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Subject: Joint NWWAC/NSAC advice on social aspects in fisheries

Dear Ms Vitcheva,

In 2021, the North Western Waters AC and the North Sea AC set up a joint Focus Group Social Aspects with the aim of developing advice over a range of issues relating to this topic. A first submission was made in March 2022 in response to the fuel provisioning crisis affecting the fishing sector as a consequence of the war in Ukraine.

This second advice aims to act as a framework document outlining those social aspects in need of considerations for future advice which the joint Focus Group will continue working on.

We trust that your services will analyse this advice in detail and look forward to your response.

Best regards,



Emiel Brouckaert
Chairman NWWAC



Kenn Skau Fischer
Chairman NSAC

NWWAC/NSAC advice on social aspects in fisheries

Background

It follows from the framework regulation for the Common Fisheries Policy (CFP) that “The CFP should ensure that fishing and aquaculture activities contribute to long-term environmental, economic, and social sustainability”¹. In other words, sustainability in fisheries should address the three pillars: economic development, social development, and environmental protection. However, detailed overarching social objectives are in general missing in the CFP.

The STECF - Social dimension of the CFP (STECF-20-14) publication states that “Fisheries throughout Europe have undergone major structural changes, leading to important social consequences for both individual fishers as for fishing communities. In several fishing communities and regions of the EU, the social importance of the fisheries sector outweighs its direct economic contribution. There is an increasing awareness that more attention should be paid to the social dimension of fisheries, emphasised by the mission letter of EU Commissioner Sinkevičius explicitly mentioning the need to address the social dimension.”

With this in mind, the North Western Waters Advisory Council (NWWAC) and the North Sea Advisory Council (NSAC) came together in October 2021 to set up a joint Focus Group on Social Aspects in Fisheries. Both commercial and recreational fisheries in the European Union and beyond support livelihoods and contribute to food security and maintaining viable coastal communities. Fisheries management systems need to address and incorporate all three sustainability pillars in order to realise the full benefits of the fishery.²

The aim of this advice is to act as a framework document outlining those social aspects in need of considerations for future advice while also addressing specific issues raised in the European Parliament opinion ‘Fishers for the future’ ([2019/2161\(INI\)](#)) and the Opinion of the European Economic and Social Committee on ‘Social dimension of fisheries’ (exploratory opinion) EESC 2019/03203 ([link](#)).

What social aspects need to be considered?

NWWAC and NSAC members note that the CFP currently for many good reasons relates mostly to the management of commercial fisheries and fishing fleets engaged in a particular fishery. However, this approach does not leave much space for broad considerations on the social and economic aspects for the fishing sector and coastal communities.

¹ Regulation (EU) No 1380/2013 of the European Parliament and of the Council on the Common Fisheries Policy

² Asche et al.: Three pillars of sustainability in fisheries. Proceedings of the National Academy of Sciences, 30 October 2018, Vol. 115, no. 44 ([link](#))

In this respect, the “fishing sector” includes any industry or activity concerned with catching, culturing, processing, preserving, storing, transporting, marketing or selling fish or fish products. It is defined by the Food and Agriculture Organization as including recreational, subsistence and commercial fishing, and the related harvesting, processing, and marketing sectors. Therefore, though the practicalities of engaging in commercial fisheries differ from those in recreational fisheries, the advice in this paper should be read as covering both sectors.

Furthermore, when fishery managers consider social and economic dimensions, there is a tendency to focus solely on employment and earnings and to disregard numerous other important aspects that could contribute to both the environmental, social, and economic sustainability of the commercial and recreational fishing sectors. These aspects could be:

- Education and training
- occupational health
- physical health
- mental health
- well-being
- access
- diversity
- gender parity
- considerations on ageing workforce
- the promotion of the commercial and recreational fishing sectors to younger generations
- facilitation of entry in the fisheries sectors
- fishing/charter vessel safety
- certifications
- training standards
- ways to improve general conditions for crews and guests onboard fishing and charter vessels.
- working and living condition of fishers
- the viability of the value chain
- the effect of technical measures on fishers’ safety, health and income
- viability of coastal communities
- increase in cooperation/collaboration between stakeholders

This should not be seen as an exhaustive list. However, we do not advice that all matters are relevant or should be dealt with in every discussion. The point is that an appropriate impact assessment of proposed measures should not only include discussion on prices for fish and earning, but also discussion on relevant social aspects.

