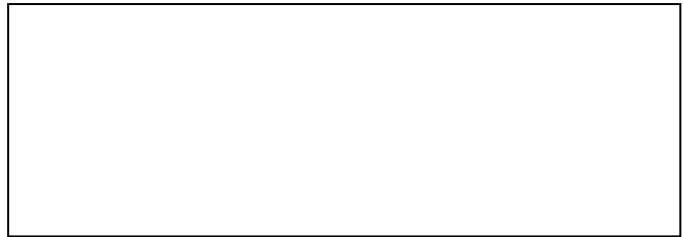




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EB/FD/BR25-13

Ostend, March 7th 2025

EU Transparency Register number: 39632242861-68

Position paper on the Evaluation of the Common Fisheries Policy (CFP)

Rederscentrale CV, the recognized Producer's Organisation (PO) representing the interests of Belgian fishers active in the North Sea, the English Channel, Celtic Sea, Irish Sea, and the Bay of Biscay, welcomes the European Commission's initiative to evaluate the Common Fisheries Policy (CFP). This evaluation, which assesses the CFP's performance in achieving its objectives over the past decade and its ability to address emerging challenges, is timely and necessary. The context in which the CFP operates has evolved significantly due to geopolitical changes like Brexit, climate impacts, and socio-economic challenges that have reshaped the fisheries sector. We recognize the CFP's role in promoting sustainable fisheries management within the EU, but it is essential that the policy evolves to address the current and emerging challenges faced by our sector.

The Belgian fishing sector, with its long-standing expertise, plays a vital role in the national and international seafood value chain and in the local coastal culture. However, the sector faces numerous challenges, including shrinking fishing opportunities, increased competition for maritime space, and regulatory and administrative burdens that threaten its socio-economic sustainability. Rederscentrale CV appreciates the opportunity to contribute to this call for evidence for the evaluation of the current CFP.

1. General Observations on the CFP

The Common Fisheries Policy (CFP) has played a crucial role in the sustainable management of fisheries within the EU. However, its implementation has also exposed significant challenges that

need to be addressed to ensure the long-term viability of the fishing sector. These challenges are particularly acute for Belgian fishers, who operate in highly regulated and politically complex maritime regions. The CFP must evolve to provide a framework that supports both sustainability and the socio-economic resilience of the fishing sector.

Need for Flexibility

The current CFP framework lacks the necessary flexibility to respond effectively to emerging challenges. Fisheries management must be adaptable to account for unpredictable environmental changes and socio-economic disruptions, such as Brexit, the COVID-19 pandemic and the energy and raw material price crisis. A rigid, one-size-fits-all approach limits the ability of fishers to adjust to new realities and undermines the sector's capacity to remain viable.

To enhance resilience, the CFP should incorporate mechanisms that allow for more responsive decision-making. This includes adjusting quotas and effort allocations in a way that accounts for scientific evolutions, technological innovations, and socio-economic factors. A more dynamic policy framework would ensure that sustainability objectives remain achievable without imposing disproportionate burdens on the fishing sector.

Sectoral Concerns

The Belgian fishing industry has raised concerns that, while the CFP's sustainability goals are well-intended, their practical implementation often fails to consider the operational realities of small to medium-sized fishing enterprises, which constitute the backbone of the Belgian fleet. The policy must recognize that economic viability is one of the pillars of sustainability and interdependent with the environmental and social pillars.

A key issue is the imbalance between fleet capacity regulations and contemporary fisheries management. The current definition of capacity, which imposes a gross tonnage ceiling, does not accommodate the evolving needs of modern fisheries. Ensuring crew safety, improving working conditions, integrating alternative fuels, and adopting new technologies are essential for achieving sustainability. However, these innovations require regulatory flexibility to be effectively implemented.

Belgian fishers, in collaboration with scientists, have proactively engaged in research and innovation to enhance sustainability. However, the current regulatory framework often fails to facilitate the practical application of these advancements. For instance, efforts to improve fuel efficiency through hybrid propulsion systems and the use of alternative fuels, such as hydrogen, are constrained by existing vessel capacity restrictions, preventing fishers from upgrading their engines without exceeding regulatory thresholds. Additionally, the installation of enhanced safety equipment can inadvertently push vessels over their permitted gross tonnage, creating a regulatory paradox where safety measures are discouraged rather than incentivized. The CFP must incorporate a forward-looking approach that not only encourages innovation but also ensures that regulatory constraints do not hinder progress. By fostering a policy environment that supports adaptation and modernization, the EU can ensure that its fishing sector remains both sustainable and competitive.

