



LIFE's Analysis of the Evaluation of the Common Fisheries Policy

Position of the Low Impact Fishers of Europe

Transparency register number: 335382815910-56

The analysis of the European Commission's evaluation of the Common Fisheries Policy (CFP) through the lens of the Low Impact Fishers of Europe (LIFE) reveals a **shared acknowledgement of the policy's implementation and enforcement failures**, though perspectives on the core reasons for this differ.

1. Introduction- Addressing the Delivery of Core Goals

LIFE asserts that the CFP's goals of **long-term sustainability (on all three pillars) and a fair standard of living are not being delivered**, particularly for small-scale low-impact fleets, due to *poor implementation by Member States, failing to maintain the spirit of the law and serving mainly larger-scale interests*. The Commission's evaluation largely mirrors this picture, acknowledging that while governance and data collection are stronger, **fish stock recovery remains too slow and economic gains predicted in 2014 did not materialise**¹. Crucially, the Commission and LIFE agree that the primary challenge is not the rules themselves but mostly **inconsistent implementation and enforcement across Member States**.

2. Failure of the CFP to contribute to a fair standard of living for those who depend on fishing activities, bearing in mind coastal fisheries and socio-economic aspects

The evaluation confirms LIFE's analysis regarding the **failure to improve the socio-economic situation** of those who depend on fishing for their livelihoods. The 2011 socio-economic impact analysis expected that the Small-Scale Coastal Fisheries (SSCF) sector would perform best in general and remain very profitable, despite the relatively low effort per vessel². Yet, the performance of this sector has been dismal, with STECF AER for 2025 reporting that: *In the 4 years from 2018 to 2022, the value of SSCF catches from the Baltic, the Black Sea, the Mediterranean, and the North Sea declined by between 30% and 36%*.

The Commission's evaluation highlights the **reduction of the EU fleet** (-6.2% in the SSCF)³, with the **renewal rate falling below 1%** for both the overall total (active + passive) and active fleets and for all three main fleet categories⁴, and the **decline in landings over the period**⁵. It also highlights a steady **decline in total employment and full-time equivalent (FTE) employment**, and the rise of part-time or seasonal employment⁶. Finally, the expected target assumed by the impact assessment, which

¹ Press Release

² Pg 22 Staff working document

³ Pg 33 and Tab.10 Annex VI

⁴ Pg 34 Staff working document

⁵ Page 29 and 36 Staff working document

⁶ Pg 41 staff working document

foresaw an increase in wages by 125%, was not met. In fact, **SSCF has the lowest ratio of wages in the fishing fleet** compared to national wages, and is currently around 50%⁷. In LIFE's view, the 2011 socio-economic impact analysis failed to take into account the socio-economic realities of SSCF as nano and micro family-based enterprises, vulnerable to external shocks and with restricted access to fishing opportunities and sectoral support, whilst being highly dependent on value-added markets that differentiate their products.

The evaluation explicitly mentions that the **promotion of coastal fishing** activities following the introduction of the 2013 CFP Regulation could be achieved through the use of preferential allocation criteria for fishing opportunities (quota or effort) and preferential spatial access to the 0-12 nautical mile zone, highlighting that, in both cases, this remains a national prerogative.

Access to resources and Article 17: LIFE has long highlighted that the implementation of Article 17 has fallen short, with a blindness to the spirit of the law (explicitly outlined in Recital 33), resulting in the predictable outcome of access to fishing opportunities being strangled, further undermining the viability of SSCF.

Although mentioned in Annex V on stakeholder consultation, we regret the deafening silence in the evaluation about Article 17. However, the document notes as a persistent finding that **small-scale fishers face significant challenges regarding access to fishing opportunities**, and reminds that one of the CFP's intended results was the **allocation of fishing opportunities in a transparent, stable and fair manner** to improve the profitability and competitiveness of the sector⁸.

But Article 17 is not just about favouring SSCF. The intention to promote responsible fishing and to provide incentives to fishing vessels deploying selective fishing gear or using fishing techniques with reduced environmental impact (Recital 33) through the allocation of fishing opportunities also failed due to implementation shortcomings. Yet this is not mentioned in the evaluation (Section 3.2 Evolution of Discards or elsewhere). The use of Article 17 could have provided a strong incentive for highly non-selective fishing operations to change gear.

