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NSAC Advice on the Evaluation of the Common Fisheries Policy

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Executive Summary

Internal governance

- EU fisheries management should be informed and guided by new technological advancements (i.e., REM, AI, and machine learning) and digital tools (i.e., e-governance) providing near-instant insights on socio-ecological developments.
- Effective fisheries management reflected in EBM requires cross-sectoral and cross-disciplinary collaboration driven through Advisory Councils.
- The Greater North Sea Basin Initiative and the Joint Special Group for the Marine Action Plan may provide best-practice examples of cross-sectoral engagement in decision-making.
- Given the significant differences in gear use and cultural aspects across various sea basins, innovations and technological improvements should be looked through regional lens and adapted to regional specificities.
- Multiannual plans should move towards ecosystem-based and long-term approach with improved involvement of stakeholders, reflecting the sharing of stocks with third countries (such as Norway and the UK).
- Siloed departmental thinking should be replaced with holistic approaches through systematic exchanges and coordination between fisheries, environmental and other relevant governance units. Multi-department platforms should facilitate this exchange at EU and national levels.
- Further thought should be given to how the different groups could use and benefit from the platforms created for collaboration, such as Advisory Councils, to achieve optimal results in fisheries development. All stakeholder groups to adopt a more positive, productive and constructive stance against all actors sharing an interest in the field.
- The integration of the Blue Economy framework with international ocean governance, climate, and biodiversity initiatives at both the EU and Member State levels is needed.



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- Steps need to be taken to effectively implement participatory approaches in all aspects of fisheries management, potentially leading to co-management modalities with positive incentives rather than restrictive control to ensure compliance.
- A proactive and balanced inclusion of the industry, environmental NGOs, and other fisheries stakeholders in public platforms and events are a step towards granting ownership of policy decisions, as well as fostering partnerships and alliances.
- Barriers need to be removed for fishers to be able to accelerate selectivity efforts, with greater recognition given to scientists, institutes, and industry collaborating on sustainable gear development.
- Allowing freer choice of gear and addressing regulatory barriers could incentivize the adoption of REM, fostering enhanced participation and contribution to data-driven fisheries management.
- MSP processes should incorporate areas reserved for fisheries to ensure food security, sector's long-term perspective and viability, and sustainable use of marine resources. The fishing industry should be incentivized to proactively map out key fishing areas and provide this information to national administrations to strengthen their position in MSP discussions.
- A clear legal mandate with strict authorisation rules should be established to enable cross-border data flow, leveraging existing infrastructure and expertise within Member States.
- Science-policy society integration should be facilitated by actively and systematically engaging scientists and policy actors in ACs, and vice-versa. Interdisciplinary relationships and effective knowledge transfer must be at the core of effective future policies.
- To ensure the long-term viability and competitiveness of the EU fishing sector, it is essential to attract a younger, more diverse workforce by modernizing vessels, improving working and social conditions, and promoting gender equality.

External governance

- Food sovereignty must be explicitly recognized within international environmental policy frameworks through sustainable extracting activities that are in line with biodiversity, restoration, and climate targets.
- A shift in perspective is needed from fisheries as a threat to fisheries as a contributing factor to societal and ecological health so that the full benefits of sea-based diet can be reaped. The EU should champion the new narrative on global stage.
- Considering relations with third countries, such as the UK, NSAC welcomes productive exchanges between DG MARE and stakeholders in the past years. Similar efforts should be replicated in EU's engagement with other coastal states, such as Norway.

- Maintaining a level playing field across all players that share resources, both on technical and control levels, is of utmost importance for effective fisheries management and compliance.

Management

- EU fisheries management should be results-based focusing on achieving specific, measurable outcomes with clear and socially negotiated and acceptable objectives, built-in monitoring and evaluation of existing strategies, adaptation mechanisms transparency and accountability of all system's actors and decision-making processes.
- In terms of decarbonisation of fishing fleet, comparative SWOT analyses are needed to assess feasibility, costs, funding, and technical challenges across different technologies. A third-party review should evaluate technology's maturity, applicability to fisheries, and environmental impacts to guide decision-making. We welcome Commission's efforts in producing a roadmap for energy transition.
- As the EU fleets transition, the definition of capacity must account for the space and weight required by alternative fuel technologies.
- Fleet modernization and adaptation should be facilitated without risking increased fishing effort. In the North Sea, sufficient controls are in place through TACs and quotas to mitigate this risk.
- Despite the efforts made by all the parties involved in implementing the landing obligation, this provision has not provided the expected results in managing discards. The current regulatory framework needs to be adapted to foster data sharing for accurate management. Fully Documented Fisheries (FDF) could represent a step towards a more realistic, pragmatic and adaptive management.
- Effective mapping should reflect the reality of fishing activities while remaining clear and practical for decision-making. This requires active engagement and collaborative stakeholder involvement, standardized and inclusive methodologies for data gathering, real-time data production and integration, cross-border data sharing, and long-term funding to ensure maintenance of mapping tools. Additionally, strategies must be developed to analyse, mitigate and compensate for fisheries displacement.
- Technological innovations have the capacity to enhance selectivity, reduce bottom contact, and help protect vulnerable species and habitats while also lowering fuel consumption and CO₂ emissions. With these advancements, demersal fishing has the potential to be reframed as nature-friendly supplier of healthy seafood.
- To drive innovation, the CFP should promote bottom-up approaches that actively involve fishers in gear development and approval processes to ensure practical applicability and faster adoption.
- Establishing a permanent committee comprising Member States' authorities, scientists (including national research bodies, STECF, and ICES), and other relevant stakeholders could significantly enhance co-management efforts in gear innovation.
- NSAC calls for a clear distinction between compliance control and fisheries documentation and advocates for provision of clear guidelines for industry stakeholders on the role of new monitoring technologies.

- With the rise of digital tools and new regulations, technological solutions should prioritize data accuracy and usability for fishers, rather than mainly serving as instruments of top-down control and enforcement.
- The new Commission's direction on simplification of rules should be embraced. Different policy revisions need to be coherent and aligned both in terms of content and processes.

