



The Oceans Pact

Response to EC Consultation from the Low Impact Fishers of Europe (LIFE)

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The Low Impact Fishers of Europe - LIFE

[LIFE](#) is the only European level organization providing a dedicated representation for small-scale fishers that have a low environmental impact. Our aim is to unite small scale fishers to achieve fair fisheries, healthy seas and vibrant communities. LIFE was launched on the eve of the reformed Common Fisheries Policy (CFP) in 2012. Currently LIFE incorporates 37 member organisations from 15 Member States across Europe (EU and UK) and all sea basins, from the Baltic to the Black Sea and the Mediterranean, representing around 10,000 fishers. LIFE's members are committed to minimizing their environmental impacts whilst maximizing their socio-economic benefits.

The Low Impact Fishers of Europe (LIFE) welcomes the Commission initiative to develop a holistic approach to ocean-related policies. We feel that this approach has the potential to build an overarching framework that aligns and ensures coherence among sectoral policies, reduce conflicts between different coastal users, improve governance and multisectoral collaboration, simplify regulatory frameworks, while addressing important legislative gaps.

In her Political Guidelines President Von de Leyen states that under her new mandate the *“competitiveness of the entire food chain will be supported and food sovereignty protected; and that this must apply to our fishermen and women, who ensure that fisheries remain the lifeblood of our coastal communities and economies. They provide a healthy supply of food to local, national and international markets.”*

LIFE agrees: While we need to urgently restore our seas, fisheries, fishing communities, fishing livelihoods, food sovereignty and securing food from the sea must be at the heart of the Oceans Pact. Concretely, small-scale fisheries¹ need to recuperate and be recognised for the crucial role they play in the blue economy. They are vital for sustaining coastal local economies, for food security, and cultural heritage while doing so in a low impact manner whilst providing high socio-economic value.

We are convinced that, given policy space and appropriate support, small-scale fisheries (SSF) could be part of the solution and a gamechanger to Europe's ailing seas. SSF will make a vital contribution to implementing the Green Deal agenda for 2030 and 2050 in line with the FAO

¹ Throughout this document, SSF refers to vessels under 12 metres using non-towed gears, as defined in the EMFAF Regulation (Article 2.14 Regulation 2021/1139).



Voluntary Guidelines for SSF, United Nations 2030 Agenda for Sustainable Development and towards achieving the UN's Sustainable Development Goals (SDGs).

LIFE's Proposals for the Oceans Pact

LIFE believes the Ocean Pact has to be ambitious and exhaustive. It should include objectives, targets and proper indicators to follow its accomplishment and should be accompanied with a roadmap of policy and legislative actions to achieve them by 2030, to address important legislative gaps.

The SSF sector currently feels an acute sense of urgency, having reached a tipping point and is in danger of disappearing. The EU cannot afford any further delay in protecting and promoting this sector and its potential. For this LIFE enlists here three main priorities for the Oceans Pact to address:

1- Place once and for all, small-scale fisheries at the heart of the Oceans Pact and at the heart of the Blue Economy.

- The Oceans Pact must recognise and protect small-scale fishing, including its tenure rights, in line with the FAO Voluntary Guidelines on Small-Scale Fisheries (SSF Guidelines).
- Current EU fisheries policies fail to adequately recognise traditional SSF fishing areas, leading to displacement and marginalisation of small-scale fishers due to LSF activities and overfishing, offshore renewable energy (ORE) expansion and Marine Protected Areas (MPAs). Ocean Pact should ring fence SSF's rights (access to fishing areas and resources) and protect the sector from the encroachment of more powerful blue economy sectors, reserving access in the 12 nautical mile zone for small-scale low impact fishing where management plans are set through co-management schemes.
- A differentiated policy and management approach to SSF and larger-scale fisheries (LSF) is essential for safeguarding the survival of SSF, ensuring that policies reflect the unique needs of small-scale fishers rather than applying a one-size-fits-all regulatory model that favors larger-scale operations.
- Fair and equitable allocation of fishing opportunities is ensured. For that, legal ambiguity inherent in the criteria set out in Article 17 needs to be addressed by establishing weighting and guidelines on applying the criteria of an environmental, social and economic nature.
- Ensure better use of Traditional Ecological (and experiential) Knowledge and meaningful participation of small-scale fishers in decision-making processes.
- Build the capacity of SSF organisations and eliminate administrative burdens to create dedicated small-scale fisheries Producer Organisations.
- Address the critical issue of generational renewal in the fisheries sector, as the lack of succession planning threatens the long-term viability of small-scale fisheries. Barriers to new generation entry in existing policies need to be lifted and replaced by provisions that incentivise a new generation of small-scale fishers.
- Establish a reserved SSF fund for supporting its development.



