

Dear Commissioner Sinkevičius,

The failure to address equity in European fisheries policies has led to missed opportunities to deal with environmental degradation, economic disparities, and social injustices.¹ Low-impact, small-scale fisheries (SSF) generate more jobs and greater added value per litre of fuel used whilst causing less environmental damage, in contrast to large-scale, high-impact fishing.^{2,3} Despite this, the sector has been starved of fishing opportunities and sectoral support over decades, impacting the overall resilience of European fishing communities.

We are calling on you to address the inequalities generated by European fisheries policies through a just transition that ends harmful subsidies and secures fair access for small-scale, low-impact fishers to financial support and fishing opportunities in Europe.

The potential of low-impact, small-scale fisheries to support livelihoods, local food systems, and socio-economic activities in coastal communities has not yet been realised. Due to the partial implementation of the 2013 Common Fisheries Policy (CFP), fisheries management in Europe continues to favour large-scale, high-impact fishing, a subsector causing environmental harm, driving overfishing and significantly contributing to the climate crisis. Harmful fuel subsidies continue to benefit and maintain larger, more polluting vessels, whilst fishing opportunities in Europe are concentrated in the hands of the wealthier, industrial, high-impact fishing vessel owners, due to allocations based on historical catch records.^{4,5,6,7,8,9}

By prioritising and providing policy support, low-impact, small-scale fisheries will play a key role in addressing Europe's overfishing, preserving marine biodiversity, reducing the fishing industry's carbon footprint, and tackling socio-economic challenges in the maritime sector.

The key to dealing with the critical state of EU fisheries and unlocking the potential of SSF is Article 17 of the CFP, which has lain dormant this past decade. By applying transparent and objective criteria of an environmental, social and economic nature to the allocation of fishing opportunities, the full application of Article 17 would reward sustainable practices and encourage a shift to low-impact fishing.^{10,11,12,13,14} The current focus on catch history as the basis for allocating fishing opportunities is deeply flawed, encouraging fishing companies to prioritise quantity over quality.^{15,16} Allocating the lion's share of fishing opportunities to members of Fish Producer Organizations (FPOs) discriminates against smaller, low-impact fishing operators that don't meet the high-catch volume requirements of most FPOs.

Additionally, by redirecting public money spent on harmful capacity-enhancing subsidies for larger-scale, high-impact fishing, the EU should support those within the fisheries sector who provide the greatest benefits for society and the environment and restore degraded marine ecosystems.^{17,18}

We, therefore, call on the Commission to:

- Establish a detailed and binding implementation plan for Article 17 along with clear guidelines on how to develop and apply transparent and objective criteria to reward sustainable fishing practices and protect ecosystems and local communities;
- End harmful subsidies and prioritise small-scale, low-impact fishing activities. In particular:
 - support SSF associations to form dedicated Producer Organisations and other marketing structures;
 - support the decarbonisation of the sector through the development of the most appropriate technology and infrastructure;

- increase the share and widen the scope of the European Maritime Fisheries and Aquaculture Fund (EMFAF) used to promote nature restoration and regenerative practices;
- Ensure the processes of allocating fisheries subsidies and fishing opportunities are fully transparent and publicly accessible through the release of EU-level annual reports outlining how fishing opportunities and subsidies were allocated and to whom.

These actions, which we are asking you to implement, have become not only environmental but also socio-economic imperatives. The European Commission must urgently rethink fisheries management to drive a just transition away from an extractive industry supporting high-impact, large-scale fishing, towards one that champions the role of low-impact, small-scale fishers as guardians of the ocean.

We look forward to discussing these actions with you.

Signed by

European Association of Fishermen at the Black Sea
 Association of Small Coastal Fishermen of the Adriatic
 Scottish Creel Fishermens Federation
 Snow change cooperative
 Schleswig-Holstein Fisheries Protection Association
 New Under Ten Fisherman's Association
 Pleine Mer
 FSKPO
 Mulleres Salgadas
 Levende Hav
 Casa dei Pesci
 Renato Ricciardo
 LIFE Netherlands
 Irish Islands Marine Resource Organisation
 Association des Ligneurs de la point de Bretagne
 Plateforme de la petite pêche artisanale française
 Asociación pescadores artesanales del parque natural cabo de gata nijar
 Asociación de atuneros con linea de mano del mediterráneo