The evaluation mentions that “regarding allocation criteria, more than 50% of coastal Member States have some form of measure encouraging small-scale fishing, including dedicated quotas, or weighting factors that reward low impact gears”. However, it continues, “it is not always clear when these measures were introduced, therefore any conclusion on the evolution of such measures over time should be considered with caution”⁹. According to LIFE, these measures appear to be minimal, if not totally absent, and it would be important to clarify how the figure of 50% was set, especially considering that the evaluation itself states that “gathered data has also been limited” in this regard. It appears plausible that, if any measure was established, it predated the 2013 CFP reform.

Access to fishing grounds: LIFE underlines that the implementation of articles 5 and 20 of the CFP has also fallen short. The evaluation acknowledges this, revealing that **no cases were found where the 12-nm zone is formally reserved for SSCF**¹⁰. This finding is also supported by a recent global inventory of preferential access areas for small-scale fisheries, which identified no EU examples of SSCF-only spatial reservation (DeLand et al., 2025).

Sectoral Support and SSF POs: The evaluation finds that there has been an overall increase in the number of POs since the reform of the CMO, with POs covering 56% of fisheries production.

⁷ Fig 24 and 35 Annex VI, staff working document

⁸ Page 18 of the Staff working document

⁹ Pg 43 and 64 staff working document

¹⁰ Pg 43 and Addendum 3, Annex VI

However, **membership of small-scale fishers in POs remains relatively low in most countries**¹¹. It recognises that **weak structuring of small-scale fishers through POs limits their ability to benefit from collective bargaining power**¹². LIFE regrets that there is no explicit mention about the lack of progress on POs dedicated to SSFs, especially considering that such a challenge was already recognised in the Commission's [Report on the Implementation of the Common Market Organisation for fishery and aquaculture products](#): *“It is well recognised that the small-scale Producer Organisations remains a challenge, that there is a need for a better structuring of small-scale fishers, the lack of appropriate administrative and/or financial support to establish SSF POs or that member states do not take sufficient account of their specificities laying down criteria for recognition”*.

According to LIFE, the chapter on **“evolution of consumer awareness, understanding, confidence and ability to make informed choices”**¹³, is very synthetic and falls short in recognising some shortcomings of the CMO as, for example, the clear lack of enforcement of the mandatory consumer information throughout the whole value chain, failing traceability and transparency.

LIFE regrets that the **evaluation does not refer to the lack of access to sectoral support for the SSCF fleet**. The Commission's proposal for Member States to establish SSCF Action Plans was completely watered down when the length limit for the purchase of a second-hand vessel was extended from 12 to 24 metres. Additionally, although this is not questioned in the evaluation, it is important to remind that, for LIFE, the **definition of small-scale fishing** used by the European Maritime, Fisheries and Aquaculture Fund (EMFAF)¹⁴ - i.e. under 12 metres LOA and using non-towed gears - is the most practicable definition.

3. Failure to set fishing levels capable of building healthy stocks

Healthy fish stocks are the cornerstone of a thriving small-scale coastal fishery, marine environment, while providing nutritious food and socioeconomic benefits to all Europeans.

LIFE agrees with the evaluation that **the target of restoring all stocks above levels capable of producing Maximum Sustainable Yield (MSY) by 2015 where possible, and 2020 for all stocks has not been reached and that biomass rebuilding has failed**.

The Evaluation provides a misleading claim of a decline in overexploitation and that the share of stocks fished at sustainable levels rising from 50% in 2014 to 63% in 2022¹⁵. However, this **positive result trend presented in the Evaluation is not borne out by reality**: at best we have had a decade of stagnation and at worst, a significant decline. Commercially important stocks which have collapsed or now lack MSY reference points, such as Baltic cod or western spring spawning herring, are excluded from the analysis. By cherry-picking in this way the purported benefits of MSY management are inflated, providing a false positive perspective.

