

Contribution to the Call for Evidence - Evaluation of the Common Fisheries Policy

The Association Française d'Halieutique (AFH) is a non-profit organisation founded in 1994 and bringing together more than 100 French-speaking fisheries scientists from different disciplines and institutes¹. We thank the European Commission for this opportunity to reflect on the Common Fisheries Policy (CFP) and to contribute to this public debate. It is one of our key objectives, as well as to foster dynamic research and disseminate scientific findings and priorities to all stakeholders.

Initially developed in the 1970s, adopted in 1983, revised in 1992, 2002 and 2013, the CFP has undergone profound changes over the past five decades. These developments have fundamentally shaped European fisheries. Considered one of the most integrated policies in the world, the aims of the CFP (that we fully endorse) are to preserve the long-term sustainability of fisheries and aquaculture, contribute to the protection of the marine environment, the availability of food supplies, and provide a fair standard of living for fisheries and aquaculture communities.

We first look back at the 10 years of implementing the CFP Regulation to deliver some key messages regarding the current state of play, and then put forward numerous proposals to improve the CFP in view of the challenges ahead.

1. Major achievements and difficulties of the CFP so far

Since the formal implementation of the CFP integrating major changes (e.g. MSY as a management target, landing obligation, multiannual plans, and the strengthening of controls), the policy has received intense criticisms from stakeholders in the sector (fishers, NGOs, fisheries managers and scientists), and is still being questioned today as highlighted by the contributions to this public call for evidence. Indeed, the overall results of the CFP to date have been mixed (Aranda et al., 2019; STECF, 2024):

- Stock status evolution

From 2014 to 2022, there has been a decrease in the fishing pressure with median F/F_{MSY} below 1 in the Northeast Atlantic from 2011 onwards and a sharp decrease in the Mediterranean and Black Sea in 2020 and 2021 leading to a value of 1.25 (STECF, 2024). Concomitantly, **the proportion of overfished stocks has fallen from 50% to 30% in the Northeast Atlantic, and from 75% to 60% in the Mediterranean Sea. However, the stated objectives of exploiting 100% of stocks at Maximum Sustainable Yield (MSY) and achieving good environmental status in the marine environment by 2020 have not been met.** As noted by STECF (2024), *“of the 83 stocks considered [in the Northeast Atlantic], only 28% (23 stocks) were neither overexploited nor outside safe biological limits, suggesting that the objective in Art. 2.2 of the CFP has not been met fully”*.

¹ <https://www.association-francaise-halieuistique.fr/>

- Socio-economic results

The socio-economic results of the CFP are also mixed. Although **the EU fishing fleet was overall profitable in 2021**, results vary by fleet and country. **The situation remains alarming in several Member States that suffered net losses**, as well as six small-scale coastal fleets, four large-scale fleets and one distant-water fleet (STECF, 2023). Based on figures from the STECF, the World Wide Fund for Nature (WWF) estimated that **43% of EU fishers were paid less than the national minimum wage in 2018** (reaching 70% of fishers operating on small-scale vessels smaller than 12 metres; WWF, 2021). It questions the effectiveness of the CFP in providing a fair standard of living for fishing communities, one of its main objectives. Furthermore, there is a **lack of generational renewal** (Debeauvais, 2020) that also raises the question of obstacles faced by youth and newcomers in the fisheries sector (e.g. Lebedef and Chambers, 2023).

- Landing obligation

In 2016, AFH published a note entitled 'Landing obligation: let's avoid failure'². Unfortunately, recent years have demonstrated that the criticisms were indeed pertinent and the key points of this note are still very much relevant today. **The initial objective of reducing discards or unwanted catches must be reaffirmed**, it is essential and technically possible. Moreover, such reduction is positive both for stocks and fishers. **However, it is urgent to discuss the general design and means of achieving this objective**, in light of the knowledge acquired over the last ten years (e.g. Uhlmann et al., 2019), the experience of other countries (e.g. Chile), and new means of monitoring and control. In this note, we put forward proposals with the aim of avoiding failure. In particular, **it is important to decouple the discard reduction, which is critically needed, and the obligation to bring to land that is not working and ultimately not effectively applied. To do so, we should promote and support virtuous approaches (e.g. fully-monitored fisheries) that lead to a verifiable reduction in unwanted catches**. AFH also outlines the contours of an alternative system for managing quotas and undersized catches as a basis for future debate. More generally, what is not sufficiently concerted with stakeholders, understood, accepted or controlled is unlikely to succeed and might on the contrary lead to unanticipated side-effects and unsustainable results (Borges, 2021; Maynou et al., 2018; Villasante et al., 2016).

