

Advice

Evaluation of the Common Fisheries Policy (2014-2024)

Brussels, 8 July 2025

I - Introduction

1. Background

The Common Fisheries Policy (CFP)¹ combines environmental, social and economic sustainability objectives, aiming to preserve the long-term sustainability of fisheries and aquaculture, contribute to the protection of the marine environment, the availability of food supplies, and provide a fair standard of living for fisheries and aquaculture communities.

Under the CFP Regulation, the EU has exclusive competence to manage the conservation of marine biological resources. The CFP also includes areas of shared competence between the EU and its Member States (subsidiarity principle), such as for aquaculture and for market policy. Under the 2013 reform of the CFP Regulation, various new measures were introduced, such as fish stock management at maximum sustainable yield (MSY), the landing obligation, multiannual plans for fisheries management, fleet capacity ceilings, a regionalisation approach to conservation measures, and increased stakeholder involvement.

In 2024, the European Commission launched a consultation process on the evaluation of the CFP Regulation, which will consider five key criteria (effectiveness, efficiency, relevance, coherence,

¹ [Regulation \(EU\) No 1380/2013 on the Common Fisheries Policy](#)



and added value), to determine how the CFP Regulation is performing regarding its objectives as well as existing and emerging needs².

Previously, as determined by Article 49 of the CFP Regulation, the Commission published a report on the functioning of the CFP. In that context, in 2022, the Market Advisory Council (MAC), adopted advice on the functioning of the CFP³. At the time, the MAC also adopted advice on the functioning of the Common Market Organisation (CMO) Regulation for fishery and aquaculture products⁴.

II – Effectiveness

1. Economic Sustainability

In accordance with the concept of sustainability outlined in Article 2 of the CFP Regulation, the implementation should reflect the three pillars of sustainability. As determined by point c) of paragraph 5 of the referred Article, the CFP framework shall provide the conditions for economically viable and competitive fishing industry.

Presently, the economic viability of the fisheries and aquaculture value chain is at risk and generational change is hindered, causing a reduction in companies and employment in the sector. The lack of certainty and stability, further aggravated by recent geopolitical developments, contributed to the described situation. As explained in Recital (32) of the EMFAF Regulation, given that fishers are exposed to increased economic risks, the EMFAF supports actions that strengthen the resilience of the fisheries sector.

² https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14203-Common-fisheries-policy-evaluation_en

³ [MAC Advice on “Current functioning of the Common Fisheries Policy \(CFP\) and post-2020 perspectives” \(23 March 2022\)](#)

⁴ [MAC Advice on “2022 Report on the Functioning of the Common Market Organisation \(CMO\)” \(30 March 2022\)](#)

As the fisheries and aquaculture value chain was exposed to increased economic risks aggravated by geopolitical developments, such as Brexit, the COVID-19 pandemic, and Russia's war of aggression against Ukraine, the EMFAF and other relevant public funds (e.g., state aid framework, Brexit Adjustment Reserve) supported actions to strengthen the resilience of the value chain.

a) Fisheries catching sector

Since 2013, according to the available data, there was a significant reduction in the number of fishing vessels, jobs, and production⁵. Overall, the policy's implementation gaps and contribution to economic sustainability as a consequence has been mixed, as highlighted by the 2024 edition of the STECF's Annual Economic Report on the EU Fishing Fleet.

The EU market's self-sufficiency rate barely reaches 30%⁶, reflecting a significant dependence from production from third countries. In the view of EAPO and Européche, the administrative burden placed on EU operators hinders competitiveness, leading to operators leaving the sector.

Due to various reasons, there has been an underutilisation of some EU fishing quotas⁷. The lack of raw materials contributes to the EU processing sector's reliance on non-EU sources. Therefore, efforts should be made to optimise the utilisation rate, including through increased collaboration between scientists, stakeholders (both industry and NGOs), Member States and the Commission to find solutions to face the various constraints.

b) Fish auctions

⁵ [STECF, The 2024 Annual Economic Report on the EU Fishing Fleet \(2024\)](#). On the reduction of the number of fishing vessels, also [FAO, "The State of World Fisheries and Aquaculture" \(2022\)](#).

⁶ [EUMOFA, The EU Fish Market \(2024\)](#)

⁷ [AIPCE-CEP "EU Seafood Supply Synopsys 2024"](#)

Fish auctions are an essential link between the catching sector and a part of the processing and marketing sectors and facilitate an equal access by all operators to a public resource. Fish auctions also facilitate a transparent first sale pricing mechanism, guarantee payment to fishers, and guarantee traceability. The reduction in fishing quotas, number of fishing vessels, and the problems in generational renewal have a tremendous impact on the viability of auctions, which have tended to reduce in numbers or even fully disappear in several countries. Most of the existing fish auctions are economically not viable but are still working because the local fishers' cooperatives, local government or ports are supporting them. It is important to consider that a fish auction is a crucial factor for the local communities.

c) Fisheries processing sector

The EU fish processing sector has faced several challenges, including rising raw material costs, robust environmental regulations necessary for the sustainable management of fish stocks, and increased market competition. The sector continues to innovate and adapt to changing market demands, a need which was compounded by the impacts of the COVID-19 pandemic⁸ and Russia's war of aggression against Ukraine⁹. Furthermore, there are regional disparities in the economic viability of the EU processing sector that must be accounted for. Over the past years, importers and processors have faced a higher administrative burden.

As the EU's own production remains insufficient to supply the market and serve EU consumers¹⁰, the CFP is complemented with other mechanisms that facilitate access to marine proteins from

⁸ [MAC Advice on "Impact and Mitigation of the COVID-19 Pandemic on the Seafood Supply Chain" \(11 December 2020\)](#)

⁹ [MAC Advice on "Disturbances in the market of fisheries and aquaculture products due to the Russian invasion of Ukraine" \(3 February 2023\)](#)

¹⁰ Concerning the EU's own production, in the view of WWF, due to the fishing of a number of stocks beyond scientific advice, and the continued use of MSY as a fixed goal rather than a precautionary threshold, combined with the cumulative impact of anthropogenic pressures that have negatively affected spawning rates, there has been marked

external sources, including through sourcing from producers from third countries. Trade instruments, including free trade agreements, economic partnership agreements, the General Scheme of Preferences, play an important role in the latter aspect. Relations with third countries, including through trade agreements, should only be developed with respect for EU producers by ensuring a level playing field of sustainability norms, while also accounting for the needs of EU processors, and without prejudice to ensuring an equitable partnership with developing coastal States.

In the view of AIPCE and CEP, besides the relevant aforementioned trade instruments, the system of autonomous tariff quotas¹¹ also plays an important role in facilitating access to marine proteins from external sources, being beneficial to the overall market supply. In the view of Environmental Justice Foundation, Good Fish Foundation, Oceana and WWF, the current ATQ system does not benefit the entire fisheries and aquaculture supply chain and has significant environmental and social costs that must be accounted for.

d) Fisheries marketing sector

As demonstrated by the latest edition of “The EU Fish Market” report published by EUMOFA¹², across the EU, between 2013 to 2022, there has been a reduction in the apparent consumption of fishery and aquaculture products coupled with an increased in household expenditure linked to rising fish prices and inflation. The most recent Eurobarometer survey¹³ indicates the same trend. These developments translate into lower turnover and a deterioration of the profitability

depletion of several stocks, resulting in reduced availability of catches. While the underlying biological and management factors fall within the remit of other Advisory Councils and scientific bodies, they have direct consequences for the EU’s capacity to meet market demand through its own production.

¹¹ [MAC Advice on “Integration of sustainability criteria under the regime of Autonomous Tariff Quotas for certain fishery products” \(28 April 2024\)](#)

¹² <https://op.europa.eu/en/publication-detail/-/publication/22f27511-b382-11ef-acb1-01aa75ed71a1>

¹³ [European Commission, Special Eurobarometer 558 on “EU consumer habits regarding fishery and aquaculture products” \(2025\)](#)

of fisher traders and fishmongers as well as a loss of employment in several Member States¹⁴. Nevertheless, there is insufficient data on the exact evolution of the profitability and employment of fish traders and fishmongers at the EU-level, so the monitoring of the profitability and employment in the seafood trading and fishmongers' sector should be strengthened, particularly by EUMOFA.

e) Aquaculture sector

The EU aquaculture sector has stagnated since 2020, which demonstrates that, in terms of economic sustainability, the national implementation of the CFP has not been effective in providing significant positive impacts to the sector. In the case of shellfish production, over the past 20 years, production in volume significantly declined¹⁵, while the number of companies decreased by more 5% per year, and the number of operators went from 50,000 to 35,000.

