



## **A Practical Definition of EU Small-scale Fisheries: LIFE's Position**

### **Why define small-scale fisheries?**

The discussion on how to define small-scale fishing is not new. But today it has become an important issue to resolve due to:

- The need to apply Article 17 in a way that creates a level playing field and fair system for small-scale inshore fishing companies to access fishery resources;
- The need to establish a ringfenced fund for the renewal and decarbonisation of the small-scale inshore fleet which also supports generational renewal;
- The need to establish exclusive fishing zones for small-scale low impact fishing and fishery regenerative zones within territorial waters, within the 6 and 12 mile zones, and within defined bathymetric contours (50 metres to 100 metres depth); and
- The need to define the scope of a Small-Scale Fisheries Advisory Council.

LIFE has long argued for a differentiated approach to small-scale and large-scale fishing. For such an approach, we need to clearly define what we mean by small-scale fishing.

### **What We Propose**

For LIFE, the definition used by the European Maritime, Fisheries and Aquaculture Fund (EMFAF)<sup>1</sup> - i.e. under 12 metres LOA and using non-towed gears - is the most practicable definition. The Scientific and Technical Committee on Fisheries (STECF) found that in 2023 fishing operations that complied with this definition (small-scale coastal fleets (SSCF)) comprised 41,106 vessels, accounting for 77% of the active EU fleet. These vessels contributed to 16.6% of the value and 6.4% of the weight of all EU landings.<sup>2</sup>

The STECF also highlight that the main characteristics of vessels that fit this definition of SSCF are as follows:

- a polyvalent, multi-gear and multi-species fleet.
- operating in an area closest to landing points, usually operating within 12 miles.

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<sup>1</sup> small-scale coastal fishing' means fishing activities carried out by: a) marine and inland fishing vessels of an overall length of less than 12 metres and not using towed gear as defined in point (1) of Article 2 of Council Regulation (EC) No 1967/2006 (28); or b) fishers on foot, including shellfish gatherers

<sup>2</sup> The 2025 annual economic report on the EU fishing fleet (STECF 25-03 & 25-07)

- vessels usually owned by small families or one individual.
- generally increases production price more than the LSF, with potentially large gaps between prices at first sale. These differences can be due to quality linked to freshness, size grade, and shorter fish supply chain.
- supports coastal communities, providing employment opportunities and contributing to local economies.
- Many small-scale coastal fishers practice sustainable fishing to preserve fish stocks and maintain ecological balance in coastal areas. They often use selective fishing techniques, avoid overfished species, and minimize bycatch

LIFE feels that these criteria justify the use of this definition.

The EMFAF could also provide a gateway or key to provide an overarching definition of small-scale fisheries that could be further defined at regional, national or local level.

### **What Others Propose**

The EMFAF definition has come in for significant criticism because it draws a line, and excludes certain kinds of slightly larger vessels. For example, it is questioned why the line should be drawn at 12 metres and not at 13, 14 or 15 metres. Others say that some kinds of trawling or towed gears should be included in a definition of small-scale fishing.

LIFE says no.

Two other approaches in particular have generated considerable interest:

### **The ICCAT Definition<sup>3</sup>**

The International Commission for the Conservation of Tuna (ICCAT), under the Blue fin Tuna Management plan, defines a small-scale coastal vessel as having **at least three of the following characteristics**:

- overall length less than 12 m.
- operating inside the flag state's territorial waters.
- trip duration less than 24 hours.
- maximum of four crew members.
- using selective, low-impact gear.

Based on compliance with only 3 out of 5 criteria, this scheme potentially would allow vessels over 12 meters and/or which are not using particularly selective gear, to be classified as small-scale. Moreover, if it were to be applied, it is likely that a significant portion of the EU fleet that is not small in scale could be classified as such under this definition, defeating its final purpose and risking misuse.

For LIFE, such a scheme only makes sense if all 5 criteria were to be applied.

### **The FAO Matrix Approach**

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<sup>3</sup> A small-scale coastal vessel in the Bluefin Tuna management plan is defined as having at least three of the following characteristics: overall length <12 m; operating inside the flag state's territorial waters; trip duration <24 hours; maximum of four crew members; using selective, low-impact gear.

FAO has been looking into a matrix approach<sup>4</sup> for the characterization of small-scale fisheries to assist national management and enable inter-comparability of data and information relating to small-scale fisheries.

In essence, the matrix approach applies a scoring system to a range of activities (range of operations, time at sea), technical criteria (size of vessel, power of engine, fishing gear) and socio-economic aspects (ownership, labour, disposal/ destination of catch). The matrix scoring addresses the multi-character complexity and inter-regional diversity of fishing operations, and enables a distinction to be made between larger and smaller scale fishing activities.

The matrix may allow for a systematic approach to comparing different types of fisheries (fishing units) and to facilitating the identification of commonalities and differences. However, the matrix does not suggest any clear cut-offs between small- and large-scale fisheries.

In LIFE's view, such an approach, whilst allowing the application of a variety of descriptors that may be interesting from an academic point of view, falls short of being useful to policy making or to provide an absolute definition of SSCF that is needed for fisheries management. It is too complex and does not provide a neat way to identify small from large-scale. It is just too imprecise, for example using wording (like mainly/relatively) that is open to a wide interpretation from a policy perspective. Further, it is untried and untested as a fishery management tool, and many of the descriptors would need to be refined and better calibrated to have a wider validation.

### **Conclusion**

LIFE rejects these other approaches as inadequate, but favours the EMFAF approach, for the reasons discussed above.

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<sup>4</sup> [https://www.fr.med-ac.eu/files/documentazione\\_eventi/2025/10/5\\_gfcm\\_-\\_medac\\_-\\_characterization\\_matrix.pdf](https://www.fr.med-ac.eu/files/documentazione_eventi/2025/10/5_gfcm_-_medac_-_characterization_matrix.pdf)