



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels,
MARE.C.5/ac/AK

Dear Mr Skau Fisher,

Thank you for submitting the NSAC Advice on Mapping of Important Fishing Grounds. We appreciate your efforts, and the valuable insights provided in the paper.

We welcome your proactive approach towards the Greater North Sea Basin Initiative's (GNSBI) working track on the long-term perspective of fisheries and we can confirm that they have received your advice and shared it with all members. Your recommendations represent a valuable contribution to the ongoing efforts to integrate fisheries into Maritime Spatial Planning (MSP), a central focus of this working track.

We agree with many of the challenges you have outlined on standardising, sharing and analysis of spatial fisheries data, which need to be overcome to accurately represent fishing grounds while balancing the constraints of confidentiality and stakeholder interests. Below, we provide some initial feedback on the advice, bearing in mind that overcoming these hurdles is an iterative process involving stakeholders, scientists and scientific organisations, Member States and the Commission.

1. THE REQUIREMENT TO SHARE FISHERIES SPATIAL DATA FOR SCIENTIFIC END USERS

The Data Collection Framework (DCF) and its multiannual programme on data collection (EUMAP) require Member States to collect, manage and disseminate data in support of the implementation of the Common Fisheries Policy (CFP). While Vessel Monitoring System (VMS) and logbook data is collected under the fisheries control regulation, its dissemination also falls under the DCF and as such, Member States are required to provide this data to scientific end-users. Member States have an obligation to share but also to respect the constraints of confidentiality. Confidentiality clauses are included in the control regulation to cover personal data and commercial secrecy as well as in the DCF. The regulations differentiate between primary (raw) and detailed data, which is processed to ensure confidentiality before being transmitted to scientific end-users.

Through the DCF Regional Coordination Groups, and with the relevant end-users such as the International Council for the Exploration of the Sea (ICES), the Commission works with the Member States to overcome challenges in data sharing and confidentiality restrictions of DCF data for scientific purposes.

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The concept of a centralised data centre with clear data-sharing agreements may be challenging to reconcile with the requirement for individual fishers to consent to data sharing. An alternative approach could be to maximise the existing DCF that feeds data to ICES, incorporating additional data sources and improving the resolution of the data. This could provide a more comprehensive and robust foundation for fisheries management.

The example of the GNSBI project, which employed a collaborative model where participating countries' scientific institutes analysed their own data using a standardised algorithm, and only shared the results, is an interesting approach that could be encouraged in other contexts. This model allows for the protection of sensitive information while still facilitating the sharing of valuable insights and knowledge.

2. STANDARDISATION OF SPATIAL DATA

VMS data collection is regulated through the EU fisheries control regulation and as such important data collection parameters are standardised. Working groups such as the ICES Working Group on Spatial Fisheries Data (WGSFD) have been instrumental in developing and standardising analysis tools for spatial fisheries data for the provision of scientific advice. We believe that they are key fora to assemble the data sets and progress with mapping analyses as Member States work closely together in a long-term setting, overcoming national challenges and standardising procedures. While the data is analysed for the purpose of fisheries advice, the data can be requested at a resolution that is not publicly available and used for other purposes such as MSP, subject to a prior explicit consent from the national administrations providing the data. We are hopeful that the results and lessons learned from GNSBI will be integrated into the ICES work.

3. ACCURATE REPRESENTATION OF FISHING DATA

Your advice highlights that public data sources such as Global Fishing Watch can lead to misinterpretation of spatial maps and fishing behaviour. We agree that while the analysis of the Automatic Identification System (AIS) provides a valuable additional data source, it has important limitations and can lead to misinterpretation when used in isolation. We therefore welcome the work that is carried out by scientists in collating and critically reviewing different data sources to evaluate how they can complement each other. We rely in this respect on the scientific community of ICES, and their work in WGSFD and workshops such as the Workshop on Geo-Spatial Data for Small-Scale Fisheries (WKSSFGE0) to adopt and evaluate data sources when providing fisheries mapping advice.

4. FISHERIES MONITORING

Your advice points to the complexities of collecting and utilising data for fisheries management, and it is essential to acknowledge the distinction between data collected through legal obligations, such as AIS, VMS, logbooks, and data collected through voluntary agreements with fishers, including information on engine power and fuel consumption.

Regarding the use of tracking devices for control purposes, it is crucial to recognise that VMS and AIS are essential tools for ensuring compliance with fisheries regulations and maritime traffic control. It is essential to emphasise the importance of these systems in maintaining the integrity of fisheries management and ensuring the safety of maritime traffic.

5. POLICY INTEGRATION

On 5 June 2025, the Commission presented the **European Ocean Pact**. The Pact is a European initiative, bringing together European ocean policies into a single, cohesive framework, yielding direct benefits for ocean protection and its ecosystems, coastal communities and the economy as a whole.

The Pact aims to take a holistic approach, promoting collaboration across EU Member States, regions, and stakeholders including fishers, other blue economy professionals, innovators, investors, scientists, and civil society. It sets out a series of flagship actions over the years to come. It ensures coherence and alignment, bringing together policies and initiatives, like the CFP and the Water Resilience Strategy amongst others, under a unified approach. The Marine Action Plan is part of the 2023 Fisheries and Ocean Package whose intention was to reinforce common ground for both fisheries and environmental policies, working together to pave the way for a more sustainable and resilient fisheries sector. The Commission therefore remains committed to the objectives of the Marine Action Plan, in particular working together with Member States' authorities, fishers and other stakeholders to implement solutions to make fisheries more resilient and sustainable; and to achieve our EU and global environmental goals and commitments.

The Ocean Pact also announces the adoption of a proposal for an Ocean Act by 2027, as well as the establishment of an Ocean Board, gathering relevant stakeholders. The Ocean Act will build on the evaluation and revision of the Maritime Spatial Planning Directive which will enhance cross-sectoral coordination and sea basin management.

In this context, the Commission organised an Implementation Dialogue on the MSP Directive on 1 July 2025 ⁽¹⁾. It focused on the progress made in implementing existing measures, as well as the challenges and opportunities linked to MSP to help the EU in identifying bottlenecks, areas for simplification, and best practices. Fisheries representatives were actively participating. A summary of the dialogue's conclusions is available on the Commission's dedicated page ⁽¹⁾.

I look forward to our continuous cooperation. Should you have any further questions on this reply, please contact Ms Julia Rubeck, our Advisory Councils coordinator, via the functional mailbox (MARE-AC@ec.europa.eu).

Yours sincerely,

Charlina VITCHEVA

⁽¹⁾ https://oceans-and-fisheries.ec.europa.eu/events/implementation-dialogue-implementation-maritime-spatial-planning-directive-2025-07-01_en