2. Modernisation and innovation

a) Fisheries catching sector

There have been significant technological and innovation advances. The EMFAF also provided funding for modernisation, including to improve safety on board and energy efficiency of fishing vessels. The CFP contains technical (capacity limits) and financial (EMFAF) requirements that limit

¹⁴ As an example, in Spain, in 2013, there were 22,043 people employed in the specialised trade in fishery and aquaculture products, while, in 2023, there were 17,380 people, meaning a decrease of 21.15% (source: https://www.ine.es/jaxiT3/Datos.htm?t=36194#_tabs-tabla). As another example, in France, in 2011, the "mareyage" sector employed 8,300 people, while, in 2021, there were 7,500 people, a decline of nearly 10%. In 2024, nearly 30% of "mareyage" companies were operating at a loss, compared to 17% in 2019 (source: [Étude sur la situation économique et financière des entreprises de Mareyage](#)).

¹⁵ [Wijsman, Jeroen & Troost, K. & Fang, J. & Roncarati, A. \(2019\). Global Production of Marine Bivalves - Trends and Challenges, Goods and Services of Marine Bivalves \(pp.7-26\)](#)

investment possibilities in fishing vessels (e.g., energy efficiency, conditions on board) if these are deemed to increase fishing capacity.

b) Fisheries processing sector

The framework of the CFP Regulation contributed to the support for the modernisation and innovation of the EU processing sector, as the accompanying structural funds made it possible to further support some collective actions as well as actions by small and micro enterprises. Through the EMFF and the EMFAF, funds were made available for processing and marketing, which were expected to have a positive impact on these activities. Nevertheless, due to challenges in the implementation of these funds¹⁶, it becomes difficult to fully assess their impact, particularly as the ex-post evaluation of the EMFF has not been completed. In some Member States, the processing sector was excluded from the EMFAF, which shows, under the next sectorial fund, the accessibility by this sector should be further facilitated, particularly to enable the implementation of important EU environmental and climate initiatives, such as the energy transition. Moreover, there should be funds to develop the biotechnology and valorisation of byproducts.

c) Fisheries marketing sector

While there could have been more ambition, through national and long-term programmes, the CFP facilitated the development of new marketing strategies, the promotion of sustainable local products by EU POs, and the consumption of sustainable fishery and aquaculture products in a more innovative way. The policy facilitates innovation in new products, forms of presentation, elaborations and packaging, innovation in the way products are promoted and sold, the empowerment of digital platforms and e-commerce, while also helping distributors and retailers

¹⁶ These implementation challenges were previously outlined in the [MAC Advice “Post-2020 EU funding for fisheries and maritime sectors” \(15 March 2018\)](#).

to innovate in sales strategies and expand their reach. In some Member States, the implementation of new certification standards also benefited from the CFP.

Support for innovative initiatives for the training of operators in the chain has been missing. The CFP promoted modernisation in the control of traceability and data registration between operators, but the ambiguity in interpretation of requirements had generated doubts and duplication of systems.

d) Aquaculture sector

The CFP, through the EMFF and the EMFAF, has effectively supported the modernisation and innovation of the EU aquaculture sector. These modernisation and innovation efforts have had a positive impact on a lighter environmental footprint, but have not driven the sector forward from an economic and employment perspective. The implementation of the CFP should foster innovation policies for sustainable aquaculture, affecting the sector's development.

The specificities of aquaculture are not always accounted for in the implementation of the CFP. The lack of differentiation between fishing and aquaculture vessels, including of their gears, can make the implementation of measures and funding complex, impacting the modernisation and valorisation of the sector. As an example, the reports of EMFAF do not have specific quantitative indicators for aquaculture.

3. Functioning of the market

a) Ensuring availability of food supplies at reasonable prices for consumers

According to the 2024 edition of “The EU Fish Market” report¹⁷, in 2023, there was a decrease in the consumption of fishery and aquaculture products and an increase in household expenditures,

¹⁷ <https://op.europa.eu/en/publication-detail/-/publication/22f27511-b382-11ef-acb1-01aa75ed71a1>

which was attributed to rising prices and linked to inflationary pressures. The same report shows a slight decrease in the apparent consumption when comparing 2013 to 2022. According to Eurostat data, between 2014 and 2024, the EU trade deficit in aquatic animals increased from 16,4 billion € and 3294 metric tonnes to 22,1 billion € and 3652 metric tonnes. In general, when compared to other proteins, the price levels for fishery and aquaculture products remained relatively high, particularly for fresh products. In this context, it is important to consider the specific costs of the fisheries and aquaculture value chain, such as the use of cold storage and nighttime work.

Overall, the CFP has scope to directly impact consumer prices depending on its implementation, as poor implementation of the CFP and fisheries conservation measures lead to depleted stocks and scarcity-induced inflated prices, whereas stocks fished responsibly in line with scientific advice leads to greater abundance reflected in lower prices¹⁸. The European Commission and the Member States have continuously pushed for the provision of food at affordable prices for consumers, to keep the Consumer Price Index as stable as possible. At the same time, compulsory legal production standards, labour and social requirements have been progressively raised. Strong standards provide benefits for operators, consumers and society at large. As there is an internalisation of externalities generated by businesses, operators also needed to adapt to the cost implications when compared to the previous situation. Additionally, external factors (i.e., inflation, gas prices) also increased costs. There was a reduction in the availability of local fishery supplies as well as limited development of aquaculture in the EU. In the context of the recent crisis situations, there were steep cost increases in every segment, but market operators made a significant effort to prevent further price increases.

¹⁸ <https://hsph.harvard.edu/news/more-affordable-aquatic-foods-could-prevent-166-million-micronutrient-deficiencies-worldwide/>

Nevertheless, the recent EU policies have been unable to improve the EU market's self-sufficiency rate, which remains barely over 30%. Trade policy instruments have played a positive role in limiting the impact of high prices for EU consumers, particularly in the case of processed products. It is important to ensure that the imported products do not compete unfairly with EU products, including respect for the same economic standards as the ones applied in the EU, or undermine the level playing field.

b) Supplying aquatic food to processors and consumers with adequate level of information

The Food Information to Consumers Regulation¹⁹ foresees information requirements for all food products intended for the final consumer. Article 35 of the CFP Regulation foresees that the common market organisation for fishery and aquaculture products will be established to, among other objectives, improve consumer information and to raise awareness. Therefore, the CFP contributed to a greater amount of accurate and reliable information available to businesses and consumers, making the EU a global leader in transparency, particularly on the type and provenance of the marketed products.

Article 35 of the CMO Regulation²⁰ foresees that fishery and aquaculture products under Code 03 of the Combined Nomenclature, to be offered for sale to the final consumer or to a mass caterer, must indicate specific pieces of information. The relevant pieces of information are the commercial designation of the species and its scientific name, the production method (caught or farmed), the area where the product was caught or farmed, the category of fishing gear used in capture fisheries, and whether the product has been defrosted.

As described above, there is no mandatory requirement to transmit the mentioned pieces of information in the case of fishery and aquaculture products under Code 16 of the Combined

¹⁹ [Regulation \(EU\) No 1169/2011 on the provision of food information to consumers](#)

²⁰ [Regulation \(EU\) No 1379/2013 on the common organisation of the markets in fishery and aquaculture products](#)

Nomenclature or, in general, made available to consumers through the HORECA sector. At the same time, manufacturers can and sometimes do provide information, on a voluntary basis, on species and fishing areas for products containing more than 50% whole fish or whole fish parts, excluding highly processed and unstructured products such as spreads, surimi, pasta, creams, fish mousses.

As recognised by the European Commission²¹, differences in coverage and compliance for some outlets in the provision of information to consumers is a shortcoming, though it remains relatively low (24% of non-compliance for non-prepacked products and 4% for unprocessed prepacked products). According to various consumer surveys²², the relevance of the mandatory labelling information for consumers varies, but practical and product-specific information on the labels remain essential for half of the respondents: expiration date, species name, method of production (wild or farmed) and origin are the most expected information, both for processed and non-processed products²³. In practice, consumer awareness remains low, and consumers do not always have access to information on sustainability, and the contributions from ongoing initiatives, such as the development of sustainability indicators for fishery and aquaculture products by STECF²⁴, and the Horizon Europe projects VeriFish²⁵ and Mr. GoodFish 3.0²⁶ are still to be determined. The success of these initiatives depends, among other factors, on the availability and costs of more detailed information as well as the market relevance.