In addition, using indicators such as F/F_{msy} and $SSB > BMSY/MSY$ trigger clouds the picture of the effectiveness of the policy. During the past decade, baselines have shifted and do so on a continual basis. F_{msy} values and biomass thresholds are not fixed values and where stocks decline or

¹¹ Page 40 of staff working document

¹² Pg 61 of staff working document

¹³ Pg 40 of staff working document cherry-picking, is ,t

¹⁴ 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

¹⁵ Pg 25 of staff working document, t

productivity changes are observed, for example through multispecies interactions and climate change, the baselines will also alter. This creates a situation where fishing opportunities and stock size can be significantly eroded, but instead, the metrics used in the evaluation can give the categorisation of improvement. We underline the need to also **use absolute values for catches and SSB** in comparative studies rather than exclusively relying on relative values.

LIFE regrets that the evaluation does not acknowledge that the **scientific advice necessary to deliver on this goal (BMSY) is still not available**. LIFE believes that the failure to build healthy stocks and set fishing levels capable of delivering this is rooted in how the Commission requests that ICES scientific advice is generated, interpreted, and applied. Biological reference points such as *Btrigger* and *Blim*—intended as warning thresholds—have instead been used as management targets, keeping many stocks dangerously close to their lowest viable levels. At the same time, ICES assessments often overlook key ecological realities, including predator–prey interactions, changes in natural mortality, changing environmental conditions, and the importance of age classes and individual size in the structure of fish populations. We regret that the **evaluation overlooks highlighting these failings**. LIFE has long [called for a revision of the scientific basis](#) for fisheries management geared both towards rebuilding stocks and promoting the growth of the spawning stock, to ensure a healthier mix in the population balance of older and larger individuals. This will involve [changing the way that scientific advice is provided](#), moving away from single species models towards a recovery-focused, ecosystem-based advice for fisheries that prioritises biomass over yields.

The evaluation confirms LIFE’s views that **progress in operationalising ecosystem-based approaches** to minimise the negative impacts of fishing on marine biodiversity and ecosystems **has been evident but relatively slow**.

LIFE recommends that where MSY reference points are used, fishing limits for lower trophic level prey species should be capped at $F \leq 0.5 F_{msy}$ and $F \leq 0.75 F_{msy}$ for all stocks. [The ICES advisory committee itself states](#) that they have “very recently shown that fishing at levels that are around 75% of FMSY or even lower will result in a minimal loss of long-term yields and produce a much larger SSB, which is *de facto* compatible with EBFM and in line with current legislation, given the large, often unaccounted uncertainty in any assessment model.”

Attempting to fish all stocks, regardless of trophic level and species interactions, at 100% of F_{msy} simultaneously is impossible. The current structure represents a hidden subsidy to the fleet segments that fish further down the food chain by providing them with a *de facto* preferential access.

4. Failure to implement the Landing Obligation and regulate fleet capacity ceilings

LIFE and the evaluation coincide on the general concerns that both Landing Obligation and Fleet capacity did not meet the expected objectives, generating fisheries mismanagement and the erosion of the resilience of all fishing sectors, especially the SSF fleet.

Landing Obligation: The evaluation confirms LIFE’s concerns, highlighting that this rule has **not led to expected improvements in selectivity** and that discarding is still occurring due to poor implementation and enforcement and the high number of exemptions, with no increase in the uptake of more selective fishing techniques and gears. For LIFE, the failure of the Landing Obligation and lack of political will to implement it is epitomised by the fact that “reinforced regional cooperation led to an observed increase in the number of joint recommendations for exemptions to allow the discarding of a level of unwanted catches rather than improving selectivity of fishing

practices”¹⁶. Also, we believe that the Commission could have done more to push Member States for action and develop the necessary means to make the Landing Obligation a reality, including any needed infrastructure at ports. No details about the number of infringement procedures due to the Landing Obligation are reflected in the evaluation, which would have been informative and would have appointed its co-responsibility in this matter as well.

