



LDAC RESPONSE TO EU PUBLIC CONSULTATION CALL FOR EVIDENCE - STRATEGY FOR FISHERIES EXTERNAL ACTION

Date: 15 September 2025

Preamble:

The LDAC supports this initiative and finds it very important for integrating aspects of the External Dimension of the CFP in the broader context of an EU Ocean Pact aimed at developing an ambitious strategy to improve the EU ocean diplomacy and gain influence in the field of International Ocean Governance.

The definition of this strategy provides a unique opportunity to develop a holistic approach strengthening synergies between EU policies, in particular the Policy Coherence for Development (PCD) and the different elements of the international dimension of the CFP, namely RFMOs, new generation of SFPAs, fight against IUU fishing and other international commitments on environmental and social sustainability including import of fishing products from third countries into the EU market.

Improving ocean diplomacy, both through hard and soft channels, does not only help to provide legal certainty and economic viability to the EU operators, but also strengthens the contribution of EU external fisheries action to sustainable development in partner countries, including the food security and resilience of small-scale fishing communities. It also helps to promote a more integrated approach of the EU fisheries external policy with others such as EU cooperation for development, trade, or labour.

This is important also for other maritime activities as reflected in the EU Ocean Pact. The EU should reinforce and enhance its scientific capacity and research through adequate funds and investments. The EU fishing stakeholders, including fishing companies, are willing to help with their own funding under CMO Regulation and voluntary/pilot science-industry partnerships. Collection, analysis and publication of data is essential for long term use of the ocean and healthy stocks.

The emphasis of this initiative in achieving a fairer international level playing field is welcome and will be essential for the EU to meet its ambitions in the fields of fisheries and, to a greater extent, ocean governance. The EU's ambitions in these areas reflect its important responsibilities as a major "fisheries" and ocean player and its credibility in putting forward international commitments – particularly in delivering the United Nations 2030 Agenda on Sustainable Development Goals (SDGs).

Funding

The LDAC deems this strategy as essential for the EU to act as a global leader and regain influence in a complex geopolitical context. Sufficient and adequate funding should be provided under the new EU budget and in particular on the Multiannual Framework Fund (MFF) for 2028-2034 which will replace the existing European Maritime, Fisheries and Aquaculture Fund 2021-2027 (EMFAF). Internal discussions within the LDAC are taking place on the nature of the fund in view of the needs of the EU operators and the funding priorities linked to support for governance reforms, capacity building, artisanal fisheries development, and climate adaptation in partner countries.

In addition, we recall the joint ACs advice Ref.: 111/2025 which stated that "*although challenging aspects have emerged from the practical implementation over the years (e.g., bureaucratic complexity, limited resources towards technological innovation, allocation and uptake, among others), the strengthening and the need of additional funding is undeniable and vital for the future of the primary production.*"

Further clarity should be provided in the allocation and use of the new proposed funds for this initiative, including those under the "Global Europe" chapter.

It is also crucial that sufficient budget is available for the team in DG MARE that is responsible for the external dimension, as in recent years we have observed that lack of capacity has sometimes impacted the strength of action from the EU in RFMOs, bilateral negotiations, or in IUU dialogues.

RFMOs

RFMOs are a paramount example of regional cooperation amongst CPCs on fisheries governance. The adoption of effective conservation, management and control measures contributes to the aim of achieving sustainable fisheries and promote a culture of compliance abiding by the same rules and promoting a zero-tolerance approach to IUU fishing as indicated in our recent advice:

The LDAC encourages the EU to make the most of its participation in RFMOs to further its shared objectives on ocean governance and geopolitical engagement, while also acknowledging the valuable role played by fishers and other stakeholders in supporting monitoring and enforcement. In this regard, ensuring that DG MARE has adequate resources to enable regular, in-person participation in all relevant meetings, including scientific workshops and committee discussions, would be an important step.

At the same time, it will be important to strike a balanced approach in the transposition of RFMO rules into the EU aquis, to avoid unintended competitive disadvantages for EU fleets.

