May 2026

Consultancy support:

EU fishing fleet capacity ceilings and decarbonisation

Terms of Reference

Seas At Risk (SAR) is the European umbrella organisation of NGOs working towards a healthy ocean. Its vision is: seas and ocean whose marine life is abundant, diverse, climate resilient, and not threatened by human pressures.

Aim of the consultancy: Deliver a study assessing whether alternative propulsion systems and fuels for the EU fishing fleet can be accommodated within the current national fleet capacity ceilings and evaluating the evidence basis for claims that increased gross tonnage (GT) ceilings are necessary for decarbonisation.

Duration: 2 months starting as of 15 June 2026

Submission of proposals: Tender should be sent to the contact person no later than 05 June 2026, end of the day.

Contact person: Bruno Nicostrate (bnicostrate@seas-at-risk.org)

1. Objective and expected deliverables

This study is meant to support Seas At Risk and its member organisations in their research and advocacy work related to the decarbonisation of the fisheries sector and the implementation of the Common Fisheries Policy (CFP).

Fishing industry representatives and several policy discussions at EU level have argued that the current fleet capacity ceilings established under the CFP constitute a barrier to decarbonisation. According to this claim, lower-carbon propulsion systems and alternative fuels require additional vessel space and gross tonnage (GT), thereby reducing the functional fishing capacity of vessels unless ceilings are increased.

These claims have increasingly appeared in EU policy discussions and commissioned studies. However, the evidence base supporting them remains limited and fragmented. Existing references to the issue generally rely on simplified examples or qualitative assertions, without systematic analysis across fleet segments and vessel types. At the same time, there has been limited rigorous rebuttal of

these claims, creating a risk that assumptions unsupported by comprehensive evidence become embedded in policy discussions.

The expected deliverables include a study assessing the relationship between fleet decarbonisation pathways and fleet capacity ceilings in the EU. The study should evaluate whether full or substantial decarbonisation of the EU fishing fleet can be achieved within existing national capacity ceilings and under what conditions. It should also assess the extent to which any potential additional GT requirements may emerge over time and across different fleet segments.

The study should provide evidence-based estimates of the gross tonnage implications associated with different propulsion technologies and fuel systems for representative vessel categories and should compare these estimates against current fleet utilisation levels and national ceiling margins.

2. Background

The European Union has committed to reducing greenhouse gas emissions across all sectors of the economy, including fisheries and maritime transport. Within fisheries policy discussions, increasing attention has been given to pathways for reducing fuel use and transitioning away from fossil-fuel propulsion systems.

A range of decarbonisation measures are currently discussed within the sector, including operational energy-efficiency improvements, changes in fishing practices and gears, hybridisation, and the use of alternative fuels and propulsion technologies such as methanol, hydrogen, ammonia, battery-electric systems and other emerging solutions.

At the same time, the CFP maintains a system of fleet capacity ceilings expressed in gross tonnage (GT) and engine power (kW) for each Member State. These ceilings were established to prevent structural overcapacity and remain one of the central management tools of EU fisheries policy.

Industry representatives have argued that alternative propulsion systems may require greater onboard space for engines, fuel storage, batteries, safety systems or related infrastructure. According to this argument, decarbonisation would therefore reduce the operational and economic functionality of fishing vessels unless Member State fleet ceilings are increased.

Despite the growing prominence of this argument in policy discussions, there appears to be limited systematic evidence assessing:

- how much vessel capacity is currently devoted to propulsion systems across different fleet segments;
- how much additional capacity alternative propulsion systems would require;
- whether these additional requirements would materially affect fishing functionality;
- and whether existing unused capacity under national ceilings could accommodate these changes over time.

Previous NGO work on fisheries decarbonisation has already explored potential technological pathways for reducing emissions from fishing fleets. In particular, the 2024 RISE study commissioned by ClientEarth assessed several pathways to reduce the carbon intensity of fishing activities, including full decarbonisation scenarios. However, the treatment of fleet capacity implications remained

limited, relying primarily on simplified examples and expert judgement rather than systematic modelling across fleet segments.

A preliminary review of available literature suggests that there are currently no standardised or consolidated estimates regarding the gross tonnage implications of different propulsion technologies for fishing vessels. Existing evidence is dispersed across academic literature, ship design studies, technical specifications and sectoral reports. Additional analytical work is therefore required to develop robust and credible estimates suitable for policy discussions.

Given the increasing relevance of this issue for future CFP discussions and fleet transition policies, there is a need for an independent and evidence-based assessment of whether decarbonisation can realistically occur within the current fleet capacity framework.

3. Tasks

Seas At Risk is looking for a consultant to deliver a study assessing the implications of fishing fleet decarbonisation for EU fleet capacity ceilings.

The study should examine whether the existing national GT ceilings constitute a material barrier to fleet decarbonisation and should evaluate the validity of claims that increases in fleet ceilings are necessary to accommodate alternative propulsion systems.

The study should include, at minimum, the following components:

a) Assessment of current vessel capacity allocation

The consultant should assess how vessel capacity is currently distributed across representative vessel and fleet segment categories, including:

- propulsion systems;
- fuel storage;
- onboard operational systems;
- storage and processing functions;
- fishing-related operational space.

The assessment should identify representative vessel categories and operating profiles across relevant fleet segments, including distinctions between small-scale coastal fleets and larger industrial or offshore fleets where appropriate.

b) Assessment of decarbonisation technology pathways

The consultant should identify and assess propulsion technologies and fuel systems that are relevant and technically feasible for different vessel categories and operational profiles.