2- Improve the implementation and strengthen the enforcement of existing legislation and policies, including the MSFD and CFP, and new laws like the Nature Restoration Law. Strengthen accountability and adopt practical and workable infringement proceedings against Member States or EU institutions when legal frameworks are not implemented.

- Address the incoherence between policy and practice in fisheries management. Revise the way that scientific advice is provided and deal with the management shortcomings that undermine fish stock growth and penalise low impact fishery methods. More concretely utilise BMSY as the standard reference point for stock management and as an objective when managing fisheries stocks and establish thresholds and reference values that facilitate MSFD implementation. Clarity is also needed on the different terms used and their definitions. In this regard, it is important that the “precautionary approach” should be defined and or replaced with the precautionary principle. Also, ecosystem-based approach should be included as a guiding principle but would need to be defined to avoid later misinterpretations or misuse. An ecosystems approach should take account of predator/prey relationships, sustaining marine trophic structures and the cumulative impacts of fishing on the wider ecosystem.
- Align Europe’s policy on food from the sea with the wider issue of food security and food sovereignty in Europe, prioritising EU produced over imported seafood products, and promoting local value chains. It's important to better define food security as securing sufficient supplies through production, but also ensuring a sustainable, efficient and equitable distribution of food now and in the future, and making sure it is available for the generations to come. The entire value chain - from sea to plate - must be considered. More emphasis needs to be given to the circular economy in fisheries, 100% use of fish and reducing food waste in fishery value chains.

3- Ensure policy coherence and appropriate governance to restore and maintain ocean good environmental status; the short-term goal should be improvement, while avoiding damage.

Coherence and precaution are needed when addressing the potential “boost of the Blue Economy”, making sure there are no effects to the state of the ecosystems and the existing low impact and high social blue economy actors, such as the Small-scale Fishers.

- This includes all measures to promote coherent, synergistic and action-oriented policies to reverse these existential threats and restore the productivity of our oceans, marine ecosystems, critical habitats and fish stocks. The Ocean Pact should Include in its roadmap a particular strategy for the EU to adopt Integrated Coastal Management (ICM), in advance fit for purpose science and social oriented indicators, baselines and reference data and thresholds, used to measure them.



- Promote the Energy Transition of the Fisheries Sector with the objective to both decrease emissions and increase carbon sequestration. For that it also needs to be aligned with and complement the Marine Action Plan and CFP implementation to achieve ending overfishing, rebuilding fish stocks, and reducing the impact of carbon intensive, high impact fishing practices, especially those directly impacting the seabed.
- Implement a “blue doughnut” approach to the Blue Economy, building on social foundations and respecting ecological ceilings. This will be the base to ensure greater coherence and compatibility with other blue economy policies that potentially impact on marine food production.
- Strengthening Marine Spatial Planning, making sure it’s inclusive and implemented correctly by the Member States, and the local SSF communities are truly and effectively involved in the design and implementation of the Marine Spatial Plans and spatial squeeze and displacement of the SSF is prevented.
- Mitigating and offsetting the footprint of boosting the Blue Economy: Boosting the Blue Economy will also incur a significant worrying ecological footprint and there will be a need to boost more importantly ocean’s restoration ahead of any important development, mitigate and offset this with specific additional conservation and management measures. On this, as listed above, LIFE calls for the need to reserve access in the 12 nautical mile zone for small-scale low impact fishing.

