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## **NSAC/NWWAC Advice on recreational fisheries**

*This paper was approved with consensus by the NSAC and NWWAC Executive Committee on 21 December 2023 via written procedure.*

### 1 Background

This paper is a result of the North Sea and North Western Waters joint focus group on Social Aspects of the Common Fisheries Policy (CFP), which aims to bring to attention identified gaps and shortcomings in the fisheries legislation concerning the social and economic considerations, provide missing links or point to areas where further work is needed, and provide recommendations on ways to improve the social and economic aspects of commercial, small-scale and recreational fisheries.

Recreational fishing is a large and growing sector in the EU. According to the research paper of the European Parliament, some 9 million Europeans go fishing at sea every year as recreation with an economic impact of about 10.5 billion euro, supporting almost 100,000 jobs.<sup>1</sup> Recreational fisheries are an important part of the fishing sector, affecting the ecosystem and contributing to the social and economic development of coastal communities. In Europe, recreational angling (rod & line fishing) is represented by the European Anglers Alliance (EAA)<sup>2</sup> and the recreational spear fishers are represented by the International Forum

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<sup>1</sup> Research for PECH Committee - Marine recreational and semi-subsistence fishing - its value and its impact on fish stocks. Study 14-07-2017

[www.europarl.europa.eu/RegData/etudes/STUD/2017/601996/IPOL\\_STU\(2017\)601996\\_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/STUD/2017/601996/IPOL_STU(2017)601996_EN.pdf)  
“There was an estimated 8.7 million European MRFs and a participation rate of 1.6% (Figure 1A; Table 4).”

<sup>2</sup> EAA is a member of the NSAC, NWWAC, MEDAC, BSAC. Recreational spear fishers are represented by the International Forum for Sustainable Underwater Activities (IFSUA). EAA and the European Fishing Tackle & Trade Association share an office in Brussels and provide the secretariat

for Sustainable Underwater Activities (IFSUA)<sup>3</sup>. Other recreational segments (nets, pots, traps, longlines) are not represented at European level.

In this paper, we aim to shed light on recreational fishing. We posit that the non-negligible impact of recreational fishing on the state of certain stocks and the positive impact on socio-economic aspects in coastal communities requires greater regulation and a level playing field, which requires more and better data collection of catches and the socio-economic value of recreational fishing.

## 2 Definition of recreational fishing

Recreational fishing is characterized by varied definitions provided by different organizations. In 2004, the EAA proposed a definition of recreational angling due to the ambiguous use of various terms such as sport fishing, recreational fishing, and recreational angling. Additionally, the term 'angling' is not universally recognized in Southern European countries, which has led to complications. Within the EU legislation, recreational fisheries are defined as "non-commercial fishing activities exploiting marine biological resources for recreation, tourism, or sport." The term 'subsistence fishing' can pose challenges in definition as it might encompass aspects of both recreational and commercial fishing. The EU legislation doesn't explicitly incorporate subsistence fishing. Instead, it distinguishes between commercial and recreational fishing. The key distinction between recreational and commercial fishing lies in the fact that recreational fishers are prohibited from selling their catches. However, a complication arises in the context of pesca-tourism, where discerning whether the catch of a passenger onboard a fishing vessel for pesca-tourism qualifies as commercial or recreational can be intricate.

The Commission does not currently differentiate between the two, categorizing everything caught during a pesca-tourism trip as recreational, which might not be accurate. The reviewed Fisheries Control Regulation will somewhat alleviate the issue, as all marine recreational fishers will be mandated to hold licenses or registrations. This change will be transformative, considering that only half of the European countries currently adhere to this requirement with regard to marine waters (all EU member states have in place recreational freshwater license schemes). If any portion or all of passenger's catch remains on the fishing vessel, these catches will be recorded as commercial. This will allow for more transparency and better data collection.