2. Regionalisation

Tailored Management Plans

Regionalisation should ensure that fisheries management measures are adapted to the specific characteristics of different sea basins, while also ensuring that regional stakeholders are fully

involved in decision-making. Advisory councils, fishers' organisations, and other relevant stakeholders must play an active role in policy development and implementation to ensure effective and equitable governance.

Each sea basin has unique ecological and economic conditions, making a one-size-fits-all approach ineffective. The CFP should allow for regionally differentiated management measures that reflect the specific needs of each region, ensuring that policies are both practical and sustainable.

Competing Maritime Activities

The expansion of marine protected areas (MPAs) for environmental protection and restoration, alongside the rapid growth of the offshore energy industry and the restricted access to third-country waters, is reducing available fishing grounds. This phenomenon, often referred to as 'spatial squeeze', is putting increasing pressure on the fishing sector. The CFP must take into account the impact of fishing effort displacement and develop strategies to mitigate these effects.

The rising use of maritime space by other sectors, particularly offshore renewable energy (ORE), presents significant challenges for fishers. The CFP must consider the cumulative impacts of ORE activities on both fishers and marine ecosystems, ensuring that the rights and interests of fishers are adequately protected and food production remains a priority.

Belgian fisheries contribute to environmental protection through initiatives such as Belreefs, an oyster reef restoration project, and Fishing for Litter. The diverse roles fishers play in environmental stewardship must be acknowledged. As stakeholders whose livelihoods depend on healthy marine ecosystems, fishers should be actively involved in decision-making processes. Their knowledge and expertise must be valued and integrated into marine spatial planning.

Restoration efforts must align with socio-economic realities, ensuring that conservation measures do not disproportionately impact the viability of the fishing sector and the production of food. The exclusion of all fishing methods from MPAs should be reconsidered if certain methods do not conflict with the conservation goals of these areas. Effective coordination between fishing activities, renewable energy projects, and restoration initiatives is essential to prevent conflicts and promote balanced and sustainable ocean space usage.

3. Socio-Economic Issues

Support for Generational Renewal

The Belgian fishing industry is facing a significant decline in young entrants, posing a serious threat to the sector's future. To ensure long-term economic viability and the preservation of cultural heritage, the CFP must introduce targeted initiatives to attract new generations to the fishing profession. These initiatives should facilitate vocational training programs, apprenticeships, financial incentives, and mentorship schemes. Encouraging generational renewal is essential for maintaining a sustainable and resilient fishing sector.

Administrative simplification

The fishing sector has long struggled with an increasing administrative burden, which negatively impacts both operational efficiency and fishers' motivation. While regulatory controls remain crucial for ensuring sustainability and safety, structural reforms are necessary to simplify administrative processes. A more pragmatic approach is required to reduce bureaucracy and allow fishers to focus on their core activities without being overburdened by excessive paperwork.

Employment and Community Resilience

The decline in employment within the fishing sector has far-reaching consequences for coastal communities. Each job at sea supports up to five jobs on land, meaning that a shrinking fishing workforce also impacts related industries such as processing, logistics, and equipment supply. The CFP must strengthen the seafood value chain to ensure resilience against economic pressures, globalization, and environmental changes. Additionally, the cumulative impact of regulatory measures must be assessed, and compensatory mechanisms should be introduced where necessary to support affected communities.

Food Security

Fisheries products provide a crucial source of high-quality protein and on average have a lower carbon footprint compared to other animal protein sources, making them essential to a balanced and sustainable diet. However, the EU currently depends on external sources for over 70% of its fisheries and aquaculture products. Strategic policy decisions must safeguard the EU's food supply by ensuring the availability of sustainable domestic fish stocks.