Science

- To make operational steps towards EBFM, structural barriers and institutional challenges, such as suboptimal interactions between EU member states, the EU Commission, and ACs, and obstacles in the regionalization process need to be addressed.
- Management Strategy Evaluations are the key approach to operationalisation of EBFM, helping to identify strategies that address natural variability, uncertainty and stock assessment errors. Opportunities for stakeholder engagement in MSEs processes should be identified and championed.
- EBFM should gradually incorporate relevant ecosystem considerations in special scientific advice and eventually in the setting of fishing opportunities. To this end, NSAC welcomes ICES' Framework for Ecosystem-Informed Science and Advice (FEISA) to support ecosystem-informed scientific advice.
- Enhanced industry participation in scientific work is needed to ensure policies remain practical and responsive.
- A one-size-fits-all approach to climate adaptation is not adequate. Fisheries management must be tailored for specific solutions, balancing scientific evidence and local and regional stakeholder input to develop suitable policies.
- The EU should integrate social science methodologies into fisheries management by conducting regular social impact assessments to understand how policy changes affect fishers and their communities.
- Resilient, well addressed and informed communities with trust in the future of their activities are a vital component of sustainability transitions. NSAC welcomes and commends the work carried out in the STECF Expert Working Group on Social data and particularly efforts to compile the first STECF Annual Social Report.
- While regulatory controls remain crucial for ensuring sustainability and safety, structural reforms are necessary to simplify administrative processes.
- The fisheries management approach needs to evolve to reflect the fluctuating nature of ecosystem components. Some examples of adapted MSY, such as F_{eco} and Maximum Economic Yield (MEY), may be further explored for specific stocks and their components in light of changing ecosystem and socio-economic conditions.

1 Background

On 27 January 2025, the European Commission published a public consultation on the Common Fisheries Policy (CFP) evaluation aimed at gathering stakeholder views on the effectiveness and sustainability of the policy. This consultation serves to assess how well the CFP is meeting its objectives, including ensuring sustainable fish stocks, protecting marine ecosystems, and supporting the livelihoods of fishing communities.

The NSAC has been monitoring and critically evaluating the implementation and effectiveness of the current CFP since it entered into force in 2014. Our advice is aimed towards ensuring proper implementation of the policy and its tools, while also voicing structural shortcomings and addressing implementation barriers, where they exist.

Significant developments and changes in fisheries (geo)politics, policy, management, and science have occurred in the last decade, with further and faster changes still to come. With climate change effects in full swing, real-time monitoring and data provision are not only an aspirational ideal anymore but a tangible and necessary future, where improving efficiency and sustainability is managed at vessel-level and relevant data fed into a system that is responsive to changes in the environment, politics and markets. Further resources and capacity building will be needed to capture the full potential of emerging technologies, such as REM, AI, and machine learning. We believe that with enhanced transparency and accountability, top-down management should give way to bottom-up approaches, fostering agency and ownership.

We all need to come to terms with and respond to the new reality taking shape globally. As the EU Commission under von der Leyen's second term already recognized, the globalist world order is crumbling under partisan and nationalistic tendencies, making a pivot to increased self-sufficiency inevitable. In Europe we import over 70% of seafood while being endowed with the world's longest coastal area. We need to make sensible use of our resources to feed the population in a fair, healthy and sustainable manner. In recent years, seafood consumption has been in decline while reports on healthy diet unequivocally point to nutritional benefits of aquatic foods. Further decline in seafood consumption will have detrimental effects on public health, especially if compensated with cheaper unhealthy alternatives. Efforts are needed to promote seafood's nutritional value to consumers while ensuring that it remains available at reasonable prices.

The NSAC believes that seafood can and should be produced sustainably, ensuring viability of ecosystems, businesses and coastal communities. The three pillars of sustainability are not mutually exclusive but reinforcing. Participatory governance is the key to realizing the full potential of all sustainability aspects, ensuring that trade-offs are not imposed but mutually agreed. Advisory Councils should remain the main mechanism for these discussions with improved functioning and clear roles and responsibilities. Fair and inclusive deliberations will ensure that risks and stakes are well understood across society, and that measures are implemented faithfully and successfully. Digitalisation and e-governance, but also

simplification of legislative procedures, will help make these processes more streamlined and efficient.

In the next couple of pages, we relay our stakeholders' views gathered at the dedicated Conference on the Future of the CFP in September 2024, and in over a decade worth of expert discussions in NSAC's working and focus groups on aspects and developments that we believe the new-era European fisheries policy warrants. We would also like to note that all transformations and transitions can only happen with appropriate human resources and funding. To this end, we draw your attention to the joint-AC letter on Multiannual Financial Framework¹, highlighting the essential and positive contributions of DG MARE and Advisory Councils to sustainable exploitation of fisheries resources in the EU.

2 Governance

2.1 Internal governance

2.1.1 Agile, responsive and integrated governance system

An agile governance system is needed to promptly adapt to changes in fisheries' environmental, economic, and social conditions. With digital transition now in full swing, where near real-time monitoring of fish stocks, ecosystem health, and industry performance are not a distant reality anymore, these new technological advancements and resulting insights should inform and guide fisheries management.

Ecosystem-Based Management and transdisciplinary approaches aim to balance nature conservation with other societal needs. Regional high-level initiatives such as the Greater North Sea Basin Initiative should be strengthened, promoted and replicated to ensure balanced and inclusive MSP processes. Effective fisheries management requires cross-sectoral and cross-disciplinary collaboration, including between science, policy, and society, and between industry and conservation. Engaging stakeholders through Advisory Councils ensures policies reflect diverse perspectives and needs and helps evaluate priorities, makes decisions more robust and enhances ownership and compliance. In addition, Regional Sea Conventions are an important part of this governance ecosystem. Relationships between OSPAR and Northeast Atlantic-based ACs should be brought to a more productive cooperation. Pragmatic and reasonable enforcement, positive incentives, and international collaboration are key to addressing shared challenges like overfishing and ecosystem degradation, while also ensuring fair and stable access to fishing grounds and markets.

E-governance, leveraging Information and Communication Technology (ICT) tools and data analytics, holds significant potential for improving fisheries management and decision-making. Support is needed for AI-driven decision-making platforms, and digital traceability solutions to ensure that governance is more transparent, responsive, and data-driven. Consideration

¹ https://www.nsrac.org/wp-content/uploads/2025/04/11-2425-Multi-AC-letter-on-MFF-EN_signed.pdf

should be given to privacy concerns, and stakeholder perception of surveillance technology should be part of the governance design.

Finally, strong collaboration across regions and between ACs has proven beneficial for the quality and coordination of fisheries advice. Holding regular Inter-AC meetings and supporting joint advisory platforms ensures that advice remains aligned with broader fisheries management objectives across both EU and third country waters. Increased efforts to engage stakeholders in EU-UK-NO negotiations to ensure their perspectives are adequately considered is also of vital importance. Beyond negotiations, stakeholder relations between different coastal states should be fostered through international platforms and events. NSAC continues to nurture relationships forged during our 20-year operation with our former UK members, as well as with neighbouring Norway by inviting them to participate on various occasions.

