of the sector and hampers the social sustainability objectives of the CFP. Addressing these issues requires targeted policies, including better working conditions, career incentives, and improved status of fish stocks to provide a steady supply of the resource that underpins the industry.

The EU maintains fisheries management and labour standards, yet unfair competition arises both internally and externally. Internally, some fleets fail to fully comply with CFP rules, creating disparities and disadvantages for those who adhere to sustainability measures. Externally, imports from third countries with lower fisheries management, fisheries control and labour standards undercut EU fishers, raising concerns about sustainability and ethical production practices. Addressing these issues requires stronger trade measures and market controls to ensure that seafood imports meet equivalent sustainability and labour standards. Concretely, there should be sustainability standards for all seafood imports and consumer information on seafood products that indicate the status of the stock, the impact on the seabed and the incidental catches of protected species.

Climate change is increasingly affecting fish stocks, altering their distribution and abundance. Better scientific advice factoring climate change impacts and more dynamic fisheries management are needed and must be adhered to by policy makers to improve resilience in the face of climate variability.

While the CFP is a technical policy, its legal requirements are not excessively complex. Given that fisheries are a regulated sector, technical details are necessary to ensure effective management. The challenge lies more in ensuring proper implementation and compliance rather than in the complexity of the regulations themselves.

The CFP has sufficient flexibility to accommodate regional and national differences. The introduction of regionalization tools was a key improvement in this regard. While national-level flexibility can be variable depending on Member State realities, this should not lead to a watering down of CFP objectives nor become a major obstacle to the CFP's success.

While bureaucracy can slow down the approval of new technologies, the CFP has mechanisms to facilitate innovation. The challenge is not the policy itself but rather the slow pace of regulatory adaptation.

There are strong regional disparities in fleet size, economic capacity, and enforcement efforts, which affect the level playing field within the EU. However, this is not a fundamental obstacle to

the CFP’s effectiveness, it is more of a governance and equity issue that should be addressed through improved financial support and capacity-building measures for weaker regions.

The CFP rightly seeks to balance fish productivity with ensuring the long-term sustainability of fish stocks and marine ecosystems. Food security is not a primary challenge in the EU and therefore should not be the main driver of fisheries management decisions. Said so, the MSY objective aims to maximize productivity of the fish stocks in the long-term, which would contribute positively to domestic food supply in the EU. Maintaining and strengthening the CFP’s environmental and social objectives would help build more resilient fisheries, ensuring that benefits are equitably distributed, particularly for small-scale fishers and coastal communities that depend on healthy fish stocks for their livelihoods.

Market fluctuations affect the economic dimension of fisheries, but they do not necessarily hinder the effectiveness of the CFP’s conservation and sustainability objectives. Economic uncertainties may pose challenges for fishers, but they are not directly tied to the CFP’s core regulatory framework.

**7b. According to your view, which areas of the CFP Regulation have potential for simplification and cost reduction?**

- Measures for the conservation and sustainable exploitation of marine biological resources
- Control and enforcement
- External policy

Could you please briefly elaborate on your selection?

Ensure that all marine protected areas are fully closed to bottom trawling, instead of relying on a case-by-case approach. This would significantly simplify governance, enhance legal clarity, and improve control and enforcement across EU waters.

Make information on the beneficial ownership of fishing vessels publicly available. This would streamline the identification of EU nationals profiting from illegal, unreported, and unregulated (IUU) fishing, and strengthen accountability and enforcement efforts.

## Relevance of the CFP regulation

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**9. To what extent do you agree that the objectives of the CFP Regulation have remained relevant over the past 10 years / implementation period?**

	Fully relevant	Somewhat relevant	Neutral	Somewhat irrelevant	Fully irrelevant	No opinion / unfamiliar with topic
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Fostering “Long-term environmental sustainability of fishing and aquaculture activities”	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring “Economic benefits”	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring “Social and employment benefits”	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contributing to the availability of food supplies	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pursue the objectives at international level	X	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any specific points you want to raise clarifying your above ranking

The CFP has contributed to reducing overfishing and rebuilding some fish stocks, with MSY principles guiding fishing opportunities setting, as well as creating a level playing field across EU fishers and at sub-basin level. Its objectives remain highly relevant today, particularly in the context of climate, biodiversity, and economic crises. However, full implementation remains a challenge, particularly due to deviations from scientific advice, slowing the recovery of some stocks, non-compliance with the Landing Obligation, weakening selectivity measures, and insufficient integration of climate change considerations, including the impact of shifting stock distributions and changing ecosystem productivity. To tackle these challenges, the EU should now make full use of the CFP’s existing tools. While the CFP provides tools to address these challenges, climate adaptation and mitigation need to be more explicitly incorporated into fisheries management. This includes ensuring that scientific advice accounts for climate-driven changes and that management strategies are adjusted accordingly. Greater commitment is needed to ensure fisheries management decisions support the resilience of marine ecosystems and food production under climate stress.