²¹ [Report from the Commission to the European Parliament and the Council on “Implementation of Regulation \(EU\) No 1379/2013 on the common organisation of the markets in fishery and aquaculture products”](#)

²² [European Commission, Special Eurobarometer 558 on “EU consumer habits regarding fishery and aquaculture products” \(2025\)](#)

²³ https://oceans-and-fisheries.ec.europa.eu/news/eurobarometer-survey-shows-new-trends-fishery-and-aquaculture-products-consumption-2025-02-20_en

²⁴ [MAC Advice on “Development of Fishery Sustainability Indicators by STECF” \(30 January 2025\)](#)

²⁵ <https://verifish.info/>

²⁶ <https://www.mrgoodfish.com/en/>

Under the Farm to Fork Strategy²⁷, the European Commission had announced the adoption of a horizontal framework law to accelerate and facilitate the transition and ensure that foods placed on the EU market increasingly become sustainable, which would include a proposal for a sustainable food labelling framework. In 2022, the MAC adopted advice on the mentioned initiative²⁸. Nevertheless, the initiative remains pending²⁹ and evaluating the sustainability of fishery and aquaculture continues to be challenging for consumers, and impossible in cases where the aforementioned pieces of information are not legally required, such as for processed products.

As outlined in previous advice³⁰, among the membership of the MAC, there are varying views on the potential need to amend the existing legal framework. On one hand, APROMAR, Conxemar, Environmental Justice Foundation, FEAP, FEDEPESCA, Good Fish Foundation, HAPO, Oceana, and WWF call for a revision of the CMO Regulation, particularly focused on Article 35 and Chapter IV, to ensure the application of the same consumer information and traceability requirements to all fishery and aquaculture products sold in the EU, regardless of the presentation of the product and the point of sale, to enable more informed and responsible choices by EU consumers and further transparency in the market. On the other hand, ANFACO-CECOPECA, EuroCommerce, FEICOPESCA, Fischverband, PACT'ALIM, and Visfederatie, call for a harmonised approach across all food systems, instead of an expansion of the scope and ambitions of the CMO Regulation - in this frame, the possibility for prepacked products to develop of off-pack information systems

²⁷ [Communication from the European Commission, “A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system” \(2020\)](#)

²⁸ [MAC Advice on “Sustainable Food System - Setting Up an EU Framework” \(13 December 2022\)](#)

²⁹ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13174-Sustainable-EU-food-system-new-initiative_en

³⁰ [MAC and AAC Recommendation on consumer information on fishery and aquaculture products, particularly in the context of the HORECA Sector \(October 2024\), MAC Advice on “Public Consultation on Revision of EU Regulation on the Provision of Food Information to Consumers” \(30 March 2022\)](#)

should be sought (e.g., QR codes or similar information system) to avoid confusion and illegibility of excessive on-pack information.

c) Improving the stability of the fishery and aquaculture market

Through the improvement of the state of target fish stocks caught in EU waters, in accordance with the MSY objective³¹, the CFP Regulation stabilised the availability of marine food for consumers. There are increasing impacts due to climate change and deterioration of water quality, issues that are not sufficiently addressed in the scientific advice underpinning management of fisheries, mainly in the case of shellfish and algae production and fish stocks with a coastal part of the life cycle.

As the EU production from fisheries and from aquaculture has been insufficient to supply the EU market, the CFP is supplemented by trade policy instruments, such as free trade agreements, economic partnership agreements, the Generalised Scheme of Preferences, and autonomous tariff quotas. In the context of ongoing tensions in the trade relationships among the main seafood purchasing and processing countries, the EU should continue its dialogue with third countries and provide targeted support to those facing challenges in implementing environmental and social practices.

d) Ensuring fair competition conditions between stakeholders of the fishery and aquaculture sector on the EU market³²

As outlined in previous advice³³, the marketing standards framework provides uniform visibility of product diversity, contributing to transparency in the EU market through the imposition of

³¹ [Communication from the European Commission “Sustainable fishing in the EU: state of play and orientations for 2026” \(6 June 2025\)](#)

³² [MAC Advice on “Level Playing Field” \(30 September 2019\)](#)

³³ [MAC Advice on “2022 Report on the Functioning of the Common Market Organisation \(CMO\)” \(30 March 2022\)](#)

minimum classifications, and contributes to fair competition practices in the EU internal market. In relation to trade with third countries, conditions for fair competition should be ensured, particularly through respect for sustainability and the application of social standards equivalent to those which apply to Union products, such as good fisheries management (e.g., control, working conditions, health, safety, training, hygiene, fishing gears, fisheries restricted areas) and sustainability of the resources. It is also important to account for the significant cost for EU operators of complying with the EU's high sustainability standards, which need to be reflected on the price of the products marketed.

As outlined in previous sections of the present advice, APROMAR, Conxemar, FEAP, FEDEPESCA, Good Fish Foundation, HAPO, Oceana, and WWF, are concerned about the effects on fair competition of the existing legal requirements on traceability and consumer information. These concerns also extend to the existing requirements for fishery products used in aquafeed, which are not covered by the current specific requirements on traceability of information for fishery and aquaculture products (Article 58 of the Fisheries Control Regulation) or requirements on catch certificates. In the view of the concerned members, these fishery products should be subject to the requirements of Article 58 of the Fisheries Control Regulation.

4. Fair standard of living

A profitable, economically viable, and environmentally sustainable fisheries and aquaculture sector in Europe is essential, and the EU fish processing and marketing sectors also play a critical role in supporting local economies, creating jobs, and enhancing competitiveness. These sectors are deeply interconnected.

a) Fisheries sector

The fisheries sector faces challenges in staying profitable, attracting workforce³⁴ and remaining competitive. The reduction in fishing opportunities without Member States implementing adequate socio-economic corrective measures, together with increases in administrative requirements, contributed to a reduction in income³⁵, less access to local products, and loss of skilled fishing jobs. These factors, together with medium-term uncertainty, affect the generational renewal.

Ensuring a fair standard of living for those employed in the fisheries sector, particularly those working aboard vessels, requires stronger commitments to stable and fair incomes and fishing opportunities as well as to decent working conditions. Fisheries policies should prioritise long-term employment stability and social cohesion together with long-term management of the marine resources, including the continued recovery of fish stocks, particularly in coastal communities dependent on fishing activities.

b) Fish auctions

Well-functioning fish auctions are important for coastal communities, as they attract the entire fishery chain, from fishing vessels to processors, traders, and retailers and creates a significant quantity of employment in the communities, while facilitating an equal access by all operators to a public resource. Fish auctions facilitate generational renewal due to the very significant visibility in the coastal communities in which they are located. At the same time, landings of a stable volume and a viable income are crucial for the economic viability of fish auctions and for their societal role.

c) Fisheries processing sector

³⁴ [MAC Advice on “European Year of Skills” \(30 March 2023\)](#)

³⁵ [STECF, The 2024 Annual Economic Report on the EU Fishing Fleet \(2024\)](#)

The EU processing sector faces a significant challenge due to the lack of generational renewal, which is expected to become more pressing in the next 10 to 15 years. Presently, employment opportunities and job types are not attractive to younger generations. Therefore, there will be a shortage of experienced, well-trained motivated personnel. The industry will likely increasingly rely on foreign labour with reduced or no training. It is also important to keep in mind that, to employ staff in proper and stable conditions, the EU processing sector requires a stable supply of raw materials.

d) Fisheries marketing sector

The CFP framework, including via the CMO, provided limited contributions to the improvement of working conditions in the fisheries marketing sector. There was limited progress in ensuring equitable benefits for those involved in the sector. There has been a lack of funding for activities related to occupational risk prevention in marketing activities. It would be important to consider the incidence of accidents in the trade of fishery products is higher than in other sectors, which is related to nighttime work, the use of sharp objects, among other factors.

e) Aquaculture sector

In the case of the aquaculture sector, the implementation of the CFP has provided no significant positive impact on the standards of living of owners, employers, employees, and operators. Policy incoherence at national level, mainly environmental and spatial planning³⁶, make it challenging to practice the profession, especially for the smallest companies. In the past years, there was a reduction in the employment, in the number of companies, particularly small / “family”

³⁶ The Aquaculture Advisory Council (AAC) had adopted several recommendations related to environmental and spatial planning policies, such as [Recommendation on the EU Biodiversity Strategy for 2030 \(July 2021\)](#), [Recommendation on the Climate Change Adaptation and Mitigation in Aquaculture \(May 2023\)](#), [Recommendation on the European Union Marine Strategy Framework Directive \(April 2024\)](#), and [Recommendation for an Aquaculture Policy Reform \(July 2024\)](#).

companies, and in the surface area of aquaculture farms. Despite some strategic initiatives to modernise and support aquaculture, social conditions, including fair wages and employment security, remain underdeveloped across Member States. Mechanisms and incentives aiming to support micro and small companies could help bridge that gap.

