



European Ocean Act- Call for Evidence

Introduction

The Low Impact Fishers of Europe (LIFE) is a European platform of small-scale fishers associations committed to minimising their impact on the environment and maximising the socio-economic benefits they generate. Currently LIFE incorporates 37 associations across 15 Member States, uniting around 10.000 small-scale fishers on the platform.

LIFE's Mission is to unite European small-scale fishers to achieve fair fisheries, healthy seas and vibrant communities, through three main axes: a) representing and supporting the interests of its members; b) providing a voice for, and supporting its members in policy advocacy and decision taking processes; and, c) support them on the ground to be actors of change.

LIFE was first incorporated in the UK in 2014, then following Brexit registered in Belgium as an asbl in November 2018 - www.lifeplatform.eu

Background

LIFE welcomes the [call for evidence](#) with a view to developing a Directive for an Ocean Act based on the Ocean Pact, which will build on the revision of the Maritime Spatial Planning Directive.

Providing an effective and coherent framework for governance across all sectors is both necessary and timely. There is also an urgent need for coherence between the different blue economy interests competing for space and resources, an equitable allocation of ocean space, and regulatory measures to restrict the negative environmental impacts of blue economy development and the potential socio-economic harm that could be inflicted on coastal communities.

Without such a framework, there is a danger that traditional, lower profile blue economy activities will be overlooked and marginalised in the rush to establish new economically powerful and politically influential sectors, negatively impacting the longer-term socio-economic viability and quality of life of coastal communities. Fishing, and particularly small-scale fishing, is already feeling a spatial squeeze from large-scale fishing, offshore energy generation, aquaculture and other emerging blue economy sectors, and the

negative environmental impact and socio-economic consequences are already apparent and halting their potential. In the Mediterranean basin, especially, tourism and recreational fishing has taken over much of the space previously occupied by small-scale fishing.

Challenges facing Small-scale Fisheries, an overlooked potential

For more than three decades, the potential and importance of small-scale fisheries has been highlighted in many relevant international and European fora. Small-scale fisheries (SSF) could be part of the solution and a gamechanger to Europe's ailing seas, making a vital contribution to implementing the Green Deal agenda for 2030 and 2050 in line with the FAO Voluntary Guidelines for SSF, United Nations 2030 Agenda for Sustainable Development and towards achieving the UN's Sustainable Development Goals (SDGs), on which the Ocean Act has to align with.

However small-scale fisheries (SSF) are all too often an undervalued and overlooked sector, with priority given to other more economically powerful and politically influential sectors. Small-scale fishers from across Europe face an increasing array of constraints and challenges, which have made them arrive at a tipping point in decline, which is becoming increasingly challenging to reverse.

LIFE therefore welcomes that, under Section 3.1. the Ocean Pact recognises the importance of the fisheries for sustainable Aquatic Food, Food Security and Sovereignty, and the need to "support small scale fisheries as a priority".

Although the Ocean Pact outlines relevant actions which are potentially good steps forward, few details are provided on the nature of such support or actions, or how this priority will be concretised in the future Ocean Act. If SSF is to survive and thrive, such details are essential.

The call for evidence mentions that the Act will reference existing binding targets, help meet them effectively and consistently, and streamline reporting obligations. This is a key opportunity to address the decline, by including key targets and provisions on the following principles in the Ocean Act. These aspects should be legally operationalised, not non-binding principles.

Urgent action is needed now. The EU cannot afford any further delay in protecting and promoting this sector and its potential, and to legislate and steer policies that are fair for the fishers, fair for future generations and fair for nature.

Principles, targets and provisions to be included in the Ocean Act

1. Support SSF as a priority based on a differentiated approach to managing SSF

SSF needs concrete policies that halt their decline and strengthen their potential.

Fisheries policies and regulations have all too often been formulated with the requirements of larger scale fisheries in mind, based on the assumption that the SSF sector will somehow adapt. This is not borne out in practice. It is vital to ensure the application of policies that protect SSF rights and reflect the unique needs of small-scale fishers rather than applying a one-size-fits-all approach that favours larger-scale, high impact operations.

Establishing small-scale fisheries plans of action at national levels and at EU level within the Ocean Act would transform small-scale fisheries from a marginal policy concern into a central pillar of sustainable EU ocean governance.

