



Brussels
MARE.D.3/JR

Dear Sir, / Dear Madam,

Last February 2023, the [Fisheries and Ocean Package](#) ⁽¹⁾ called on stakeholders and Member States to work hand-in-hand with the European Commission to improve the implementation of the Common Fisheries Policy ⁽²⁾ (CFP) in the short term, and to open a new phase of discussion between all fisheries stakeholders.

In the spirit of this package, we wish to consult you regarding two specific actions included in the CFP Communication:

1. The further **development of social indicators** to be used in the analysis of socio-economic reports with the help of the Scientific, Technical and Economic Committee for Fisheries (STECF).
2. Discussions among Member States and stakeholders with a view to preparing a **vademecum on the allocation of fishing opportunities** to improve transparency, promote sustainable practices across the EU and support small-scale and coastal fishers.

This letter consists of information on both these actions and includes two annexes, each one with consultation questions. It builds on the [latest STECF report on social data in fisheries](#) which focused on 3 complementary aspects of social data:

- National Fisheries Profiles,
- the development of additional social indicators and
- the analysis of Member States' answers regarding the method of allocation of fishing opportunities at national level (Article 17 of the CFP).

1. SOCIAL DATA IN FISHERIES

One of the objectives of the CFP Regulation is to promote social sustainability. According to Article 2, the CFP aims to “contribute to a fair standard of living for those who depend on fishing activities, bearing in mind coastal fisheries and socio-economic aspects”.

⁽¹⁾ https://oceans-and-fisheries.ec.europa.eu/policy/common-fisheries-policy-cfp_en

⁽²⁾ Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy

The social dimension is also reflected in the European Maritime, Fisheries and Aquaculture Fund ⁽³⁾ (EMFAF), which makes funding opportunities available for Member States to foster human capital and skills, attract young people into the fisheries sector through educational and communication measures, grant start-up support to young fishers, improve safety and working conditions on board fishing vessels, improve gender balance (e.g. promoting the role of women in fishing communities) and facilitate labour relations involving all relevant stakeholders.

As outlined in the package, many challenges remain to strengthen the social aspects of the CFP. Fisheries throughout Europe have undergone major structural changes, leading to important social consequences for both individual fishers as well as for fishing communities. **Improved social data collection and analysis** is required to better understand this reality.

1.1. Ongoing work & next steps

The [latest STECF report on social data in fisheries](#) contains important elements related to National Fisheries Profiles and the development of additional social indicators.

National Fisheries Profiles aim to gather existing quantitative and qualitative social data for each Member State. They provide historical background and specific contextual information, and emphasise the most salient social, institutional, and legal aspects related to fisheries in each country. As such, they are a key tool to understand the wider social context of fisheries. Three initial profiles were prepared (Netherlands, Spain and Denmark) and acted as proof of concept. Work is under way to produce an additional 9 profiles based on the revised template and guidelines ⁽⁴⁾ provided by the STECF in its report. This means 12 Member States will be covered by the end of March 2024: Spain, Portugal, Denmark, Cyprus, France, Slovenia, Sweden, Croatia, Estonia, Netherlands, Italy and Bulgaria. For the moment, these profiles are not publicly available: the Commission plans on making them accessible to all in the course of 2024 (for further details and rationale see paragraph 2.1).

Regarding social indicators, the STECF provided a detailed analysis of 7 policy priorities identified by the Commission as essential to grasp the social reality of fishers: state of play, assessment of conservation and management measures, dependency, mobility, immaterial value, generational renewal, engagement & compliance. For each priority, the STECF provided the social concepts associated, potential indicators, availability of data and collection method, and level of granularity of data required.

Given the wide scope of policy priorities, the STECF concluded that the list of potential indicators was too high to allow the Expert Working Group to operationalize them into concrete data calls ⁽⁵⁾. It therefore suggested that the Commission engage in discussions with the wider stakeholder community **to prioritise and identify the most relevant policy questions**.

With this input, the STECF will further its work on developing and integrating additional indicators into existing data calls.

⁽³⁾ Regulation (EU) 2021/1139 of the European Parliament and of the Council of 7 July 2021 establishing the European Maritime, Fisheries and Aquaculture Fund

⁽⁴⁾ Annex 1 of [STECF Report 23-17](#)

⁽⁵⁾ See p3 of [STECF Report 23-17](#)

We welcome your input on the issues listed above. For the list of consultation questions on social data, please refer to Annex 1.

2. VADEMECUM ON ARTICLE 17 (ALLOCATION OF FISHING OPPORTUNITIES)

The third element of the STECF report concerns the allocation of quotas by Member States.