2.1.2 Regionalisation and cooperation on conservation measures

The CFP, along with the Technical Measures Regulations and corresponding articles on regionalisation, empowers the Commission to adopt delegated acts based on joint recommendations from Member States with direct management interests. While technical measures are highly regionalized, greater attention should be given to the regionalization of innovations and technological improvements, given the significant differences in gear use cultures across various sea basins.

In this regard, we wish to note that Member States Regional Groups have a legal obligation to consult relevant ACs as set out in Article 18(2) of the CFP Regulation. This obligation includes allowing for meaningful consultation, enabling members to provide informed consensus advice. While the NSAC is grateful for periodical meetings with the Regional Member States Group, these brief interactions would benefit from more in-depth engagement or dialogue. To strengthen collaboration with the North Sea MS Group, the NSAC has requested access to or briefings from several regional sub-groups of MS, such as FISH-ENV and the Control Expert Group.

With this in mind, we welcome the Commission's letter to MS to improve this engagement in regionalisation processes, from conception to implementation of measures², and kindly ask MS to reorganise MS group's meetings in a way that properly honours stakeholder input through Advisory Councils.

2.1.3 Coherence and alignment between environmental, fisheries and other legislation/directorates

Successful fisheries and ecosystem management is dependent on the coherence of measures taken and their consistency with other Union policies, as outlined in Article 3 of the CFP.

² <https://www.nsrac.org/wp-content/uploads/2025/02/Regionalisation-Letter-for-the-Regional-Groups.pdf>

However, the EU's current ocean governance model lacks sufficient cooperation between departments, legislative acts, and stakeholder groups. This limits synergies between different maritime activities and hampers the integration of sustainability across sectors.

Any such convergence and collaboration need to happen between people first. Mindful public communication is needed in order to forge alliances and partnerships. Further thought should be given to how the different groups could use and benefit from the platforms created for collaboration, such as Advisory Councils, to achieve optimal results in fisheries transition, to the benefit of the people and the planet. We call on all stakeholder groups to adopt a more positive and collaborative stance against all actors sharing an interest in the field.

Greater coherence is needed between the CFP, and other key policies, such as the Marine Strategy Framework Directive (MSFD), the Marine Spatial Planning (MSP) Directive, the Nature Restoration Law (NRL), the initiatives adopted or proposed under the European Green Deal (i.e., Biodiversity Strategy, the Zero Pollution Action Plan, the Farm to Fork Strategy) and the Action Plan to conserve fisheries resources and protect marine ecosystems, with the latter seeing a commendable initiative to bridge environmental and fisheries departments at national and EU levels, such as the Marine Expert Group and FISH-ENVI groups. It is vital to break down silos, ensure cooperative space between departments and improve information flow. Multi-department platforms should spring up to facilitate this exchange.

An important reconciliation needs to be made in terms of resource utilisation to satisfy the increasing need for protein-rich food while ensuring effective nature conservation. Working in isolation will not deliver the necessary progress towards continuous environmental, social and economic sustainability. Though ACs operate in the framework of the CFP, they must be able to also engage with environmental and other relevant departments whose work affects fisheries, such as DG ENV and OSPAR. The integration of the Blue Economy framework with international ocean governance, climate, and biodiversity initiatives at both the EU and Member State levels is urgently needed.

To make a concerted example, while in its formulation the MSFD provides the necessary tools to achieve Good Environmental Status (GES) through an ecosystem-based approach, its success depends on effective coordination with fisheries-related policies. Commercial fishing sector plays a key role in delivering GES for multiple descriptors, making stakeholder inclusion in marine resource management essential. The EU Commission and Member States need to guarantee that future and existing fisheries conservation initiatives align with the CFP to enhance fisheries management measures that contribute to GES. In general, many inconsistencies between the CFP and MSFD persist that could be resolved or minimized with structured engagement.

The NSAC welcomes the announcement of the European Ocean Pact, promoting a holistic and coherent approach to all ocean related policies, from governance to concrete actions supporting a healthy and productive ocean. However, we emphasize the importance of continuous stakeholder involvement in its development to ensure that such initiatives address the real needs of key marine stakeholders, like fishers and environmental NGOs, and do not add unnecessary burdens to an already complex EU ocean governance framework. Furthermore, the Pact should recognize the crucial role of the fisheries sector in advancing

EU's food security targets. Finally, the Ocean Pact needs to be flexible, allowing for the integration of climate change impacts on marine and maritime sectors, and adaptable to future evaluations and revisions of marine policies and frameworks (i.e., current evaluation of the CFP).

2.1.4 Ownership through agency

As set out in the current Common Fisheries Policy, the management of European fisheries should be based on broad and meaningful stakeholder involvement. Stakeholder engagement should be applied from the conception to implementation of measures.

The NSAC believes that involvement of stakeholders should go beyond mere consultation. Steps need to be taken to effectively implement participatory approach in all aspects of fisheries management, ensuring that stakeholders are granted meaningful roles in decision-making. Involving stakeholders in management from the get-go not only allows that measures are designed to achieve the set objectives through the provision of relevant knowledge base, but also aids the implementation of measures, improving compliance through enhanced ownership.

Strengthening bottom-up management in fisheries - and potentially introducing elements of co-management or self-management - provides tangible benefits. For instance, considering gear innovation and approval processes, allowing fishers to be involved in the process of innovation and approval of fishing gear speeds up practical application and enhances the wider uptake of sustainable technologies. Additionally, currently the CFP relies heavily on control and enforcement, which may be suitable for measurable aspects like fleet size and fishing days but ineffective for more nuanced aspects that cannot be strictly controlled. This undermines fishers' trust in policies and weakens cooperation. A transition toward a more bottom-up and co-developed control system through granting the fishers greater autonomy and agency could benefit the functioning of the CFP.

Belgium presents a good example of the benefits of a collaborative approach to fisheries management, where the burden of proof and responsibility for sustainability is placed on the fishers in collaboration with civil society and science. Among some of the results, this partnership produced a roadmap (the Vistraject), a labelling program (Visserij Verduurzaam) and the Vistools project, which allows for real-time collection of data from individual vessels. By shifting toward a model that emphasizes participation, responsibility, and data-driven decision-making, the CFP can achieve more effective and trusted fisheries management while reducing reliance on strict and resource-intensive enforcement mechanisms.