The Ocean Act should:

- Set a specific target for a Plan of Action for Small-scale Fishing in Europe, incorporating the principles of the FAO Voluntary Guidelines on Small-Scale Fisheries (SSF Guidelines), including binding actions and concrete timelines.
- The EU Ocean Pact dashboard should define and establish baselines, monitoring yearly progress using transparent and objective indicators, both of an environmental and socioeconomic nature. Specifically, LIFE calls for setting indicators to monitor progress on generational renewal, trends in small-scale fishing and the contribution of EU fisheries and aquaculture to food and livelihood security, social cohesion-wellbeing, cultural heritage and identity, documenting synergies with other sectors (tourism, regenerative aquaculture, etc), and SSF access to resources and space.

2. Improved governance: Co-Design Co-Decision and Co-management in MSP

In the context of Maritime Spatial Planning (MSP), SSF struggle to be visible, facing a David and Goliath-like situation, where ocean space is being carved out for and shaped by the larger players, with significantly concentrated economic power and political influence. Already targets have been set for off-shore energy production, with greater priority for food production being given to aquaculture, overlooking again the potential of SSF. The challenge is not just to strengthen and make Maritime Spatial

Planning inclusive, but to ensure that the less visible but highly important actors like SSF can engage meaningfully in the co-design of plans, and in the co-decision making processes on how these plans are implemented.

Coastal communities and small-scale fisheries should be placed at the heart of ocean governance. Participation, access rights, tenure security and co-management should be the norm – structural conditions for sustainability –, not merely accompanying measures.

LIFE calls for adaptive co-management to be applied across all coastal areas, starting in Marine Protected Areas, in specially designated “fishery regenerative areas”, and as part of Restoration Plans, inclusive of small-scale fishers, guaranteeing their shared authority in decision-making guided by inclusiveness, transparency, accountability and equity in European coastal waters. This would be the best way for the local, traditional and experiential knowledge of SSF to be incorporated alongside scientific advice in making decisions concerning SSF.

The Ocean Act should:

- Ensure that dedicated SSF European representatives are included in the high-level Ocean Board, where they could - together with other stakeholders - support the Commission in its task of monitoring and ensuring the effective implementation of the Ocean Act.
- Establish, as a key complementary and parallel step, a dedicated Small-scale Fisheries Advisory Council, whilst working to improve the functioning of already existing ACs, with a greater participation of small-scale fishers’ associations.
- Establish provisions to ensure an inclusive Maritime Spatial Planning processes, in which small-scale fishers are supported to participate effectively on an equal footing with other stakeholders.
- Establish clear guidelines for co-management in the different MS, defining the terminology needed, the roles and shared responsibilities of authorities and stakeholders, including small-scale fishers
- Require Member States to establish specific legal frameworks that incorporate co-management into their governance schemes in coastal waters.
- Ensure that adequate financial resources are allocated in annual European and national budgets to support social dialogue and co-management systems, enable effective implementation, and build the capacity needed for meaningful participation of small-scale fishers in decision-making processes.

3. Equitable allocation of maritime space and resources based on socio-economic value and low environmental impact

The potential boom of the blue economy carries a high risk of being accompanied by significant, but as yet unquantified, environmental and socio-economic impact of large-scale blue economy sectors on the marine environment and coastal communities.

Fishing, and small-scale fishing in particular, is increasingly left to compete for what crumbs of space and resources are left for them. Unlike larger scale fishing operations, SSF cannot move and displace their activity to “other fishing grounds”, due to their limited range.

The potential for multi-use of space by compatible and complementary activities (such as fishing in wind parks, combined with regenerative aquaculture) needs further investigation and trial; it is a complicated matter with many unknowns. For example, how will vessel insurance and sea-safety be affected if working amongst large offshore installations? What kinds of biodiversity and biological community changes will occur in offshore installations? All this needs to be further studied through dedicated and independent social and environmental scientific studies, before further progress and assumptions are taken.

Small-scale fisheries need to be placed at the heart of the Blue Economy, recognising their tenure and customary rights as a sector, protecting against spatial squeeze by competing or incompatible activities through the creation of “small-scale stewardship areas” and recognising their valuable contribution to food and livelihood security, social cohesion, cultural heritage and identity and synergies with other sectors.

On a related matter, allocation of fishing opportunities based primarily on historical catch records entrenches inequality and reinforces concentration of access rights. This disproportionately disadvantages small-scale fisheries, new entrants, women, and young fishers, while facilitating the de facto privatisation of public marine resources.