- Quota allocation

The issue of the allocation of fishing opportunities remains a debated topic between stakeholders, both among and within countries. **The question of the flexibility/adaptability of the relative stability key is indeed an important debate to initiate, notably in view of fisheries evolutions and the impacts of global change** (e.g. changes in species distribution, new and invasive species). Regarding quota allocation within countries, **the Article 17 of the CFP, which deals with the "Criteria for the allocation of fishing opportunities by Member States", has so far been little used and there is a lack of transparency and evaluation of the different management and access systems** (Carpenter and Kleinjans, 2017; MRAG et al., 2019; Said et al., 2020). As an example, a study by Kinds et al. (2022) of the French quota allocation system has shown that it has created *"significant entry barriers for artisanal fishers, notably new entrants and small-scale producers, which has contributed to a shift away from family-based fishing and towards expansion."* This

² Available here (only in French): https://www.association-francaise-halieuutique.fr/wp-content/uploads/Obligation_de_d%C3%A9barquement_Une_analyse_de_IAFH.pdf

state of play highlights the **need for management plans, their declinations and capacity management programs to specify how quotas and/or licenses are allocated, and for an ex-ante and ex-post evaluation to be carried out**. Furthermore, Member States must use transparent and objective criteria and **it is urgent to decide (in concertation with all stakeholders) and operationalize the environmental, social and economic criteria to be used by fishery**, in order to incentive reduced environmental impacts and maximized economic and social results (e.g. Dewals and Gascuel, 2020).

- Stakeholder dialogue and regionalisation

The CFP still remains too centralised with insufficient stakeholder dialogues, as illustrated by the lack of consideration and recognition for Regional Advisory Councils (RAC). Created in 2004 to promote dialogue between stakeholders and initiate a process of regionalised co-management (Hatchard and Gray, 2014; Long, 2010), then transformed into Regional Advisory Councils (RAC) from 2013 onwards, **these councils have since been regularly sidelined from debates in favour of political representatives from the Member States**, to whom the European Commission turns in preference (e.g. Eliassen et al., 2015). This situation generates frustration among a certain number of Advisory Council stakeholders (e.g. Linke et al., 2022; Linke and Jentoft, 2016).

2. The CFP tomorrow

In light of new scientific knowledge and emerging international issues, AFH decided in 2021 to take advantage of the starting CFP review period to solicit the views of all its members on concrete political, economic or environmental measures that could be integrated into a new CFP in order to achieve its objectives, or to set new ones, in a changing world (Drouineau et al., 2023). We used a participatory approach to identify and prioritise areas for improvement of the CFP by seeking proposals from scientists, and outline the measures that seem most suitable to face the challenges ahead, taking stock of the evolution of the CFP over the last decade (see point 1.). Four major issues emerged from this initiative:

- Issue 1: a need for more transparency and less complexity in fisheries management

In response to the often-voiced criticism of the lack of transparency and the high complexity of the CFP, scientists put forward several proposals to improve the situation. **Aligning all management units (i.e. the units on which TACs are set) with the functional units of biological populations (on which scientific assessment is based) was considered a priority**, especially as AFH has long been alerting on this issue³. These functional units correspond to the best scientific knowledge currently available on population distribution, and management at any other scale could be ineffective. **This realignment measure was also considered necessary to make political decisions more transparent and to be able to compare them with scientific recommendations, as well as to increase the resiliency and adaptability of the CFP in view of climate changes**. Complexity also arises from directives and initiatives that are too 'siloed' and it is important to **maintain and enhance the dynamics of integrating fisheries and environmental conservation policies, particularly with regard to integrated spatial management** (e.g. MPAs). Finally, transparency and complexity were also often linked to a lack of consultation and dialogue (see point 1.).

