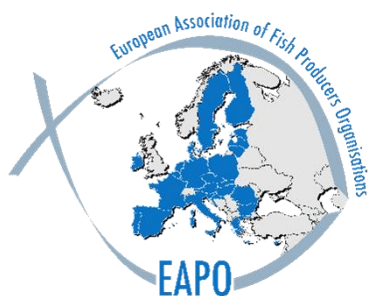


**European Association of Fish Producers Organisations**

**Association Européenne des Organisations de Producteurs dans le secteur de la pêche**



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## **EAPO contribution to the call for evidence on the European Oceans Pact**

EAPO welcomes the initiative of the European Commission (EC) to establish a comprehensive vision for ocean-related policies through a single reference framework marking the commencement of the new Commission's mandate. The European Oceans Pact comes at a pivotal moment when the global focus is increasingly directed towards ocean issues, amidst prevailing geopolitical uncertainties. It is imperative for the EU to implement robust and committed measures to ensure a healthy and productive ocean, boost a competitive, resilient, and sustainable EU blue economy, and consolidate, simplify, and extend the EU's marine knowledge framework. To pursue these three equally important objectives defined by the EC, EAPO firmly asserts that EU fisheries represent an undeniable asset on which to build and while guaranteeing its prosperity and future.

EAPO was founded in 1980, its headquarters are located in Ostend on the Belgian coast, and we unify 30 Producers Organisations among 12 EU Member states. As an association of European recognised Producers Organisations, our key role is to assist our members and the people onboard the 4.000 fishing vessels they represent in achieving the objectives of the Common Fishery Policy (CFP) and the Common Market Organisation (CMO) for fishery and aquaculture products. EAPO aims to strengthen the cooperation

between European POs by looking for common grounds in addressing the challenges for European fisheries, such as securing sustainable food production through socio-economic viability, with respect for the environment, cultural heritage and livelihoods. For these reasons, we are convinced that the European Oceans Pact creates a unique opportunity to redefine strategies by placing fisheries and fishermen at the heart of blue economy policies.

Improving the coherence of policies as part of a global approach at the crossroads of environmental, economic and social issues should enable more effective, coordinated and ambitious action. Healthy, productive oceans combined with a competitive, resilient and sustainable European fishing industry must be objectives of the same level that can be achieved together over the long term.

In this context, EAPO encourages the European Commission to continue along the path of harmonizing regulations and adapting existing legal frameworks (such as the Common Fisheries Policy, about which we support a forthcoming reform) to avoid contradictions between environmental, economic and social policies and various sectors, while relying on relevant stakeholder participation. However, a review of certain existing regulations is necessary, as some clearly do not align with the best available scientific knowledge—such as Implementing Regulation (EU) 2022/1614 on vulnerable marine ecosystems (VMEs). Additionally, others, like the Landing Obligation (LO), require reassessment to ensure more effective implementation.

### **A strategic focus on fisheries in a turbulent context**

In an increasingly complex global geopolitical landscape, the fisheries sector has not been spared in recent years. The fishing industry has faced many challenges, among which Covid-19 crisis, Brexit and the inflation crisis following the unlawful invasion of Ukraine by Russia has a considerable impact on the sector. The most recent political agendas around the world have raised fears of new shocks, also on markets, and territorial and maritime sovereignties for the fishing industry, whose resilience has *de facto* been greatly reduced. Moreover, fishers are on the front lines of climate change, as fish populations across the EU continue to decline despite sustainable fishing regulations being in place. They are also under serious threat from environmental issues, the future consequences of which are not yet clear.

As mentioned by the Commissioner for Oceans and Fisheries, "oceans are of vital importance to our security and competitiveness and to the health of our planet, providing opportunity for many sectors". Supporting emerging maritime sectors is important, but not at the expense of fisheries, which should be prioritized as a key guarantor of food sovereignty, and as they play a crucial role in providing the population with high-quality protein with a low carbon footprint while serving as the foundation of the marine-industrial economy.

This pact must consider the interests of fishermen by ensuring the rational exploitation of fishery resources without jeopardising technical developments, labour renewal, and the sector's attractiveness; while recognizing the efforts made by fishermen in terms of sustainability, such as adopting more selective fishing techniques, participating in more sustainable stock management plans, and reducing carbon emissions by modernizing gear. Thus, science, innovation, technological advancements, and robust funding programs must serve as pillars of this initiative. A well-supported and prosperous fishing sector is crucial to achieving EU food sovereignty and strategic autonomy.