LIFE also considers it a **serious oversight that no reference or link is made between the failure of the Landing Obligation and the flawed implementation of Article 17**, particularly as regards the failure to “provide incentives to fishing vessels deploying selective fishing gear or using fishing techniques with reduced environmental impact, such as reduced energy consumption or habitat damage”, or to “promote responsible fishing by providing incentives to those operators who fish in the least environmentally damaging way and who provide the greatest benefits for society”, as the spirit of the law (Recital 33) intends. Article 17 has the potential to bring about environmental and social change through rewarding good practice and by taking affirmative action in a much more effective way. **Zero attempt has been made to operationalise the potential of Article 17** in this regard, resulting in a total disincentive to fish more selectively and in the consequent failure of the landing obligation.

Fleet Capacity: LIFE agrees with the evaluation that while the total **number of vessels decreased, fishing capacity ceilings did not achieve the expected rationalisation (or reduction)**, and many fleet segments remain imbalanced relative to available opportunities.

However, the evaluation implies that “limited capacity rationalisation in the SSCF (compared to the LSF and DWF) may have contributed to business models where economic viability is harder to achieve”¹⁷. From LIFE’s perspective, the statement above is misleading. **Capacity reduction is needed, but it has to be performed based on the actual fishing mortality and impact of the vessels**, rather than averaged across all fleet segments. We currently see a serious flaw in the way Member States report annually on the matching of fleet capacity to the available resources, when the contribution of SSCF to fishing mortality is marginal compared to larger-scale fleets¹⁸. We agree with the evaluation that “this relative protection of SSCF is linked to its higher perceived value to the livelihoods of coastal communities”, which would need to be maintained and we would add that even with “capacity rationalisation” in the SSCF fleet segment, this wouldn’t result in substantial changes in the biomass available.

We look with concern that the Evaluation note that a lesson learned is that “excess capacity does not necessarily lead to excessive fishing pressure”¹⁹ which is a false statement. While the evaluation recognises that “kW and GT metrics do not reflect real fishing effort, which is increasingly driven by factors such as gear efficiency, digitalisation and vessel modernisation”²⁰, it is misleading not to mention in this section the issue of **the technological creep** on increasing fishing capacity, the **inadequate engine power verification systems**²¹ and mismanagement and illegal activities, including

¹⁶ Pg 30 staff working document

¹⁷ Pg 64 staff working document

¹⁸ According to STECF 25-03 & 25-07, SSCF only represent 6.4% of the weight of all EU landings

¹⁹ Pg 90 staff working document

²⁰ Pg 60 staff working document

²¹ EC study on engine power verification by Member States

<https://op.europa.eu/en/publication-detail/-/publication/a867cbac-8e90-11e9-9369-01aa75ed71a1>

falsified engine certificates²² that have been exposed over the years. This would surely show the link between excess capacity and excessive fishing pressure. This lack of information and clarity on the actual capacity of the EU fishing fleet has clearly been an obstacle to achieving CFP objectives.

5. Ineffective and insufficient regionalisation and stakeholder involvement

LIFE views the current regionalisation and stakeholder involvement as inadequate for small-scale fishers and their representatives.

Regionalisation: While the Commission views the framework as "working effectively," it acknowledges that **lengthy scientific data collection and the need for unanimity** among Member States often result in less ambitious conservation measures.

Advisory Councils (ACs): The evaluation finds that there has been a clear strengthening of stakeholder engagement through the EU Advisory Council (AC) system, where the number of AC recommendations increased substantially (although there is no reflection on the quality or usefulness of this). However, it also coincides with LIFE views that **structural imbalances and problems of representativeness persist in ACs**²³. The evaluation confirms that "following a drop in membership of other interest groups members, notably NGOs and SSCF, are currently under-represented, with some stakeholders requesting a dedicated SSCF AC, while some ACs already have a much greater SSCF focus than others". It must be noted, however, that SSCF forms part of the Sector grouping, and not part of the Other Interest Groups. The evaluation also highlights how governance issues, relations between members, as well as members facing financial and human resources difficulties, hinder the core regulatory objective of achieving consensus and balanced AC advice.