The CFP aims to ensure the economic viability of the fishing sector, but its impact on economic benefits has been mixed. On the one hand, the recovery of certain stocks has contributed to higher yields and profitability for some fleets. On the other, unequal distribution of benefits across fleet segments has created disparities, with larger, industrial fleets often gaining more from the system than small-scale and artisanal fishers. Moreover, economic objectives sometimes conflict with sustainability targets, particularly when short-term economic pressures lead to decisions that compromise long-term stock health. The lack of full enforcement of the Landing Obligation and exemptions that favour discarding further complicate the economic outlook. To ensure lasting

economic benefits, Member States must urgently commit to implementing CFP provisions that protect fish stocks and incentivise sustainable practices.

While the CFP includes provisions to support social and employment benefits, these have been largely overlooked in implementation. The allocation of fishing opportunities does not incorporate social criteria in a meaningful way, despite Article 17 of the CFP calling for the use of transparent and objective criteria, including social and environmental factors. To ensure that the policy delivers on its social objectives, Member States must strengthen their use of these criteria. Ensure fairer allocation of fishing opportunities, particularly for small-scale fishers who provide social and economic value to coastal communities. Fairer allocation of fishing opportunities can also contribute to improving the attractiveness of the sector and promote generation renewal. To remain fully relevant, the CFP needs stronger mechanisms to define and implement social criteria—including prioritizing low-impact fisheries, small-scale operators, and vulnerable coastal communities in the allocation of fishing opportunities.

The CFP contributes to food availability through its objective of achieving MSY, which aims to maximize the long-term productivity of fish stocks. However, food security is not a primary driver of fisheries management decisions in the EU and MSY does not always align with economic profitability or social protection, creating trade-offs. Better control of imports and information on processed seafood products would contribute as well to enhancing responsible purchase of seafood by EU consumers.

The CFP aligns with global fisheries management objectives, including: Sustainable Development Goals (SDGs), UN Fish Stocks Agreement and other key international agreements. However, achieving global sustainability requires stronger implementation of CFP commitments within the EU itself. The EU’s leadership should ensure strict adherence to CFP principles within its waters and beyond, reinforcing credibility abroad and promoting high sustainability and labour standards when trading with seafood-exporting nations. The EU must lead by example by implementing the CFP in full—only then can it demand higher standards from global partners.

Are there specific needs missing in your opinion, that are not sufficiently addressed in the current CFP Regulation and its objectives, if so, which?

**10. To what extent do you consider that the following challenges, raised in different stakeholder fora or recommendations, are sufficiently addressed today by the CFP Regulation**

	Sufficiently addressed	Somewhat addressed	Neutral	Somewhat not addressed	Not addressed at all	No opinion / unfamiliar with topic

Brexit and its effect on the implementation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Governance of commonly shared or managed stocks	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact of climate change / mitigation and adaptation (e.g. stock migration, natural disasters, invasive species, acidification, heatwaves)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact of biodiversity loss including loss of ecosystem services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pollution, including eutrophication of waters leading to oxygen-deprived marine areas ('dead zones')	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Unstable geopolitical context	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
International competition (eg. economic, market, technological, access to resources)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>



Inflation and rising operational costs including energy costs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Investment capacity, including for the energy transition and modernisation of vessels and equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Unstable markets and price volatility	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital transition	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Behavioural changes and shift in consumption patterns	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Labour shortage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Recreational fisheries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competition for space	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Management of inland waters	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Challenges of small-scale coastal fishing	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Prevention of food loss and food waste	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Animal welfare	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
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Please add any specific points you want to raise clarifying your above ranking

The Common Fisheries Policy (CFP) was adopted before Brexit, but it already includes provisions to manage fisheries with third countries—such as Norway or the Faroe Islands—and these also apply to the post-Brexit relationship with the United Kingdom. While the number of shared stocks with the UK is significantly higher, the legal framework and mechanisms under the CFP remain applicable. The Trade and Cooperation Agreement (TCA) between the EU and the UK establishes a regulatory framework that aligns with key CFP principles. Fisheries negotiations with the UK require ongoing adjustments, particularly in terms of access, quota shares, and sustainability commitments, managing these complexities has been a challenge. This challenge relates to a considerable number of stocks, but the tools of the CFP to engage with third parties remain applicable.