Data Collection

In 2010, the NWWAC initially carried out work on this topic at a seminar on economics in fisheries in Dublin Castle ([link](#)). At the time it was noted that from 2001 onwards, commercial fishing economics were incorporated into the remit of the STECF. Since then, the Joint Research Centre of the European Commission has been tasked with collation and quality control of commercial fishing economic data collected under the Data Collection Framework. This incorporation of economic criteria in the working practices of STECF was driven by the realisation that the CFP was perceived to be locked into a paradigm that dealt only with the environmental pillar (biology and stock assessments) and political pillar (decisions on TACs and quotas) but did not take into account social or economic aspects.

Member States are obligated to collect economic data from the fisheries, aquaculture and processing sectors of the European seafood industry. However, for recreational fishers the CFP only provides for the collection of biological data – the Data Collection Framework therefore needs to be extended to include economic data on recreational fishing.

Economic data for both the fishing sector and the recreational sector should cover the businesses that support them and the coastal communities where fishing-related activity takes place.

The impact of recreational fishing activities may also need to be taken into account in stock assessments where specific conservation measures are needed and where recreational fishing has a material impact on a stock.

More data on social aspects is needed

Data is an essential matter when discussing social sustainability. Data is necessary to qualify any issue and to help identifying shortcomings and find solutions to challenges. Better data on social aspects should be aimed at improving and discussing the social sustainability.

Moreover, to fully address social and economic considerations, socio-economic impact assessments of fisheries and conservation measures should be carried out to provide a holistic ecosystem-based view on interactions between different management factors.

Social and economic aspects still remain outside the standard inputs to fisheries management models. However, it is important that fishery managers should understand the possible short term and long term social and economic impacts of different fishing opportunities and measures on fishers, the businesses that support them and the coastal communities where fishing-related activity takes place.

The EU could become an international role model on social sustainability

Commercial fishing in the EU is estimated to contribute to the overall economy with 6.3 billion EUR and 92 298 full-time equivalent jobs³. Marine recreational fishing in the EU contributes considerably to social and economic activity – in 2017 it was estimated that approx. 8-10 million recreational sea anglers support an economic activity of €5.1 billion EUR and almost 57,000 full-time equivalent jobs.⁴

The overall contribution to the EU economy may be small. However, the fishing sector is often located in smaller communities at the coastline, and there the local business communities are dependent on the fishery sector to a large extent, either directly or indirectly.

In recent years, though, it has been increasingly difficult to fill vacancies in the fisheries sector with qualified employees, particularly in the catching sector. One of the main challenges seems to be a relatively low attractiveness of the sector, particularly for new generations of fishers. This lack of attractiveness can in some cases be linked with the balance between remuneration and hard-working conditions. Also contributing to the lack of attractiveness is the lack of visibility of the work carried out at sea, the public image of the sector as well as that of related shore-based activities. With the number of jobs depending on the catching sector declining in the majority of coastal areas, some coastal communities are at risk of not being viable in the future. Social sustainability is intrinsically linked with environmental and economic sustainability.

The social dimension of the CFP has to be understood as one of the pillars of sustainability in general. It does not only cover the social aspects for the commercial and recreational fishing sectors themselves, but also the role of fisheries for society as a source of food and for food security. The ACs observe that this is an issue of increasing relevance which adds to overall social stability. It also includes caring for and ensuring the competitiveness and economic viability of the fisheries sector in Europe as well as meeting increasing consumer demands for sustainable fish and transparency throughout the supply chain.

Full acknowledgement of this and a balanced approach to all three sustainability pillars would turn the CFP into an international template for achieving sustainability in fisheries.

³ STECF 2021 Annual Economic Report on the EU Fishing Fleet ([link](#))

⁴ Hyder, K, Radford, Z, Prellezo, R, Weltersbach, MS, Lewin, WC, Zarauz, L, Ferter, K, Ruiz, J, Townhill, B, Mugerza, E, & Strehlow, HV, 2017, Research for PECH Committee – Marine recreational and semi-subsistence fishing - its value and its impact on fish stocks, European Parliament, Policy Department for Structural and Cohesion Policies, Brussels ([link](#))

Safety

“European fleets meet among the highest standards in the world in terms of safety, working conditions, skilled jobs, the protection of the environment and biodiversity, and minimising their environmental footprint” (European Parliament opinion ‘Fishers for the future’ ([2019/2161\(INI\)](#))). However, fishing vessels are still lost at sea and the catching sector is generally considered to be a relatively dangerous place to work.