5. Social aspects, particularly accounting interests of consumers by ensuring the availability of food supplies at reasonable prices, enabling informed choices, and promoting responsible consumption

The EU legislative framework should provide a clear definition of what constitutes “responsible” or “sustainable consumption”. Across the past years, in the market, there have been developments in how information is provided to consumers and in the availability of new products, to meet the needs of today’s consumers. Additionally, there has been an increased presence of voluntary certification schemes, which aim to guarantee even higher standards than those of EU legislation though some of them, such as the MSC certification scheme, are potentially difficult to obtain for small and medium size enterprises due to their cost.

For several product categories, the consumer prices have remained quite stable, despite higher raw material, energy, and production and labour costs. The costs on investments have not always been passed on to retail prices, which, combined with the decline in the consumption of fishery and aquaculture products in the EU, led EU operators to seek new markets, as final consumers are sensitive to price. It is also important to prevent the provision, as a strategy to entice the purchase of the entire food basket, by large retailers of fishery products without a profit margin, as this approach can trivialise fishery products and cause confusion among consumers between value and price.

Further consumer awareness to promote sustainable consumption is needed³⁷, including to address potential negative outlooks on fishery and aquaculture products and activities, while highlighting local supply chains including EU-based processing industry, benefits for coastal communities, health benefits, and gastronomic and cultural elements. Awareness campaigns should also promote the social recognition of the professions linked to the fisheries and aquaculture chain. Presently, the promotion of responsible consumption has mainly been done by the implicated stakeholders, civil society organisations and certification schemes, sometimes in collaboration with the branded processing and retail sectors. The access to EU funding for these promotion activities is rather limited.

Consumers should have access to clear, science-based sustainability information, enabling their choices based on their own priorities, such as stock status, environmental impacts, fishing methods, social conditions, origin and support for local communities.

In the view of ASC, Environmental Justice Foundation, and Oceana, informed choices of consumers cannot be achieved if a large portion of products (i.e. processed products) do not contain crucial information (species name, catch location, etc.), and it is difficult to achieve without some guidance on the environmental and social sustainability of the product.

III – Efficiency

1. Landing Obligation

In previous opportunities, the MAC adopted advice specifically on the landing obligation³⁸.

³⁷ [MAC Advice on “Taste the Ocean” campaign and other potential campaigns for awareness about fishery and aquaculture products in the EU” \(31 January 2024\)](#)

³⁸ [MAC Advice on “Study supporting the evaluation of the Landing Obligation” \(18 September 2024\)](#)

2. Professional Organisations, including Producer Organisations³⁹

The CFP has had a positive impact through the support for Producer Organisations in both fisheries and aquaculture. Producer Organisations play a significant role in the implementation of the CFP by managing fishing activities, market access, resource distribution, and supporting consumers. At the same time, the implementation of Producer Organisations and the empowerment of stakeholders remains uneven across the Member States. In some Member States, there can also be regional differences due to different management levels. Therefore, some adjustments to ensure a level-playing-field in the EU would be relevant, while also further encouraging the participation of underrepresented operators, particularly small-scale ones.

Interbranch organisations play a crucial role in the structuring of the fisheries and aquaculture sector, ensuring effective coordination between producers, auctions, processors and distributors, thus contributing to market stability and product value. Due to regulatory differences, these structures do not always benefit from the same financial support as Producer Organisations.

Although any organisation when fulfilling the conditions laid down in the CMO Regulation can be recognised as a Producer Organisation, it is important to keep in mind the role played by other organisations, such as the Spanish Fishermen Guilds (“Cofradías de Pescadores”), in the production and marketing planning of the fisheries sector in several Member States.

3. Marketing standards

³⁹ [MAC Advice on “Awareness on the Role of Producer Organisations” \(3 February 2023\)](#)

As outlined in previous advice⁴⁰, following technical advancements in the cold chain, the freshness criteria established in the marketing standards framework are no longer relevant and should be replaced with the indication “fit for human consumption” or “not fit for human consumption”, as per the General Food Law. The size criteria remain relevant and useful, even though there should be a degree of flexibility to reflect changing market demands. The minimum marketing sizes should be coherent with the minimum conservation sizes, to prevent discarding of fish that is fit for human consumption. In the view of Oceana and WWF, the described coherence should also serve to protect juvenile fish to allow stock regeneration.

In 2018, the European Commission launched a review of the marketing standards framework⁴¹. The evaluation identified that the marketing standards were not sufficient to deliver on the objective of enabling the EU market to be provided with sustainable products. An inception impact assessment stated that, consequently, revision of the marketing standards could form part of the initiatives under the Green Deal and the Farm to Fork Strategy⁴². STECF was tasked with the development of sustainability indicators⁴³, which led to a pilot tool. According to information recently provided by DG MARE officials, DG MARE is no longer pursuing the integration of the new tool into the marketing standards framework.

4. Consumer Information / labelling rules

The existing consumer information and labelling rules have improved transparency, particularly for fresh and frozen products, allowing consumers to make more informed and environmentally

⁴⁰ [MAC Advice on “Public Consultation - Review of the Marketing Standards Framework for Fishery and Aquaculture products \(4 February 2021\)](#), [MAC Advice on “EU marketing standards for fishery and aquaculture products: Regulations 2136/89 and 1536/92” \(12 July 2019\)](#), [MAC Advice on “EU marketing standards for fishery and aquaculture products: Regulations 2406/96 and 1379/2013” \(28 March 2019\)](#)

⁴¹ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12262-Fish-seafood-products-review-of-marketing-standards_en

⁴² [MAC Advice on “Incorporation of Sustainability Aspects in the Marketing Standards Framework” \(15 October 2021\)](#)

⁴³ [MAC Advice on “Development of Fishery Sustainability Indicators by STECF”\(30 January 2025\)](#)

conscious choices, and making the EU a global leader on the labelling of fishery and aquaculture products. Nevertheless, the lack of strict enforcement and a relatively minor perceived lack of compliance in some Member States (24% for non-prepacked products and 4% for unprocessed prepacked products⁴⁴) could limit their impact. In general, and based on a study conducted in Spain, France and Belgium⁴⁵, the consumer information requirements of the CMO Regulation are generally well implemented for products under its scope, namely fresh and frozen products and smoked fish. However, differences in consumer information practices across Member States should be evaluated to determine why occasional cases of non-compliance persist.

The consumer interest and understanding of some of the mandatory information varies. The information on the scientific name or the FAO catch area code is more complex to understand, unless it is provided in the form of a drawing and a map, which is occasionally the case, while information on origin/provenance might be easier to understand by the consumer and is usually indicated as more relevant⁴⁶.

The use of voluntary schemes can also provide an efficient way to provide additional information with consumers on nutritional elements and on sustainability. This information should be correct and verifiable by interested consumers, ensuring the truthfulness of the relationship between the product and the consumer. At the same time, social certification, ensuring good social and labour practices in the global supply chains, either mandatory or voluntary, for fishery and aquaculture products, is missing in the market, impacting differentiation and purchasing choices of EU consumers.

⁴⁴ [Paolacci et al., 2021, Labels on seafood products in different European countries and their compliance to EU legislation, Marine Policy Volume 134, December 2021, 104810](#)

⁴⁵ <https://europe.oceana.org/reports/fishy-labels-what-do-we-know-about-the-seafood-we-buy-in-supermarkets/>

⁴⁶ [European Commission, Special Eurobarometer 558 on “EU consumer habits regarding fishery and aquaculture products” \(2025\)](#)

Amongst the MAC's membership, Conxemar, Environmental Justice Foundation, FEDEPESCA, FEAP, Good Fish Foundation, NOVA, Oceana, WWF, favour a revision of Article 35 of the CMO Regulation to extend the mandatory information requirements to fishery and aquaculture products to all fishery and aquaculture products, including those under Code 16 of the Combined Nomenclature. Furthermore, ASC, Environmental Justice Foundation, FEDEPESCA, FEAP, Good Fish Foundation, Oceana, and WWF favour a requirement for mass caterers to provide the information provided in Article 35 to consumers, so that access by consumers to information on fishery and aquaculture products do not depend on the place of purchase / consumption.