According to EAA<sup>4</sup>, recreational fishing is fishing, which is not deemed to be commercial fishing. Recreational angling is one form of recreational fishing. According to the paper published by the EAA in 2004, angling can be defined as line fishing using the hooking method. As angling can be both commercial and non-commercial, recreational angling can be

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to the 'Forum on Recreational Fisheries and Aquatic Environment' at the European Parliament:  
[www.eaa-europe.org/european-parliament-forum](http://www.eaa-europe.org/european-parliament-forum)

<sup>3</sup> IFSUA is a member of the NWWAC, SWWAC, MEDAC

<sup>4</sup> <https://www.eaa-europe.org/topics/what-is-recreational-fishing/>

defined as the activity of catching or attempting to catch fish, principally by rod and line, pole or hand-held line for non-commercial purposes. The EAA definition and the EU legislation (Article 55(2); Council Regulation (EC) No 1224/2009 of 20 November 2009),<sup>5</sup> note that recreational fishers (which include recreational anglers) do not sell the fish they catch.

The term “recreational angling sector”<sup>6</sup> encompasses anglers, tackle shops and tackle manufacturers<sup>7</sup>, bait suppliers, charter-boating, recreational boat builders<sup>8</sup> and handlery suppliers, marina operators and specialised angling media, angling tourism and other related business and organisations as well as the whole management environment (e.g. public agencies) to varying degrees dependant on or directed at recreational angling.

In most, if not all, countries, the recreational angling segment contributes by far the most to the recreational fishing sector’s total socio-economic value. While a list of recreational fishing gear could be compiled, it is essential to emphasize that recreational fishing cannot be defined solely by the types of gear used, as some gear is used by both recreational and commercial fishers.

### 3 Recreational fisheries: state of play

Currently, there is a lack of consistent and robust data on the motivations and behaviours of recreational fishers, and a lack of robust data on the social and economic contribution of recreational fishing. More and regular data streams are needed to understand trends, contributing to more effective management. There is a need for consistent data collection across borders, following the examples of the United States and Canada. Here we note the potential benefits of the newly revised EU fisheries control regulation on data collection for recreational fisheries, as when the regulation takes effect all recreational fishers will have to be licensed or registered, and some of their catches shall be electronically registered.

The Common Fisheries Policy (CFP)<sup>9</sup> has so far not had recreational fisheries within its scope explicitly. The present CFP (of 2013) has one only mention of recreational fishing in recital 3: *“Recreational fisheries can have a significant impact on fish resources and Member States should, therefore, ensure that they are conducted in a manner that is compatible with the objectives of the CFP.”*<sup>10</sup>

In effect, recreational fishing is only of real interest to EU fisheries management when recreational fishing has a “significant impact” on fish stocks of commercial fisheries’ interest, the so-called ‘commercial fish stocks’. Recreational fishing sector representatives urge that

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<sup>5</sup> Article 55(2) in Council Regulation (EC) No 1224/2009 of 20 November 2009; now Article 55(5) in the revised Control Regulation, version 25 October 2023: [https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CONSIL:PE\\_38\\_2023\\_INIT](https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CONSIL:PE_38_2023_INIT)

<sup>6</sup> See also definition of “Recreational fisheries sector” in EIFAC Code of Practice for Recreational Fisheries (2008) [www.fao.org/3/i0363e/i0363e00.pdf](http://www.fao.org/3/i0363e/i0363e00.pdf)

<sup>7</sup> In Europe represented by the European Fishing Tackle & Trade Association (EFTTA) [www.eftta.com](http://www.eftta.com)

<sup>8</sup> In Europe represented by the European Boating Industry (EBI) [www.europeanboatingindustry.eu](http://www.europeanboatingindustry.eu)

<sup>9</sup> [https://oceans-and-fisheries.ec.europa.eu/policy/common-fisheries-policy-cfp\\_en#what-is-the-cfp](https://oceans-and-fisheries.ec.europa.eu/policy/common-fisheries-policy-cfp_en#what-is-the-cfp)

<sup>10</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32013R1380>

changes are made to the CFP to make it fair and equitable to the recreational fishing sector.

