



**What impact do you think the CFP Regulation has had to the contribution to the environmental sustainability and conservation of marine resources?**

The CFP has had positive impacts on environmental sustainability however, there are many aspects of the CFP which have not been fully implemented and therefore it has not reached its full potential to improve the economic and environmental sustainability of EU fisheries and sufficiently protect the marine environment.

Article 11 & 18 in the CFP looks at regional cooperation on conservation measures in order to comply with EU environmental legislation and the process of initiating Joint Recommendations (JR) between Member States and the Commission. These articles have not been sufficiently utilised and due to this the environmental benefits have been reduced. When a Member State fails to effectively implement necessary actions within the CFP, the Commission is required to step in and should make this a priority to ensure the law is adhered to. In terms of supporting the economic sustainability of people within the sector, the Multiannual Financial Framework should be a tool used to ensure sufficient support is given to fisheries and that the European Maritime, Fisheries and Aquaculture Fund helps with the transition to sustainable fishing practices for the future.

**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 ?**

According to evaluations by the Commission, the CFP has increased the economic value of the EU fishing fleet. However, small scale fisheries have not received a fair share of benefits. These fishing communities do not have fair representation and do not receive a fair share of quota allocations. Many of these fishing communities are low impact and should be incentivised for this.

Article 17 of the CFP states that when allocating fishing opportunities Member States shall use transparent and objective criteria including those of an environmental, social and economic nature. It also states that Member States shall endeavor to provide incentives to fishing vessels deploying selective fishing gear to using fishing techniques with reduced environmental impact, such as reduced energy consumption or habitat damage. This Article within the CFP has been vastly ignored across the EU. In order to create a sustainable fishing fleet across the EU, help end the practice of overfishing, and reduce bycatch of non-target species, it is imperative that this Article is fully enforced



and well resourced. A transparent, equitable system should be in place with fair quota allocation supporting low impact fisheries. Sustainable and small-scale fishers are facing extreme pressures within the industry and are not receiving high enough rewards for their efforts in conserving the oceans and fishing industry for future generations.

Full implementation of the Control Regulation will help with the modernisation of the fishing sector and successful application of Articles within the CFP. Electronic logbooks and fishing trips having individual ID's will assist with transparency across the food chain. In order to ensure economic sustainability into the future, environmental sustainability is vital. Increased enforcement of legislation such as the CPF and Control Regulation as well as other supporting policies will help ensure this. More targeted and robust socio-economic data (including from the inshore sector), and ecosystem data should be collected under the CFP.

**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**

It's important to restate that full implementation of Article 17 would improve the social conditions for many working in the sector and without this, the positive impact on people's livelihoods and social conditions is greatly reduced. Historical fishing rights appears to be the preferred method of allocating quotas but ensuring the other criteria mentioned in Article 17 such as, the impact of fishing on the environment, will improve sustainable economies. Providing incentives for vessels using selective gear, reduced energy consumption and reduced habitat damage will improve the future of the blue economy. Many fishermen have been unfairly treated through the lack of implementation from Member States. Rectifying this through fair, equitable and transparent quota sharing will improve the social conditions, cultural heritage and help with uptake for future generations of these fisheries. Ensuring that the inequalities within the sector are rectified is vital for the future of the fishing sector.

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



Member States have failed to make effective use implementing conservation measures necessary for compliance with obligations under EU environmental legislation. Very few joint recommendations have been initiated as well as delegated acts arising from these. The Commission has also failed to effectively step in when Member States have neglected to effectively put in management measures through this Article. There has been enough scientific evidence produced to warrant emergency actions being put in place but unfortunately this has been another measure which hasn't been utilised. Complete use of Article 11 will help to ensure greater protection through management measures in MPAs. *Damaging fishing activity, such as bottom trawling, occurs within these areas decimating fish stocks and destroying precious habitats. A report released earlier this year has shown that 90% of offshore sites have bottom trawling taking place within them and between 2015 and 2023, 4.4 million hours of trawling has occurred in the EU sites analysed (Special Areas of Conservation designated under the Habitats Directive). This practice is not only damaging and indiscriminate in what it catches, it is also one of the most fuel intensive fishing techniques and so has a significantly negative effect on climate related targets.*

Ensuring fair quota allocation to small scale and low impact fishers will improve sustainability and have positive effects for the environment. As mentioned previously, the CFP allows for this and yet this is not adhered to by Member States or the Commission. Transparency from Member States when allocating fish quotas must be improved to assist with public confidence in the process and ensure that member States can be held accountable.