On the other hand, among the MAC's membership, ANFACO-CECOPEPESCA, EuroCommerce, FEICOPESCA, Fischverband, PACT'ALIM, and Visfederatie favour the maintenance of the current legal framework. In their view, the current legal framework continues to be fit for purpose and, instead of legislative amendments, the provision of information to consumers beyond the minimum requirements via voluntary methods should be incentivised. In their view, the provision of information on a voluntary basis enhances differentiation and should be made available via off-pack information systems (e.g., QR codes), to preserve legibility of essential on-pack information (e.g., nature of the product, use-by date, ingredients, allergens, storage and use recommendations).

In the view of Oceana, EAPO, Environmental Justice Foundation, FEDEPESCA, and UMF, flag State information should be included in the mandatory consumer information requirements, as this information provides key insights into environmental and labour standards and working conditions, which would allow EU consumers to support seafood caught under high social standards, such as by EU vessels. A study commissioned by the Committee on Fisheries of the European Parliament⁴⁷ recommended making flag State a mandatory part of consumer

⁴⁷ [Martin ARANDA, et al, Policy options for strengthening the competitiveness of the EU fisheries and aquaculture sector, March 2024](#)

information, especially for imported seafood products. According to the latest Eurobarometer survey, 34% of consumers specifically expressed interest in flag State information.

In the view of ASC, Environmental Justice Foundation, Oceana and WWF, given the core sustainability objectives of the CFP, some sustainability information should be included in the mandatory consumer information requirements, possibly benefitting EU products and improving their competitive advantage. As current consumer information requirements provide no sustainability indicators, it is difficult for consumers to make environmentally responsible choices. The 2023 evaluation of the CMO Regulation identified this as a key gap. The latest Eurobarometer survey indicated that 36% of EU citizens want more environmental information on fishery and aquaculture products. As STECF already developed some sustainability criteria, these can guide the development of sustainability information.

IV – Governance

1. Use of scientific advice to inform policy decisions

The CFP promotes robust scientific data collection, including through the Data Collection Framework. The EU has a well-established and robust system for obtaining scientific advice for its fisheries, which is internationally recognised. The economic reports of STECF on the EU fishing fleet⁴⁸, the EU aquaculture sector⁴⁹, and the EU fish processing sector⁵⁰ provide comprehensive overviews and are highly valued by the relevant stakeholders.

Data collection and scientific research should continue to be strengthened, including through an increase in financial means, access to recent data and contributions from stakeholders, to ensure

⁴⁸ [MAC Advice on “STECF’s Annual Economic Report on the EU Fishing Fleet \(2024\)” \(31 January 2024\)](#)

⁴⁹ [MAC and AAC “Recommendations for the inclusion of indicators of economic sustainability in the STECF’s The EU aquaculture sector report” \(July 2023\)](#)

⁵⁰ [MAC Advice on “STECF’s Economic Report on the Fish Processing Industry \(2025 edition\)” \(18 September 2024\)](#)

that all decisions are based on the best available science, including on fisheries management. When preparing requests for scientific advice, the European Commission should also continue to take into account the needs of the market. In the development of advice, it is essential to ensure transparent rules on expert qualifications and multidisciplinary expert panels, while also promoting the involvement of a wide range of scientific institutions.

Collaboration with other scientific bodies, such as ICES, and with national institutes and experts is also essential for informed policy decisions and to ensure sustainability and profitability.

2. Involving stakeholders at all stages of the policymaking process

The CFP provides multiple opportunities for stakeholder involvement at multiple levels, including via public consultations, the Advisory Councils, and regional cooperation mechanisms. Stakeholder engagement and input helps shape policy, consideration for diverse perspectives, better understanding of ongoing challenges, adaptation to regional realities, and a level-playing-field in implementation and solutions. Stakeholder engagement should include the entire fisheries and aquaculture value chain as well as other interest groups.

The Advisory Councils have been a positive step for stakeholder engagement and are an important and effective tool to facilitate this engagement, allowing stakeholders to share their knowledge and present their proposals. To further value the resources dedicated by stakeholders in the Advisory Councils, it is important that the recommendations are integrated into policy and that the Commission and the Member States provide comprehensive replies. Further efforts are needed to encourage stakeholders who are not present in Advisory Councils, particularly those lacking capacity, to become members and participate in the work.

The establishment, under the 2013 reform, of horizontal/cross-cutting Advisory Councils, namely the MAC and the Aquaculture Advisory Council, marked an important step for appropriate

stakeholder consultation on horizontal issues. Therefore, in the future, the Advisory Councils, with particular consideration for the horizontal ones, should be maintained.

3. Empowerment of stakeholders through professional organisations, in particular Producer Organisations, to implement the CFP

As previously mentioned, Producer Organisations play an important role in the implementation of the CFP, including management of fishing activities, market access⁵¹, and resource distribution. Support for Producer Organisations has been positive for the empowerment of fisheries and aquaculture stakeholders.

Overall, the internal functioning of Producer Organisations can vary across the EU, but generally they are perceived to be democratic and allow for effective participation. Through the compliance with the Production and Marketing Plans and their minimum annual objectives, stakeholders should ensure the proper implementation of the CFP and all its objectives resulting from the evaluation in process. Further efforts should be made to raise awareness among all fishery and aquaculture producers about the advantages of establishing and participating in Producer Organisations, while aiming to increase the attractiveness of these structures⁵².

Associations representing the interests of the various parts of the value chain also play an important role in facilitating the implementation of the CFP, particularly in ensuring that operators are familiar with new requirements.

4. Ensuring transparency in decision-making

⁵¹ Besides Producer Organisations, there are other stakeholders involved in the implementation of market access, such as auctions organised by the port authorities, cities, private partners or Chambers of Commerce among others. It is important that the CFP supports the organiser of the market access, which can vary across countries and regions.

⁵² [MAC-SWWAC Advice on “Producer Organisations under the Common Market Organisation in Fishery and Aquaculture Products” \(7 May 2025\)](#)

Transparency in decision-making is essential to ensure accountability and public trust. Overall, the EU fisheries and aquaculture sector relies on the general transparency rules for the EU institutions on decision-making. Efforts to increase transparency in some fisheries-specific issues, such as setting and allocation of fishing opportunities and in negotiations of international agreements, could be made.

V - Effectiveness and efficiency

1. Successfulness of CFP Regulation

a) Complexity of legal requirements

The EU fisheries and aquaculture sector is highly regulated, which can be rather challenging for operators to implement. Compared to other markets, the EU has publicly documented rules on production. At the same time, EU operators benefit from public support and from high-quality scientific research and advice.

b) Control and enforcement

Worldwide, the EU has one of the most developed systems to regulate and control fishing activities.

On control and enforcement, there is a widespread perception that a lack of coherence leads to inconsistencies between Member States. A lack of control and uneven implementation affects the overall effectiveness of the CFP, hindering sustainability and fairness. Enforcement must be strengthened to deter IUU fishing practices and incentivise ecologically and socially responsible fisheries.

To ensure a similar treatment in comparison with other food sectors, consistency is also needed with general food legislation, in particular on hygiene rules and consumer information, but also

other relevant legislation, such as on contaminants, additives, packaging, social issues, including forced labour, and due diligence.

c) Flexibility of the legal framework

Regionalisation within the CFP in principle allows Member States to implement the CFP into their own specific realities and contexts. While Member States have some flexibility, insufficient national implementation can hinder the effectiveness of the CFP. The aim should be to achieve the best possible harmonisation between the national implementations of EU rules. When EU and national rules do not align in their implementation, it generates legal uncertainty for operators.

d) Attractiveness of the sector

Labour shortages in the fisheries and aquaculture sector represent a significant challenge for the viability of the industry. While the chain requires workers, the professions are not considered attractive, and workers are not available. The sector continues to be perceived as providing low remuneration and difficult working conditions. Therefore, the necessary generational renewal is not guaranteed in the sector. The situation is particularly challenging for small to medium size operators. Measures are required to enhance working conditions, end exploitation of undocumented workers, improve working conditions, ensure fair wages, and provide career development opportunities to retain and attract a new generation of workers.