6. To what extent is the CFP relevant to current and emerging needs

Climate change: Both the evaluation and LIFE coincide in highlighting **that the increasing pace of climate change** (and its associated impacts) constitutes **a major pressure for fisheries**²⁴. Its effects in European seas interact with existing pressures on marine ecosystems and challenge traditional management approaches. In this context, the evaluation overestimates the benefits of the current interpretation of MSY as a realistic approach to achieve environmental results that contribute to viable socio-economic performance. Stocks need to respond to exogenous threats stemming from climate change via resilience and adaptation, and, as confirmed by scientific consensus, older and larger individuals within fish populations improve their capacity to respond to environmental changes. The current MSY approach negatively impacts populations and leads to an increase in the proportion of the youngest age classes in the spawning stock biomass. Therefore, it is no surprise that the **use of FMSY as the main target for achieving MSY has not led to the expected rebuilding of stocks**, especially those suffering declining productivity stemming from climate change factors. In addition, the scientific community indicated a strong consensus towards the need for **clearer targets to operationalise socio-economic objectives** alongside MSY. LIFE would agree on this need and would like to **have more specific objectives for SSCF**.

²² Review of the management of the motor power and gear area Danish Fisheries Agency June 2024: <https://fvm.dk/Media/638551643928914259/Gennemgang%20vedr.%20forvaltning%20af%20motorkraft-%20og%20redskabsomr%C3%A5det.pdf>

²³ Pg 46, 67, 82 staff working document

²⁴ Pg 84 staff working document

Spatial squeeze: LIFE agrees when the evaluation **recognises that increasing spatial squeeze is a key concern** for many fisheries operators, particularly when linked to the development of offshore wind energy and marine protected areas. Managing limited space requires increasing involvement and collaboration in planning processes, and while the CFP Regulation does not cover this topic directly, recent developments in EU policy (European Ocean Pact and upcoming European Ocean Act, and revision of MSPD) seek to address these concerns, through broader policy coordination of different legal instruments, including the CFP Regulation.

Generational renewal: The evaluation confirms that **structural difficulties persist** in the catching sector, which seem to be **deterring new generations from entering the sector**. This is linked to poor economic performance as well as factors that go beyond the remit of the CFP Regulation and refer to **broader societal changes**, including evolving expectations regarding working conditions, social protection, gender equality and work-life balance²⁵. LIFE agrees but regrets that **key barriers** such as the training constraints, access to fishing opportunities, financial support and the lack of incentives are not reflected as key causes for poor generational renewal. The Commission intends to use the evaluation to build a "**2040 Vision**" that better integrates the needs of **coastal communities** into the broader European Ocean Pact. LIFE welcomes this.

7. Final conclusions

All in all, LIFE agrees with the Commission's evaluation on the fact that the **CFP Regulation remains a very important and relevant tool** to manage a common natural resource and related economic activities in a changing world. Its broad and comprehensive objectives make it fit for purpose to **tackle many emerging issues**.

Inefficiencies and gaps identified in the evaluation and by stakeholders are often "**dependent on the full implementation of CFP provisions or on detailed provisions and implementation of secondary legislation**" (such as the DCF, MAPs, Control Regulation, TMR, CMO, etc). The fundamental pillars of environmental, economic and social sustainability are, however, not challenged²⁶.

8. What is needed now?

The small-scale coastal fisheries sector (SSCF) is at a turning point, and urgent action is needed. LIFE's view is that **SSCF has no time for a lengthy process of reforming the CFP**, with all the uncertainty that such a process could bring. The evaluation already highlights implementation and enforcement as the main reasons for its poor results. Instead, it would be more effective to focus time and efforts on the following steps, as these could lead to more immediate results:

- A. Prioritising European waters to have **more fish in the sea and for stocks to have a bigger proportion of older and larger individuals**. This policy shift could be achieved rapidly under the current CFP regulation and would bring immediate benefits to the fishing industry. As an interim solution, it would be possible to use proxy values that would contribute to fish stock recovery in parallel with an urgent **review of the scientific advice** process and of the shortcomings that undermine fish stock recovery²⁷. This could be done in the framework of the Multiannual agreement of the Commission with ICES, as explained in pages 3 and 4 of this document.