Many fish populations are still being dangerously overfished. Scientific advice from ICES helps to identify the upper limits for Total Allowable Catches but often this is disregarded with TACs being set above advisable limits. Maximum Sustainable Yield is supposed to strike a balance between economic and social benefits as well as preventing collapse of fish stocks and this number should be treated as an upper limit not a target to reach. The MSFD mirrors the CFP's 2020 MSY obligation and Irelands draft 2024 Marine Strategy Framework Directive report showed that Good Environmental Status has only been achieved for 29 stocks of commercially exploited fish and shellfish. GES has not been achieved for 46 stocks, and the status of 99 stocks remains unknown. The number of fish populations achieving GES has therefore gone down from 34 in the 2020 report (with 99 still unknown and 44 not achieving GES). Fishing below MSY can help to yield longer term economic and environmental benefits which is necessary for the long term health of the ocean and profitability of the fishing sector.



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

Ensuring that the Articles within the CFP are fully implemented will improve sustainability across the environment and economy and improve social sustainability. Without full implementation and coherence with other environmental legislation such as the habitats Directive, MSFD, NRR and others, these goals will not be effectively reached.

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

While the CFP allows for public consultations and stakeholder engagement there is an imbalance towards industry voices. Ensuring small scale fishing communities have their voices heard is an important step that needs to be taken and actions to address their concerns should be taken.

Multiannual plans allow for flexibility across regions but this has not ensured the protection of specific regions habitats and species.

As mentioned previously, greater transparency is needed throughout the processes involved in the CFP, including negotiations on quota allocations. Greater transparency is needed at EU and national level on these issues.

As mentioned previously a lack of implementation is restricting the level of environmental and economic benefits that should arise from the CFP. MPA's are not effectively managed and initiating joint recommendations would assist with the management of offshore MPAs. Greater stakeholder engagement is needed in this process with civil society and scientists involved in the process not just industry level representatives. Coherence across all environmental legislation to achieve a truly ecosystems based approach is needed.

**what extent do you consider the compliance costs generated by the CFP Regulation, including administrative burden.**

Deviating from scientific advice when adopting fisheries conservation measures will have an impact on the sustainability and effectiveness of the CFP. Allowing for political compromises to undermine scientific advice increases negative impacts for the environment and the economy.



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

An effective way to reduce costs of the CFP would be greater enforcement of the current rules of the law. Ensuring compliance will help to reduce administrative burdens and costs with non compliance. Any simplification of the CFP mustn't lower environmental goals. Deviating from scientific advice when adopting fisheries conservation measures will have a negative knock on effect to every goal within the CFP, reducing the environmental sustainability of the law and will result in far greater costs to the economy and ecosystems in the future.

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

The goals of the CFP are to ensure a sustainable and equitable fishing industry in the EU. In order to achieve this greater emphasis need to be put on to addressing environmental concerns. Without a healthy and thriving ocean, there will be no such thing as fisheries let alone sustainable fisheries. Coherence across EU environmental legislation, adherence to the precautionary principle and full implementation of articles within the law are some of the actions needed to address the failings within the law. It is not necessary to reopen the law, which will be costly and time consuming, when the text if fully implemented allows for a pathway to sustainable, fair and equitable fisheries in the EU.

While there is coherence across EU environmental policies and the CFP, there has not been coherent implementation across these policies. The new Nature Restoration Regulation has specific reference to initiating Joint Recommendations through the CFP. Ensuring that scientifically robust JR's are within Member States NRP's that have suitable conservation actions within them will be imperative. Ensuring that there are effectively managed MPAs will help to achieve existing EU legal objectives. MPAs can positively impact the environment, fisheries and climate action as well as improve social sustainability and the economy to help to achieve greater coherence across policies.