Article 16(6) of [Regulation \(EU\) No 1380/2013](#) on the CFP stipulates that “*each Member State shall decide how the fishing opportunities that are allocated to it, and which are not subject to a system of transferable fishing concessions, may be allocated to vessels flying its flag*”, and that each Member State “*shall inform the Commission of the allocation method*”.

Article 17 of the same Regulation stipulates that “*when allocating the fishing opportunities available to them, as referred to in Article 16, Member States shall use transparent and objective criteria including those of an environmental, social and economic nature. The criteria to be used may include, inter alia, the impact of fishing on the environment, the history of compliance, the contribution to the local economy and historic catch levels. Within the fishing opportunities allocated to them, Member States shall endeavour 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.*”

In the [Fisheries Package of February 2023](#), the Commission committed to working with Member States and stakeholders to improve transparency, promote sustainable fishing practices and support small-scale and coastal fishers through a vademecum of existing practices on the allocation of fishing opportunities.

2.1. On the transparency of the system of allocation of fishing opportunities

The Commission sent questionnaires to all Member States to gather information on their allocation methods in March 2016, May 2020, January 2022 and July 2023. The answers collected were subsequently analysed by the STECF. In [its latest report](#), the STECF Expert Working Group on social data concluded that “*the degree of completeness of the content of Member States answers has however been difficult to assess due to, among others, the lack of a baseline*” ⁽⁶⁾. To solve this issue, the STECF recommends that “*the description of the allocation of fishing opportunities including the implementation of article 17 should be included in the National Fisheries Profiles*” ⁽⁷⁾. This would contribute to establishing a baseline of information against which future STECF work could assess the completeness of information provided to the Commission by Member States on the implementation of Article 17.

As indicated in paragraph 1.1 above, 12 National Fisheries Profiles will be produced by April 2024. Following STECF review and endorsement, the European Commission plans to publish these profiles on the JRC website in the fall of 2024. Making these National Fisheries Profiles public will enable all stakeholders to access and understand the national

⁽⁶⁾ See p 74 of [STECF Report 23-17](#)

⁽⁷⁾ See p 4 of [STECF Report 23-17](#)

allocation systems of fishing opportunities thus **improving transparency on article 17** of the CFP, as per its commitment in the Fisheries and Oceans Package.

2.2. On the content of the vademecum

The STECF provided an analysis of the latest set of answers provided by Member States on the use of Article 17 at national level. This analysis compiled and detailed a list of novel practices and identified a number of outstanding obstacles, among which the definition of fishing opportunities.

The STECF noted that, although all coastal Member States provided answers to the 2023 questionnaire, *“there are multiple interpretations of the term “fishing opportunity” from TAC and quotas to effort limits and spatial and temporal allocations. The definition of fishing opportunities should be better specified [...] as it has a strong influence on the quantity of information delivered (e.g. in the Mediterranean there is a large majority of stocks that not subject to quotas. Too narrow a definition of fishing opportunities will potentially result in some relevant information not being provided.”* ⁽⁸⁾.

This also includes Member States that allocate their fishing opportunities under a system of transferable fishing concessions (TFC). While they do not fall under Article 17, *“they could nevertheless describe the criteria used for their primary allocation of rights (state to PO/firms/individuals) even if data on the secondary allocation (e.g. through the market) is not known.”* ⁽⁹⁾

Taking into account STECF’s work and conclusions, we may consider options including the possibilities of having the following elements in the vademecum on the allocation of fishing opportunities:

- A. General background and context
- B. Legal requirements about transparency and objectivity
- C. Clarification/illustration of the meaning of fishing opportunities
- D. Existing practices to allocate fishing opportunities based on social criteria
- E. Existing practices to allocate fishing opportunities based on environmental criteria

We welcome your input on the issues listed above. For [the list of consultation questions on the vademecum on article 17 of the CFP](#), please go to [Annex 2](#).

Your feedback on these important topics is essential as we move forward to strengthen the social dimension of fisheries. Your knowledge of the sector and national context will help us fine-tune the tools we are currently developing to inform our policy decisions.

You can reply to us with answers to both or only one of the actions, by April 15th, to the following email address: mare-d3@ec.europa.eu.

⁽⁸⁾ See p 3 [STECF Report 23-17](#)

⁽⁹⁾ See p 3 [STECF Report 23-17](#)

Please do not hesitate to contact Joan Roussoulière-Azzam in case of questions.