To move in this direction, the Commission should evaluate which tasks currently performed by public authorities could be transferred to the industry/stakeholders or independent third parties, while still maintaining necessary regulatory oversight. This would relieve the strain on the Commission and Member States and ensure ownership through agency. We endorse the conclusions and principles outlined in the LIFE policy brief on co-management in small-scale fisheries³ and note that the EU should take further steps towards bringing regionalisation to a

³ <https://lifeplatform.eu/wp-content/uploads/2021/02/LIFE-Co-Management-for-SSF-compressed.pdf>

higher level, respectful of the principles of subsidiarity, proportionality, and inclusivity. In-depth discussions should take place on the different modalities of a more decentralized, bottom-up system with clear roles, responsibilities and reporting commitments.

Besides clear management roles, important is also a proactive and balanced inclusion of the industry, eNGOs, and other fisheries stakeholders in public platforms and events. Fisheries are considered one of the main activities in European seas. As such, it is essential that they have an appropriate and meaningful role to play in public discourse related to maritime affairs and fisheries, as well as conservation and climate. Proactive invitations to panel discussions are a step towards granting that ownership and active engagement. Having a balanced representation at public events will grant wider participation in events and policymaking, as it will signal decision-makers commitment to having all relevant actors at the table. Not only that, having diverse stakeholders participate will also foster unexpected alliances and mutual understanding.

2.1.5 Technical measures and freer choice of gear

In relation to participatory management, reversed burden of proof and enhanced ownership of management measures, granting fishers the freedom to choose their gear within a well-defined sustainability framework can drive innovation, improve selectivity, and enhance environmental outcomes in fisheries management. Through years of experience, fishers possess unique knowledge that allows deployment of most effective gear for a certain fishery or region, achieving optimal selectivity in catching the target species.

Currently, the scrutiny of innovative gears by the STECF is perceived to be insufficiently transparent and efficient, and the Commission appears to lack the necessary flexibility and pragmatism in interpreting STECF advice. A more region-specific approach to gear implementation is needed, allowing fishers to adapt to local conditions. The current Technical Measures regulation is regionalised, but often extremely restrictive and incentivises further discards. Barriers need to be removed for fishers to be able to accelerate selectivity efforts, with greater recognition given to scientists and institutes collaborating on sustainable gear development. The NSAC strongly supports eliminating measures that hinder the adoption of scientifically validated, low-impact fishing gears. Moreover, allowing freer choice of gear and selective deregulation could incentivize the adoption of Remote Electronic Monitoring (REM), fostering greater participation in data-driven fisheries management.⁴

2.1.6 Fisheries coexistence with competing human activities at sea

To ensure equitable and sustainable Marine Spatial Planning (MSP), the CFP must place greater emphasis on coexistence, ensuring that fisheries are considered and are active

⁴ <https://www.nsrac.org/wp-content/uploads/2023/05/08-2223-NSAC-Advice-on-the-functioning-of-Landing-Obligation.pdf>

contributors to MSP discussions and decision-making. Better integration of CFP provisions in MSP, and vice-versa, are needed. In current MSP plans, fisheries are constrained to zones left unclaimed by other sectors. In the NSAC, we believe the MSP should actively consider areas reserved for fisheries to ensure food security and sustainable use of marine resources. Greater transparency in planning processes is essential, particularly regarding the costs and benefits of spatial decisions.

Additionally, to facilitate coexistence, improved data sharing between neighbouring countries is needed. A clear legal mandate with strict authorisation rules should be established to enable cross-border data flow, leveraging existing infrastructure and expertise within Member States. A centralized data centre with transparent and robust data-sharing agreements would allow key information to be accessed while safeguarding commercial sensitivities. The fishing industry should be incentivized to proactively map out key fishing areas and provide this information to national administrations to strengthen their position in MSP discussions.

Priority needs to be given to cross-sectoral and cross-border cooperation. Initiatives such as the Greater North Sea Basin Initiative (GNSBI) could serve as a model for effective collaboration and coexistence across sectors, provided they ensure inclusive and equitable participations from all marine users.. Established in 2023 among nine North Sea countries, GNSBI highlights the need for improved data access, sharing, and aggregation while respecting confidentiality concerns. Strengthening such initiatives will be essential in addressing ecosystem challenges and balancing competing maritime activities more effectively. We welcome GNSBI's upcoming stakeholder engagement strategy and its commitment to include relevant stakeholders, particularly Advisory Councils, with the possibility for access and input on GNSBI future products.

By reinforcing governance structures, improving data-sharing mechanisms, and fostering cross-sectoral cooperation, the CFP can better support fisheries amidst the rapid expansion of offshore wind and other maritime activities. Early engagement, transparency, and a regional approach to spatial planning will be key to maintaining a balanced and resilient marine environment while safeguarding the future of the fishing industry.

2.1.7 Science-policy-society integration

Established in 2003 in response to the “democratic deficit” in fisheries management, ACs bring together fisheries and conservation stakeholders for improved fisheries management. While collaborating closely with science through external platforms, such as MIAC/O, currently and formally ACs memberships do not involve fisheries scientists. While individual scientists can take part in AC meetings, their participation is limited to the role of expert observers. Although certain ACs have successfully collaborated with scientists in producing joint outputs, this remains an exception rather than a norm.

By definition, ACs serve as crucial forums for engagement between policy, science, industry and other stakeholders, providing an opportunity for knowledge exchange and mutual understanding. We believe that further integration of scientists as full members would improve

the robustness of stakeholder expertise in advisory products. Additionally, different stakeholder groups often produce and communicate knowledge differently, which can create barriers to effective dialogue and flow of knowledge and information. By incorporating fisheries scientists as regular members of ACs, this exchange would become more systematic, enabling genuine co-production between scientists, fishers, and other stakeholders. The inclusion would also align with envisioned implementation of an ecosystem-based approach to fisheries management (EBFM), which requires a more integrated and interdisciplinary approach to decision-making.

Given the steps already taken toward a systematic stakeholder inclusion in the scientific advice processes (see, for example, MIAC/O meetings between ICES and stakeholders, ICES Stakeholder Engagement Strategy, and NSAC Advice on Stakeholder Engagement in ICES advice Request formulation⁵, Joint-AC Advice on Stakeholder Engagement in ICES Advice request formulation⁶, Multi-AC Advice on Stakeholder Engagement in STECF⁷), the formal involvement of scientists in ACs, either as staff/consultants or full members, would enhance the relevance, credibility, and impact of fisheries advice. It would also reinforce the objectives of the CFP to include diverse forms of knowledge to reach sustainability targets, ensuring that fisheries management is both science-based and inclusive.