An ongoing challenge is the linguistic delineation between the terminology used in commercial and recreational fisheries. For instance, "quotas" are portions of the national Total Allowable Catches (TACs) distributed to the national commercial fishing vessels/fishers. However, the revised Control Regulation introduces, as a possibility, recreational fishing quotas. Article 55(3)(a): *"Coastal Member States shall ensure that natural persons engaged in recreational fisheries are registered and that they record and report their catches through an electronic system referred to paragraph 1 as follows: (a) For species, stocks, or groups of stocks that are subject to Union conservation measures which apply specifically to recreational fisheries such as quotas, catch-limits and bag limits, on a daily basis"*<sup>11</sup>. This has sparked concern within the commercial fisheries sector, as there is a perception that such quotas might be subtracted from their allocations, which isn't necessarily accurate.

At present the recreational fishing sector has no firm position for or against recreational fishing quotas. However, the recreational sector wants to be treated equally and fairly with other marine fisheries stakeholders, which includes taking into account the recreational fisheries sector's needs, development potential, and social and economic contributions to society.

In Commission's Staff Working Document on the Report of the CFP<sup>12</sup>, it is mentioned that *"Recreational fishing is already integrated in multiple aspects of the CFP (...). There needs to be a continued focus and improvement in the ongoing work on data collection, monitoring and regional implementation."* Indeed, the sector is currently managed in the CFP through various policy instruments with a patchwork approach, such as:

- The Data Collection Framework covers recreational fisheries (however does not distinguish between the different sub-segments);
- Some Multiannual Plans manage directly some recreational fisheries (but only when the environmental impact is significant).
- EU management measures may be applied to recreational fisheries (minimum sizes, bag limits, closed seasons). Measures in effect today are set for seabass, Baltic cod, salmon and eels.<sup>13</sup>
- The Commission is increasingly, or incrementally, adding more importance and substance to recreational fisheries in various policies.<sup>14</sup>

<sup>11</sup> [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CONSIL:PE\\_38\\_2023\\_INIT](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CONSIL:PE_38_2023_INIT)

<sup>12</sup> [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52023SC0103\(01\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52023SC0103(01))

<sup>13</sup> <https://www.eaa-europe.org/european-parliament-forum/ep-recfishing-forum-events/23-march-2022-recreational-fisheries-and-cfp.html>

<sup>14</sup> See for an example this answer from Commissioner Mr Sinkevičius (11/7/2022):

[www.europarl.europa.eu/doceo/document/E-9-2022-001830-ASW\\_EN.html](http://www.europarl.europa.eu/doceo/document/E-9-2022-001830-ASW_EN.html)

Cutting: "The Commission's new approach to a sustainable blue economy emphasises the cross-cutting elements in the blue economy over a sectoral approach. Recreational fishing is part of this approach as far as it can integrate the interlinked strands of decarbonisation, biodiversity and coastal resilience or circularity, as identified in the Commission's strategy."

Within the EU's Data Collection Framework, recreational fisheries are encompassed within the definition of the 'fisheries sector': *“fisheries sector’ means activities related to commercial fisheries, recreational fisheries, aquaculture and industries processing fisheries products”*. Notably, this is the sole instance in any EU document where recreational fisheries are incorporated within the definition.

The Multiannual Plan for Demersal Fisheries in the North Sea includes a mention of recreational fisheries in Article 10 on Fishing Opportunities: “When scientific advice indicates that recreational fisheries have a *significant impact* on the fishing mortality of a particular stock, the Council shall take them into account and may limit recreational fisheries when fixing fishing opportunities in order to avoid exceeding the total target of fishing mortality.”

A clear definition of recreational fishing showing the subsegments<sup>15</sup> is needed to be able to manage the subsegments individually taking into account their differences in environmental and socio-economic impact, and to avoid misconceptions and provide legal certainty as to what it entails and what implications it may have for the commercial sector and wider.

