

Recommendation 78

Regulatory Simplification for the Outermost Regions

Considering the public consultation currently being promoted by the European Commission within the scope of the Regulatory Simplification applicable to the Outermost Regions¹, the Advisory Council for the Outermost Regions (CCRUP) hereby expresses its opinion:

We welcome the European Commission's endeavour to launch this initiative aimed at removing regulatory obstacles that limit the socio-economic development, sustainable competitiveness and resilience of the ORs, as well as simplifying and adapting the European Union's legal requirements to the permanent specificities of these Regions. However, we consider it essential to make several observations in order to ensure that future regulatory simplification measures are truly effective, without jeopardising essential functions for the proper functioning of the Common Fisheries Policy, particularly in the fisheries and aquaculture sectors.

The European Outermost Regions (ORs) of *Saint-Martin, Guadeloupe, Martinique, French Guiana*, the Azores, Madeira, the Canary Islands, *Mayotte* and *La Réunion* have unique characteristics in the context of the European Union, namely: geographical dispersion, significant infrastructure limitations, the predominance of artisanal fleets, the presence of less studied tropical and subtropical species and a strong socio-economic dependence on the sea. For this reason, we believe that any simplification process must take into account the need to maintain - and in some cases strengthen - quality scientific data collection capacity, especially with regard to fisheries resources⁽²⁾.

The CCRUP notes that the application of uniform simplification measures without adequate flexibility mechanisms can result in a reduction in the essential information needed for sustainable fisheries management. In this regard, in the ORs there are still gaps in the availability of reliable data on recreational fishing, demersal species and accumulated fishing effort. These gaps hinder scientific monitoring, adaptive management and the fulfilment of European statistical obligations.

¹ Public Consultation on the *Regulatory Simplification Package for the European Union's ORs*

We would also point out that, with the entry into force in January 2026 of Implementing Regulation (EU) 2025/274 on electronic reporting of recreational fishing catches, the ORs will need specific technical systems and adequate institutional support to ensure its correct application. Regulatory simplification must not weaken these efforts or create a context in which a lack of resources prevents compliance with European requirements. Similarly, national legislative initiatives - such as the final third provision of draft [Royal Decree XX/2025, which establishes measures for the management of fishing resources](#) - highlight the need to strengthen coordination between the state and regional authorities in order to ensure uniform, practical and effective application throughout the territory of the ORs concerned.

It is also essential to adapt administrative procedures to the specific characteristics of small-scale commercial fishing fleets, which are often run by family micro-enterprises with limited management capacity. Providing resources to local fishermen's associations to hire specialised staff - particularly in maritime affairs and management - will make it possible to provide qualified support to small ship-owners, increasing compliance and ensuring more effective implementation of European policies.

Strengthening coherence between the different European Union financial instruments applicable to the ORs - including the European Maritime, Fisheries and Aquaculture Fund (EMFAF), the European Regional Development Fund (ERDF), the European Social Fund Plus (ESF+) and the Interreg cooperation programmes - is also a fundamental step. We realise that the coexistence of different rules, divergent eligibility criteria and overlapping administrative requirements hinders the implementation of projects that are essential to the development of the ORs. A harmonised and clear approach will contribute significantly to reducing the administrative burden and improving the effectiveness of European investment in our Regions.

We reaffirm our willingness to work with the European Commission and the Member States to ensure that regulatory simplification promotes the sustainable development, competitiveness and resilience of the Outermost Regions.

The CCRUP therefore **recommends that the European Commission, in close collaboration with the Member States**, take the following elements into account in the regulatory simplification initiative:

1. Effective mechanisms for regulatory flexibility, allowing data collection requirements to be adapted to the biological, social and economic specificities of the ORs, avoiding the loss of strategic information necessary for the sustainable management of their resources;

2. A stable coordination mechanism between the European Commission, the Member States and the OR authorities, with a view to monitoring the real impact of regulatory simplification and making adjustments where necessary;

3. Carrying out a specific impact analysis for each OR, avoiding generalised approaches that do not take into account the diversity of outermost contexts;

4. Guarantees that simplification processes will not be applied to the detriment of statistical quality, especially in sectors where the scientific base is already limited, such as tropical, subtropical and artisanal fisheries;

5. Providing adequate technical and financial resources to support the implementation of electronic catch reporting systems - including those for recreational fishing - ensuring effective application adapted to the ORs;

6. Adapting administrative procedures to the specificities of the ORs, ensuring that fishermen's associations have adequate resources to hire specialised staff, in order to support small ship-owners and ensure more effective implementation of European policies and promote better use of European funds in the ORs;

7. Strengthen coherence and harmonisation between the different EU financial instruments applicable to the ORs, in order to reduce administrative burdens, eliminate overlapping requirements and improve the effectiveness of European investment in the outermost regions.

Opinion of the *Comité Régional des Pêches Maritimes et des Élevages Marins de La Réunion*

The *Comité Régional des Pêches Maritimes et des Élevages Marins de La Réunion (CRPMEM La Réunion)* considers that :

This recommendation falls within the scope of regulatory simplification, focusing exclusively on the application and operationalisation of the current legal framework, without prejudice to it. We also believe that any regulatory simplification initiative must result in effective gains for the operators

and administrations of the ORs, reducing disproportionate burdens and practical obstacles, without jeopardising the fundamental objectives of the Common Fisheries Policy or the scientific data collection that is essential for the sustainable management of resources.

The European Outermost Regions (ORs) of *Saint-Martin, Guadeloupe, Martinique, French Guiana*, the Azores, Madeira, the Canary Islands, *Mayotte* and *Réunion* have unique characteristics in the context of the European Union, particularly through their vast Exclusive Economic Zones, while facing permanent structural constraints and specific challenges recognised in Article 349 of the Treaty on the Functioning of the European Union (TFEU). Despite this recognition, the application of this article in the fisheries sector remains limited, in a context marked by geographical dispersion, infrastructural weaknesses, the predominance of artisanal fleets, the presence of less studied species and a strong socio-economic dependence on the sea.

They recommend **that the European Commission, in close collaboration with the Member States**, take into account the following elements in the regulatory simplification initiative:

1. **Reintroduce public support for the financing of fish aggregating devices (FADs) anchored** in the Outermost Regions (ORs);
2. **Consolidate the possibility of renewing fishing fleets in the ORs using public funds**, leaving it up to the Member States to define the relevant criteria for balancing fishing capacity and possibilities, according to the specific realities of each sea basin;
3. **Establish a specific status for the ORs in the European Union's negotiations within the Regional Fisheries Management Organisations (RFMOs)**, making it possible to adapt fish stocks management measures to the particularities of our regions, similar to the more favourable measures proposed for neighbouring coastal states.