Despite the existence of Article 17 of the Common Fisheries Policy, which requires the use of transparent and objective criteria when allocating fishing opportunities, implementation has not taken into account the spirit of the law (as stated in Recital 33), and so the full potential of Article 17 to promote responsible, low environmental impact fishing remains untapped. As a result, fishing opportunities are rarely allocated on the basis of transparent and objective socio-economic and environmental criteria.

This partial implementation of Article 17 undermines generational renewal, economic viability, and social cohesion in coastal regions, and directly

contradicts EU sustainability and social justice objectives. This is highlighted in the EC's recently published "Communication for enhanced transparency and good governance in the allocation of fishing opportunities by Member States: A [vade mecum](#) on the application of Articles 16 and 17 of Regulation (EU) No 1380/2013 on the Common Fisheries Policy. This provides guidelines on good practice for improving good governance through transparency, and are an important step forward. The Ocean Act should require that MS take note of, and apply them.

The Ocean Act must:

- Treat low environmental impact seafood production as a priority and overriding public interest.
- Include specific guiding principles for MSP based on social and environmental justice, the ecosystem approach and precautionary principle, transparency, inclusiveness and informed participation, with particular attention to the rights, livelihoods and traditional knowledge of small-scale fishing communities.
- Include safeguards to ensure the rights of fishing communities (access rights, tenure rights) are respected. This includes formal recognition of preferential access for small-scale fisheries through spatial zoning and resource allocation, legal recognition of tenure and customary access systems, and the systematic integration of fishers traditional knowledge alongside scientific data.
- Establish regenerative fishery areas, giving preferential access in territorial waters, extending out to the 6 mile and 12 nautical mile limits where appropriate for small-scale low impact fishing, with management plans established through co-management schemes.
- Incorporate the principle of fisheries dependency in offshore islands, embedded in Recital 20 of the CFP which states that "Small offshore islands which are dependent on fishing should, where appropriate, be especially recognised and supported in order to enable them to survive and prosper".
- Include provisions that operationalise Article 17 of the CFP in the spirit of the law (recital 33 within the Ocean Act's legal framework, ensuring allocation reflects sustainability and equity, with a minimum of 20% of total opportunities (TAC/effort) reserved for SSF, along with safeguards to prevent erosion, as exemplified by Denmark's inshore reserved pool.

4. Environmental sustainability must form the foundation of the Ocean Act, with priority given to boosting self-sufficiency in fisheries production and increasing the contribution of fisheries to food security, limiting high impact activities and rationalising tradeoffs between energy security and food security

Without fish in the sea there is no future for fisheries and fishing communities. This is a major concern in all sea-basins where our sector operates.

Environmental sustainability must form the foundation of the Ocean Act, establishing clear, harmonised targets and indicators to ensure that fisheries and aquaculture operate within ecologically restored and climate-resilient marine and coastal ecosystems. This implies ecosystem-based management founded on the precautionary principle, focussed on stock recovery and reducing the impacts of destructive/ high-impact practices, and the integration of fisheries into marine ecosystem restoration, including coastal habitats.

Available stocks and catches in European waters have declined considerably since the first Common Fisheries Policy was enacted in 1983, as have supplies of fish caught in European waters to European markets. In parallel, seafood self-sufficiency has declined, reaching 37.5% in 2022, with EU production supplying less than 20% of total EU seafood consumption. The contribution of fish to European food security is now overly reliant on imports. This creates unfair competition with EU produced products, as imports are not subject to the same social and environmental standards.

Currently, instead of building European stocks to secure future food needs, increasing quantities of fish are destined for reduction to fishmeal and oil, notably in the Baltic. This must change, with fish for human consumption being prioritised over fish for reduction to fishmeal and oil.

The Blue Economy narrative of triple bottom line win-wins is fallacious and dangerous. Not all things labelled Blue are compatible, coherent or sustainable. Oceans are not just a “space” from which each and every stakeholder can have their slice of cake and eat it. We tend to forget that oceans are a living ecosystem affected by the impacts of human activities, and the impacts are cumulative. The trade-offs, synergies and potential conflicts between energy security and food security need to be made more explicit, and rationalised.

