



Brussels, 19 October 2026

To: Members of the European Parliament of the PECH Committee,

Subject: Proposed redefinition of small-scale coastal fisheries

Dear Member of the European Parliament,

On behalf of the Low Impact Fishers of Europe (LIFE), its 40 member organisations and the recently created LIFE Youth Network, we write to express our strong opposition to current proposals to redefine small-scale coastal fisheries (SSCF) through a flexible "3 out of 5 criteria" system.

The proposed change would be counterproductive, risks distorting European fisheries policy and undermining the very purpose of recognising small-scale fisheries as a distinct sector requiring targeted support.

The current EMFAF definition works. It should be retained.

The existing EMFAF definition provides a clear, practical and established basis for identifying the small-scale fleet.

According to STECF, vessels meeting this definition represented approximately 77% of the active EU fleet in 2023, yet accounted for only 16.6% of the value and 6.4% of the weight of total EU landings. These figures illustrate the distinctive contribution of a numerous fleet whose operations, economic structures and relationship with coastal communities differ significantly from those of larger-scale fishing.

Key Concerns with the Proposed Redefinition:

1. It would create major loopholes and establish a bad precedent

Allowing vessels to qualify by meeting just three of five criteria permit very large vessels using high impact gears to qualify as "small-scale", opening the door to misuse of the terminology and claim policy advantages meant for low-impact fishers. Despite the definition at this

moment only relates to the funding scheme (MFF), it would create a bad precedent for later potential policy modifications and extension of the definition to fisheries management.

2. It would weaken environmental safeguards

Vessel size and fishing gear matter. Towed gears can have significantly different impacts on seabed habitats, bycatch and non-target species compared with selective, non-towed methods. A vessel should not qualify as small-scale simply because it operates within territorial waters, has a small crew or undertakes short trips, irrespective of its gear and environmental impact.

3. It renders the Definition Meaningless

Broadening and flexibilising the criteria could reclassify **up almost the entire EU fleet** as "small-scale". A category that encompasses almost the whole fleet ceases to provide a meaningful policy distinction or targeted protection.

4. It risks diverting critical public funding

In a scenario where the funds are limited, this would dilute targeted support and increase competition for limited public resources. It will divert vital support away from smaller-scale fisheries who already struggle to access funds, benefiting larger operators, **who already receive 80% of EMFAF funding**. Public funding should instead prioritise the needs of small-scale fishers, including energy transition, generational renewal and economic resilience.

5. It would make statistics unusable and obscure the social and economic value of coastal fisheries.

The new criteria proposed are not just vague and would need to be defined, but the fact of having variable criteria makes accurate monitoring and tracking of this segment impossible. Small-scale fisheries are often family-owned, operate close to shore and supply local markets through shorter supply chains. They support employment, coastal economies, traditional knowledge and community identity. Their value cannot be measured by landed volume alone. Policy should strengthen these distinctive contributions, not blur them by grouping fundamentally different fishing operations together.

LIFE's call to action and recommendations

LIFE calls on the European Parliament to:

- **Retain the existing EMFAF definition** of vessels under 12 metres using non-towed gears, alongside the recognised inclusion of fishers operating on foot.
- **Reject Amendments 81, 82, 83, 85, 86, and 219 of Herbst Report**, to be voted on November 10th, which seek to introduce the **three-out-of-five ICCAT criteria** as a general EU definition. **If this approach is pursued, all five criteria should be required.**
- **Protect targeted funding** for small-scale, lower-impact fisheries and ensure that eligibility reflects the objectives of the support provided.
- **Strengthen differentiated fisheries management**, including the implementation of Article 17 and measures supporting fair access to resources.
- **Require a transparent impact assessment** before any change, examining its implications for fleet composition, fishing gears, subsidy eligibility, environmental impacts and coastal communities.

Conclusion

The question is not whether definitions can be changed, but whether this particular change would improve European fisheries policy. LIFE believes it would do the opposite.

We urge the European institutions to retain the existing definition and focus instead on making small-scale fisheries more viable, sustainable and resilient. Europe's small-scale fishers

are not simply a smaller version of the industrial fleet: they represent a distinctive way of fishing and sustaining coastal communities that deserves recognition and targeted support.

Yours sincerely,

Low Impact Fishers of Europe (LIFE)
The LIFE Youth Network

List of LIFE Members:

- Cooperativa San Leopoldo,
- Associazione Pescatori di Pantelleria,
- Association des Ligneurs de la Pointe de Bretagne,
- Plateforme de la petite pêche artisanale française (PPPAF)
- Union des communautés des prud'hommes pêcheurs de Méditerranée (UCPPM)
- Prud'homie de Saint Raphaël
- Latvian Fishermen Federation
- Fischereischutzverband Schleswig-Holstein
- Association of Small Coastal Fishermen of the Adriatic
- Vis PO-Organizacija proizvođača Ribarska Zadruga Komiža
- European Association of fishermen at the black sea
- Marsempe, Associação Marítima de Ferragudo
- Scottish Creel Fishers Association
- Sveriges Yrkesfiskare Ekonomiska Förening (SYEF)
- PO Kustfiskarna Bottenhavet Ekonomisk Förening
- Foreningen for Skånsomt Kystfiskeri Producentorganisation (FSK-PO)
- Irish Islands Marine Resource Organisation (IIMRO)
- C-LIFE
- NetVisWerk
- Pescartes
- Asociación de atuneros con linea de mano del mediterráneo
- Miracanarias
- Cofradía la restinga (El Hierro)
- Cofradía de Sitges
- Mulleres Salgadas
- Norges Kystfiskarlag
- Snowchange
- Federatia Delta Dunarii
- Erris Lobster Conservation and Restocking Association
- Pancyriot Association of Professional Coastal Fishermen
- Zygi Fishermen Association Wolińskie Stowarzyszenie Rybaków
- Empesca't
- Arts Menors Costa Brava
- Darłowska Grupa Producentów Ryb i Armatorów Łodzi Rybackich
- Association of Boat Fishers "Mierzeja"
- Wolin Fishermen's Association
- Szczecin Group of Fish Producers
- Środkowopomorska Grupa Rybacka