

Recommendation N° 52

Sustainable Fishing in the European Union: State of play and guidelines for 2025

Considering the Communication from the European Commission (EC) to the European Parliament and the Council on *Sustainable fishing in the EU: state of play and orientations for 2025* [COM (2024) 235], the Advisory Council for the Outermost Regions (CCRUP), hereby presents its opinion:

The outermost regions (ORs) of the European Union (EU) face unique challenges due to their geographical isolation, their economic dependence on marine resources and their vulnerability to environmental changes. Coastal small-scale fisheries are crucial to the local economies and socio-cultural heritage of these regions. However, their fisheries are highly sensitive to stock fluctuations and environmental pressures, including the rising of sea temperatures and species migrations. The remoteness of these regions from the European continent, makes the implementation of EU policies difficult and requires specific approaches to ensure sustainable and equitable outcomes.

Considering that “*Member States must continue to act to achieve sustainable fisheries that underpin a resilient fisheries sector and to protect the ecosystems of these sea basins*”, we stress the importance of a holistic and equitable approach, that supports not only sustainable fishing practices (namely, small-scale and ‘one man, one fish’ fisheries), but also energy transition and climate adaptation. We also reiterate the need to allocate equitable quotas and support local economies through infrastructure development, in line with the Common Fisheries Policy (CFP), which aims to ‘*put sustainability at the heart of EU fisheries policy*’¹. By addressing these issues, CCRUP aims to contribute to the resilience and sustainability of fisheries of the outermost regions.

¹ https://oceans-and-fisheries.ec.europa.eu/fisheries_en?prefLang=pt&etrans=pt

Introduction and 4. Socio-economic performance

The document highlights the need for EU fishing fleets to become climate neutral by 2050, in particular, through the *Energy Transition Partnership for EU Fisheries and Aquaculture*, which aims to help fleets reduce their carbon footprint and adopt more sustainable practices. It also points out, that energy will remain to be ‘*one of the main costs of the EU fishing fleet in 2023-2024, putting at risk the gains obtained*’ and that ‘*fleet segments that rely on sustainably exploited stocks and have improved energy efficiency, tend to perform better and to generate higher wages for their crews*’. Here we should highlight pole and line fishery, a highly artisanal fishing gear that fully complies with the requirements of the Code of Conduct for Responsible Fisheries (CCRF) of the Food and Agriculture Organization of the United Nations (FAO) in terms of selectivity of fishing, proximity to local communities, respect for their needs in terms of fish supply, small-scale economies or a rational use of fuel in the development of the activity. This type of fishing gear is also in line with the Sustainable Development Goals (SDGs) set by the United Nations (UN), particularly in the area of eradicating poverty and combating hunger, as it is an important mean of food production, in the area of prosperity and harmony between people and nature, or even in terms of the protection of resources, given the way in which this fishery is developed, and is in line with some of the priorities adopted by the European Commission, particularly those of the “European Green Deal” and in the construction of an “economy that functions for the persons”.

Under the European Maritime, Fisheries and Aquaculture Fund (EMFAF), around 40% of funding is earmarked for the replacement of fishing vessel engines, to improve energy efficiency and reduce greenhouse gas emissions. The outermost regions are rich in biodiversity, their fishermen use low-impact fishing gears and wish to reduce the environmental impact of the motorisation in their waters.

By the exposed above, **the CCRUP recommends that the support of EMFAF for the replacement or modernisation of the vessels engines of the outermost regions, to be majored, and the support for the energy transition of these engines, should increase proportionally to the percentage reduction in greenhouse gas emissions.**

Considering that the strengthening of local fish processing and commercialization infrastructures: adds value to catches, supports local economies, creates more stable

conditions for fishermen and can also reduce dependence on imports, **the CCRUP recommends that the EC facilitate the improvement of the access to the international market for fisheries products with origin in the outermost regions.**

1. Progress in Achieving Sustainable Fishing in the EU

Considering the constraints imposed on the fisheries sector - such as the energy transition, the increase in marine protected areas and the quotas reduction, we consider it is necessary to reinforce the support to the fisheries sector of the outermost regions, so that we can adapt to this new reality. In the context of the mission ‘*Recovering our oceans and waters by 2030*’, which includes the commitment to create 30% of Marine Protected Areas (15% fully protected, 15% highly protected), **the CCRUP recommends that the European Commission reallocates financial resources, to allow the restructuring of the fisheries sector of the outermost regions, before 2027.**

With regard to factors such as ‘*ocean warming, acidification, pollution and deoxygenation of the seas*’, it is essential that these negative impacts on fisheries productivity are fully measured and that sustainable fishing of the outermost regions is positively discriminated, on the measures to mitigate these impacts.