³ <https://www.association-francaise-halieuistique.fr/presse/l-afh-communique-fixation-des-quotas-de-peche-2017-en/>

According to the survey, **consultation on decisions with all the stakeholders in a sector is a prerequisite, particularly for implementing relevant multiyear, multispecies management plans and for evaluating them afterwards.** This is also the case for the landing obligation as detailed above.

- Issue 2: a need for more consultation and dialogue between stakeholders to improve understanding and acceptability

The role of stakeholders was central to two of the first ten proposals. This was the case for the previously mentioned proposal on the concerted implementation of management plans, but was also the focus of a proposal aiming to increase the use of incentives in response to virtuous behaviour (in the form of allocation of fishing effort quotas or additional catch quotas, or real-time incentives, etc.) rather than the taxation/subsidy mechanisms currently practiced. This mechanism could draw on Article 17 of the CFP, which has so far been little used as discussed in part 1. Here again, **the types of behaviour to be promoted and the incentive methods should be developed jointly with stakeholders to ensure the system is effective and coherent.**

- Issue 3: Fisheries resources in the Mediterranean Sea

Two of the proposals perceived as the most relevant concerned the Mediterranean, underlining the extent to which the situation in this region is considered very concerning. In this respect, the panel members found it essential to **improve knowledge on both the biology of the species and on their exploitation in order to better assess the status of exploited populations and to improve the settings of technical measures** (e.g. discussion about size-at-maturity and minimum landing). **Scientists also raised concerns about data sharing and availability, notably regarding scientific campaigns, highlighting the need for an improved scientific frame on this issue.** We recommended in 2022, based on our participatory approach, that the CFP should gradually align its approach in the Mediterranean with that in force in the North-East Atlantic, as **management by fishing effort has shown its limits when not linked to other conditions.** Yet, the situation in the Mediterranean Sea strongly evolved over the last years through the West Med management plan and such proposed changes would need further ecological and socio-economic analyses and stakeholders' consultations to envision a robust and adaptable management plan. Indeed, **what is fundamentally missing is a shared long-term vision for Mediterranean fisheries in view of pressing climate change impacts and current management struggles.**

- Issue 4: Ecosystem-based management: from theory to practice.

The panel members noted that **(i) the first calls for an ecosystem approach to fisheries date back several decades, (ii) that little has yet been done in concrete terms to respond to this, while (iii) operational instruments are nevertheless available and could already be enlisted.** As far as analysis tools are concerned, ecosystem models (end-to-end, trophic) have multiplied, but are still used in a disparate, scattered and ad hoc manner, which does not allow for long-term monitoring of the state of ecosystems, feedback on these tools by scientists and stakeholders, and even less their uptake by decision-makers. **The use of ecosystem models and the knowledge they produce should therefore be made more routine and regular, and the data collection systems needed to inform and update them set up.** Such ecosystem models do not aim to set measures such as yearly single-stock TACs, nor to replace single-species models which are well suited to carry-out short-term predictions, but rather as **complementary tools to holistically assess the relevance and impacts of**

management approaches (as spatial conservation measures), to assess and discuss management recommendations with stakeholders (see Issue 2), or to monitor ecosystems and anticipate changes over the long term.

Furthermore, scientists consider that MSY should only be an intermediate step and that ecosystem-based fisheries management will necessarily involve going further. **A further step would be to reduce the fishing mortality target (e.g. $F_{MSY-lower}$ or F_{MEY} rather than F_{MSY}) to fully reach the MSY objective** and help reduce impacts on habitats and bycatch. This could also entail minimum biomass constraints for individual stocks. This proposal highlights the need to continue discuss and adapt fisheries management targets in link with sustainability objectives and global changes. This is particularly the case with regard to **selectivity and the need to reinforce the obligation to protect juveniles**, notably by revising the minimum conservation reference sizes (MCRS) and corresponding exploitation diagrams (e.g., mesh size, spatial management) for identified stocks. Implementing both elements (F and selectivity) would lead to substantially reduced environmental impacts and improved stock status. **These proposed evolutions should also be integrated within future multiannual management plans**, which need to be updated and improved, and which represent appropriate tools for the integrated management of multispecies and mixed fisheries.