The CFP’s external dimension includes provisions for regional cooperation on conservation measures, and the EU actively participates in regional fisheries management organizations (RFMOs) and bilateral agreements to ensure sustainable management of shared stocks. However, cooperation with non-EU countries remains uneven, and there are still challenges in securing effective, science-based decision-making at the international level.

The CFP does not explicitly address climate change, as the word "climate" is absent from its text. However, climate impacts should be accounted for under the ecosystem-based approach, and nothing prevents the European Commission and Member States from requesting climate-informed scientific advice for fisheries management. Scientific advice from ICES and STECF should systematically integrate climate-related changes in stock dynamics, species interactions, and ecosystem shifts. While the European Commission has initiated discussions on energy transition in the fishing sector, including a roadmap for emissions reduction, clear targets and deadlines aligned with the European Green Deal are needed. Fisheries management should incorporate measures to protect carbon-storing habitats, and allocation of fishing opportunities could incentivize low-impact and low-energy fishing practices.

While the CFP contains provisions to protect biodiversity and ecosystem services, implementation remains insufficient. Many fishing decisions continue to be made without fully considering their environmental impact, and destructive fishing practices persist in Marine Protected Areas (MPAs). Stronger enforcement of ecosystem-based fisheries management (EBFM) and full implementation of Articles 11 and 13 of the CFP (which allow for conservation measures under EU environmental law) are necessary to effectively align fisheries management with biodiversity goals.

Pollution and eutrophication fall outside the direct competence of the CFP, as these issues are primarily addressed under EU environmental policies such as the Marine Strategy Framework

Directive (MSFD) and the Water Framework Directive (WFD). However, scientific advice for fisheries management should better integrate ecosystem-based considerations, including the effects of nutrient pollution on fish stocks and marine ecosystems. EU initiatives such as the European Ocean Pact should outline measures to enhance the implementation of EU regulations to address pollution and increase the coherence with the needs of marine-reliant sectors such as fisheries.

The CFP does not provide specific provisions to address geopolitical instability, even though fisheries agreements with third countries are highly susceptible to political and diplomatic shifts. Effective management of shared stocks requires flexibility and adaptability, but such adjustments must remain within established management objectives to ensure sustainability, as well as predictability for EU fishers.

EU fisheries management and labour regulations ensure high sustainability and social standards for the EU fleet, but they also increase production costs, making some EU fish products less competitive in price compared to imports from third countries. While high standards should be maintained, the EU should strengthen controls and put in place sustainability criteria for imported seafood to ensure equivalent environmental, labour, and safety standards, creating a level playing field for EU fishers.

Financial support mechanisms such as the European Maritime, Fisheries and Aquaculture Fund (EMFAF) play a key role in promoting sustainable fisheries and mitigating economic shocks. Such funds should be fully aligned with achieving the objectives of the CFP. The European Commission and Member States have responded relatively quickly to recent challenges, including rising fuel prices, proving the effectivity of these funds.

The European Maritime, Fisheries and Aquaculture Fund (EMFAF) plays a key role in providing financial support for innovation, energy efficiency, and vessel modernization, but there is no clear, long-term EU strategy to drive investment in these areas. While the energy transition and modernization of the fleet are critical issues, investments should be driven by the businesses that will reap the benefits from such investments. The European Commission should outline potential policy support options in its energy transition roadmap, emphasising the potential of fishing opportunities allocation to reward low-emissions fishing and reinforcing the EU's support to research and innovation in low-impact and low-emissions fishing.

Market instability and price volatility are influenced by external economic factors such as global demand, inflation, fuel prices, and trade policies. While the Common Market Organization (CMO) Regulation provides some mechanisms to stabilize seafood markets (e.g. producer organizations, storage aid), the CFP does not directly address economic fluctuations affecting the fisheries sector. The CFP does attempt to minimise volatility by rebuilding healthy and abundant fish populations, which in turn would underpin a stable and profitable catching sector. Further measures—such as strengthening market resilience, improving seafood value chains, and ensuring fairer pricing mechanisms—could be considered at the EU level to support fishers facing market volatility, but would require instruments such as the CMO or additional mechanisms to the CFP basic regulation.