We still see that not all EU Member States have ratified the International Maritime Organisation’s instruments relating to fishers’ safety and well-being. Commercial fleets and the recreational sector also face challenges regarding generational renewal as fewer new entrants year on year are registered across EU Member States. With an aging fleet and lack of modernisation of vessels in most EU Member States, working conditions on board fishing vessels need improvement, also with view to enable more women to enter the sector at catching level.

These improvements require careful consideration of the CFP requirements on fishing capacity⁵ which impact the modernisation of the fleet and therefore should accordingly be reassessed for this specific purpose. Article 22 of the CFP provides for the fixing of maximum capacity ceilings in Kw and GT by Member States, as well as a segmentation of the fleet for adapting their fishing capacity as set out in Appendix II. Considering the efforts regarding decarbonisation of the EU fishing fleet, it is important to note that hydrogen and other new technologies have several limits, especially related to storage on board, which can compromise catch storage, affecting EU management by capacity of the fishing effort, in turn potentially impacting the crew accommodation and ship’s safety areas.⁶

In addition, commercial fishing can still be considered one of the most dangerous occupations. Figures from the European Maritime Safety Agency’s Annual Overview of Marine Casualties and Incidents 2021⁷ show that during the period 2014 – 2020, a total of 4,132 incidents involving fishing vessels occurred. “During the 2014-2020 period, 101 accidents involving fishing vessels resulted in a total of 191 lives lost. The decrease observed since 2016, despite a reverse in 2019, continued and resulted in the lowest number of lives lost in 2020 (10). Crew have been the most impacted category of victims over this period with 186 fatalities safety level related to fishing vessels has negatively evolved during the past years.”. However, the true number of accidents at sea is unknown as Directive

⁵ Article 4 of Regulation (EU) 2017/1130 defining the characteristics of fishing vessels, specifies that the gross tonnage of ships > or = 15 m is defined by the International Convention on the Tonnage Measurement of Ships 1969; the gross tonnage of vessels < 15 m is fixed by Annex I of Regulation (EU) 2017/1130.

⁶ NWWAC feedback on the public initiative "CO2 emissions of engines - methodology for their reduction", 06 August 2021 ([link](#))

⁷ EMSA Annual Overview of Marine Casualties and Incidents 2021([link](#)) containing “statistics on marine casualties and incidents which: involve ships flying a flag of one of the EU Member States; occur within EU Member States’ territorial sea or internal waters as defined in UNCLOS; or involve other substantial interests of EU Member States, as reported by Member States in the EU database for maritime incidents EMCIP (European Marine Casualty Information Platform).”

[97/70/EC](#) of 11 December 1997 setting up a harmonised safety regime for fishing vessels of 24 metres in length and over only applies to fishing vessels of 24m and over, with recreational craft engaged in non-commercial fishing being excluded from its scope. This Directive is currently under revision and the ACs' advice should be taken into account in this review.

Progress on previous opinions and resolutions

In its opinion adopted in 2019, the European Economic and Social Committee on 'Social dimension of fisheries' stated that "Sustainable competitiveness needs to take into consideration two new dimensions — environmental and social".⁸ NWWAC and NSAC members ask the Commission if and how the recommendations made in this opinion have been addressed, for example regarding "necessary amendments to the Common Fisheries Policy Regulation so that, where improvements in living conditions and safety on board fishing vessels are concerned, gross tonnage and power are not taken into account for the purposes of calculating fishing capacity" (see also above).

In its JRC Science for Policy Report "Social dimension of the CFP" ([STECF-20-14](#)), the Scientific, Technical and Economic Committee for Fisheries concluded "that the discussions and the proposals of the EWG 20-14 should be considered by the Commission and MS when revising the EU-MAP and developing the social indicators for the 2021-2022 period.

In response to TOR 2 and TOR 3 STECF concludes that for the next period three main activities need to be addressed:

- (i) Unification of concepts, definitions and variables
- (ii) Development of National Profiles
- (iii) Development of Community Profiles"

The ACs ask the Commission to provide an update on these conclusions and where possible share the information contained in the National and Community Profiles for those Member States relevant to both ACs.

NWWAC and NSAC members support the European Parliament's resolution of 16 September 2021 on "Fishers for the future: Attracting a new generation of workers to the fishing industry and generating employment in coastal communities" ([2019/2161\(INI\)](#)) and ask the Commission to provide an update on if and how this resolution is being addressed. Members would also like to see this work extended to include recreational fishing employment.