The development of the social pillar of the CFP would also greatly benefit from a stronger integration of science and society. With increased efforts being made to standardize the social dimension of fisheries, particularly through the work of the STECF EWG on Social Data in EU Fisheries, it is essential that representatives of the fishing sector are meaningfully involved and incorporated into scientific research, and their input carefully considered. Strengthening collaboration between STECF and fisheries stakeholders⁸ is vital to enhancing the understanding of the social aspects of fisheries and, ultimately, to the creation of more effective fisheries policies.

2.1.8 Strengthened efforts for increased recruitment with emphasis on gender equality

The older generation of fishers remains a vital part of the EU fishing sector, contributing extensive knowledge and richness of experience built over decades. However, ensuring the industry's long term viability depends on the active recruitment of a younger generation of fishers and ensure intergenerational knowledge transfer. The integration of more modern technology on board including sustainable innovations and digital transition represents a

⁵ <https://www.nsrac.org/wp-content/uploads/2023/10/16-2223-NSAC-Advice-on-stakeholder-engagement-in-ICES-Advice-requests.pdf>

⁶ www.nsrac.org/wp-content/uploads/2024/10/15-2324-Joint-AC-Advice-on-Stakeholder-Engagement-in-ICES-Advice-request-formulation-1.pdf

⁷ <https://www.nsrac.org/wp-content/uploads/2025/02/07-2425-Multi-AC-Advice-on-Stakeholder-Engagement-in-STEFCF.pdf>

⁸ <https://www.nsrac.org/wp-content/uploads/2025/02/07-2425-Multi-AC-Advice-on-Stakeholder-Engagement-in-STEFCF.pdf>

significant advancement, ensuring enhanced safety and adding to the attractiveness of the sector.

Today, young professionals are more attentive to the notions of safety, health, comfort, inclusivity, and equality. To attract and retain this emerging workforce, the sector should be able to improve working and social conditions to align with the growing needs and demands. Taking action to create a more inclusive environment is also instrumental to increase the competitive advantage and economic performance of fishing activities in the EU. Crucially, the continued attractiveness of fisheries hinges on the industry's short- and long-term viability.

A key challenge in promoting recruitment of a new workforce in fisheries lies in the limitations on fishing capacity, which restrict opportunities for vessel modernization. Upgrading vessels to improve comfort, security, and allow for gender inclusivity is critical for fostering a more equitable fisheries sector. Such limitations should be reconsidered in light of social progress.

To build a sustainable and inclusive fisheries sector, gender equality must be fully integrated into the governance framework of the CFP. While gender equality objectives in fisheries exist at EU level, they are not explicitly referenced in Regulation (EU) No 1380/2013. Achieving full integration calls for policy adjustments, targeted initiatives, improved working conditions, and active engagement of women in decision-making structures.

Lastly, there is need to review and streamline EMFAF requirements to effectively reach those projects that contribute to social sustainability of the fishing sector as well as to ensure technology transfer from research to practice. Financial barriers faced by young professionals must also be addressed through EU funding instruments to ensure continued generational renewal in the sector.

2.2 External governance

2.2.1 Balancing biodiversity and food security targets

The CFP should remain in alignment with global biodiversity, environmental, and ecosystem restoration targets, while simultaneously addressing critical societal needs such as food security and climate mitigation. In doing so, the EU should ensure biodiversity objectives are met without compromising food security or climate goals. Fisheries should be seen as the Blue Solution to community needs, such as food security and poverty reduction, with policies that highlight the contribution of fish to society. The current narrative often portrays fisheries as a threat to nature, but they can play a key role in sustainability if managed correctly. This shift in perspective will help enhance the sector's viability while contributing to societal and ecological health. It is also important to remind that associated carbon emissions per kilo of protein of landed seafood is lower than most animal proteins, meaning fishing's climate impact is manageable, in terms of ensuring future food security while keeping carbon emissions to a minimum.

2.2.2 Shared management & cooperation with third countries

The latest reform of the CFP 2013 did not anticipate the UK's departure from the EU, meaning that its current provisions do not reflect the post-Brexit reality. While Part VI of the CFP covers external fisheries policy and cooperation with third countries, the unique changes posed by Brexit require a more tailored approach to ensure sustainable and fair fisheries management. Maintaining a level playing field across all players that share resources is of utmost importance to ensure trust for effective fisheries management, prevent overfishing, and ensure fair and continuous access to fishing grounds and markets. To achieve this, joint management strategies must be agreed for important stocks and must promote stronger and more inclusive stakeholder involvement.

To ensure a level playing field, it is essential to uphold consistency between the various EU measures, as well as alignment between EU and third countries regulations. Each major fishing nation surrounding the North Sea applies their own rules on the management of discards and technical measures. EU policies must account for this international context to promote fairness for all vessels operating in the shared waters and to strengthen joint commitment of sustainable exploitation of marine resources.

This principle also applies to the implementation of innovations in fisheries practices, where discrepancies between regulatory frameworks in the EU, UK, and Norway create unnecessary burdens for the fishers. Ensuring consistency, fairness, and harmonization in the adoption of new technologies across jurisdictions would facilitate smoother operations and improve sustainability efforts. Best practice examples should be shared across borders.

Concerning EU-UK relations, the Trade and Cooperation Agreement (TCA) fisheries framework must continue to be adhered to ensure the long-term sustainability and mutual benefit of fisheries management between the EU and UK. Regular engagement through platforms like the Special Committee on Fisheries (SCF), as well as the Inter-AC Brexit Forum for stakeholders, should be prioritized, with an emphasis on fostering effective bilateral communication to avoid unilateral decisions that could disrupt the existing cooperation. Ongoing evaluation and discussion of Joint Recommendations (JRs) to integrate UK positions into negotiations while maintaining a fair and level playing field for all parties involved must also be ensured.

Continued participation of stakeholders is essential in shaping outcomes. In this sense, stakeholders should have a say in the post-2026 TCA discussions, as well as in formal channels of communication and aligned input into UK technical consultation processes and broader strategic discussions.

As for EU-Norway relations, current engagement is less structured compared to the framework in place with the UK. The NSAC would welcome efforts to move towards a more continuous dialogue where stakeholders are able to exchange bilaterally. The NSAC continues to invite Norwegian as well as UK counterparts to some of our meetings and events, displaying a genuine wish for collaboration and information sharing.