An attractive ecosystem in coastal communities, combining both traditional and innovative jobs, is needed to retain and attract a new generation of workers. In this perspective, an easy flow from younger people working at sea, once they are no longer fit for challenging work at sea, can come to work on land in processing facilities or fish auctions. A more visible activity in the coastal

communities and the fishers working in the industry onshore can attract more young people and contribute to generational renewal.

The fisheries and aquaculture sector faces difficulties in attracting investment, as there is economic uncertainty. This should be taken into account when creating regulatory restrictions, for instance to address environmental climate change concerns. Even though there is a growing demand for sustainable products, investors are reluctant to enter a sector marked by volatility and risks related to regulatory uncertainty and long-term sustainability.

e) Unfair competition

Differences in access to public financing through the EMFAF, particularly by smaller operators, the fisheries catching sector, and by operators at the end of the chain, can create inequities.

Overall, the EU maintains high production and labour standards, but unfair competition arises both internally and externally when operators do not comply with equivalent rules. Internally, the same level of consumer information is not always available for all products available on the market. Externally, imported products do not always meet standards on fisheries management, fisheries control, and labour rules equivalent to those of EU production.

However, it is important to note that the EU does import fishery and aquaculture products from third countries that adhere to good management and labour standards. In addition, the EU has recently established stringent regulations and guidelines to strengthen the likelihood that these imported products are sourced from companies with no identified adverse human rights or environmental impacts, upholding fair labour conditions, and reliable traceability. This includes the newly adopted CSDDD Directive, the Forced Labour Regulation, and the EU CATCH IT system. However, it is crucial that these legislative initiatives are implemented efficiently.

f) Contribution to food security

Through the improvement of the state of target fish stocks caught in EU waters, in accordance with the MSY objective, the CFP positively contributed to food security. Nevertheless, there are challenges related to some fish stocks that are still overfished, fish stocks fluctuations and uncertainty in supply due to the nature of extracting a wild resource, which affects the stability of the supply. The calculation of fish quotas through the use of modern techniques and real-time data could prevent significant fluctuations that put pressure on the entire supply chain. The requirements imposed on aquaculture production also impact the sector's contribution to food security⁵³. The role that externally sourced materials play in supplying EU consumers with nutritious fishery and aquaculture products must also be considered.

g) Lack of predictability (market conditions)

The lack of predictability in market conditions is a major challenge for the fisheries and aquaculture sector. Regulatory changes and fluctuations in the demand for fishery and aquaculture products causes economic uncertainty for the entire value chain, hindering long-term decisions and planning. Besides market fluctuations, the economic resilience of the sector is also impacted by inflation and input costs.

2. Compliance costs and administrative burden

a) Catching sector

For the catching sector, the complexities and regulatory burdens have translated into an increase in compliance costs. All operators face significant administrative burdens due to reporting obligations and monitoring requirements, such as logbooks and catch certificates.

b) Fish auctions

⁵³ See pages 15 and 29 of the present advice. See also [European Court of Auditors, Special report 25/2023: EU aquaculture policy – Stagnating production and unclear results despite increased EU funding.](#)

Fish auctions face considerable compliance costs, which cannot be passed on to the sales prices, as the prices are set by demand and supply on a daily basis. The described situation puts the viability of the auction under pressure.

c) Processing sector

The processing sector faces administrative requirements related to traceability, and product certification, which provide value in terms of market transparency. Nevertheless, the increase in compliance costs has not always been passed on to retail prices, particularly as economic returns decline due to a decrease in the sales and consumption of fishery and aquaculture products in the EU.

The processing sector believes that it faces ambiguity in the implementation of traceability rules, which generates different implementations that are not compatible or standards through the supply chain, generating further compliance costs. The revised Fisheries Control Regulation, particularly Articles 56a and 58⁵⁴, will likely generate significant additional compliance costs.

d) Fisheries marketing sector

The fisheries marketing sector faces complexities related to administrative requirements and bureaucratic complexity. The sector faces difficulties in transmitting cost increases related to labour, energy, raw materials, and packaging management, to the final consumer price. With a decrease in demand, the profitability becomes jeopardised.

e) Aquaculture sector

⁵⁴ [MAC Advice on “Terms of Reference of the Study on Feasible Traceability Systems and Procedures for Prepared and Preserved Fishery and Aquaculture Products” \(24 May 2024\)](#) and [MAC Advice on “Upcoming Delegated Act on Additional Rules for Traceability of Fresh and Frozen Fishery and Aquaculture Products and Marking of Lots” \(12 March 2025\)](#)

The aquaculture sector faces high compliance costs. Generally, these costs do not stem directly from the implementation of the CFP, but from other policies incoherencies, mainly environmental and spatial planning. Some voluntary certification standards can assist aquaculture players and supply chain address some of those holistically. Mechanisms and incentives aiming to financially support small companies to face these costs should be integrated through the value chain.

3. Simplification and cost reduction

Overall, efforts should be made to simplify and reduce costs, in line with President von der Leyen's initiative to reduce reporting requirements by 25%. These efforts should be evaluated against the economic impact by volume, value and employment in the entire sector. Simplification efforts should not impact the collection of environmental data, the assessment of compliance, control and enforcement, or the promotion of sustainable management.

Transparency and efficiency in traceability and labelling requirements could be improved, for example through simplified procedures for product certification. The increased use of technology, such as electronic logbooks, and the CATCH IT system, provides an opportunity to streamline and automate monitoring processes, reduce manual inspections, and lower enforcement costs for both authorities and operators. Roles and responsibilities at regional and national levels should be clarified to avoid duplication. In the case of low trophic aquaculture, the duration of the environmental impact studies could be extended.

VI – Relevance

1. Relevance of the objectives

a) Ensuring “economic benefits”

The objective of “ensuring economic benefits” was and continues to be relevant for the CFP. The CFP has supported economic benefits in some areas, even if the distribution may be unequal⁵⁵. The fisheries and aquaculture sector, across the entire value chain, faces several economic challenges, including rising operational costs, linked to successive crises. Overall, the industry must be profitable to continue ensuring food security and promoting economic development.

b) Ensuring “social and employment benefits”

The objective of “ensuring social and employment benefit” was and continues to be relevant for the CFP. Further focus on coastal communities through the entire value chain can provide increased social impact and relevance. In the case of the aquaculture sector, there have been adequate benefits, but with significant disparities between Member States.

c) Contributing to the availability of food supplies

The objective of “contributing to the availability of food supplies” was and continues to be relevant for the CFP. However, the CFP should address external pressures, such as climate change and market volatility, to maintain its relevance, while also accounting for the low self-sufficiency rate in the EU market.

As fishery and aquaculture products can be a low-carbon source of protein, vital to the EU’s food security and the promotion of healthy, sustainable diets, the objective of “contributing to the availability of food supplies” should remain fundamental in the CFP, particularly through the supply of sustainable sourced products.

d) Pursuing the objectives at international level

⁵⁵ [STECF, The 2024 Annual Economic Report on the EU Fishing Fleet](#)

As the EU constitutes the second largest market of imported fishery and aquaculture products, pursuing the objectives at international level remains very relevant. The EU has a significant market power and is active in many RFMOs. In line with the CFP's focus on international ocean governance, the EU, through RFMOs and Sustainable Fisheries Partnership Agreements, aligns with global sustainability goals, such as the UN Sustainable Development Goals.

2. Challenges

a) Brexit⁵⁶

The withdrawal of the United Kingdom from the European Union changed the way the extractive activity works, creating significant disruptions in the management of shared stocks, and requiring better collaboration with the UK.

The market was also impacted, as now the UK is a direct competitor to EU operators. Previously, the fisheries and aquaculture industry had developed highly integrated supply chains with different stages of processing being carried out at scale in different parts of the EU including the UK. Due to the withdrawal, EU operators had to face trade disruption, increased transaction costs, reduction of market share, particularly for processors and traders and fish auctions, tariffs up to 25% on products from non-EU and non-UK raw materials, lack of viability of trade due to low margins, and a loss of employment.