## 4 Way forward

### 4.1 Recreational fishing in the CFP and the revised Control Regulation

Thirty years later, the CFP has yet to incorporate specific articles on recreational fisheries, with only a solitary recital acknowledging their significance: "(3) Recreational fisheries can have a significant impact on fish resources and Member States should, therefore, ensure that they are conducted in a manner that is compatible with the objectives of the CFP." There is a need for this aspect to progress further in the future, as other legislations concerning marine fisheries at the EU level include numerous provisions pertaining to recreational fisheries. A clear definition of recreational fisheries is necessary to ensure an unambiguous understanding of the role and implications of this sector.

Any potential upcoming CFP reform is expected to address recreational fishing in a more comprehensive manner, thereby reflecting its current and future significance within the EU. The inclusion of recreational fisheries should not only underline their impact on fish resources but also their contributions to the economy, individuals, and society at large. To some extent, this has already been acknowledged in certain EU documents, most recently in the revised control regulation draft version dated June 25 October 2023: “(51) Recreational fisheries play an important role in the Union, both from a biological, economic and social perspective...”.

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<sup>15</sup> This definition has been agreed by ICES' Working Group on Recreational Fisheries Surveys (WGRFS) (n 2013):

“Recreational fishing is the capture or attempted capture of living aquatic resources mainly for leisure and/or personal consumption. This covers active fishing methods including line, spear, and hand-gathering and passive fishing methods including nets, traps, pots, and set-lines”.



At the European Parliament, a RecFishing Forum event in 2022 on the subject of recreational fisheries within the framework of the CFP<sup>16</sup> was an important step in granting desired attention to the sector, reflecting the persistent call of the EAA and others<sup>17</sup> for the full inclusion of the recreational fisheries sector in the CFP. According to the event's conclusions, this would allow for a more sustainable blue economy and bring benefits to the coastal communities. It would also improve understanding of its environmental, social, and economic impact and improve data collection, management and control. At another RecFishing Forum event in October 2023, examples were given on management schemes in other parts of the world (USA, Australia, New Zealand, Canada), which can serve as inspiration for how to include recreational fisheries under the EU's CFP.<sup>18</sup> At that event, a researcher gave a presentation about "Recreational fishing - alternative management measures"<sup>19</sup>. It is clear that recreational fishing can and should be managed differently than commercial fisheries (i.e. with a mix of bag limits, seasonal closures, 'slots' (min/max retention sizes)). As [Dr. Ray Hilborn](#) put it at the World Recreational Fisheries Conference, July 2017, Victoria, Canada, the main concern of recreational sector is that they are being managed with methods developed for commercial fisheries (i.e. hard TACs instead of season lengths, mid-season closures, harvest control rules).

The primary goal of this advice is to highlight the absence of adequate consideration of recreational fisheries in EU-level legislation within the context of the CFP and to echo previous calls for improvement in this matter considering the possible future reform. Moreover, it aims to offer insights into the prospective trajectory of recreational fisheries at the EU level. Certain improvements have already been implemented, as evidenced by the revised Control Regulation. Notably, the new requirement that all marine recreational fishers shall be licensed or registered. Article 90 now includes specifications for serious infringements, enabling the imposition of substantial fines on recreational fishers who violate regulations.

In terms of harmonization and coordination of measures across Member States, it appears, in the context of the Control Regulation, that the responsibility falls largely on Member States to implement measures. Similarly, in terms of catch statistics, Member States seem to possess a degree of authority, as long as they provide data. Regarding data collection, the EAA has advocated for funding to develop a mobile app, which is now accessible in all countries.<sup>20</sup> The

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<sup>16</sup> [www.eaa-europe.org/european-parliament-forum/ep-recfishing-forum-events/23-march-2022-recreational-fisheries-and-cfp.html](http://www.eaa-europe.org/european-parliament-forum/ep-recfishing-forum-events/23-march-2022-recreational-fisheries-and-cfp.html)