Generally, given the increasing complexity of external fisheries governance, the CFP must evolve to reflect the new realities and allow for innovative and agile ways of working together and responding to changes.

3 Management

3.1 Results-based management

The EU fisheries management should be results-based focusing on achieving specific, measurable outcomes rather than simply adhering to processes or activities for their sake. Path dependencies are one of the leading causes of the current system's rigidity. Results-based management requires clear and socially negotiated and acceptable objectives in terms of environmental, social and economic sustainability, constant monitoring and evaluation of existing strategies, mechanisms for adjustment of these strategies should they be proven to miss the set targets, transparency and accountability of all system's actors and decision-making processes, and mechanisms and incentives to ensure that everyone contributes their part in better management. Meaningful stakeholder engagement with systematic dialogues through policy and management cycles ensures that management and policies reflect the needs and realities of the sector in line with the ecosystems' limitations.

3.2 Progress in fisheries decarbonisation and energy efficiency

Between 1990 and 2021, the EU fishing fleet reduced its greenhouse gas emissions by 52% and engine power by 41% due to the technological progress which has significantly improved efficiency, and decommissioning. This trend should be recognized as the sector's contribution to climate action and ensuring continued progress toward decarbonization. With effective support from Member States and industry collaboration, further improvements can be achieved.

Many energy efficiency solutions are being explored in fisheries. However, before widespread adoption, comparative SWOT analyses are needed to assess feasibility, costs, and technical challenges across different technologies. A third-party review should evaluate technology's maturity, applicability to fisheries, and environmental impacts to guide decision-making.

In the short term, efforts should focus on enhancing energy efficiency within the existing fleet (new type of gears, solar and wind propulsion, vessel design, etc.) while alternative fuels continue to develop. Regulatory, technological, and logistical advancements must progress hand-in-hand, ensuring a supportive legal framework that facilitates innovation and adoption.

Stakeholder involvement is crucial for the co-development and resulting legitimacy and acceptance of energy transition measures and policies. The Energy Transition Partnership is a step in the right direction, and in the NSAC we will continue to contribute to those efforts through our technical and detailed advice.

Financial barriers remain a challenge and the European Commission should work closely with the European Investment Bank to align priorities and increase financial support for fisheries-specific decarbonization projects. Public-private partnerships will be needed to drive this forward.

3.3 Capacity ceilings and modernisation

Article 22 of the CFP determines maximum capacity ceilings per Member State, based on fixed GT and kW limits. However, these definitions fail to accommodate evolving needs related to decarbonization, modernization, and safety improvements. The NSAC calls on the European Commission find ways that allows fleet modernization and adaptation to new challenges without increasing fishing effort. Many vessels in the EU fleet are aging and require modernization to enhance crew comfort, security, and gender inclusivity. Ergonomic designs, improved sanitary facilities, and increased working space could make the profession more accessible, particularly for women. Strict capacity ceilings currently limit the ability to upgrade vessels with improved safety, working conditions, and operational efficiency.

As the EU fleet transitions, the definition of capacity must account for the space and weight required by alternative fuel technologies. These new technologies present significant storage and safety challenges, which can reduce available space for catch storage and crew accommodations. Additionally, technical capacity (i.e., data collection via REM) should also be ensured on vessels in order to be able to perform independent catch verifications.

3.4 Landing Obligation, technical measures, and Fully Documented Fisheries

Provision of the Landing Obligation is often in opposition with technical measures stipulated in the Regulation (EU) 2019/1241. In the future policy framework, the NSAC would welcome more flexibility in determining ways of achieving gear selectivity (through, for example, freer choice of gear). Members also observe that given the many obstacles in obtaining permission to use innovative and more selective gears, in the way of implementation of the LO, the selectivity objective is challenging. In some cases, it seems unattainable for fishers and the scientific evaluation from STECF at times appears less transparent and productive than desired. Significant efforts by all stakeholders have been made to facilitate implementation of the landing obligation, to improve selectivity, avoidance, and particularly to enhance control and enforcement, but the full implementation remains elusive due to inherent inconsistencies and conflicting incentives.

Despite all the efforts and improvements that have been made, many fisheries are still faced with unavoidable and unwanted catches. The objective of zero discards/unwanted catches in demersal fisheries seems to be more of a utopia than a pragmatic ambition without the appropriate regulatory and policy tools. In light of these observations, it would seem appropriate to review existing regulations and propose a more pragmatic and realistic vision

to reconcile the sustainability objectives of fisheries with their economic and social imperatives.

The current Technical Measures regulation is sufficiently regionalised, but often extremely restrictive and as such generates discards. Obstacles need to be removed for fishers to be able to pro-actively improve selectivity and a greater weight should be given to individual scientists/institutes collaborating with fishers on innovative gears. The NSAC strongly believes that measures limiting innovation in fishing gears that are scientifically demonstrated to reduce environmental impact and minimise bycatch should be revised. The NSAC recommends applying a principle of conditionality of any innovative gear on scientific reviews of innovation processes, including social barriers, and end-results by relevant scientific bodies, such as ICES and STECF.

The NSAC believes that the landing obligation was implemented for the lack of a better management system providing an accurate overview of onboard operations and catch. Despite all the efforts made by all the parties involved in implementing the LO, this provision has not provided the expected solutions for managing discards. What's more, it is responsible for a regulatory overload in terms of:

- The workload, financial and human resources and inherent complexity of proposing and renewing exemptions to the LO (thereby obscuring other essential work to be carried out as part of the regionalisation process)
- The intensification of the choke-species effect, a real scourge for many fleets whose fishing opportunities have been drastically reduced, especially as the proposed flexibilities (inter-annual flexibility, inter-species flexibility, and inter-zonal flexibility) cannot be used effectively.
- The difficulty of taking account of the socio-economic dimension, whether through the assessment and recognition of the economic costs associated with the LO that businesses have to face (increased workload, processing of catches that cannot be recycled, limits imposed by tonnage thresholds, etc.) or the difficulty of proposing and gaining recognition for the relevance of the socio-economic costs argument when assessing de minimis exemptions.

Fully Documented Fisheries (FDF) can represent a step towards a more realistic, pragmatic and adaptive management. In view of this, NSAC understands the landing obligation as a transitional measure until technological, legislative and technical readiness for a fully-fledged and operational FDF concept. NSAC further advises that coordination between research institutes, the Member States and the industry is facilitated to foster FDF implementation, that FDF ambassadors are important for buy-in and contribute to widespread implementation, and that a holistic picture should be taken into account for fisheries management.