This assessment may include, where relevant:

- hybrid propulsion systems;
- battery-electric propulsion;
- methanol;

- hydrogen;
- ammonia;
- renewable fuels;
- and other emerging low-carbon technologies.

The study should distinguish, where appropriate, between technologies suitable for retrofitting existing vessels and those primarily suitable for new-build vessels.

c) Estimation of gross tonnage implications

The consultant should estimate the gross tonnage implications associated with the identified propulsion pathways for representative vessel categories.

This should include:

- estimated changes in onboard space requirements;
- implications for usable fishing and operational space;
- estimated GT impacts for retrofitting existing vessels;
- estimated GT implications for replacement or new-build vessels.

Where standardised data are unavailable, the consultant should develop reasonable and transparent estimates based on available literature, technical documentation, ship design specifications and other credible sources.

d) National-level capacity modelling

Using the above analysis, the consultant should estimate overall national-level fleet capacity requirements associated with decarbonisation scenarios.

This analysis may be conducted:

- using representative average vessel characteristics for fleet segments; or
- at individual vessel level where feasible and appropriate.

The resulting estimates should be compared against:

- current national fleet capacity;
- existing national capacity ceilings;
- and, where relevant, capacity potentially constrained under entry-exit schemes or other national implementation measures.

e) Transitional and forward-looking assessment

Where possible, the consultant should assess how fleet renewal trends, decommissioning patterns and gradual technology uptake may affect future capacity needs over time.

This assessment should examine whether any potential GT pressures would emerge only in the longer term and whether existing ceilings are likely to remain sufficient during foreseeable decarbonisation pathways.

The study should remain focused primarily on the fleet capacity implications of decarbonisation. The following aspects are initially considered outside the scope of the study unless deemed necessary for the analytical framework:

- broader energy-efficiency measures aimed solely at reducing fuel consumption of existing propulsion systems;
- economic viability assessments of future fleets;
- assessments of overfishing or fishing effort management;
- broader socio-economic restructuring of the fisheries sector.

4. Duration of work

The work will be carried out for a 2-month period, starting as of 15 June 2026.

5. Deliverables and indicative timeline

The consultant will provide the following deliverables:

- A study to be used externally, covering the above objectives with a strong executive summary including conclusions and policy recommendations.
- Supporting technical annexes describing assumptions, methodologies and calculation approaches used in the analysis.

The report will be used in advocacy and policy discussions at EU and national level concerning fisheries decarbonisation and future CFP implementation.

Indicative timeline:

June 05: Deadline for application with offer.

June 08: Selection announced.

June 09: Call with consultant to discuss the details of the work.

July 10: Delivery of the draft report.

July 15: Feedback to the draft report.

July 17: Call with consultant to discuss progress of the study.

July 30: Delivery of the final draft report.

August 05: Feedback from SAR returned to consultant for last changes if needed.

August 14: Delivery of the final report.

6. Payments

The available budget for the study is between 15000 EUR and 20000 EUR (including VAT). If the consultant is not registered in Belgium, SAR will have to pay the VAT directly to Belgian authorities, as required by EU legislation.

7. Tender requirements

The tender should include:

- Description of the work methodology.
- Financial offer including a breakdown by staff days per activity, staff fees, etc.
- A list of relevant projects conducted previously.
- CVs of the experts included in the project team.
- Examples of previous analytical or technical work related to fisheries, maritime decarbonisation, naval engineering, or EU fisheries policy.

8. Submission of the tender

Tenders should be sent by e-mail to Bruno Nicostrate bnicostrate@seas-at-risk.org by 05 June, end of the day.

9. Relevant reports on this topic:

Fleet capacity reports 2024, Member States reports delivered to the Commission in 2025. https://oceans-and-fisheries.ec.europa.eu/fisheries/rules/fishing-fleet-capacities/fleet-capacity-reports-2024_en

Capacity ceilings in EU fisheries: obstacle or opportunity for the decarbonisation process? Report prepared by Sara Hornborg and Friederike Ziegler, RISE Research Institutes of Sweden, on behalf of ClientEarth. https://www.clientearth.org/latest/documents/capacity-ceilings-in-eu-fisheries-obstacle-or-opportunity-for-the-decarbonisation-process/

European Commission, Joint Research Centre, Scientific, Technical and Economic Committee for Fisheries (STECF) – *Balance Capacity (STECF-25-12)* https://stecf.jrc.ec.europa.eu/documents/d/stecf/stecf_25-12

Union des Armateurs à la Pêche Française (UAPF), Association Nationale des Ports Maritimes Territoriaux (ANPMT), COREPEM & PCEM, Projet Pêche 4 Ever, Rapport final, Éditions Maritimes d'Oléron, La Rochelle, 2026.

Commission européenne: Agence exécutive européenne pour le climat, les infrastructures et l'environnement, Bastardie, F., Wakeford, R., Torreele, E., Aranda, M., e.a., *European Union's fishing fleet — Evolution, challenges and future*, Office des publications de l'Union européenne, 2026, https://data.europa.eu/doi/10.2926/7668818

Bastardie F, Wakeford RC, Torreele E, Aranda M, Doering R, Ligas A, Mele I, Castresana J, Gabiña G, Maes SM, Sabatella R and Malvarosa L (2026) *How to ensure sustainable fisheries while renewing the EU fishing fleet for modernization and energy transition?*. Front. Mar. Sci. 13:1812898. doi:

10.3389/fmars.2026.1812898 https://www.frontiersin.org/journals/marine-science/articles/10.3389/fmars.2026.1812898/full