Following Brexit, when exporting to the UK, there are increased administrative aspects, such as food safety checks and catch certificates, processing statements, storage documents, processing statements, and re-export certificates. The general documentary completion and clearance requirements add significantly to business costs, both through direct charges and the time taken to follow new procedures. Additionally, the UK has regulatory autonomy in several areas that can

⁵⁶ [MAC Advice on "Withdrawal of the United Kingdom from the European Union" \(11 June 2021\)](#)

impact the trade of fishery and aquaculture products, such as labelling, consumer information, and marketing standards. The development of a disharmonised regulatory environment could be harmful to the EU industry, since it can translate into the establishment of technical barriers to trade.

b) Unstable geopolitical context

While the CFP engages in international agreements, its ability to adapt to geopolitical challenges is limited, as seen in Brexit and other conflicts affecting fisheries. The geopolitical situation and access to raw materials is changing globally. For example, in many fishing grounds in Africa, the EU's fisheries access agreements are being replaced by agreements with China, as this country aims to ensure its food sovereignty. This shows the importance of the discussion of the new generation of Sustainable Fisheries Partnership Agreements and an EU strategy for fisheries external action. Facing this, the EU should also better defend its access to global marine proteins and continue as global leader vis-à-vis the CFP as a model for promoting responsible international and ocean fisheries governance. The rapidly changing global situation has highlighted the relevance of responsible governance, self-sufficiency in the spirit of multilateral cooperation, which shows the importance of sustainably managed fisheries as a shared resource, while tackling the impacts of climate change and ecological decline.

c) International competition (e.g. economic, market, technological, access to resources)

As the EU follows high environmental and social standards, international competition with countries that operate under less stringent standards is a constant challenge, as the operators of these third countries can compete on a different basis. The CFP Regulation includes measures to protect the internal market and control imports, but global competition in fishing technology and access to resources and markets remains to be managed with internal policies alone.

While the CFP has been partially effective, international competition still poses a major threat, especially for many EU operators that face challenges in competing with the lower production costs of third countries. The situation is particularly challenging in the case of consumers that prioritise the price when purchasing fishery and aquaculture products. Upholding high and well defined environmental and social standards for imported fishery and aquaculture products is important.

d) Inflation and rising operational costs including energy costs

Rising costs, particularly for fuel and electricity on shore, are straining the economic sustainability of the sector.

e) Unstable markets and price volatility

The CFP includes market interventions and support mechanisms, but mechanisms must be aligned with the WTO agreement on fisheries subsidies.

f) Behavioural changes and shift in consumption patterns

The decline in the consumption of fishery and aquaculture products in the EU poses a significant challenge, as higher prices and reduced purchasing power limit access to an essential component of a healthy diet.

Behavioural changes are not only caused by the higher prices and reduced purchasing power. Overall, there are socioeconomic changes, such as socioecological considerations inducing dietary habits changes, loss of healthy dietary habits, and loss of skills in purchasing and preparing fresh products, and competition for time and budget with the leisure and entertainment sector⁵⁷.

⁵⁷ In that direction, see, as an example, for Spain: [Mercasa, Alimentación en España 2024](#) and [Informe de Mercado D/ARetail. Platos Preparados 2024](#).

In the context of the CFP framework, including the CMO, consumer behaviour and market-driven shifts in consumption could be further addressed, including on marketing, consumer education, and promotion of sustainable fishery and aquaculture products. Coherence between fisheries and aquaculture policy and other EU policies affecting consumer behaviour (e.g., Farm to Fork Strategy, the Vision for Food and Agriculture, consumer information regulations) is important.

Consumer policies should encourage sustainable food systems, including well managed fisheries, and responsible consumption of fishery and aquaculture products (while taking into account that the EU market's self-sufficiency rate is 30%). Consumer demands for sustainable and locally sourced products should also be addressed. It is essential that awareness campaigns take place to highlight the nutritional benefits of fishery and aquaculture products, while simultaneously encouraging innovation in product presentation and formats that cater to emerging consumer trends.

g) Labour shortage

The CFP has not contributed to alleviating the shortage of labour. There must be a better implementation of existing legislative frameworks to attract and retain workers in the fisheries and aquaculture sector, which remains unattractive due to being perceived as providing low remuneration and difficult working conditions, impacting generational renewal. The labour shortage negatively impacts the growth of the sector across the entire value chain.

h) Prevention of food loss and food waste

In the context of the fisheries and aquaculture value chain, several initiatives have been taken to address food loss and food waste⁵⁸. The current figures of food loss and food waste in the sector are quite low, but sustainable practices could be further promoted to address it even more.

In the specific context of the CFP, as outlined in Recital (26) of the CFP Regulation, the “landing obligation” was introduced to reduce waste. In practice, the landing of catches that cannot be sold for human consumption contributes to waste. Additionally, undocumented discarding continues to take place⁵⁹.

i) Animal welfare⁶⁰

Animal welfare is not within the scope of the CFP, although the topic of the capture and handling of wild-caught fisheries has aroused some public interest. In the case of aquaculture, there are some animal welfare considerations. Overall, there are no clear provisions on welfare during the transport of live seafood, such as shellfish. The lack of welfare measures raises ethical concerns that could be better addressed through new scientific and policy initiatives⁶¹.

VII – Coherence

1. EU Fisheries Law

a) Control and monitoring⁶²

⁵⁸ [MAC Advice on “Proposal on EU-Level Targets for Food Waste Reduction & Good Practices in the Fisheries and Aquaculture Market” \(18 March 2024\)](#)

⁵⁹ [Report of EFCA/NSAC/Scheveningen CEG Workshop on control and compliance with the Landing Obligation \(17 January 2024\)](#)

⁶⁰ [MAC Advice on “Revision of EU Legislation on Animal Welfare” \(30 March 2022\)](#)

⁶¹ On animal welfare issues in wild-caught fisheries, the [Catch Welfare Platform](#) has undertaken research and is developing measurable indicators.

⁶² [MAC Advice on “Harmonised import controls to prevent IUU fishing products from entering EU Market” \(21 April 2023\)](#)

There is coherence between the CFP and control and monitoring framework through the Fisheries Control Regulation, even though implementation and enforcement can vary across Member States. Through the implementation of available digital technologies, it would be possible to reverse the burden of proof and enable transparent fisheries. The reinforcement of catch certificates through the CATCH IT system is expected to improve information and control of the products entering the Union market from 2026 onwards, while also improving harmonisation across Member States.

b) Fight against Illegal unreported and unregulated fishing⁶³

The CFP is very coherent and well aligned with EU initiatives to combat IUU fishing, including traceability and international cooperation measures, making it a global leader in addressing this issue. Nevertheless, the fight against IUU fishing should be continued and strengthened.

While the IUU Regulation requires Member States to ensure that no seafood products caught illegally can be placed on the EU market, there are significant differences on how the various Member States implement the necessary import checks and verifications. Therefore, the CFP's objective of enabling the provision of sustainable products to the EU market is undermined. Poor import controls could allow seafood products that were caught illegally, and likely also not sustainable, to enter the EU market.

c) Scientific data collection

The CFP is very coherent with scientific data collection measures. The CFP effectively incorporates the Data Collection Framework, supporting robust data collection. Nevertheless,

⁶³ [MAC Advice on “Improving Implementation of Council Regulation \(EC\) 1005/2008 to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated \(IUU\) Fishing” \(9 June 2017\)](#)

there should be an even stronger focus on managing data deficient and unregulated species. The collection of scientific data on aquaculture should also be strengthened.

2. Other EU policies and law

a) Food loss and waste prevention

The CFP is rather coherent with food loss and waste prevention measures. The EU policies on food loss and waste prevention are a gold standard in sustainability and circularity. Overall, the fisheries and aquaculture sector follows circular economy principles, but these practices are not always recognised under the CFP. For example, the fishmeal and fish oil sector utilises 100% of fisheries by-products, thereby minimising waste. Nevertheless, the processing sector can further improve on food loss and waste prevention actions.