The digital transition is becoming increasingly relevant in fisheries, particularly for data collection, management strategies, and control measures. While the CFP itself is “technology neutral” and does not explicitly require digitalization, other regulatory frameworks—such as the Data Collection Framework (DCF) and the EU Fisheries Control Regulation—include provisions related to electronic reporting, vessel tracking, and digital monitoring tools. Despite these advances, the uptake of digital technologies in fisheries management remains slow, and further investments and incentives could accelerate the adoption of smart monitoring, artificial intelligence, and data-driven decision-making in the sector.

The CFP does not address consumer behaviour or market-driven shifts in seafood consumption. While fisheries management influences the availability of sustainable seafood, the CFP does not include specific provisions on marketing, consumer education, or seafood promotion. These aspects are typically covered by other EU policies, such as the Farm to Fork Strategy and consumer information regulations. However, stronger links between the CFP and sustainable consumption policies could help align fisheries management with evolving consumer preferences and support the transition toward more responsible seafood consumption. A majority of consumers wants to know the origin of the seafood that they purchase, also for processed seafood, because of derogations in the CMO this information is not provided to consumers for processed products nor in restaurants.

Labour shortages in the fisheries sector are not directly addressed by the CFP, though they represent a significant challenge for the viability of the industry. The demanding nature of fishing, combined with economic uncertainty and demographic shifts, has made recruitment difficult. The CFP’s core objective is to ensure a sustainable fishing sector, including by improving sustainability and access to the resource that underpins fishing activities. Additional measures—such as enhanced working conditions, fair wages, and career development opportunities—are needed to retain and attract new generations of fishers.

Recreational fisheries remain under the competence of Member States and are not regulated at the EU level. While some provisions in EU fisheries regulations have included elements related to recreational fishing, particularly for certain stocks impacted by both commercial and recreational fisheries, there is no dedicated framework for their management under the CFP. Given the increasing pressure recreational fisheries can exert on some stocks, it is essential that data be collected and taken into consideration in scientific assessments; and that fisheries management decisions account for the impacts of recreational fisheries on biological resources.

The CFP focuses primarily on fisheries management and does not include marine spatial planning as a core element – as this is addressed through the Maritime Spatial Planning Directive (2014/89/EU). However, competition for space is a growing challenge, with fisheries increasingly competing with maritime transport, offshore energy, and other marine industries. Given the increasing push for offshore wind energy, biodiversity protection, and other marine uses, the closer integration of CFP objectives into the MSFD framework is needed to ensure fisher’s fair access and minimize conflicts between sectors.

The CFP is focused on marine fisheries and does not extend to inland waters management. While it includes certain provisions on brackish waters and the management of anadromous and catadromous species (e.g. salmon and eel), it does not provide a framework for broader inland fisheries governance. The management of inland waters remains under the competence of Member States, which develop their own regulatory frameworks for freshwater fisheries.

The CFP recognizes the importance of small-scale coastal fisheries and includes provisions to support them, such as Article 17, which requires Member States to allocate fishing opportunities based on transparent and objective criteria, including social and environmental factors. However, implementation has been weak, and many small-scale fishers have seen little benefit from these provisions. Similarly, efforts to improve the representation of small-scale fishers in Advisory Councils have had limited impact. While the CFP encourages Member States to take national measures to support small-scale fishers, its provisions alone have not been sufficient to safeguard their livelihoods. More efforts are needed to help ensure their better inclusion in decision-making and fairer allocation of resources.

The CFP includes measures aimed at reducing food waste, primarily through the Landing Obligation, which seeks to minimize unwanted catches and to ensure that all catches are landed. However, the ineffective implementation of the Landing Obligation has allowed high-grading and illegal discarding to persist, meaning that avoidable food waste continues to occur at sea. Ensuring proper enforcement of existing rules and promoting gear selectivity is critical to further reducing waste and improving sustainability. The environmental and ethical concerns surrounding food loss in fisheries remain largely unresolved and calls for abolishing the Landing Obligation have so far not been accompanied by any proposed measures that would effectively reduce bycatch and discards.

The CFP does not address animal welfare in fisheries, particularly concerning the treatment of wild-caught fish. Unlike in aquaculture, where there are some animal welfare considerations, wild fish experience no specific protections regarding their treatment during capture, retention on board, and death. There are also no clear provisions on the welfare of live seafood during transport. While fisheries target wild populations, the lack of welfare measures raises ethical concerns that could be better addressed through new scientific and policy initiatives.