The LDAC will continue to produce timely evidence-based advice to assist the EU to prepare its negotiation mandate on RFMOs on aspects related to conservation and management measures for commercial stocks; ecosystem considerations; and monitoring, control and surveillance of fishing activities.

SFPAs:

The LDAC stresses the value of SFPAs as tool for cooperation and dialogue with partner third countries. The new generation of agreements should serve to reinforce synergies and coordination between EU policies in the external action, particularly through more efficient and effective use of sectoral support and serve as an instrument to enhance diplomacy and forge alliances with coastal states in the international ocean governance arena.

The LDAC is finalising its advice on the new generation of SFPAs, where discussions are being held on the prioritisation within the sectoral support in regard to food security, gender equality (in particular post-harvest value chains), youth employment and climate resilience in coastal communities.

Over time, the LDAC has under its own initiative established strategic partnerships with regional and international organizations such as FAO, ATLAFCO-COMHAFAT or AFRIFISH-Net to develop advice on fisheries arrangements with specific recommendations on topics such as science-based approach to joint management of shared resources; integration of human and labour rights, promoting food security, enhancing transparency and accountability of fishing activities and sustainable joint ventures, ensuring non-discrimination of fleets, fostering gender balance in application of policies, facilitating stakeholder engagement and participation from local communities, enhancing transparency in the allocation and monitoring of sectoral support, and strengthening training and capacity building in partner third countries.

Climate change

Fisheries are among the sectors most vulnerable and exposed to the impacts of climate change, requiring adaptation and long-term resilience measures. Additionally to particular fishing management measures, in order to safeguard the future of the sector, policies must also look to integrate fisheries as a priority within broader climate and marine strategies. This includes regulating the expansion of new blue-economy activities through cumulative impact assessments and balanced marine spatial planning to avoid additional pressures (e.g., deep sea mining) and conflicts over marine space (including with neighbouring countries).

It is crucial to gain a deeper understanding of the impacts of climate change in the ocean and relation with human pressures and economic activities, to assess the diverse knock-on effects on the fleets and coastal fishing communities. It is important to dedicate adequate and sufficient funding to investigate this axis and to promote adaptation and mitigation of harmful effects of these impacts on both EU fleets and partner country communities, in particular small-scale fishers who are most vulnerable and exposed to climate shocks. For that, it will be necessary to look at how existing knowledge and tools provide some support for these fishing communities and fleets to be more resilient to climate change, including through coastal protection, ecosystem restoration and early warning and safety systems. These aspects must be at the core of the debate to define the objectives and nature of the future of the new funds.

UN BBNJ Treaty

The LDAC supports the EU approach to encourage the swift ratification, strict transposition and harmonized implementation of BBNJ, including provision of adequate funding and contributions to the Global Ocean Programme. The LDAC urges all the EU MS to follow this lead and ratify the Treaty as soon as possible. The LDAC supports the ongoing work of the EU and at the UN technical preparatory meetings towards designing the governing bodies and mechanisms that allow an effective implementation of this Treaty once it enters into force.

The LDAC stresses the importance of articulating the coming implementation of the BBNJ Agreement with the scope of activity and operational frameworks of existing RFMOs and RSCs, in accordance with the no-undermining principle and sustainable use of resources. The BBNJ success will depend on the complementarity of its measures with existing regional fisheries management regulations and efforts. To avoid duplication, inefficiencies, or regulatory gaps, it is essential that BBNJ mechanisms do not replace but respect, build on and reinforce the science-based decision-making processes and scientific expertise already in place in RFMOs and RSCs.

FAO will play a valuable role as secretariat of the informal network of RFMOs in coordinating these efforts. Interactions and linkages between the role and competencies of international organizations within a single Treaty will be a realistic challenge and opportunity for international law development once it enters into force. In terms of inter agency cooperation at national and regional levels, dialogue and coordination between environment and fisheries administrations, with clear tasks, roles and competencies.