How We Affect the Oceans

Existential threats

The triple planetary crisis is directly affecting the productive capacity of the oceans. For fisheries, warming seas, especially in coastal areas are making fish much less abundant with notable impacts on small-scale fisheries, while changing ocean dynamics and compromising the different species life cycles. Acidification and marine pollution is impacting primary production - notably the plankton at the base of the food chain - threatening the entire marine food web. Pollution, notably from PFAS and microplastics, agricultural and industry runoff, is also raising questions about the healthy nature of fishery products. Habitats are being degraded and biodiversity is being lost. The rivers are not running with enough water and nutrients affecting the whole coastal dynamics and across Europe, but in the Mediterranean especially, a biodiversity hotspot, invasive species are impacting on the viability of fisheries and changing the ecosystems.

At present, the work on silos to address these factors has managed to address these challenges. We need coherent, synergistic and action-oriented policies to reverse these existential threats and restore the productivity of our oceans, marine ecosystems, critical habitats and fish stocks.

Also, many of the existing policies that the EU have set to address these needs have not been fully implemented and deadlines to match objectives has passed by, like in the case of the Marine Strategy Framework Directive, which overarching objective was “to achieve Good Environmental Status (GES) of the EU's marine waters by 2020 and to protect the resource base upon which marine-related economic and social activities depend”. The upcoming report on the implementation of the MSFD will be important going forward.



Dysfunctional fisheries management

The productivity of fisheries in EU waters has declined considerably since the 1980s, thanks in no small part to unsustainable fisheries management. Overfishing needs to end.

Article 2.2 of the CFP makes restoring and maintaining populations of fish stocks above biomass levels capable of producing maximum sustainable yield a priority. Yet, the current fisheries management approach in the EU is not geared towards delivering such a stock recovery. Rather, misinterpretation and misuse of the biological reference points have been constant in both the design of the Multiannual Management Plans (MAPs) and in the way that scientific advice has been arrived at and applied. Under the current system, fisheries managers maintain stocks at around the lowest available biological reference points (Btrigger and Blim), while ignoring predator and prey relationships and population structure of fish stocks when setting fishing limits. This has meant that scientists have consistently overestimated biomass and set fishing levels too high, resulting in low and dysfunctional fish stocks which have already collapsed (like the Baltic Cod) or are now in serious decline (sprat and herring in the Baltic).

On the other hand, the approach is used with a single species approach and, through a lack of implementation of Article 17, the EU quota management system keeps rewarding those who fish most (based on catch history). It is vital that the Commission address these unsustainable aspects of fisheries management going forward.

Fisheries: extractive industry with hidden climate impacts

Fishing uses energy only to extract what nature has already produced. Therefore, compared to livestock production, fishing is able to put animal protein on our plates with a relatively low carbon footprint. However, that is only one side of the picture. Large scale fishing is an energy intensive extractive industry and aggravates the climate crisis by contributing to overfishing, impacting the food chain and marine biodiversity, exerting selection pressures on fish stocks (e.g. for early maturation and reduced size at maturity), reducing resilience of marine ecosystems, distorting predator-prey relations, and disrupting carbon sequestration. The carbon footprint of the fisheries sector may therefore be underestimated. It also needs to be assessed in a holistic way including the footprint from sea to plate.

Fisheries food insecurity: mismatch between extraction and demand

The skewed implementation of successive Common Fisheries Policies (CFPs) has led to a distorted sea, marginalising SSF, whilst enabling overfishing to worsen, and concentrating fishing capital, access to fishing opportunities, and influence in ever fewer hands. This has worked against the interests of economic security in coastal communities, and against EU food sovereignty and food security.

On the marketing side, EU fisheries, whilst an export success in many ways, are increasingly unable to meet the demands (not really the needs) of European consumers. Whilst the EU fish market attracts and distributes considerable quantities of products to EU consumers (as the world's 2nd largest market for aquaculture and fisheries products), only 20-30% of European consumer demands are met by EU caught products. Since the inception of the CFP, European



consumer food preferences have changed radically, and there is a mismatch between what Europe produces and what consumers want. This is partly due to EU fisheries becoming less competitive, their products unable to compete with relatively low-cost imports. These benefit significantly from tariff free quotas and laxer environmental and social standards compared to EU caught products. As a consequence, fisheries make an increasingly marginal contribution to marine food consumption in Europe and to food security. The Oceans Pact must address these negative trends by making responsible consumption, traceability, marine food production and food security a high priority, and creating a level playing field between EU produced and imported seafood products.