The use of emerging technologies, including Electronic Monitoring (EM), Artificial Intelligence (AI), and digital tools, should be accelerated to enhance transparency, data collection, and compliance monitoring within the fisheries sector. FDF systems should work to integrate real-time data collection, GPS tracking, and image recognition technologies for more accurate reporting of target catches and other species, addressing both sustainability and compliance needs. However, it is important to acknowledge that effectively managing and analysing the

large volumes of data generated by EM and AI systems will require additional human resources. Moreover, the associated costs of data storage, equipment, installation, and processing must be realistically accounted for.

Documentation of landings and discards was already in place before the introduction of the LO and has been strengthened by the emergence of new technological resources and the revision of the regulatory framework for monitoring. However, it is important to guard against any attempt to move towards ‘full control’ by ensuring that the means put in place are used for their intended purpose, such as documenting catch, contributing to better science, rather than control. At the same time, means for control should be proportionate to the control objectives, the added value of the system and the associated regulatory burden that will be imposed on vessels, control services and MS.

3.5 Mapping of important fisheries grounds, data sharing, and accurate modelling of seabed habitats

With increasing human activity at sea, traditional fishing grounds face growing competition from new maritime sectors. Integrating fisheries into MSP is essential to safeguard their access, though accurately mapping these areas is complex. Fishing activities are dynamic, with increased influence of climate change, and sensitive in nature, making fishers hesitant to share data due to fear of misuse or misinterpretation.

Effective mapping should reflect the reality of fishing activities while remaining clear and practical for decision-making. This requires active engagement and collaborative stakeholder involvement, standardized and inclusive methodologies for data gathering, real-time data production and integration, cross-border data sharing, and long-term funding to ensure maintenance of mapping tools. Mapping efforts should responsibly represent fishing activities while balancing economic, social, and environmental factors. Additionally, strategies must be developed to analyse, mitigate and compensate for fisheries displacement. In view of this, MPAs placement must be carefully considered. Restricting access to traditional fishing grounds without alternative solutions could force vessels to travel farther, increasing fuel consumption to reach more remote grounds.

In this context, we wish to particularly stress critical need for harmonizing datasets and standardizing methodologies across EU Member States to ensure accurate mapping of fishing grounds. To this end, the work of the EU Technical Expert Group on Data for MSP should be reinforced, particularly in light of the recent launch of the Digital Twin of the Ocean.

Governments need to establish a clear legal mandate for cross-border data sharing to facilitate efficient MSP, leveraging existing infrastructure and expertise within Member States. Striking a balance between disaggregated data for vessel management and aggregated data for fleet-level analysis would help reassure fishers that individual vessels remain unidentified. Ultimately, differing agendas must not stop data-sharing efforts, as transparent fisheries management relies on trust and collaboration.

Beyond mapping, advanced seabed modelling techniques should be developed to accurately capture interactions between fisheries and environmental features, providing robust predictive insights into shifting conditions, particularly under climate change scenarios. Spatially explicit data from these models can support MSP by simulating future environmental changes and their impact on fisheries. Additionally, datasets should be refined to distinguish between areas with minimal seabed impact and those experiencing significant sediment disturbance and greater effects on marine life.

3.6 Technological innovations to improve selectivity and data collection

Technological innovations have the capacity to enhance selectivity, reduce bottom contact, and help protect vulnerable species and habitats while also lowering fuel consumption and CO₂ emissions. These advancements can play a crucial role in contributing to ecological, social and economic objectives of the CFP. As a result, demersal fishing has the potential to be reframed as a nature-friendly supplier of healthy seafood.

Beyond environmental benefits, innovative technologies onboard fishing vessels offer significant operational advantages. These tools enable better data collection from fishing operations, allowing for optimized fishing strategies. Improved data accuracy enhances decision-making regarding fish stock assessments, contributing to more sustainable practices. AI-powered analytics can also optimize selectivity by identifying favorable fish concentrations and assessing acceptable mortality rates, leading to increased efficiency and reduced bycatch.

To drive innovation, the CFP should promote bottom-up approaches that actively involve fishers in gear development and approval processes to ensure practical applicability and faster adoption. Trust-building and co-management strategies should be prioritized, supported by clear legal frameworks that provide investment security and allow for flexible innovations. Establishing a permanent committee comprising Member States' authorities, scientists (including national research bodies, STECF, and ICES), and other relevant stakeholders could significantly enhance co-management efforts.

Economic incentives, such as compensation for revenue loss and improved funding accessibility, are essential for encouraging uptake. Socially, fostering fishers' motivation through recognition, education, and generational renewal is key. Technological advancements should be supported by adaptable onboard infrastructure and rigorous commercial trials to validate innovations before large-scale implementation.

Environmental benefits of innovations, such as minimisation of negative impacts, and long-term cost savings, should be effectively highlighted. Legal frameworks should shift toward results-based regulations that encourage adaptive and flexible innovation, with enhanced stakeholder involvement ensuring policies are comprehensive, practical, and widely accepted. Finally, cross-border cooperation is essential to create a level playing field and harmonize the implementation of new technologies across shared sea basins.

3.7 New regulations and digitalisation in fisheries control

With the rise of digital tools and new regulations, it is crucial to maintain a clear distinction between fisheries control and the full documentation process, ensuring that technological solutions remain focused on data accuracy and ease for fishers, rather than top-down control and enforcement.

The NSAC advocates for distinction between compliance control from fisheries documentation and calls for provision of clear guidelines for industry stakeholders on the role of technologies like Electronic Monitoring. This will foster trust and cooperation among fishers, preventing resistance to new systems, and ensure active contribution to scientific assessments.

In relation to the implementation of the latest fisheries Control Regulation, we stress the importance of embracing the new Commission's direction on simplification of rules and ensure that different streams of policy revisions are coherent and aligned in terms of content and process.

4 Science

4.1 Ecosystem-Based Fisheries Management (EBFM)

The current single-species management does not reflect what we know about ecosystems and species interactions. EBFM shifts the focus from target species to ecosystem functions by ensuring that fishing practices consider the broader ecosystem, including bycatch, protected species, habitats, and trophic interactions. EBFM aims to prevent ecosystem degradation, minimize irreversible changes, secure long-term socioeconomic benefits, and improve our understanding of ecosystem processes to better assess human impact. The EU should intensify efforts to integrate the three pillars of sustainability—ecological, social, and economic—into fisheries management, through operationalising EBFM and, wider, Ecosystem Based Management (EBM). This approach should guide the development of fisheries policies, focusing on balanced progress in sustainability without compromising biodiversity, the livelihoods of fishing communities, food security, and the resilience of ecosystems.