<sup>17</sup> See BSAC white paper to the Commission on Implementation and revision of the CFP with a Baltic perspective: [http://www.bsac.dk/getattachment/cbf2de84-7646-4d8e-bd48-3dea57777f06/ChairletterandWhitePaperFINAL21\\_22\\_38.pdf.aspx?lang=en-GB](http://www.bsac.dk/getattachment/cbf2de84-7646-4d8e-bd48-3dea57777f06/ChairletterandWhitePaperFINAL21_22_38.pdf.aspx?lang=en-GB)

<sup>18</sup> "Rethinking the allocation of fisheries catches for fairer and more sustainable decisions" [www.eaa-europe.org/european-parliament-forum/ep-recfishing-forum-events/11-october-2023-rethinking-the-allocation-of-fisheries-catches-for-fairer-and-more-sustainable-dec.html](http://www.eaa-europe.org/european-parliament-forum/ep-recfishing-forum-events/11-october-2023-rethinking-the-allocation-of-fisheries-catches-for-fairer-and-more-sustainable-dec.html) - Presentation 1 on "International examples of including recreational fishing in catch allocations" – David Mitchell [www.eaa-europe.org/files/david-mitchell-11-10-23-pdf\\_13058.pdf](http://www.eaa-europe.org/files/david-mitchell-11-10-23-pdf_13058.pdf)

<sup>19</sup> Presentation 2 "Recreational fishing, alternative management measures" – Kevin Haase [www.eaa-europe.org/files/recfish\\_kevinhaase-pdf\\_13059.pdf](http://www.eaa-europe.org/files/recfish_kevinhaase-pdf_13059.pdf)

<sup>20</sup> <https://recreational-fishing.ec.europa.eu>

EU countries still have the option to make use of their own apps, if adapted to the Control Regulation requirements. Some states already have operational apps in place. Although these apps are not obligatory at present, they might become so in the future. There are specific requirements for data collection on various species under the Data Collection Framework (e.g., eel, salmon, cod, sea bass, tuna), however some states fail to deliver data on time or deliver poor data quality, leading to implementation issues, which may put more restrictions than needed on recreational fishing for these.

#### 4.2 Synergies in Recreational Fishing for improved state of the ecosystems and social systems

Recreational fishing can provide societal services beyond the mere catching of fish. For instance, there had been a topic of public discussion in Germany regarding the establishment of a large national park in the Baltic Sea. The debate focused on what activities park users should be allowed to engage in. It was suggested that angling could play a significant role in projects related to citizen science. Anglers are widespread in many areas, even more so than commercial fishers, and this offers opportunities to report on the state of the natural environment. An example is a project in the port of Hamburg, where two hundred angler volunteers use an app to report on the time of the start of fishing activities and record the time until they catch the first pike perch. This data is then communicated to scientists who may use it to create an index of stock size based on anglers' data. By communicating these initiatives, public discussions could be stimulated about the activities of anglers in aquatic environments and foster a sense of responsibility for natural resources. In addition, anglers and divers often report suspected illegalities or pollution when they come across it. Volunteers from the recreational fishing community also help plant eel grass and build stone reefs to shelter juvenile fishes.<sup>21</sup>

Regarding the presence of anglers on board commercial fishing vessels or charter boats, it is important to maintain a clear distinction between different concepts. Charter boats serve as platforms for anglers and should in our view be subject to angling regulations. In contrast, pesca tourism involves bringing tourists out to sea to observe and learn, and sometimes participate in commercial fishing. There is a challenge of recording the fish caught in these cases. They can be counted as fish caught by the vessels, affecting quotas of the vessel, or if registered as anglers, they can be treated similarly to those on charter boats, with the fish caught attributed to the tourists, not the boat or the skippers. The Commission had not fully recognized these distinctions, which is why the term 'pesca tourism' was not included in the revised control regulation, creating confusion. Nevertheless, funding is currently provided to vessels throughout Europe for pesca tourism under the EMFAF program, requiring clarification of the regulations.