### **The role of EU fishing industry in food security, health and low-carbon footprint**

EAPo members provide a large amount of sustainable low carbon fish products to the EU consumer, contributing to the EU's food security as well as ensuring that EU consumers can lower their environmental footprint while meeting their nutritional needs.

Therefore, along with key stakeholders from across the aquatic food value chain in the European Union (AIPCE, CEP, EUROPECHE, and FEAP), EAPo decided to join the EU Seafood Alliance (EUSEA). Bringing together representatives of the fishing, aquaculture, processing, and trade sectors the alliance wishes to promote the role of seafood in Europe's society, culture, and public health. Our core mission is to enhance the consumption of aquatic food across the EU by emphasizing its exceptional nutritional and health benefits, as well as its deep cultural and gastronomic significance. Seafood has been an integral part of European heritage for centuries, and its continued promotion is essential not only for preserving culinary traditions but also for supporting healthy and sustainable diets.

The European Oceans Pact presents an opportunity to adopt a holistic approach that integrates the environmental, economic, and social dimensions of seafood consumption. It is essential to recognize that a thriving seafood market is not only a driver of consumer well-being but also a fundamental pillar of the Blue Economy, ensuring the viability of fishing, aquaculture, and seafood processing industries. A strong demand for high-quality, sustainably sourced seafood contributes to the resilience of coastal and rural communities, fosters innovation in the sector, and supports the EU's broader sustainability goals.

Given these factors, it is imperative that the European Oceans Pact includes a dedicated chapter outlining support mechanisms for the promotion of aquatic food consumption. These should encompass public awareness campaigns, educational initiatives, and policy measures that reinforce the role of seafood in European diets while fostering responsible and sustainable consumption patterns.

By strengthening the visibility and appreciation of aquatic food, the EU can ensure that consumers, policymakers, and industry stakeholders work together towards a sustainable, prosperous, and health-conscious future for Europe's seafood sector.

## **EU Action Plan for Blue Foods**

*EUSEA calls on the European Commission to develop an EU Action Plan for Blue Foods by 2026 to boost the supply and consumption of aquatic products. The plan should promote nutritious, low-carbon blue foods through sustainable fisheries, aquaculture, and ocean-friendly innovations. The plan should be backed by dedicated funding. EUSEA also urges the inclusion of blue foods in relevant EU ocean and food strategies. For that purpose, it should be a key part of the Vision for the Future of Agriculture and Food. Additionally, financial resources should support public awareness campaigns on the health, environmental, and economic benefits of blue food consumption.*

### **Innovation and energy transition for sustainable fisheries**

In order to continue on the path of sustainability, innovation is an essential component for fisheries. Yet rigid regulatory frameworks often impede the adoption of selective and efficient fishing technologies. The Technical Measures Regulation frequently creates barriers to the implementation of innovative gears, even when they are scientifically proven to reduce bycatch and environmental impact. Generally, EAPO advocates for more flexible and transparent processes to enable swift adoption of new technologies.

The modernisation of the EU fishing fleet is also a key priority. However, the sector lacks the necessary tools and capacity to invest in technologies that are still undiscovered, underdeveloped, or unproven. It is essential to first assess the feasibility of these innovations ensuring that the fishing sector can transition to modernized vessels in an economically sustainable manner.

Moreover, the burden of modernization should not fall solely on EU fisheries, which already recognize the need for fleet renewal and are making significant efforts in this regard. Other sectors, such as commercial and tourism industries, as well as vessels from third countries (many of which are significantly older and more polluting) should also be encouraged to adopt technological innovations to mitigate their impact on the marine environment.

Aware of the ecological transition to which our society must commit itself, EAPO is fully engaging alongside with the EC in the Energy Transition Partnership, in order to develop an energy transition roadmap by the end of 2025, providing a major opportunity for a coordinated plan to modernize and renew the European fishing fleet sustainably.