**11. To what extent are the objectives of the current CFP Regulation coherent with the following policies?**

A. In relation to other EU fisheries law:

	Very coherent	Coherent	Neutral	Rather incoherent	Incoherent	No opinion / unfamiliar with topic
Control and monitoring	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Fight against Illegal unreported and unregulated fishing	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rules on the external fleet	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Scientific data collection	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Common market organisation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

B. In relation to other EU policies and laws:

	Very coherent	Coherent	Neutral	Rather incoherent	Incoherent	No opinion / unfamiliar with topic
Habitats and Birds Directives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nature restoration law	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water Framework Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marine Strategy Framework Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marine and inland waters	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Maritime spatial planning	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU biodiversity strategy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Food loss and waste prevention	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Food safety and Health	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Common Agricultural Policy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Working conditions and labour standards	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

C. In relation to international action:

	Very coherent	Coherent	Neutral	Rather incoherent	Incoherent	No opinion / unfamiliar with topic
Synergy with development policy and recognition of developing countries' needs	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sustainable and fair trade	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protection of biodiversity	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting international ocean governance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
On climate change	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
UN Agreement on Marine Biodiversity of Areas beyond national jurisdiction	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
UN Sustainable Development Goals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
FAO Code of Conduct for Responsible Fisheries	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
FAO Guidelines for Sustainable Aquaculture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please add any specific points you want to raise clarifying your above ranking, or add any missing policies or themes you want to raise

Despite a rather good coherence between the CFP and the recently adopted Fisheries Control Regulation, some incoherence remains with regards to the traceability and transparency of processed products. Under the revised Fisheries Control Regulation, these products will need to follow the same more stringent traceability requirements as fresh and frozen products. However, the CMO does not require processed products to provide the more stringent labelling regulation that applies to fresh and frozen products. As a result, most processed seafood products have no information on the species they contain, where they come from, and how they were fished. Though this exemption and the lack of a level playing field between sustainability criteria for EU

produced and imported products the CFP and CMO fail to deliver on the CFP objective to supply the EU market with sustainable seafood products.

## Any further comments?

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12. Would you like to be contacted for a more in-depth interview if certain elements are not covered by this consultation – if so, please elaborate on which topic(s) and why.

Yes, we would welcome the opportunity for further discussion, particularly on the implementation gap within the CFP. While the policy framework sets strong objectives for sustainability, its success is hindered by delays, inconsistent enforcement, and political compromises. A more in-depth exchange could help explore how to strengthen compliance with existing rules and ensure that the CFP effectively delivers on its environmental, social, and economic objectives.

Beyond implementation, the role of scientific advice in fisheries management decisions warrants closer examination. While the CFP mandates decision-making based on the best available science, there are instances where advice does not fully integrate the ecosystem-based approach or account for factors such as climate change and shifting stock dynamics. A more in-depth discussion could explore ways to enhance the scope of scientific advice, ensuring that it effectively informs fisheries management to address long-term ecological and climate-related challenges, and to ensure transparency and accountability of the adopted decisions.

If you are open for a possible interview with DG MARE please leave you email address in the textbox below:

[europa@oceana.org](mailto:europa@oceana.org)

Have you any further comments on these questions? Or was there a topic regarding the CFP not yet covered?

One key point to highlight is that many of the issues raised in this consultation extend beyond the CFP basic regulation's direct scope. While fisheries management plays a crucial role in ocean sustainability, certain challenges—such as climate change, competition for space, instability of markets and price volatility, and labour market issues—require a more integrated approach across different EU policies and regulations. Addressing these broader topics through cross-sectoral coordination and coherence with other EU strategies would be essential to achieving long-term sustainability in the fisheries sector, and the European Ocean Pact offers an opportunity to do so. Fully implementing the CFP to restore marine resources and regenerate ocean ecosystems is the solution to render the fisheries sector more resilient to external crises.



Additionally, while the consultation covers a wide range of topics, it is crucial to distinguish between shortcomings in the CFP regulation itself and failures in its implementation. Many of the challenges related to environmental, social, and economic sustainability stem not from deficiencies in the CFP's design but from insufficient enforcement, political reluctance, and inconsistent application of its provisions. Strengthening compliance and political commitment at all levels is key to ensuring the CFP meets its objectives.