EAA has a webpage with references to national socio-economic studies.<sup>22</sup> In these studies, tourist anglers are rarely or poorly dealt with. This should be improved in future studies as

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<sup>21</sup> [www.sportsfiskeren.dk/kysthjaelper](http://www.sportsfiskeren.dk/kysthjaelper)

<sup>22</sup> [www.eaa-europe.org/topics/socio-economics](http://www.eaa-europe.org/topics/socio-economics)

tourist angling is very important in many respects. This is a cutting from a very recent study from Germany<sup>23</sup>: “...nonresident anglers were responsible for eight times greater economic impact than resident anglers. Maintaining attractive fishing opportunities for the recreational fishing sector, specifically angling tourism, is critical for maintaining resource flows to local and regional economies.”

Greater recognition and emphasis should also be placed on the value of recreational fishing in terms of human wellbeing. Recreational fishing offers more than just catching fish, the importance of the ‘mindfulness’ aspect and the growing recognition of its value beyond the quantity of fish caught should be properly recognized and acknowledged. This plays into the growing importance of wellness tourism, which in this sense might also include recreational fishing. Angling is also used to help deprived and vulnerable children<sup>24</sup>, as well as to help military veterans suffering from PTSD.<sup>25</sup>

## 5 Conclusion and Advice

Considering its non-ignorable effect on the state of certain stocks, and its positive socio-economic impact in coastal communities, recreational fishing requires greater regulation and a level playing field, which includes more and better data collection of catches and recognition of socio-economic value of recreational fishing. Based on the above sections and in view of the future CFP reform, the NSAC and NWWAC call for:

1. Full inclusion and consideration of recreational fisheries in the revised CFP, thereby reflecting its current and future significance within the EU. The inclusion of recreational fisheries, which would create a level-playing field and generate opportunities for the coastal and remote communities, should not only underline their impact on fish resources but also their contributions to the economy, individuals, and society at large.
2. A clear definition of recreational fisheries and distinctions made between its different segments (rod-and-line, spear, pots, nets...), which is necessary to ensure an unambiguous understanding of the role and implications of each segment and this growing sector as a whole, as well as to provide legal certainty as to what it entails and what implications it may have for the commercial sector and wider.
3. Development and collection of consistent and robust data on the motivations and behaviours of recreational fishers, including tourist fishers, as well as consistent data on the social and economic contribution of recreational fishing across EU borders.

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<sup>23</sup> “Economic impact of resident and nonresident marine anglers to the local economy in Mecklenburg-Western Pomerania, Germany” (Oct 2023); <https://onlinelibrary.wiley.com/doi/10.1111/fme.12664>

<sup>24</sup> “Get Hooked On Fishing” <https://ghof.org.uk/>

“Hooked on Fishing – Not on Drugs” (HOFNOD)” <https://dep.nj.gov/njfw/fishing/freshwater/hooked-on-fishing-not-on-drugs/>

<sup>25</sup> <https://anglingtrust.net/2023/10/09/fishing-saved-my-life/>

[www.essex.ac.uk/news/2022/07/04/fishing-could-be-prescribed-to-treat-ptsd](http://www.essex.ac.uk/news/2022/07/04/fishing-could-be-prescribed-to-treat-ptsd)

[www.telegraph.co.uk/news/2022/07/09/fishing-cures-ptsd-anxiety-first-ever-clinical-study-aims-prove/](http://www.telegraph.co.uk/news/2022/07/09/fishing-cures-ptsd-anxiety-first-ever-clinical-study-aims-prove/)





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4. Communication on societal services of recreational fishers to stimulate public discussions about the activities of anglers in aquatic environments, to foster a sense of responsibility for natural resources and the aquatic environment as such.
5. Recognition and emphasis placed on the value of recreational fishing in terms of the human wellbeing and health.
6. Recognition and enhancement of the self-consumption of catches from recreational fishing as a contribution to the food sovereignty of Europeans.