LIFE analysis of European Commission's Vision 2040's

In October 2026, the European Commission unveiled its **Vision 2040 for fisheries and aquaculture**, establishing a 15-year framework to steer the environmental sustainability, competitiveness, and resilience of Europe's seafood sector. In parallel, the **Rethinking Fisheries** vision—promoted by the Low Impact Fishers of Europe (LIFE) and Seas At Risk (SAR)—advocates for a structural transformation away from high impact, volume-driven extraction toward **"pesco-ecology"** and a socially just transition. Crucially, the Commission partially absorbs this agenda, explicitly committing to "*supporting a fair transition towards more low-impact, climate-neutral activities*" while safeguarding food security.

Both strategies diagnose the same underlying structural crises: the triple planetary crisis, degraded marine ecosystems, and an acute demographic cliff driven by a lack of generational renewal. While their proposed pathways reveal notable alignments alongside key discrepancies, LIFE views **Vision 2040 as an encouraging step toward a supportive framework for small-scale fishers**, towards a differentiated policy approach.

The defining challenge ahead is how to **translate this strategic vision into enforceable, tangible outcomes that coastal communities can rely on at sea**. LIFE is convinced that efforts must focus on delivering a robust CFP implementation and enforcement plan in the upcoming 2027 work programme, enacting an ambitious Ocean Act, and maximising the potential of secondary legislation and existing instruments—most notably the EMFAF and the Common Market Organisation (CMO). Without this, strategic roadmaps risk remaining well-intentioned rhetoric that changes little on the water.

Below we undertake a detailed thematic analysis of the 2040 Vision taking into account LIFE's perspectives, including the Rethinking Fisheries vision.

1. Ecological Foundation and rebuilding strategies are being considered

Both frameworks state unambiguously that **healthy marine ecosystems are the indispensable prerequisite for economic viability, long term competitiveness and resilience, supported by robust scientific advice**. The Commission explicitly concedes that there is no alternative to operating within

environmental limits, echoing the core premise of LIFE and SAR that "*there can be no fishing without fish*". Both acknowledge that approximately half of Europe's assessed stocks remain outside safe biological limits and that past management has failed to rebuild stocks uniformly.

The Commission Vision 2040 reaffirms the traditional framework of **Maximum Sustainable Yield (MSY)** as defined under the Common Fisheries Policy (CFP), but adding the intention to "**implement ecosystem-based approach to fisheries management** and **rebuilding strategies"** on one side and **"reinforce EU fisheries scientific community"** on the other. LIFE considers this language a good sign and recalls that fundamentally a **reform of the scientific advice EU-ICES agreement** is needed to treat FMSY as an absolute ceiling, setting catch limits for forage/low-trophic fish populations at no more than 50% of FMSY, and managing for ecosystem stability, multispecies interactions, and population age structures rather than maximum biomass extraction. This is particularly important given that the current EC's MSY led approach "*has not translated into consistent stock rebuilding* and that *climate-driven ecosystem shifts will intensify by 2040, affecting stock productivity and distribution".*

2. Small-Scale Fisheries (SSF) & fair Quota Allocation recognition

LIFE welcomes the explicit **recognition on the European Commissions' vision 2040 of small-scale coastal fishers** "as vital socio-economic pillars that contribute particularly to coastal communities' livelihoods, local employment, and territorial cohesion"; and especially celebrates the announcement that the Commission will launch "**targeted initiatives to support low impact small-scale fishers, including through the future Ocean Act"**. Although details will need to be unveiled, this responds to explicit requests from LIFE, the LIFE Youth Network and the Make Fishing Fair Campaign overall, for SSF to be explicitly included and supported in this new upcoming legal Act, to bring binding regulatory teeth to Commission's intention and ultimately, consistent change at the waterface.

On the other hand, LIFE welcomes that the Commission "will support Member States in rolling out **an incentive-based approach for more selective fishing"** and the explicit reference for Member States to "**allocate fishing opportunities fairly and transparently** with **specific attention to access for small-scale coastal fishers and young entrants** in line with Article 17 of the CFP Regulation and using the guidance in the Commission Communication for enhanced transparency and good governance in the allocation of fishing opportunities by Member States"[1]. The Rethinking Fisheries vision, and the Make Fishing Fair campaigns explicitly demand **ring-fenced quota for low-impact fishers** and **the phasing out of catch history as the core basis for allocating fishing opportunities.**

Worryingly, in 2027 the Commission "***will analyse how fishing rights can be leveraged to improve access to finance***". The system of allocation at Member State level is characterised by a high level of concentration and a lack of transparency. It has marginalised SSCF through a series of historical injustices. Fishing companies and individuals have grown rich by speculating on, accumulating, trading and leasing quotas, transforming temporary fishing rights into permanent economic assets, establishing insurmountable barriers for generational renewal. Quotas and other fishing opportunities are rights to extract public resources and should therefore remain in the public, not

[1] C/2025/6227, Communication from the Commission for enhanced transparency and good governance in the allocation of fishing opportunities by Member States: A vademecum on the application of Articles 16 and 17 of Regulation (EU) No 1380/2013 on the Common Fisheries Policy

private, domain. **Fishing rights should not become bankable assets for fishing companies as collateral for loans or** to otherwise **be leveraged to improve access to finance**.