Finally, particularly in relation to climate change, which is causing changes in the distribution range of species, and the tendency to exploit lower and lower trophic levels, the scientists recommended that **predefined rules, alongside clear criterion defining when they apply, should be rapidly put in place to limit the expansion of fisheries towards new species (either previously present but not yet exploited, or species that shift their distribution), pending the acquisition of sufficient knowledge for their proper management.**

3. Discussion and conclusion: a call for sustainable and resilient fisheries

Some of our proposals are innovative and need to be tested (e.g. modification of the landing obligation, real-time incentives), requiring a framework to facilitate such experimentation. This diversity of measures reflects the fact that there is likely no single miracle recipe, but several possible paths. **The most appropriate measures should be chosen according to context, in consultation with stakeholders.** This was the second strong consensus of our study: **the success of the CFP will necessarily depend on greater consultation with and empowerment of stakeholders, particularly fishers, in order to develop appropriate regional management plans.** The involvement of stakeholders is one of the key factors for success: the process of implementing the plan being as important as the content of the plan itself. AFH reminds that while greater flexibility, consultation and regionalisation could help implementing the most appropriate measures where they are needed, however, **it is critical that common objectives and ways of measuring them, as well as common control and enforcement methods, are clearly stated** to ensure an overall harmonisation and level-playing field at the European scale.

The context of global change, in particular climate change, only adds to the urgency of reforming the CFP. The growing concern of scientists about these new challenges is the other salient fact that stands out in contrast to AFH 2011 manifesto (Gascuel et al., 2011). In 2011, global change was mentioned only once, and climate change was only mentioned in passing. In our recent survey, climate is the subject of a specific proposal and is reflected in several others. **It is essential to put climate change at the heart of potential CFP**

evolutions and to accordingly change the objectives from ‘sustainable’ to ‘sustainable and resilient’ fisheries.

4. Bibliography

- Aranda, M., Ulrich, C., Le Gallic, B., Borges, L., Metz, S., Prellezo, R., Santurtún, M., 2019. Research for PECH Committee: EU fisheries policy - latest developments and future challenges (No. PE 629.202). European Parliament, Policy Department for Structural and Cohesion Policies, Brussels.
- Borges, L., 2021. The unintended impact of the European discard ban. *ICES Journal of Marine Science* 78, 134–141. <https://doi.org/10.1093/icesjms/fsaa200>
- Carpenter, G., Kleinjans, R., 2017. Who gets to fish? The allocation of fishing opportunities in EU Member States. New Economics Foundation, London, UK.
- Debeauvais, R., 2020. La gestion prévisionnelle des emplois et des compétences dans le secteur des pêches maritimes. Ocpiat.
- Dewals, J.-F., Gascuel, D., 2020. Les dimensions, critères et indicateurs de durabilité des pêches françaises, Pré-étude - Rapport final (Les publications du Pôle halieutique No. 53). Agrocampus Ouest, Rennes, France.
- Drouineau, H., Moullec, F., Gascuel, D., Laloë, F., Lucas, S., Bez, N., Guillotreau, P., Guitton, J., Hervann, P.-Y., Huret, M., Lehuta, S., Léopold, M., Mahévas, S., Robert, M., Woillez, M., Vermard, Y., 2023. Food for thought from French scientists for a revised EU Common Fisheries Policy to protect marine ecosystems and enhance fisheries performance. *Marine Policy* 148, 105460. <https://doi.org/10.1016/j.marpol.2022.105460>
- Eliassen, S.Q., Hegland, T.J., Raakjær, J., 2015. Decentralising: The implementation of regionalisation and co-management under the post-2013 Common Fisheries Policy. *Marine Policy* 62, 224–232. <https://doi.org/10.1016/j.marpol.2015.09.022>
- Gascuel, D., Bez, N., Forest, A., Guillotreau, P., Laloë, F., Lobry, J., Mahévas, S., Mesnil, B., Rivot, E., Rochette, S., Trenkel, V., 2011. A future for marine fisheries in Europe (Manifesto of the Association Française d’Halieumétrie). *Fisheries Research* 109, 1–6. <https://doi.org/10.1016/j.fishres.2011.02.002>
- Hatchard, J.L., Gray, T.S., 2014. From RACs to Advisory Councils: Lessons from North Sea discourse for the 2014 reform of the European Common Fisheries Policy. *Marine Policy* 47, 87–93. <https://doi.org/10.1016/j.marpol.2014.02.015>
- Kinds, A., Bugeja-Said, A., Speelman, S., Guyader, O., 2022. Navigating Institutional Change in the French Atlantic Fishing Sector: How Do Artisanal Fishers Obtain and Secure Fishing Opportunities?, in: Jentoft, S., Chuenpagdee, R., Bugeja Said, A., Isaacs, M. (Eds.), *Blue Justice: Small-Scale Fisheries in a Sustainable Ocean Economy*, MARE Publication Series. Springer International Publishing, Cham, pp. 549–567. https://doi.org/10.1007/978-3-030-89624-9_29
- Lebedef, E.A., Chambers, C., 2023. Youth and newcomers in Icelandic fisheries: opportunities and obstacles. *Maritime Studies* 22, 34. <https://doi.org/10.1007/s40152-023-00326-0>
- Linke, S., Gillette, M.B., Jentoft, S., 2022. Institutionalizing Injustice? Aligning Governance Orders in Swedish Small-Scale Fisheries, in: Jentoft, S., Chuenpagdee, R., Bugeja Said, A., Isaacs, M. (Eds.), *Blue Justice: Small-Scale Fisheries in a Sustainable Ocean Economy*. Springer International Publishing, Cham, pp. 529–547. https://doi.org/10.1007/978-3-030-89624-9_28
- Linke, S., Jentoft, S., 2016. Ideals, realities and paradoxes of stakeholder participation in EU fisheries governance. *Environmental Sociology* 2, 144–154. <https://doi.org/10.1080/23251042.2016.1155792>
- Long, R., 2010. The Role of Regional Advisory Councils in the European Common Fisheries Policy: Legal Constraints and Future Options. *The International Journal of Marine and Coastal Law* 25, 289–346. <https://doi.org/10.1163/157180810X516980>