To increase the environmental and economic resilience in the outermost regions, **the CCRUP recommends to the Member States, the development of specific measures, for the outermost regions, that promote the mitigation of the environmental pressures on their fish stocks**, in particular through specifically designed management plans, taking into account:

- the unique ecosystems and economic dependence of these areas;
- the fair and equitable distribution of fishing quotas;
- the socio-economic and environmental challenges of the outermost regions, in particular in the small-scale fisheries;
- the control of recreational fishing due to the pressure it exerts on the ORs, both on their resources and on the environment.

Regarding this last point, it is necessary that the Member States, in the waters of the outermost regions, develop measures related to the recreational fishing, in accordance with the Consideration 3 of Regulation (EU) 1380/2013 on the CFP: ‘*Recreational fisheries*

can have a significant impact on fish resources and Member States should, therefore, ensure that they are conducted in a manner that is compatible with the objectives of the CFP. Although the pressure exerted by recreational fisheries on fishery resources is unknown, it constitutes a potential impact that may be affecting the good environmental status of these resources and, consequently, the marine environment.

The CFP must regulate the problem of this fishing modality more exhaustively and restrictively, as it competing unfairly with small-scale fishing.

For all these reasons, **the CCRUP recommends the conducting of studies about the pressure of recreational fishing** to justify the needed measures so that this modality fulfils the general sustainability criteria of the European Union, and that they are created the demanded specificities of this activity to avoid illegal, unreported and unregulated (IUU) fishing, as well as to establish more restrictive specifications in case that the ORs are subject to greater pressure from this nautical activity, than other areas.

2. State of the EU fleet

Considering the concerns about the “*accuracy and reliability of the data on which the national reports are based and (...) the accuracy of the Member States action plans*”, **the CCRUP recommends to the Member States the elaboration of more accurate reports about the state of the fleet and the conservation status of fish stocks** to ensure that the OR fishing fleet, is not prejudiced in the quota allocation process and can benefit from appropriate support for its renewal.

The Communication points out that ‘*several segments still do not have the data needed to fully assess their balance. Member States are invited to intensify their efforts of data collection, particularly in areas where information is limited, such as the outermost regions*’. Considering this, **the CCRUP recommends to the Member States the determination of support to the fisheries sector to enable the construction of its own database, subsequently validated by independent entities**, and which content would be taken into account in the annual National Action Plan, supporting a better informed decision-making.

In addition, **we recommend the review of the capacity limitations of vessels**, since the new and more engines, are bigger and therefore require more space.

5. Landing Obligation

In addition, **the CCRUP recommends to the Member States the support to the implementation of improved monitoring systems, adapted to small scale vessels (both professional and recreational)** to ensure that the new regulations (e.g. the requirement for electronic monitoring) are adapted to the operational realities of these vessels, improving the compliance without incurring into additional costs and ensuring the obligation, the control and the monitoring of landings from professional and recreational fisheries.

6.2. Setting fishing opportunities for different sea basins

For stocks managed by the EU only in the Atlantic, *‘the Commission will propose TACs [total allowable catches] and quotas in line with MSY [maximum sustainable yield] when these advices are available’*, and **the CCRUP stresses the importance of the fisheries database** (mentioned above), **which will be accessible to the public**, when scientific advice or government data are not available or are insufficient.

Considering that the document emphasizes the maintenance of the quotas within sustainable limits, to ensure the long-term health of stocks, and that quotas are intended to achieve maximum sustainable yield (MSY) targets, **the CCRUP recommends the management and monitoring of the fishing gears and, consequently, the development of specific measures needed to protect juvenile and adult fish stocks.**

We also recommend the prohibition of most of bottom-contact trawling methods, due to their higher energy consumption and impact on the seabed. An exception should be made for tropical shrimp trawling in French Guiana, because the local seabed, consisting mainly of mud and sand - with no vulnerable species or hard substrates like corals, rocks, or sponges - from Amazon River, is particularly suited for this type of well managed trawling and pursues a sustainable ecosystem management.

Azores:

Considering the advice² of the International Council for the Exploration of the Sea (ICES), we have noted that the quota of Alfonsinos (*Beryx sp.*) is highly reduced since 2023, due to the lack of data, which our fishermen are oblivious.

Considering, that Azorean fishermen find that *Beryx sp.* stocks, in special from Splendid Alfonsino (*Beryx splendens*), have been increasing, from successive biannual precautionary cuts, being in a good condition.

Considering that the fishermen of the Azores, have for many years showing availability to collect and provide information about these stocks to the Regional Government, for subsequent analysis.