Therefore, it is essential to emphasize that none of these advancements can be achieved without ambitious funding schemes. Strengthening the fishing sector requires substantial and strategic investments in technology, research, and infrastructure. We strongly advocate for increased funding and better coordination of financial instruments to drive growth, innovation, and job creation.

To ensure efficient and rapid development of market-ready solutions, sufficient funding must be available at all stages of innovation. Additionally, dedicated resources should be

secured for testing, providing a risk-free environment for fishers. A trial-and-error approach will be the most effective way to facilitate adoption and integration of new technologies in the sector.

The Multiannual Financial Framework should include dedicated budget lines, while the European Maritime, Fisheries and Aquaculture Fund (EMFAF) should be strengthened and made more accessible, notably by avoiding excessive bureaucracy. On the other hand, to maximize impact, public funding should also be leveraged to attract private investment, fostering sustainable growth and innovation in the maritime sector.

## **The Blue Economy**

Given the challenges facing the European fishing industry and the gradual aging of production tools, the European Oceans Pact must serve as an opportunity to reaffirm the vital role of fishing within the blue economy. Its strategic importance and contribution to the development of coastal areas and communities must be recognized and reinforced to ensure the sector's long-term sustainability and prosperity.

Its goals would include supporting the development of sustainable and digitalized ships and maritime technologies across blue economy sectors, ensuring supply chain resilience, and driving innovation and competitiveness.

Because vessels and maritime technologies are one of the key common points across the maritime and blue economy sectors, it would be fruitful to bring together business stakeholders, research organizations, policymakers, and investors to promote collaboration and create networks.

### ***Industrial alliance for blue economy value chains***

*EAPO recommends that the European Commission establishes an industrial alliance covering the entire Blue Economy value chain. This alliance should receive operational funding and have a dedicated secretariat to coordinate initiatives, studies, scientific advancements, and technological developments. Given the interdependence of maritime sectors in developing new technologies, such collaboration is key to competitiveness and innovation.*

## **An overlooked social dimension**

The social dimension of fisheries is frequently overlooked, despite its critical importance to the sector's identity and value. Fishing communities face challenges such as an aging workforce, outdated working conditions, and the growing amount of increasingly complex administrative burdens. Addressing these issues requires prioritising social objectives within the CFP, alongside environmental and economic goals.

The generational renewal is a key challenge that the sector is already facing. The current labour market crisis is the consequence of the falling inflow into maritime professions,

this dynamic being even faster in fisheries. This may lead to a situation where at some point we can no longer meet the minimum crew requirements that member states impose on the fishing fleet under their flag.

In addition, the EU lacks a coordinated system of mutual recognition of certificates for competencies issued in accordance with the IMO Convention regarding minimum Standards for Training. We urge the EC to draw up development paths, describing at what workplaces and with what qualifications people can enter the fishing industry, but also move up their career ladder in the sector, relying on best practices among member states.

Modernising the fleet with energy-efficient and safer vessels, improving working conditions, and promoting gender equality are also essential steps to ensure the sector's long-term viability. This positive effect could help to attract younger generations.

### **Science and knowledge**

While collaborating with scientists and fully relying on scientific advice, we firmly believe that fishers' in-depth knowledge of marine ecosystems must be integrated into decision-making processes. This would ensure that the measures adopted are both realistic and enforceable, leading to more effective and sustainable fisheries management.

The fishing industry is working alongside with scientists to fish within sustainable boundaries and to ensure that our impact is as limited as possible. We welcome observers on board to improve data collection and join ICES working groups to improve models and ensure that fisheries management is based on the best available science.

We are committed to minimizing our impact on the marine environment by proposing targeted, proportionate, and science-based remedial measures and area closures. Additionally, we collaborate closely with scientists and gear manufacturers to develop innovative solutions that help achieve impact reduction targets effectively.

EAPo welcomes the development of innovative tools to inform decision-makers, such as the Digital Twin for the Ocean (DTO), and encourage building partnerships with stakeholders from industry, science, policy, and society, in particular by adopting this approach ourselves, as soon as our resources allow.

However, we would point out that fishermen and, more broadly, coastal communities are involved in the management of the environment and species. The knowledge of local stakeholders is real, and decision-making must be based on consultation with the local communities. The European Oceans Pact should reinforce the role of local stakeholders, and in particular local professional and representative structures, in multi-scale governance.