- Maynou, F., Gil, M. del M., Vitale, S., Giusto, G.B., Foutsi, A., Rangel, M., Rainha, R., Erzini, K., Gonçalves, J.M.S., Bentes, L., Viva, C., Sartor, P., De Carlo, F., Rossetti, I., Christou, M., Stergiou, K., Maravelias, C.D., Damalas, D., 2018. Fishers' perceptions of the European Union discards ban: perspective from south European fisheries. *Marine Policy* 89, 147–153. <https://doi.org/10.1016/j.marpol.2017.12.019>
- MRAG, AZTI, NEF, 2019. Study on ownership and exclusive rights of fisheries means of production (No. EASME/EMFF/2016/1.3.2.1/SI2.766458). European Commission, EASME.
- Said, A., Pascual-Fernández, J., Amorim, V.I., Autzen, M.H., Hegland, T.J., Pita, C., Ferretti, J., Penca, J., 2020. Small-scale fisheries access to fishing opportunities in the European Union: Is the Common Fisheries Policy the right step to SDG14b? *Marine Policy* 118, 104009. <https://doi.org/10.1016/j.marpol.2020.104009>
- STECF, 2024. Monitoring of the performance of the Common Fisheries Policy (STECF-Adhoc-24-01) (No. JRC137731). Publications Office of the European Union, Luxembourg.
- STECF, 2023. The 2023 Annual Economic Report on the EU Fishing Fleet (STECF 23-07) (No. STECF 23-06). Scientific, Technical and Economic Committee for Fisheries (STECF), Publications Office of the European Union, Luxembourg.
- Uhlmann, S.S., Ulrich, C., Kennelly, S.J. (Eds.), 2019. *The European Landing Obligation: Reducing Discards in Complex, Multi-Species and Multi-Jurisdictional Fisheries*. Springer International Publishing, Cham. <https://doi.org/10.1007/978-3-030-03308-8>
- Villasante, S., Pita, C., Pierce, G.J., Guimeráns, C.P., Rodrigues, J.G., Antelo, M., Rocha, J.M.D., Cutrín, J.G., Hastie, L., Sumaila, U.R., Coll, M., 2016. To land or not to land: How do stakeholders perceive the zero discard policy in European small-scale fisheries? *Marine Policy* 71, 166–174. <https://doi.org/10.1016/j.marpol.2016.05.004>
- WWF, 2021. *Socio-economic impacts of the EU Common Fisheries Policy. An evaluation of the European Union fishing fleet and options for the future*. World Wide Fund for Nature.