



NWWAC FEEDBACK TO COMMISSION'S CALL FOR EVIDENCE FOR AN EVALUATION / FITNESS CHECK:

Common Fisheries Policy – evaluation

The North Western Waters Advisory Council (NWWAC) acknowledges the launch of the call for evidence for the evaluation of the Common Fisheries Policy (CFP) on 20 June 2024 by the Commission.

We note that the evaluation aims to assess the performance of the CFP Regulation in achieving its objectives and addressing emerging challenges, considering recent environmental, political and geopolitical changes affecting EU fisheries. It will review the CFP Regulation's implementation from 2014 to 2024 with particular focus on coherence with other EU legislation.

The NWWAC has already expressed its views on the functioning and future of the CFP in several pieces of advice, namely: [NWWAC response to the targeted consultation on the functioning of the CFP](#) from March 2022, [NWWAC response to MEP Mato questionnaire on the state of play of the CFP and perspectives post 2020](#) from April 2022, [NWWAC advice on CFP reporting](#) from October 2022 and [NWWAC advice on Communication COM\(2023\) 103 final](#) from December 2023.

Potential cumulative effects resulting from all the actions envisaged in the Communication on the functioning of the CFP that will impact the activity of the fishing sector and its profitability. For this reason, the AC agrees that it is important that the Commission addresses specific elements of the CFP and their coherence with other policies, as mentioned above, reviews these in order to identify if a different approach is needed, in collaboration with Member States, Advisory Councils and other stakeholders.

The NWWAC agrees that the CFP is based on good objectives and principles. However, there are clear indications that certain elements need amending in order for the CFP to be effectively implemented. As recognised in the Commission's Communication on the functioning of the CFP, today's context is very different from that when the CFP was reformed 10 years ago, with many new elements coming into play and influencing the success of the policy. These include climate change, Brexit, competition for space and global crises, (e.g. the COVID-19 pandemic and the conflicts in Ukraine and the Middle East). In addition, it is important to reflect whether the CFP is fit to address socio-economic issues such as generational renewal and decline in employment that are hampering the continued economic sustainability of the sector. The NWWAC feels that further reflection is needed on whether the policy is flexible enough and fit for purpose to address these new challenges. Expertise from actors on the ground should be used to a greater extent to assist with reaching the objectives of the CFP. The NWWAC stands ready to contribute in this regard.

It is essential to ensure that the CFP is resilient and adaptive in addressing climate change. Scientific knowledge is consistently improving and providing more and more information on the impacts of climate change on fisheries. It is therefore crucial to evaluate and adapt key elements within the CFP including the allocation of fishing opportunities and fleet capacity measures to address the challenges now being seen from climate change.

It is paramount that the evaluation takes into account the increasing competition for space in the marine environment. A variety of sectors are increasingly using the maritime space, and the consequent anthropogenic impacts (submarine cables, aggregate extraction, dredging-immersion, concrete coastline, pollution, land-based pollution, recreational fishing, etc) need to be considered. The application of a holistic approach to marine ecosystems management needs to be ensured, taking into consideration all sources of disturbance to the environment and/or species. Additionally, the impacts on fisheries from ORE developments and the increase in the number and extent of Marine Protected Areas also needs to be seriously considered.

The NWWAC reiterates the specific challenge posed by the implementation of the landing obligation. This has been evidenced in many previous evaluations and projects (e.g. DISCARDLESS, MINOUW) that have been carried out. Based on the available information, the NWWAC considers it necessary to re-configure the landing obligation to make it implementable and controllable. We appreciate that the Commission is preparing a further evaluation of the landing obligation, and we trust that the Commission will take full account of stakeholder views on the landing obligation and take decisive action to make it fit for purpose.

At the same time, the NWWAC strongly supports the application of a regional perspective of the CFP that takes into consideration the specificities of the different sea basins and stakeholders. The NWWAC believes that regionalisation should remain one of the core principles of the CFP but following Brexit it needs a complete overhaul to provide Member States and the ACs, working through the Regional Groups, a meaningful role in the decision-making process.

To conclude, the NWWAC agrees with the consultation strategy as outlined in the call for evidence and especially with the need for strong multi-stakeholder engagement on the matter. We note that the consultation strategy combines targeted consultations and a public consultation. We appreciate that Advisory Councils are mentioned as actors among the consultation audience and recommend that their advice is requested through a targeted consultation that is tailored to ACs' expertise, membership and procedures.

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