Impacts of the Blue Economy and small-scale fisheries communities

There is no formal definition of the blue economy, but there are core aspects that are common to the understanding of the concept by the international community. It looks at combining the concern for the marine environment and coastal ecosystems with the idea that some ocean-related industries or “blue” business sectors have the potential to be expanded. However, the narrative of “win-win-win” is fallacious and is not all compatible with securing sustainable small-scale fisheries. Small-scale fisher communities are the most ancient and key actors of the blue economy, yet are the most marginalised and the most vulnerable group in this competitive environment. It is therefore imperative that governments recognise the inevitable conflicts and vulnerabilities that growth produces to them, including impact to the environment and health fish stocks they depend on, spatial squeezing and displacement.

How the ocean affects coastal communities

The critical importance of the oceans for sustaining life on Earth and human survival is widely understood. A healthy and productive ocean is crucial for building ocean resilience, which in its turn is key to supporting a flourishing blue economy and sustaining thriving coastal communities. However, the lack of proper implementation, existing fragmented EU policy framework and siloed approach to oceans and blue economy issues is not capable of addressing the human induced triple planetary crisis. Also, there is a lack of full implementation and enforcement of them that needs to be seriously addressed. As a consequence, coastal communities, whose livelihoods, well-being and prosperity directly depend on it, are being impacted.

Fisheries are a public resource, providing food, livelihoods, and economic prosperity, anchoring communities and representing an invaluable cultural heritage. All this is being put at risk by inappropriate policies (that promote high impact high volume fishing) and their implementation. In particular, this is causing overfishing and reduction of fish stocks, while causing small-scale low-impact fishing to lose viability, undermining generational renewal, the loss of jobs, eroding coastal communities, with the social fabric woven by small-scale fisheries at risk of disappearing.



The opportunities that the ocean provides us with

Food production from the sea: reform the fisheries and aquaculture sectors

The EU Fisheries and Aquaculture sectors face huge challenges. Fisheries need to be transformed from a 19th/ 20th century industrial extraction system into a modern, sustainable fit for purpose food production system - including meeting the challenges of decarbonisation and fisheries regeneration (generational renewal and restoration of marine ecosystems, habitats and biodiversity).

Aquaculture, stagnant for the past 3 decades needs to move away from the dominant intensive mono-species feedlot approach to a multi-species/ polyculture, multi-trophic approach, using the entire water column and all trophic levels, with an emphasis on primary production and regenerative systems that purify polluted waters and regenerate healthy habitats and ecosystems.

Both sectors need to anticipate that conditions in 20-30 years time will be vastly different to what they are now. Also, increasingly, both fisheries and aquaculture depend on migrant labour, with younger generations of European citizens finding jobs in the sector unattractive. This is not sustainable and must be addressed.

The Ocean Pact provides the opportunity to look to the future and envision how our food from the sea could and should be produced, how, and by who.

The underestimated and important role to be played by Small-scale fisheries

Under likely impacts (Section B of the DG Mare Call for Evidence), it is stated that “*the Pact will contribute to a prosperous fishing and aquaculture sector continuously contributing to EU’s food sovereignty and EU food strategic autonomy, including artisanal fishers who are part of Europe’s cultural heritage and traditions*”. All well and good. However, if “artisanal” refers to small-scale fisheries, then this is an inadequate description.

The term “artisanal fishing”, widely used across Europe, means different things in different contexts. It is far from a precise descriptor, and can include powerful offshore trawlers up to 24 metres in length (as in France). We find it a misleading, vague, emotive and ambiguous term. It approximates to, but is not synonymous with “small-scale fisheries” - a much more precise term. We therefore recommend that the term “small-scale coastal fishing/ fisheries” is used, a term clearly described in Article 2.14 of the EMFAF (Regulation 2021/1139).