As previously noted, in the specific context of the CFP, as outlined in Recital (26) of the CFP Regulation, the “landing obligation” was introduced to reduce waste. In practice, the landing of catches that cannot be sold for human consumption contributes to waste. Additionally, undocumented discarding continues to take place⁶⁴.

b) Food safety and health

The CFP is coherent with food safety and health measures. The CFP ensures traceability of specific information on fishery and aquaculture products and aligns well with food safety legislation. Overall, fishery and aquaculture products offer high nutritional value, contributing significantly to public health. An even more explicit alignment with food safety and health policies could enhance the raising of awareness on fishery and aquaculture products as an important component for a healthy and sustainable diet. The benefits of fishery and aquaculture products

⁶⁴ [Report of EFCA/NSAC/Scheveningen CEG Workshop on control and compliance with the Landing Obligation \(17 January 2024\)](#)

consumption should be fully recognised within the broader EU food policy framework. The very important role of nutritional education must also be considered.

c) Common Agricultural Policy

The CFP and the Common Agricultural Policy share common objectives of sustainability and food security as well as of supporting rural and coastal communities. Nevertheless, there is little direct coordination between these two policies. There is a lack of a coherent approach to ensure that the interaction between land-based and aquatic production are managed in a way that does not pit one against the other, but rather promotes a balanced, sustainable nutrient cycle across all food production sectors. Pollution derived from land-based food production running off to rivers and the sea should be carefully considered as it directly impacts the water quality, especially close to the shore and therefore the aquaculture production units located in these areas. The Commission and the Member States must ensure that food chains do not compete unfairly with each other by ensuring coherence between sector policies. However, promoting sustainable food systems is paramount.

d) Working conditions and labour standards

The EU policies on working conditions and labour standards are among the most advanced and equitable globally and are relevant and applicable to the fisheries and aquaculture value chain. The scope of the CFP Regulation does not include explicit provisions on working conditions and labour standards. Therefore, the CFP framework does not directly address issues like the prevention of occupational risks and social guarantees, or lack of fair working and labour standards (i.e., stable and fair incomes and fishing opportunities, decent working conditions, long-term employment, social cohesion), including in the context of competition with imported products. There should be better coherence with the Corporate Sustainability Due Diligence

Directive and the Forced Labour Regulation⁶⁵, including through the due consideration of the risks of labour and human rights violations in the fisheries and aquaculture value chain.

3. International action

a) Synergy with development policy and recognition of developing countries' needs

The CFP is coherent in the synergy with development policy and recognition of developing countries' needs. Through the Sustainable Fisheries Partnership Agreements⁶⁶, financial and technical support is provided to developing countries. However, transparency and equitable benefit-sharing in these agreements need improvement to fully address the needs of developing countries. As an example, in the tropical tuna sector, there is an extremely strong link between the oceanic fishery community for tropical tuna in the Indian and Atlantic Oceans in particular West Africa and the Indian Ocean, ensuring harmonised, coherent, and mutually reinforcing policies.

b) Sustainable and fair trade

The CFP is coherent with sustainable and fair trade measures. The CFP promotes traceability and sustainable sourcing, aligning with fair trade principles. However, inconsistencies in trade agreements sometimes undermine equitable outcomes for small-scale fishers in third countries. International agreements can provide further possibilities for better economic position and wealth to EU companies, including through the provision of high-quality raw materials by EU companies.

c) UN Sustainable Development Goals

⁶⁵ [MAC Advice on “Forced Labour in the Fisheries and Aquaculture Market” \(30 November 2023\)](#)

⁶⁶ [MAC Advice on “Roadmap on the Evaluation of the Sustainable Fisheries Partnership Agreements \(SFPAs\)” \(9 March 2021\)](#)



The CFP contributes to the fulfilment of many UN Sustainable Development Goals, particularly SDG 14 (Life Below Water), and is consistent with these objectives, as the policy aligns with the UN Fish Stocks Agreement and several other key international agreements. Nevertheless, the EU's leadership should ensure strict adherence to CFP principles within its waters and beyond, reinforcing credibility abroad and the promote of high sustainability standards when trading with seafood-exporting nations. At the same time, the EU must secure its access to the global marine proteins as a direction to preserve its food sovereignty.

Annex

Previous advice with particular relevance

General

- ["European Year of Skills" \(30 March 2023\)](#)
- ["Disturbances in the market of fisheries and aquaculture products due to the Russian invasion of Ukraine" \(3 February 2023\)](#)
- ["2022 Report on the Functioning of the Common Market Organisation \(CMO\)" \(30 March 2022\)](#)
- ["Current functioning of the Common Fisheries Policy \(CFP\) and post-2020 perspectives" \(23 March 2022\)](#)
- ["Health and Environmental Value of Seafood" \(8 October 2021\)](#)
- ["Impact and Mitigation of the COVID-19 Pandemic on the Seafood Supply Chain" \(11 December 2020\)](#)

Consumer Information

- ["Development of Fishery Sustainability Indicators by STECF" \(30 January 2025\)](#)
- [Recommendation on consumer information on fishery and aquaculture products, particularly in the context of the HORECA Sector \(October 2024\)](#)
- ["Taste the Ocean" campaign and other potential campaigns for awareness about fishery and aquaculture products in the EU" \(31 January 2024\)](#)
- ["Sustainable Food System - Setting Up an EU Framework" \(13 December 2022\)](#)
- ["Incorporation of Measurement and Communication on Environmental and Social Sustainability in Fishery and Aquaculture Products" \(13 December 2022\)](#)

- ["Public Consultation on Revision of EU Regulation on the Provision of Food Information to Consumers" \(30 March 2022\)](#)
- ["Revision of EU Legislation on Animal Welfare" \(30 March 2022\)](#)
- ["Roadmap on the Revision of EU Regulation on the Provision of Food Information to Consumers" \(23 February 2021\)](#)
- ["Consumer Information on Fishery and Aquaculture Products" \(5 August 2020\)](#)

Trade

- ["Urgent need for effective implementation of EU import control rules across Member States" \(27 June 2025\)](#)
- ["Integration of sustainability criteria under the regime of Autonomous Tariff Quotas for certain fishery products" \(28 April 2025\)](#)
- ["Forced Labour in the Fisheries and Aquaculture Market" \(30 November 2023\)](#)
- ["Harmonised import controls to prevent IUU fishing products from entering EU market" \(21 April 2023\)](#)
- ["Flags of Convenience" \(8 October 2021\)](#)
- ["Withdrawal of the United Kingdom from the European Union" \(11 June 2021\)](#)
- ["Roadmap on the Evaluation of the Sustainable Fisheries Partnership Agreements \(SFPAs\)" \(9 March 2021\)](#)
- ["Better Alignment of Import Control Schemes in Major Market States" \(28 September 2020\)](#)
- ["Level Playing Field" \(30 September 2019\)](#)

Marketing standards

- ["Incorporation of Sustainability Aspects in the Marketing Standards Framework" \(15 October 2021\)](#)

- ["Public Consultation - Review of the Marketing Standards Framework for Fishery and Aquaculture products \(4 February 2021\)](#)
- ["EU marketing standards for fishery and aquaculture products: Regulations 2136/89 and 1536/92" \(12 July 2019\)](#)
- ["EU marketing standards for fishery and aquaculture products: Regulations 2406/96 and 1379/2013" \(28 March 2019\)](#)

Producer Organisations

- [Producer Organisations under the Common Market Organisation in Fishery and Aquaculture Products \(7 May 2025\)](#)
- ["Market measures put in place by Producer Organisations to adjust and stabilise the market of fishery and aquaculture products" \(29 September 2023\)](#)
- ["Dissemination of MAC Guidelines & Good Practices: Production & Marketing Plans" \(2022 Edition\) \(30 March 2023\)](#)
- ["Awareness on the Role of Producer Organisations" \(3 February 2023\)](#)
- ["Transnationality of Fishery and Aquaculture Producer Organisations and of Inter-Branch Organisations" \(24 May 2022\)](#)

Financial instruments

- ["European Maritime and Fisheries Fund" \(27 February 2019\)](#)
- ["Post-2020 EU funding for fisheries and maritime sectors" \(15 March 2018\)](#)

Landing Obligation

- ["Study supporting the evaluation of the Landing Obligation" \(18 September 2024\)](#)
- ["2022 Implementation of Landing Obligation" \(30 March 2023\)](#)
- ["Annual Report on the Implementation in 2021 of the Landing Obligation" \(27 April 2022\)](#)



- [“European Commission’s request on the Annual Report on the Implementation in 2019 of the Landing Obligation” \(15 April 2020\)](#)

Scientific Advice and Data Collection

- [“STECF’s Annual Economic Report on the EU Fishing Fleet \(2025\)” \(27 March 2025\)](#)
- [“STECF’s Economic Report on the Fish Processing Industry \(2025 edition\)” \(18 September 2024\)](#)
- [“STECF’s Annual Economic Report on the EU Fishing Fleet \(2024\)” \(31 January 2024\)](#)
- [“Recommendations for the inclusion of indicators of economic sustainability in the STECF’s The EU aquaculture sector report” \(July 2023\)](#)
- ["Trade Policy Instruments and Impact on the EU Market for Fishery and Aquaculture Products – Improvement of Data" \(30 March 2022\)](#)