Medartnet Spain
 Arts Menors Costa Brava
 Miracanarias
 Associazione Pescatori Pantelleria
 Darłowska Grupa Producentów ryb i armatorów od21 rybackich
 The International Pole and Line Foundation
 Erris Lobster Conservation and Restocking Association
 Sveriges Yrkesfiskares Ekonomiska Förening
 Pancyriot Association of Professional Coastal Fishermen
 Zygi Fishermen Association
 Prud'homie de Saint Raphael
 Pescartes-Asociación pescadores artesanales del parque natural cabo de gata nijar
 Fischereischutzverband Schleswig-Holstein
 Wolińskie Stowarzyszenie Rybaków
 Empesca't
 APS Fishermen's Boxes Association
 Cofradia la restinga (Nuestra señora de los reyes el hierro)

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1. Pascual-Fernández, J., Pita, C. and Bavinck, M. (2020) Small-scale fisheries in Europe: Status, Resilience and Governance Vol 23. Cham: Springer (MARE Publication Series).
2. As per the SSCF definition in the EMFAF Regulation (Article 2.14), 'small-scale coastal fishing' means fishing activities carried out by a) marine and inland fishing vessels of an overall length of less than 12 metres and not using towed gear as defined in point (1) of Article 2 of Council Regulation (EC) No 1967/2006; or (b) fishers on foot, including shellfish gatherers.
3. Scientific, Technical and Economic Committee for Fisheries (STECF) - The 2023 Annual Economic Report on the EU Fishing Fleet (STECF 23-07), Prelezo, R., Sabatella, E., Virtanen, J., Tardy Martorell, M. and Guillen, J. editor(s), Publications Office of the European Union, Luxembourg, 2023, doi:10.2760/423534, JRC135182.
4. European Commission (2013). Common Fisheries Policy No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the common fisheries policy, amending Council Regulations (EC) No 1954/2003 and (EC) No 1224/2009 and repealing Council Regulations (EC) No 2371/2002 and (EC) No 639/2004 and Council Decision 2004/585/EC (2013) Official Journal L354,pp. 22–61.
5. Elsler, L., Oostdijk, M. (2023). Better Use of Public Money: the End of Fuel Subsidies for the EU Fishing Industry. Our Fish and Client Earth.
6. Pauly, D. (2023). Ask Dr. Pauly: Why are we giving subsidies to the fishing industry? February, 7th 2023. Oceana.
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8. Carpenter, G. and Kleinjans, R. (2017). Who gets to fish? The allocation of fishing opportunities in EU member states. The New Economics Foundation.
9. European Commission. (2024). Joint Research Centre, Van Hoof, L., Goti, L., Tardy Martorelle, M. et al., Social data in fisheries (STECF 23-17), Publications Office of the European Union: <https://data.europa.eu/doi/10.2760/982497>
10. European Union. (2013). Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy. Official Journal of the European Union, L 354, Article 17.
11. Elsler, L., Oostdijk, M. (2024). Allocating fishing opportunities with environmental, social and economic criteria. Examples from EU member states. Seas at Risk.
12. Kelly, F., Hubbard, R., O'Riordan, B. (2021). How the EU Fishing Fleet can become Low Environmental Impact, Low Carbon and Socially Just. Fishing Opportunities as an Agent of Change. Our Fish and LIFE.
13. European Parliament resolution of 19 January 2023 on the small-scale fisheries situation in the EU and future perspectives (2021/2056(INI))
14. European Parliament resolution of 7 June 2022 on the implementation of Article 17 of the Common Fisheries Policy Regulation (2021/2168(INI))
15. Said, A., Pascual-Fernández, J., Amorim, V.I., Autzen, M.H., Hegland, T.J., Pita, C., Ferretti, J., Penca, J. (2020). 'Small-scale fisheries access to fishing opportunities in the European Union: Is the common fisheries policy the right step to SDG14b?', Marine Policy, 118.104009.
16. Kelly, F., Hubbard, R., O'Riordan, B. (2021). How the EU Fishing Fleet can become Low Environmental Impact, Low Carbon and Socially Just. Fishing Opportunities as an Agent of Change. Our Fish and LIFE.
17. LIFE (2022). Call to Action: Better implementation of the CFP through a differentiated Approach. Accessed on: 15/03/2024
18. Bloom (2024). Time for a U-Turn. For a social-écological transition of fisheries.