SSF - far from merely being just “*part of Europe’s cultural heritage and traditions*” - plays a key socio-economic role in coastal and island communities by providing livelihoods and economic activities in areas with few alternatives. There are also important linkages between tourism and SSF, with SSF providing an important intangible cultural heritage, contributing to bio-cultural diversity, and a rich source of experiential knowledge of the marine environment invaluable for informing fisheries management decisions. SSF (vessels under 12 metres using non-towed gears) constitute over 70% of the vessel fleet and provide half of the sea going jobs in fishing. Whilst contributing 6% of the fish landings by volume, they provide 15% of the catch value. SSF are mainly micro and nano sized family enterprises, which support (through administration,



business management, fish handling, etc) ancillary fishery activities and distribute socio-economic benefits widely.

Low-impact, small-scale fisheries can generate significant numbers of jobs and added-value for every litre of fuel used whilst causing less environmental damage, in contrast to larger-scale, high-impact fishing. Despite this, the sector has been marginalised, and starved of fishing opportunities and sectoral support over decades, impacting the overall resilience of European fishing communities.

Given an appropriate policy framework, adequate support and protection, SSF has the possibility to provide decent livelihoods on a sustainable basis, to contribute healthy value-added products to Europe's food systems, and to building the EU's oceans knowledge framework.

- *A differentiated approach*

LIFE is convinced that both small-scale low impact and large-scale high-volume fisheries have a contribution to make to EU food security - but they are different and must be treated differently, with a level playing field created to ensure fair competition for access to resources and markets for both.

This is why LIFE is calling for a differentiated approach to managing small-scale and large-scale fisheries, to protect SSF with secure rights (to access resources, infrastructure and fishing areas and to access markets with differentiated value chains for their products), to promote their proper organisation in functional dedicated structures and to incentivise and reward those fishing with the least environmental impact and highest social value. This will include securing wider inshore fishing areas reserved for small-scale low impact fishing, effectively managed through adaptive local co-management regimes.

Concretely, small-scale fisheries need to recuperate and be recognised for the crucial role they play in sustaining resources and food supplies, and as a key player and stakeholder in the blue economy. They are vital for anchoring and sustaining coastal economies at the local level, in addition to being part of Europe's cultural heritage and traditions.

The SSF sector currently feels an acute sense of urgency, having reached a tipping point and is in danger of disappearing. The EU cannot afford any further delay in protecting and promoting this sector and its potential.

This is why LIFE proposes that the Ocean Pact incorporates in its Roadmap provisions to define, promote and protect the small-scale, low impact fishing sector in Europe.

- *Changing the status quo*

Up to now, EU fisheries policies have rewarded those fishing practices with the largest ecological footprints with both subsidies and quota, creating unfair competition between high impact high volume fisheries, and low impact value added fisheries. This must stop.

Mechanisms in the CFP already exist for changing the status quo. Article 17 and other mechanisms could be used to reward good practice with additional quota, and adapting fisheries



science to the realities of the EU's degraded fisheries. We look forward to the publication of a *Vademecum* on Article 17, and to the report on the evaluation of the CFP.

- *Protect SSF from impacts, spatial squeezing and displacement with other Blue Economy sectors, notably with energy sector*

Similarly, small-scale fisheries need to be placed at the heart of the Blue Economy, whilst recognising the tenure and customary rights of the SSF sector, protecting it from displacement through spatial squeezing by competing or incompatible activities.

We advocate for a “blue doughnut” approach to the blue economy, building on social foundations and respecting ecological ceilings. This will be the base to ensure greater coherence and compatibility with other blue economy policies that potentially impact on marine food production.

Marine Spatial Planning needs to be strengthened, ensure its coherence and proper implementation. It has to be more inclusive so small-scale fishers are really supported to participate effectively.

- *Prioritise access to the 12 nautical mile zone reserved for small-scale low impact fishing*

Boosting the blue economy will also incur a significant ecological footprint and there will be a need to mitigate and offset this with specific additional conservation measures, including marine protected areas. In particular LIFE calls for the 12-mile inshore zone to form a contiguous conservation area, reserved for small-scale low impact fishing under a co-management regime.

The Oceans Pact provides an important opportunity to align Europe’s policy on food from the sea with the wider issue of food security and food sovereignty in Europe. Food security is not only about securing sufficient supplies through production, but it is also about ensuring a sustainable, efficient and equitable distribution of food now and in the future.