⁸ Opinion of the European Economic and Social Committee on 'Social dimension of fisheries' (exploratory opinion) EESC 2019/03203 ([link](#))

Recommendations

1. The EU should become an international role model dealing with social sustainability in the fisheries sector.
2. Full ratification across EU Member States including appropriate enforcement measures of the IMO Cape Town Agreement and ILO 188, as well as STCW-F Convention on standards of training, certification and watchkeeping for Fishing Vessel Personnel across all EU Member States,
3. The Common Fisheries Policy should include clearly identified social objectives in parallel with environmental objectives in order to ensure the continued attractiveness of the commercial and recreational fishing sectors for younger generations, ensuring better protection and optimal working conditions and safeguarding the economic, social and environmental viability of the fishing sectors.
4. The ACs support the conclusions of the STECF in their 20-14 stating “that to be able to properly analyse and advise on impacts of fisheries management measures these National and Community profiles are a necessity.”
5. There is a need to improve the collection of economic and social data for commercial fishing and for recreational fishing. This data should include the coastal communities and the businesses benefiting from the commercial and recreational fishing.
6. The framework for the capacities of fishing vessels as provided for by Regulation 1380/2013 is no longer adapted to today's technical and economic challenges since it freezes the structure of vessels to technical criteria which do not conform with the requirements of cyclical and even structural adaptations to today's issues. It is therefore necessary to review and possibly restructure the regulatory framework which allows the improvement of:
 - ship safety
 - ship stability
 - crew comfort
 - new energy technologies: Hybridization, LNG, H2
 - renewal of fleets
 - the attractiveness of the sector
 - generational succession
 - food security/sovereignty
 - environmental impacts
7. To fully address the social and economic aspects of recreational fisheries, the management of these fisheries should be included in the provisions of the CFP with equal requirements and benefits to commercial fisheries, thus enabling both industries to

contribute equally to the objectives of the CFP and the economically, environmentally and socially sustainable management of fisheries in Europe.⁹

8. Member states should conduct regular surveys of recreational fishing to collect the social and economic data needed to properly manage recreational fishing.
9. The EU needs to continue to improve statistics and evaluation of accidents, increase effort for best-practise-examples in Europe to prevent accidents to move further towards “vision zero”.
10. Extension of Marine Accident investigation to smaller vessels (under 15m).
11. Inclusion of commercial fishing vessels under 24m and where relevant recreational craft engaged in non-commercial fishing in Council Directive 97/70/EC of 11 December 1997 setting up a harmonised safety regime for fishing vessels of 24 metres in length and over ([link](#)).
12. All Member States should carry out risk analyses on board vessels to reduce accidents, and a level playing field should be established with regards to funding for improving vessel safety thus decreasing competitive disadvantages.
13. The ACs support the priorities identified by the Social Partners for Fisheries in their document “Future of the Common Fisheries Policy – A need of a strong social dimension in the future CFP” and urge the Commission to address the identified concerns.
14. The ACs support the Commission’s initiatives to improve participation of women in fisheries sectors such as through the “Women in the Blue Economy” call for proposals under the European Maritime, Fisheries and Aquaculture Fund (EMFAF) and call on the Commission to continue promoting and encouraging gender considerations in the seafood sector as well as in Advisory Councils’ structures.
15. The ACs recommend that a review be carried out regarding Regulation (EU) 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 on whether the current CFP has met the objectives it sets out for those who work in the fisheries sector and depend on it for their living but also under CMO has the objective of creating a level playing field for all been achieved so that all commercial and recreational fishers are afforded the rights enshrined in the CFP as per below:

Article 2

⁹ In this regard, the ACs support the proposals included in the “Implementation and revision of the CFP with a Baltic perspective” – BSAC white paper to the Commission ([link](#))

1. The CFP shall ensure that fishing and aquaculture activities are environmentally sustainable in the long-term and are managed in a way that is consistent with the objectives of achieving economic, social and employment benefits, and of contributing to the availability of food supplies.

4. (c) provide conditions for economically viable and competitive fishing capture and processing industry and land-based fishing related activity;

(f) contribute to a fair standard of living for those who depend on fishing activities, bearing in mind coastal fisheries and socio-economic aspects;

(g) contribute to an efficient and transparent internal market for fisheries and aquaculture products and contribute to ensuring a level-playing field for fisheries and aquaculture products marketed in the Union.

- END -