Considering also the selectivity of the fishing gears used and the fact that fishermen can easily direct their fishing to catch the Alfonsino (*Beryx decadactylus*) or Splendid alfonsino (*Beryx splendens*), depending on the different depths at which these species live.

The CCRUP recommends:

- 1. The separation of quotas for the Alfonsino and Splendid Alfonsino species;**
- 2. An increase of 60 tons in the quota for *Beryx sp.*, being divided into 50% for each of the mentioned species.**

Azores and Madeira:

Regarding the fishing possibility for bigeye tuna (*Thunnus obesus*), and considering:

- That pole and line fishing is highly selective and environmentally friendly, noting that the Azores won the international prize for the world's first plastic-free fishery;
- This gear is carried out by one man with one hook, which means that it is selective gear regarding the targeted species;
- In order to protect the species and to manage the few quota available, the fishermen themselves have implemented a minimum catch size of 10 kg and set catch limits for each segment of the fleet;
- This is a sustainable fishery, also because, the fish is properly conditioned and chilled (not frozen) as soon as it is caught, so it arrives at the fish auction, fresh and in excellent conservation conditions, for human consumption;
- The Azores and Madeira already use around 85% of the Portuguese quota;

² [Alfonsinos \(*Beryl spp.*\) in subareas 1–10, 12, and 14 \(Northeast Atlantic and adjacent waters\)](#)

- The current quota allocated to these outermost regions is clearly scarce, as the regional value chain linked to this fishery is at risk of socio-economic failure;

The CCRUP recommends the augmentation of the quota for the bigeye tuna to 3 600 tonnes, for the Portuguese outermost regions.

Canary Islands:

The bigeye tuna stock, which is traditionally the target of the Canary Islands fishing fleet, is fished in accordance with the recommendations of the International Commission for the Conservation of Atlantic Tunas (ICCAT), in order to ensure the conservation and promote the objective of optimum utilisation of this species throughout the Atlantic Ocean and adjacent seas. This fishery must serve the social objective of halieutic resources.

This objective of optimum utilisation is in line with Article 64 of the United Nations Convention on the Law of the Sea, adopted in Montego Bay on 10 December 1982, and governs the activities of all regional fisheries organisations regarding highly migratory species. The objectives of generating economic, social and employment benefits as well as contributing to the availability of food from sustainable fisheries, are also set out in Article 2(1) of Regulation (EU) 1380/2013 of the European Parliament and of the Council of 11 December 2013, on the CFP.

It is important to recall and emphasise that, in relation to bigeye tuna, there is a high dependence of the Canary Islands fishing fleet, due to the insular territory whose structural, social and economic situation has led it to the special consideration as outermost region under Article 349 of the Treaty on the Functioning of the European Union, as recognised in Article 3 of the Statute of Autonomy of the Canary Islands. In this context, and given that the Canary Islands fleet is subject to quota restrictions based on the provisions of the Spanish national legislation which manages this fishery, in which rewards the catch records of the industrial fleet, without taking into account the artisanal characteristics and the sustainable fishing gears used by the artisanal fleet, that don't prejudice the resources (one man, one hook), **the CCRUP recommends that one part of the European bigeye tuna quota to be allocated in benefit of the artisanal fishermen from the Canary Islands**, in accordance with the current ICCAT Recommendation 22-01, which replaces Recommendation 21-01 '*on a multiannual programme for the conservation and management of tropical tunas*', which states, in the case of bigeye tuna, that '*special attention must be paid to the needs and specific*

characteristics of small-scale fishermen’.

Opinion from Europêche, Organización de Productores Asociados de Grandes Atuneros Congeladores (OPAGAC), Organisation des Producteurs de Thon Congelé et Surgelé (Orthongel) and Union des Armateurs à la Pêche de France (UAPF)

These organisations do not agree with the inclusion of the phrase “*in particular small-scale fisheries and ‘one man, one fish’*” in the third paragraph of this recommendation.

Opinion of Sciaena

Sciaena disagrees with the two recommendations for the Azores concerning *Beryx sp.* in particular regarding:

- Recommendation 1: “*The separation of quotas for the Alfonsino and Splendid Alfonsino species*”. because the information currently available for the management of the stock is limited, so that splitting one stock in two appears to be counterproductive, from a management point of view, until the necessary scientific information is available.

- Recommendation 2: “An increase of 60 tons (...)” because although they understand that fishermen may expect the perspective that the stock is in a good conservation status, we don’t have a verified scientific basis or recent history of landings that support the request for an increase, and therefore, leading to the precautionary approach of the management of this stock, recommended by ICES.