The Belgian fleet must retain access to traditional fishing grounds, and proposed area closures should be based on solid scientific evidence to ensure a fair balance between seafood value chain supply and nature conservation. The Rederscentrale CV emphasizes the importance of aligning with the Paris Agreement (Art. 2b), which aims to enhance climate resilience and low greenhouse gas emissions development while ensuring that food production is not threatened. The CFP must reflect these principles to secure a stable and sustainable European seafood supply.

4. Landing Obligation

Reassessment of Effectiveness

The Landing Obligation presents significant operational challenges, increased costs, and potential safety risks for fishers. Requiring fishers to land all catches, including those with no commercial value, leads to inefficiencies and unnecessary waste. The CFP must reassess the practicality and effectiveness of this measure to ensure that it aligns with sustainability goals without imposing excessive burdens on fishers.

Consideration of Practical Realities

The CFP must recognize the inherent complexities of mixed fisheries, where avoiding unwanted catches entirely is not always feasible despite technological advancements. Rather than enforcing absolute retention, the focus should be on prevention and minimization. The CFP should support research, pilot projects, and partnerships to drive innovation in selective fishing gear. The Belgian fleet has a strong collaborative relationship with ILVO, a Belgian scientific research institute, and actively works towards an alternative, practical, and sustainable management model that align with all three pillars of sustainability. The CFP must allow such alternative management models to be tested through a pilot study if it aims to improve.

5. Common Market Organisation

The role of Producers Organisations (POs) has expanded significantly since the 2013 CFP reform. POs are actively involved in maritime spatial planning, market development, research, and sustainability initiatives. Their contributions have become essential to ensuring a resilient and well-organized fisheries sector.

The CFP should continue to formally recognise the crucial role POs play in achieving its objectives and support them to continue their work effectively. A well-supported PO structure will strengthen sector resilience, improve market stability, and enhance the implementation of sustainable fishing practices.

6. MSY Objective

While managing stocks at MSY level has provided fishers with greater visibility and improved stock status, the strict annual quota-setting requirement based on F_{MSY} and the disregard of the natural fluctuation of MSY, in combination with an excessive precautionary approach have led to quotas being set below sustainable levels. This creates inefficiencies and economic challenges. A more balanced approach should be considered, allowing for sustainable low-carbon food production without compromising legal obligations.

7. Impact of Brexit

EU-UK Trade and Cooperation Agreement (TCA)

Brexit has fundamentally reshaped the regulatory framework for European fisheries, introducing significant challenges related to access to traditional fishing grounds. The TCA established new rules for shared fisheries management, but its implementation has led to additional restrictions that disproportionately affect small to medium-sized fishing enterprises.

Technical measures and evolving control regulations have been used to restrict fishing effort, exacerbating operational difficulties for fishers. The CFP must adapt to post-Brexit realities recognising the new reality of negotiations with third countries on shared stocks and avoiding excessive differences in fisheries management for activities both in EU and third country waters.

Regulatory Alignment and Simplification

The post-Brexit regulatory landscape has become increasingly complex, placing a heavy administrative burden on fishers and fishing organisations. Smaller enterprises, in particular, struggle to comply with overlapping EU and UK regulations, which can lead to inefficiencies and financial strain. The CFP should prioritise regulatory simplification and alignment to ensure that fishers can navigate the new system without unnecessary bureaucratic obstacles.

A streamlined and harmonised regulatory framework is essential to maintain competitiveness and sustainability within the sector. The CFP should advocate for practical solutions that reduce administrative complexity while ensuring continued compliance with sustainability objectives. Additionally, mechanisms should be put in place to monitor and address unforeseen challenges arising from Brexit-related regulatory shifts.

Conclusion

The evaluation of the Common Fisheries Policy (CFP) presents a crucial opportunity to address the persistent challenges faced by the Belgian fishing industry and to shape a policy that remains effective in a rapidly evolving context. While the CFP has contributed to sustainability, its rigid framework, increasing regulatory burden, and lack of flexibility in addressing socio-economic realities threaten the viability of the sector.

Rederscentrale CV advocates for a CFP that is more adaptable, regionally tailored, and balanced between ecological, economic, and social sustainability. The policy must support the resilience of small to medium-sized fishing enterprises, ensure fair access to resources and facilitate innovation within the sector. A thriving and sustainable Belgian and European fishing industry can only be achieved if the CFP evolves to meet real-world challenges while maintaining its core objectives.