²⁵ Pg 85 staff working document

²⁶ Pg 92 staff working document

²⁷ See the full position here:

<https://lifeplatform.eu/putting-stocks-recovery-at-the-centre-of-eu-fisheries-decisions/>

- B. Making sure that **Member States better implement and enforce the current legal frameworks** and that they **do so in the spirit of the law**. Building on the Ocean Pact's commitment to support SSCF as a priority, the **Ocean Act should establish a binding mandate for Member States to take meaningful action in support of SSCF**. It should also include safeguards that address the sector's specific vulnerabilities where the provisions of the CFP are insufficiently explicit. More concretely, the Ocean Act should:
- Embed as a key target the set-up of a **binding Plan of Action for Small-scale Fisheries in Europe**, incorporating the principles of the FAO Voluntary Guidelines on Small-Scale Fisheries, including binding actions and concrete timelines.
 - Protect coastal communities from significant environmental and socio-economic harm. **It should establish regenerative fishery areas, granting preferential access to small-scale, low-impact fishers within designated zones out to 12 miles**. These areas should be managed through co-management schemes to ensure equitable governance and sustainability. In this sense, LIFE welcomes the **Parliament Resolution adopted on May 20th on Marine Spatial Planning**²⁸ that recognises precisely this.
 - **Establish clear guidelines for stakeholder engagement** in MSP processes and **co-management**, so that less powerful but meaningful sectors are equally heard and taken into account.
 - **Give full effect to Article 17 of the CFP in the spirit of the law**, ensuring that the allocation of fishing opportunities reflects sustainability and equity, with a minimum of 20% of total opportunities reserved for SSCF.
 - **Foster generation renewal and gender equity in fisheries** by removing barriers and providing incentives and concrete plans to achieve this
- C. **Unlocking the potential of secondary legislation, like the CMO and EMFAF (upcoming MFF)**, to address the shortcomings that prevent the SSCF sector from being better self-organised in dedicated SSF POs, to access the markets and access sectoral support. LIFE considers a meaningful, ring-fenced SSCF fund and a streamlined fit-for-purpose delivery system to ensure that support reaches SSCF, are essential.

The **definition of small-scale fishing** used by the European Maritime, Fisheries and Aquaculture Fund (EMFAF)²⁹ - i.e. under 12 metres LOA and using non-towed gears - is the most practicable definition. We reject any alternative definitions currently under consideration, as their application could result in a significant share of the EU fleet that is not genuinely small-scale being classified as such. This would further erode SSF access to resources, undermine the purpose of the definition, and create opportunities for misuse³⁰.

- D. Small-scale coastal fisheries should be fully included in the **forthcoming 2040 EU vision for fisheries**. The Vision 2040 should recognise that the future of fisheries lies in fair, low-carbon, low-impact fishing that brings social, environmental and economic values into balance. For this, the Commission should **consider the Rethinking Fisheries vision**³¹ **as a base**, a vision already conceived with a multidisciplinary approach and endorsed by a wide number of different stakeholders, calling for a transformation of European fisheries that protects

²⁸ https://www.europarl.europa.eu/doceo/document/A-10-2026-0120_EN.html

²⁹ 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

³⁰ See LIFE's reflection: https://lifeplatform.eu/wp-content/uploads/2026/04/EN_Practicle-Definition-SSF.pdf

³¹ See: <https://rethinkfisheries.eu/>

biodiversity, restores ecosystem functions, upholds social justice, and ensures that marine space and resources are shared fairly.

- E. The upcoming **Roadmap on Energy Transition** should incorporate the “SSF recommendations for the Energy Transition of the Energy Transition Partnership (ETP)”³². Additionally, we call on the Commission on the need for caution when amending the current EMFAF, given the potential risks of including capacity-enhancing subsidies. Given that the public funds available are limited, these should be prioritised for supporting environmental and social justice, supporting the development of sustainable small-scale coastal fishing through national Action Plans for SSCF³³.

³² See:

https://maritime-forum.ec.europa.eu/document/download/5ecdcba1-b5f2-4bf5-874f-5fffbf0db55b_en?filename=SSF_WG_Recommendations.pdf

³³ See the full position and proposal for amendments of the current EMFAF:

<https://lifeplatform.eu/mobilizing-the-2021-2027-emfaf-sectoral-support-to-finance-the-energy-transition-in-fisheries/>