## **Governance and geopolitics of the sea**

The EU's ocean governance framework is complex, incorporating the Common Fisheries Policy (CFP), Marine Strategy Framework Directive (MSFD), Marine Spatial Planning Directive, Nature Restoration Law, and initiatives under the European Green Deal. While these frameworks promote sustainability, their lack of coherence and socio-economic impact assessment often hinders effective implementation.

The evaluation of the CFP provides a valuable opportunity to address these inconsistencies and to ensure its alignment with the objectives of the Oceans Pact. Lessons learned from the CFP evaluation should be integrated into the Pact to better harmonise fisheries management with broader ocean governance policies, ensuring that the three pillars of sustainability are equally prioritized.

Additionally, the Marine Strategy Framework Directive's processes and its ongoing revision present challenges due to their complexity and overlapping regulatory requirements. Aligning marine policies with those addressing land-based pressures, such as plastic pollution and agricultural runoff, is equally crucial to achieving a holistic approach.

Concerning the Marine Spatial Planning, EAPO is in favour of a fair and equal approach between stakeholders, including coastal communities and fishers, in order to develop a balanced positive coexistence at sea, that can benefit to the different sectors operating in maritime areas.

The establishment of Marine Protected Areas (MPAs) and related conservation measures must balance ecosystem conservation with the socio-economic viability of fishing fleets. A participatory and multilateral approach involving stakeholders ensures that measures are clearly understood, effectively monitored, and widely accepted. This approach is critical to achieving compliance and maintaining trust among all parties involved.

The deployment of offshore wind farms and other marine activities should also take into account their impacts on mobile marine species and traditional fishing grounds. Cross-border collaboration through initiatives like the Greater North Sea Basin Initiative can provide holistic management solutions for addressing food, energy, and environmental priorities simultaneously.

EAPO supports the recognition of Transnational Associations of Producers Organisations, that play an active role in the governance of the fishing industry, in good understanding with the EC. However, their financing is a challenge as public funds should be agreed and pooled together by several Member States. A better recognition and simplified access to funding would definitely improve their role at the interface between institutions and fishers.

Given that 70% of EU seafood products are imported, it is necessary to look at third countries. We strongly encourage EC to take measures in order to ensure a level-playing field with third countries in terms of sustainability standards, to meet EU requirements, and avoid any unfair competition. This commitment also applies to fight against illegal

unregulated and unregulated (IUU) fishing outside of the EU, which can sometimes lead to cases of forced labour.

Moreover, in this tense geopolitical context, the fisheries fleet, navigating in the European and global seas represent the EU in many areas where their strategic importance could prove decisive.

### **The need to put fisheries in perspective**

Finally, EAPO would like to point at the global picture and to put things in perspective. As already mentioned, fisheries provide healthy, low-carbon seafood to citizens while safeguarding cultural heritage and livelihoods of local communities. However, fishing is under the constant threat of marine and terrestrial pollutions.

For an ambitious European Oceans Pact and coherent public policy, it is essential to consider the anthropogenic activities on land that impact the ocean. Estuarine and coastal environments are essential to the life cycle of many species, which are of major importance to coastal communities, especially fishermen. Water quality and the quantity of fresh water available are crucial to maintaining healthy, productive ecosystems. Fishermen are already suffering from eutrophication and pollution, which should be addressed in the pact, with effective mechanisms.

Those threats on the oceans need to be addressed together with the fishermen and not by depriving them from the seas. Fishermen expect other pollution-causing activities responsible for environmental change to contribute to the protection of the oceans. They cannot suffer both the consequences and responsibility for them alone.

### **Summary**

The European Ocean Pact offers an opportunity to secure a future for the fishing sector by reconciling the protection of marine ecosystems and maintaining prosperous and resilient fisheries. Enhanced cooperation between Member States, European institutions and industry is essential for effective ocean governance. The European Oceans Pact must be accompanied by a stable regulatory framework, avoiding administrative burden that weaken fishing industry.

This ambitious pact will be presented at the United Nations Conference on the Oceans (UNOC3) to be held in Nice in 2025, under the motto “Our Ocean, Our Future, Our Responsibility”. Let's make sure it also leads to a future for fishermen and fishing.