



Contribution of the Low Impact Fishers of Europe (LIFE) to the Ocean Act Consultation

The Low Impact Fishers of Europe (LIFE) welcomes the Ocean Act as an opportunity to balance a number of key priorities including energy security, food security and economic security, to allocate marine space in an equitable manner, whilst helping to secure healthy marine ecosystems and sustainable fisheries.

For LIFE, representing approximately **10,000 small-scale fishers across 18 Member States in the EU**, the forthcoming **European Ocean Act** comes at a critical juncture for our sector which has arrived at a tipping point in decline, which is mirrored by an aging fishing fleet, an aging fishing population and a lack of generational renewal. Small-scale fishing economic viability is being undermined by the combined impacts of overfishing, pollution and climate change leading to a lack of commercial fish available within the inshore areas. This is exacerbated by lack of access of fishing resources to markets and an increasing spatial squeezing by more powerful economic interests in the blue economy including large-scale fishing, offshore renewables, aquaculture, and tourism.

However, if properly prioritised, **small-scale could be a very strategic sector** with a diversity of downstream benefits, as has the potential to be **part of a sustainable solution of our ailing seas**, for **securing the socio-economic well being of coastal communities** (by providing both full time and part time seasonal employment, compatible with other seagoing activities), and be a **key player in European's self-sufficient provision of low impact food**.

While the Common Fisheries Policy (CFP) has largely failed to deliver its socio-economic objectives for small-scale fisheries (SSF) due to poor implementation and enforcement, failing to adhere to the spirit of the law and serving mainly larger-scale interests, the Ocean Act presents a unique opportunity to transform the sector from a policy outlier into a **central pillar of sustainable EU ocean governance**, and key for the future wellbeing of coastal communities.

The Opportunity: Prioritize Small-scale fisheries, and unlock its latent potential

For more than three decades, the potential and importance of small-scale fisheries have 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), with which the Ocean Act must align. LIFE therefore welcomes that, under its Section 3.1. the Ocean Pact recognises the importance of fisheries for sustainable Aquatic Food, Food Security and Sovereignty, and the need to **"support small scale fisheries as a priority"**.

The upcoming Ocean Act offers an opportunity to establish a legislative framework to **operationalize this priority** established in the Ocean Pact. LIFE identifies several key benefits that could be achieved if well addressed within this new legislation through:

- **Establishing a differentiated approach to managing SSF:** SSF needs concrete policies that halt their decline whilst strengthening their potential. Fisheries policies and regulations have all too often been formulated and implemented 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. The Act should establish a binding mandate for Member States to support SSF, moving beyond "one-size-fits-all" policies that typically favour larger, high-impact operations.
- **Linking Environment and Livelihoods:** Environmental sustainability must form the foundation of the Ocean Act with fisheries integrated in ways that do not undermine the Act's ability to deliver meaningful environmental outcomes. By prioritizing and incentivising low-impact fishing, and empowering a just transition the Act can align the EU's environmental restoration targets (such as Good Environmental Status) with the socio-economic wellbeing of coastal communities.
- **Improving governance for a fair allocation of space and marine resources:** SSF are currently marginalized and squeezed by more economically powerful sectors, including large-scale fishing, offshore energy, aquaculture and tourism both in terms of space but also in the allocation of fishing opportunities. Through the Ocean Act, 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 - with clear rules established for the fair allocation of space and fishing opportunities, based on objective and transparent criteria of a socio-economic and environmental nature. It should indicate what activities should be prioritised and which high impacting and environmentally damaging activities should be prohibited.
- **Addressing climate change and developing 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. The Ocean Act should address it as a priority.
- **Providing legal Clarity and Accountability:** The Act should establish clear targets, giving equal weight to implementation, coordination and accountability mechanisms to address the risk of implementation failures that have long hindered progress.

LIFE's Main Proposals for the Ocean Act

To ensure the prosperity of the sector, wellbeing of coastal communities and recovery of ocean health LIFE proposes that the Ocean Act include several binding targets and provisions:

1. A Binding Plan of Action for Small-Scale Fishing: The Act should mandate a specific **Plan of Action for SSF** in Europe, to be implemented by MS, with a framework that incorporates the principles of the FAO Voluntary Guidelines on SSF. This plan must be legally binding, with concrete timelines. The "Ocean Pact Dashboard" should establish a baseline and dedicated indicators to monitor its progress. Indicators should also be developed to monitor generational renewal within the SSF sector and access to resources and space, including for young fishers and new entrants.

2. Preferential Access and Regenerative Fishery Areas: LIFE calls for the establishment of **"regenerative fishery areas"** within territorial waters, extending out to 12 nautical miles where appropriate. These areas would grant **preferential or reserved access** to low-impact SSF and low

impact producers, protecting them from industrial fishing incursions and other incompatible blue economy activities. These areas should be managed through co-management schemes to ensure equitable governance and sustainability.

3. Fair Allocation of Fishing Opportunities and foster a just transition to low impact fishing: The Act must operationalize **Article 17 of the CFP in the spirit of the law (Recital 33)**, which requires the use of transparent and objective criteria of an environmental, social and economic nature for allocating fishing opportunities. It should also be used to foster a just transition to low impact fishing. The Act should establish a provision for the **ring fencing of fishing opportunities for SSF in a legally binding manner**, with a **minimum of 25% of total fishing opportunities** (TAC/effort) reserved specifically for the SSF sector to ensure economic viability and generational renewal.

4. Co-management and Inclusive Governance, with mechanisms for affirmative action: The Ocean Act should establish clear rules for stakeholder engagement in MSP processes, so that less economically and politically powerful but valuable sectors are equally heard and taken into account, and low impact food production is prioritised. In this sense the Ocean Act should guide Member States how to prioritise participation and tenure security for SSF. Potential mechanisms include establishing a dedicated **Small-scale Fisheries Advisory Council at European level**, establishing a **definition of co-management** and **legally mandating the establishment of co-management schemes** where fishers share authority and decision-making authority with state actors and indicating basic rules on how they should function.

5. Prioritizing Fishing for Direct Human Consumption over Reduction Fisheries in the interests of food security and stock recovery: The Act should prioritize fish for **human consumption** over fish destined for fishmeal and oil (reduction fisheries). LIFE advocates for limiting fishing mortality to 0.5 Fmsy for forage fish to ensure ecosystem resilience and prey availability.

6. Social Dimension and Generational Renewal: To combat the rapidly aging fishing population, the Act should set **specific strategies** and **indicators for generational renewal**, youth involvement, and **gender equity**. This includes removing barriers to entry such as restricted access to licenses and quotas and finance for young fishers, and/ or by providing an affirmative action fast lane to fishing opportunities and grants for young fishers.

7. Establish a climate-adaptive MSP with a mandate to develop effective climate change mitigation strategies: The Act should make these strategies mandatory and tailor them to the specificities of SSF, while integrating provisions for climate displacement, ecosystem changes, community-level adaptation needs, and increasing vulnerability and conflict over space and resources into the Maritime Spatial Planning processes.

By incorporating these measures, LIFE believes the Ocean Act can finally achieve a balance that is **"fair for fishers, fair for nature, and fair for future generations"**.