3. Generational renewal

The European Commission's Vision 2040 directly echoes the core diagnosis of the **Make Fishing Fair (MFF) Youth Summit Declaration**, acknowledging that an ageing workforce, a weak inflow of new entrants, and degraded inshore marine ecosystems threaten the future of European fisheries. For potential new entrants, fishing is seen as an unattractive career prospect and risky investment. In terms of policy alignment, the Vision supports several of the MFF Youth delegation's calls for social equity, human capital development, and structural entry support. It commits to launching a **Blue Generational Renewal Strategy in 2027** to help attract younger generations to the sector, while acknowledging the intention to **"promote education,training and intergenerational knowledge transfer. It will consider paid apprenticeships, mentoring, recognised qualifications and possible forms of support for access to a first vessel or business".** This echoes the Make Fishing Fair Youth Summit's demands for structured mentoring schemes and reduced capital barriers.

4. Governance, Power Sharing & Maritime Spatial Planning (MSP)

Competition for marine space threatens to displace fishing, whilst the impacts of establishing offshore energy infrastructure are likely to be significant although as yet unquantified. LIFE welcomes the emphasis placed on developing **MSP as an essential tool "***to strategically develop sustainable fisheries and aquaculture, avoid or manage potential conflicts and operationalise the ecosystem-based approach*". In this regard, the **Ocean Act 2027** and the revision of the Maritime Spatial Planning Directive are of vital importance.

The need for top-down management to be replaced with regionalised, stakeholder-led processes, improved social dialogue, and community-led local development (CLLD) are central to both our visions. The 2040 Vision's insistence that MSP should be pursued **through stakeholder engagement, co-design and co-management**, and via transparent processes is particularly welcome. LIFE recalls that the Ocean Act should include specific provisions to define and regulate this. Also, establishing an autonomous **Small-Scale Fisheries Advisory Council** would be an important step towards enhancing SSF voice in the relevant policy-making processes.

LIFE agrees that **coexistence and multi-use** of maritime space must be a cornerstone of future governance, but cautions that not all maritime activities are compatible. Coexistence is not always feasible, and LIFE calls for the creation of **"fishery regenerative areas" within territorial waters (up to 12 nautical miles)** to mitigate the impacts of blue economy development further off-shore and the impacts of climate change in coastal waters. Such zones must guarantee preferential access to low-impact fisheries, restorative aquaculture, and other coastal activities compatible with ecosystem restoration using nature based solutions.

5. Aligning Seafood Markets with Producer Governance

The need to **reshape European seafood consumption patterns** and respond to changing circumstances are central to both visions. Both advocate shifting market demand toward a more diverse range of species, with a particular focus on promoting underused and invasive wild-caught species to alleviate pressure on depleted commercial stocks. In this regard, **LIFE supports a level playing field for European producers** and a **more robust and transparent information system for European consumers with improved traceability, including extending mandatory consumer information to prepared and preserved products.**

The 2040 Vision's proposal to reinforce existing governance mechanisms— through funding, capacity building, and operational support to help small-scale operators integrate into existing or newly formed Producer Organisations (POs)—overlooks systemic power imbalances. Rather than simply absorbing small-scale fishers into PO's dominated by large-scale interests, LIFE calls for a differentiated approach that would support the **creation and support of dedicated small-scale POs** and/or other appropriate structures, anchored within a targeted reform of the **Common Market Organisation (CMO)**.

6. Decarbonisation, Fleet Capacity & Public Subsidies

The need for a **realistic, affordable and socially just energy transition** to mitigate climate change, reduce the fleet's over-reliance on fossil fuels and improve working conditions is central to both our visions. LIFE welcomes the inclusion of the long awaited Roadmap for the Energy Transition in fisheries and aquaculture and its staff working document (included as an annex to the 2040 Vision). Of particular importance is the need to balance fishing capacity with the available fishing opportunities when making the transition.

The Commission's commitment to launching an assessment in 2027 to "**develop indicators for effective harvesting capacity, taking account of the characteristics of different fisheries"** alongside capacity needed for safety, working conditions, and the energy transition is welcome and necessary. LIFE agrees that the current fleet capacity metrics—measured narrowly (and indirectly) in gross tonnage (GT) and/or engine power (kW)—are outdated and not fit for purpose. What is more, relaxing capacity limits for industrial fleets without an airtight system to control catching efficiency, auxiliary power, and technological creep creates an unacceptable risk of fraud and increasing overfishing.

While the Commission's Vision strongly advocates for facilitating private and public investment for **fleet modernisation**, LIFE is concerned that this will channel public funds to subsidise industrial vessel construction with a risk of causing overcapacity and overfishing. LIFE calls to **eliminate environmentally harmful subsidies** in line with WTO commitments, demanding that public money be used strictly for public goods, including community infrastructure, small-scale generational renewal and a just transition.

7. What the 2040 Vision does not mention

A critical takeaway is that the Commission's Vision 2040 makes **no reference to a potential legislative reform of the Common Fisheries Policy (CFP)**. For LIFE, this omission is positive for several strategic reasons.

First, as confirmed by the Commission's own recent evaluation of the CFP, the current regulation already provides the necessary legal mechanisms for **social and environmental recovery**—what has been lacking is mainly political will and full implementation.

Second, small-scale fishers cannot afford the time lost to a lengthy and uncertain legislative process that risks opening the door to deregulation, diluting social and environmental safeguards, and causing regulatory paralysis. Instead, **efforts must focus on delivering a robust CFP implementation and enforcement plan,** to be included in the Commission's 2027 work programme, realising an **ambitious Ocean Act in 2027**, whilst **maximising the potential of secondary legislation** and existing instruments—most notably the EMFAF and the Common Market Organisation (CMO).

Whilst 2040 may seem like a far-away deadline, achieving this vision depends on decisions being taken now to steer us in the right direction. The LIFE Platform stands ready to work constructively with the Commission and the European Institutions on this journey to a promising future.