Internal discussions on the transposition of the Treaty onto EU acquis and how it should coordinate and interact with existing legal frameworks and obligations still is ongoing, with topics including the nature of the impacts required, what should be encompassed on them and the consideration that food security must have, as well as how the protection objectives in line with international obligations such as the Kunming-Montreal Global Biodiversity Framework or Paris Agreement, are reached and which tools should be used are important areas of these discussions leading to a specific advice.

The LDAC is available to meet MARE officials through the different stages of consultation in the coming months to discuss any relevant topics in more depth, bringing a balanced delegation of representatives both from the fishing sector and other interest groups.

Trade and sustainability of seafood value chain

To build a more sustainable value chain for aquatic food, the EU should strengthen trade and marketing measures that prioritise environmental and social sustainability, alongside legality of both EU imports and exports. This includes using trade-based tools and import controls to prevent products linked to IUU fishing, overfishing, or human rights abuses from entering the EU market.

Tools such as the IUU Regulation, Forced Labour Regulation and 2025 Regulation to adopt measures against non-EU countries that allow non-sustainable fishing practices should be used to their full potential to incentivise compliance with legal and sustainability standards by trading partners. It is also critical for the EU to ensure policy consistency, for example between "fisheries" mechanisms and trade arrangements.

The EU should limit access to the future Autonomous Tariff Quota to raw materials sourced from countries that have ratified key international agreements on labour conditions and fisheries management, including membership in relevant RFMOs. In addition, for the sustainability criteria that are being considered with the future ATQ system, compliance with RFMO requirements and rules should be taken into consideration.

Strengthening consumer information requirements would also create a level playing field, empower citizens, and reduce seafood fraud. EU consumers have the right to know the species and origin of the seafood products they consume. The CMO Regulation must enhance transparency and ensure that consumers receive the same level of information for processed seafood as they do for fresh and frozen products, fillets, and whole seafood products.

Fight against IUU fishing and fisheries control rules

The LDAC supports the EU work as a global ocean leader to break the vicious cycle of illegal fishing and human rights abuses in the fisheries sector. The effectiveness of the EU's zero tolerance approach to IUU fishing must be further strengthened both in the legislative and implementation side, ensuring that any future attempts at weakening its provisions/systems are firmly resisted. To deliver on this commitment, the EU should leverage its leadership beyond its borders by continuing to support non-EU countries to enhance transparency, reinforce their anti-IUU frameworks, and tackle the key enablers of IUU fishing. It should also maintain the highest standards at the EU market by: (i) ensuring full compliance of Member States with relevant rules; (ii) tightening controls, particularly on imports; and (iii) applying rigorous due diligence in relation to suspected IUU cases involving EU vessels and nationals.

The LDAC supports the effective implementation of IT CATCH, and the full digitalisation of the IUU catch certification scheme that will start from January 2026 and will require extensive work with partner countries to streamline the process with the aim to prevent IUU fishery products from entering the EU market.

To preserve the credibility of the carding system, it is essential that the EU applies the mechanism consistently and without geopolitical bias, holding major fishing nations with systemic compliance failures to the same standards as smaller or low-income States. In addition, the EU should promote polices at RFMO level, to prevent practices that facilitate IUU fishing, tax evasion, or other illicit practices.

List of relevant previous advice (period 2020-2025):

[LDAC Recommendations for a Level Playing Field for EU and non- EU fish products](#)

[LDAC advice on sustainability and competitiveness of EU across RFMOs](#)

[LDAC advice on Improving transparency of joint ventures in Third Countries](#)

[The Social Dimension of Sustainable Fisheries Partnership Agreements \(SFPA\) between the European Union and Third Countries](#)

[LDAC-AFRIFISH-NET joint advice on “Addressing role of women in fisheries – example of EU SFPAs”](#)

[Seminar on ED for May \(RFMOs\)](#)

[Transparency and accountability of the SFPAs sectoral support](#)

[LDAC Recommendations for making SFPAs evaluations more efficient](#)

[LDAC Recommendations on Strengthening the European Union Role In the field of International Fisheries Governance](#)