

CCRUP Recommendation 16 in response to the public consultation for the proposal for an implementing regulation (EU) 2021/XX of the European Parliament and of the Council establishing the European Maritime, Fisheries and Aquaculture Fund (EU) 2017/1004 as regards the **identification of energy-efficient technologies and the specification of methodological elements for determining the normal fishing effort of fishing vessels**

Considering the specific objective of the point 1 (b), article 14 of the European Maritime and Fisheries Fund (EMFF)¹ which refers to "*increasing energy efficiency and reducing CO₂ emissions through the replacement or modernization of engines of fishing vessels*" and the point 2 (c), article 18, of the same regulation¹ which states that "*for small-scale coastal fishing vessels, the new or modernized engine does not have more power in kW than that of the current engine*", the fishermen of the outermost regions remain concerned with the fact that this new proposal for a regulation, only considers the increase of the energy efficiency and reduction of CO₂ but still does not allow an increase in the power of the engines of their vessels.

Considering also that the fishing gears practiced in our Regions are highly selective and sustainable, this engine power increase would have only as objectives:

- Increasing the safety conditions of the journeys (in our regions there is often sudden inclement weather, and it is necessary to reach the port quickly and safely);
- The valorization of the wild caught fish (the increase of the speed of the trip allows the reduction of the time to arrival at the port, maintaining the freshness conditions of the caught fish for sale and the fisherman can obtain a higher income from it).
- The improvement of the social conditions of the crew, namely their familiar relationship (the fisherman could spend more time at home with their family, improving their family relationship and their motivation, as they would spend less time at the sea).

Our members also consider that the relation between the increase in engine power and CO₂ emissions is not directly proportional. For example, if we consider an engine with an authorized power of 425 CV, this could be replaced by a new engine of (for example) 800 CV, limited by a regulator, and thus we could ensure that the power of this new 800 CV engine would maintain the authorized power of 425 CV, allowing however:

- Fishing and navigating at the authorized speed with the new engine, compared to the old one, but reducing considerably the RPMs of the new engine;
- By reducing the engine RPMs, we would reduce the fuel consumption.
- By reducing the fuel consumption, we would reduce CO₂ emissions.

Our proposal allows the use of more efficient engines without the need for vessel adaptations, nor the use of technologies that have not yet been properly tested and that may be dangerous (like hydrogen) or that we believe are not suited to the sea (electric). Therefore, it would also avoid costs in the adaptation of the vessels.

The Outermost Regions Advisory Council (CCRUP) recommends that article 2 of this new proposal² reflects a **positive discrimination for the small-scale fishing in the Outermost Regions, authorizing the increase in the engine power of the vessels that are registered and operate in our waters.**

Best regards,

The President of the Executive Committee of the CC RUP,

(David Pavón González)

¹ REGULATION (EU) 2021/1139 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 7 JULY 2021 establishing a European Maritime, Fisheries and Aquaculture Fund and amending Regulation(EU) 2017/1004

² IMPLEMENTING REGULATION (EU) 2021/XX OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the European Maritime, Fisheries and Aquaculture Fund (EU) 2017/1004 as regards the identification of energy-efficient technologies and the specification of methodological elements for determining the normal fishing effort of fishing vessels