The Ocean Act should:

- Develop an approach to the blue economy which builds on social foundations and respects ecological ceilings and marine targets (Good Environmental Status).
- Establish comprehensive legally binding objectives and timebound and measurable targets (with thresholds) for 2030, 2040 and 2050, including the achievement of Good Environmental Status and others international ocean targets and objectives that are not yet enshrined in EU law.
- Strengthen enforcement and transparency, empowering the Commission to monitor progress and enforce compliance through regular assessments and the Ocean Act Dashboard as a public accountability tool.
- Address the incoherence between policy and practice in the application to the MSY objective of the CFP (Article 2.2) to 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 establish BMSY as the standard reference point for stock management and as an objective when managing fisheries stocks.
- Prioritise fish for human consumption over fish for reduction to fishmeal and oil, by limiting of 0.5 Fmsy for lower trophic level forage fish. Such a limit would support adequate energy transfers throughout the ecosystem, improve stock resilience, ensure prey availability higher up the food chain and reduce the risk of stock collapse and fishery closure.
- Clearly define the different terms used. In this regard, it is important that the "precautionary approach" should be defined and be replaced by the "precautionary principle". Better define "Good Environmental Status", establishing thresholds and reference values that facilitate MSFD implementation.
- Include the ecosystem-based approach as a guiding principle, and clearly defined. An ecosystems approach should take account of predator/prey relationships, sustaining marine trophic structures and reducing the cumulative impacts of fishing on the wider ecosystem.
- Make the following key requirements: the establishment of a mandatory environmental impact assessment (covering cumulative and long-term effects of ocean activities); and gender-sensitive social impact assessments for all significant coastal and offshore

developments. These should examine impacts on ecosystem resilience, livelihoods, food security and cultural practices.

- Align Europe's policy on food from the sea with the wider issue of self-sufficiency in fisheries, and the contribution of fish to food security and food sovereignty in Europe, prioritising EU produced over imported seafood products, and promoting local value chains.
- Better address land-sea interactions embedding Integrated Coastal Zone Management and place more emphasis on the circular economy in fisheries, aiming to achieve 100% use of fish and reducing food waste in fishery value chains.

5. Address climate change and develop effective climate change mitigation strategies

Small-scale fishing communities are on the frontline of climate change impacts, including shifting species distributions, in-migration of invasive species, extreme weather events, and loss of coastal habitats. Yet current climate and maritime policies rarely provide tailored adaptation frameworks for SSF, and Maritime Spatial Planning processes often fail to integrate climate displacement, ecosystem changes, or community-level adaptation needs, increasing vulnerability and conflict over space and resources.

The Ocean Act should:

- Maintain the existing legally binding targets and policies of restoring marine ecosystems and rebuilding biodiversity, which can contribute to slowing down global warming, by increasing the ocean's carbon capture function.
- Mandate climate-responsive coastal and fisheries strategies that are locally co-designed with fishing communities and integrated into marine spatial planning frameworks, improving the resilience of coastal communities, particularly those facing resource scarcity, helping them reduce post-harvest losses and/or to develop alternative resources, including the development of innovative solutions for the valorization and utilization of invasive species.
- Promote an adaptive approach to fisheries management that takes into account the impact of climate change and accommodates the specific needs of small-scale fishers and fishworkers.

6. Strengthen the social dimension of the blue economy, especially on generational renewal, promoting the involvement of youth and gender equity in fisheries

The future of Europe's fisheries depends on its young. However, we are faced with a rapidly ageing fishing population, rising barriers to entry, and declining attractiveness of fishing as a livelihood. Access to quota, finance, training, and infrastructure is becoming increasingly restricted for young people, while intergenerational knowledge transfer is weakening. These trends have long-term implications for self-sufficiency in fish, livelihood security, cultural heritage, and the viability of coastal communities.

Without targeted policy intervention, many small-scale fisheries face structural decline regardless of ecological recovery. Generational renewal should therefore be understood not as a niche social issue, but as a core objective.

Equally, the essential role of women in fisheries—often informal and undervalued—must be recognized and supported for its contributions to the economy, food security, and sustainable fisheries. The Ocean Act should address this social need and set provisions and targets to strengthen this as a transversal objective.

The Ocean Act should:

- Strengthen the social dimension of the blue economy, especially on the generation renewal, involvement of youth, and gender equity as key targets.
- Set specific strategies and guidelines for gender equity, generational renewal of the fishing sector and decent livelihoods for young fishers in Europe.
- Add specific dedicated indicators in the EU Ocean Pact Dashboard on generation renewal and gender equity.