Yours faithfully,

Stylios MITOLIDIS

Contact:

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Enclosure: Annex 1 – Policy questions on social indicators
 Annex 2 – Policy questions on article 17

ANNEX 1: SOCIAL DATA IN FISHERIES

The collection of data for calculating the social indicators for the EU fishing fleet, aquaculture and fish processing industry is required under the Data Collection Framework (10). The multiannual program for data collection (EU MAP) (11) specifies which social variables are to be collected every three years (12). This data has been collected since 2018 through the Annual Economic Data Call.

As its main focus is employment, the data currently collected offers critical albeit limited insight into social impacts of policy measures. To better understand the social context of fishing communities, additional social data is required. In order to decide what type of additional data to collect, DG MARE developed a list of policy areas to be addressed. The data collected would provide quantitative or qualitative evidence in these areas to inform policy-making. These areas were identified following internal consultations in DG MARE and discussions with other Directorates-General working on social data.

Questions on social data

1. Looking at the list below, could you indicate which of the policy areas should be addressed as a matter of priority?
2. Looking at the list below, could you indicate if any area/aspect is missing?

List of policy areas

- A. State of play:
 - a. Current socio-economic situation of fishers (working conditions, safety, type & number of contracts over a year, well-being, training & skills, social position in society, income, employment type, age, gender, etc)
 - b. Comparison of situation to other sectors (in terms of danger, difficulty, etc)
 - c. Level of awareness of sustainability issues (environment, social, economic)
 - d. Working conditions of non-EU workers onboard EU vessels fishing outside EU waters (equal treatment, equal training / skills, etc)
- B. Assessment of management measures:
 - a. Impact of EU conservation measures on fishing communities in terms of employment, working conditions and potential for social conflict
- C. Dependency:
 - a. Vulnerability of fishers (wages, contracts, social coverage, pension, predictability of business environment, financial position, work safety, etc.)
 - b. Level of adaptability to current changes (business structure, polyvalence including other non-fishing activities, training & skills, duration of residence (e.g., likeliness to accept moving), working rhythm
 - c. Impact of the employment of non-national fishers (EU and non-EU) on fishing communities

(10) [Regulation \(EU\) 2017/1004](#) on the establishment of a Union framework for the collection, management and use of data in the fisheries sector and support for scientific advice regarding the CFP

(11) Decisions (EU) [2021/1167](#) and [2021/1168](#)

(12) Social variables collected in EU MAP: employment by gender, Full Time Employment (FTE) by gender, unpaid labour by gender, employment by age, employment by education level, employment by nationality, employment by employment status, total FTE national

- D. Mobility:
 - a. Number of fishers that have tried to work in the fleet of another EU country but couldn't (link to mutual recognition, training)
- E. Immaterial value:
 - a. Perceived historical and cultural importance of the fishing community in the EU by different categories of the population
- F. Generation renewal:
 - a. Attractiveness of the profession for the younger generation (working conditions and safety for men and women, training & skills, safety, income, social coverage, pension, working hours, time away from home, employment type (self-employed, full time, part time, etc.), level of professionalization, use of IT/technology, integration of environmental concerns, etc.)
 - b. Number of fishers that have “dropped” or discontinued the family business, and reasons (safety, income, hardship, family itself doesn't want them to continue)
- G. Engagement & compliance:
 - a. Level of engagement of fishing communities (through representative bodies)
 - b. Type of representation in local/national decision bodies
 - c. Role of producer organisations and fishers' associations
 - d. Perceived role and impact of these organisations and associations in fisheries management decisions
 - e. Influence of fishing communities influence on compliance

ANNEX 2: VADEMECUM ON ARTICLE 17 (ALLOCATION OF FISHING OPPORTUNITIES)

Based on the issues outlined in the letter, we would like your feedback on the following aspects.

Questions on the vademecum

1. Regarding the suggested draft content of the vademecum presented in part 2.2:
 - a. Do you agree with the elements to be included?
 - b. Do you have additional suggestions regarding the content?
 - c. Do you have comments about any of the specific sections (A, B, C, D or E)?
2. Section 4.5 of STECF EWG Report 23-17 identifies some novel ways to allocate fishing opportunities.
 - a. What do you think about the unique practices identified?
 - b. Could they be used more widely in the future?
 - c. How/at what point could they be introduced?
3. Do you have any comments about using the publication of National Fisheries Profiles, as a means to improve transparency on the use of article 17 by Member States (see point 2.1)? Do you think transparency could be achieved by other means?
4. Would you like to participate in a workshop where some of these different practices are described in more detail?