Currently, the key approach to implementing EBFM is through Management Strategy Evaluations (MSEs), using simulations to explore different management options and assess trade-offs between various objectives. MSEs help identify strategies that address natural variability, uncertainty, and stock assessment errors, rather than focusing solely on maximizing short term yield or profit. MSEs evaluate a range of management approaches, including top-down regulations, incentive-based methods, management based on communities, or portfolios, and spatial management.

MSEs require collaboration between scientists, policymakers, and stakeholders. Policymakers may set management objectives, informed by stakeholder input. Systematic stakeholder engagement helps identify key relevant ecosystem and species interactions and trade-offs for optimal harvest strategies. Inclusion of scientists in ACs would further facilitate knowledge exchange and strengthen AC contributions to science and policy.

Given the growing challenges to marine biodiversity, particularly in ecosystems like the North Sea, the EU needs a robust approach that addresses both environmental degradation, supports the need for sustainable fisheries, and aligns with broader strategic EU targets of food security and food sovereignty. EBFM should provide a framework for these interconnected considerations.

It is important for the managers to consider how climate change impacts the risks of achieving EBFM in the context of political, ecological, and human wellbeing. In order to have true EBFM, there needs to be an openness to new or more flexible approaches, such as industry input into scientific advice and science-industry partnerships. EBFM should be implemented as early as possible and gradually incorporate relevant ecosystem considerations in special scientific advice and eventually in the setting of fishing opportunities.

To this end, NSAC welcomes ICES' Framework for Ecosystem-Informed Science and Advice (FEISA) combining indicators with a risk-based approach to advance knowledge and data development, to support ecosystem-informed scientific advice.

The NSAC supports ICES' identified priorities in operationalisation of EBFM, particularly in broadening the scope of stakeholder engagement in ICES science and advisory process; developing tools and/or methodologies for translating perceptions of resource users and communities into measurable indicators (e.g. social acceptability); strengthening dialogue and collaborations with partners/advice requesters and the social science community to inform the development of clear and meaningful operational objectives aligned with management objectives and societal goals; and advancing socio-ecological science to investigate interactions between socio-economics and bioecological objectives and explore viable pathways and trade-offs.

We commend the Commission's recent initiative for enhanced stakeholder engagement in ICES Advice request formulation following NSAC's call for action, which we believe constitutes a crucial step in advancing EBFM in a way that prioritises relevant and crucial ecosystem, social and economic components. Further engagement should be built on the successful first pre-MIRIA meeting in January 2025.

4.2 New fisheries approaches beyond Maximum Sustainable Yield (MSY)

The scientific concept of Maximum Sustainable Yield (MSY) has played a key role in reaching the objectives of the CFP. However, its application in fisheries management remains debated, highlighting the need for greater flexibility and adaptation. The EU should reevaluate whether, in the light of what we currently know, the concept of Maximum Sustainable Yield (MSY) still reflects the best available science and the current state of the environment, and potentially reconsider the equilibrium-based models that have previously guided fisheries management. We believe that a more adaptive and holistic approach is needed taking into account the dynamic nature of ecosystems and the complexity of fisheries.

The fisheries management paradigm needs to evolve, considering that ecosystems and fish stocks are in constant flux. Embracing a more flexible approach will allow for better responses to changing conditions, from climate change to shifting socio-economic demands.

First of all, we would like to point out that setting F_{MSY} as a strict management target without considering socio-economic and ecosystem factors risks creating rigid harvest control rules that do not fully consider the full spectrum of sustainability. As a first step, NSAC calls for a broader interpretation of MSY for scientific advice that is robust and ensures stability. Effective management decisions should integrate ecological and socio-economic objectives making policies more responsive and attuned to reality.

Alternatives to MSY exist and could be explored further by the managers. One concept is the Maximum Economic Yield (MEY) which focuses on maximizing long-term economic profits while maintaining stock biomass levels higher than those under MSY. Economists argue that optimizing a fishery's economic potential can be compatible with conservation objectives. MEY can act as an important link between the biological and economic dimensions of fisheries management. By incorporating fishing costs and revenues into the sustainable yield models, MEY offers a complimentary approach rather than a substitute to MSY, supporting the development of well-balanced fishery management plans.

Another potential approach is that of a Pretty Good Yield. A case study of the Irish Sea (see ICES WKIrish) demonstrated how stock-specific ecosystem indicators can be used to set an ecosystem-based fishing mortality reference point (F_{eco}) within the "Pretty Good Yield" ranges for fishing mortality which aligns with ICES' precautionary approach. The new target F_{eco} , can be used to scale fishing mortality down when the ecosystem conditions for the stock are poor and up when conditions are good. This approach provides a streamlined quantitative way of incorporating ecosystem information into catch advice and provides an opportunity to operationalize ecosystem models and empirical indicators, while keeping the current assessment models and the F_{msy} -based advice process. Ecosystem changes should be accounted for through regular updates to the F_{eco} model and indicator time series during the annual assessments or established stock benchmark processes.

4.3 Incorporation of climate consideration within fisheries management

While the CFP lacks direct reference to climate considerations within fisheries management, its impacts are already changing stock distributions, as can be observed with the North Sea cod (see: NSAC Advice climate-informed management of North Sea cod⁹) and creating uncertainty that could potentially lead to disputes between affected Member States and/or third countries. The impacts of climate change are occurring over different temporal and spatial scales, and flexibility in management doesn't yet exist at these same scales. Management should anticipate and respond to changes with adaptive, flexible, well-informed and inclusive approaches. Enhanced industry participation in scientific activities is needed to ensure policies remain practical and responsive. Incorporating climate considerations within fisheries

⁹ www.nsrac.org/wp-content/uploads/2025/02/05-2425-NSAC-Advice-on-climate-change-and-NS-cod.pdf

management will help ensure the long-term sustainability of stocks while optimizing catch potential, as well as allow for the implementation of ecosystem-based fisheries management.

We wish to stress that a one-size-fits-all approach to climate adaptation is not adequate. Fisheries management must be tailored for specific solutions, balancing scientific evidence and local and regional stakeholder input to develop suitable policies.

4.4 Social Impact Assessments and inclusivity

The EU should integrate social science methodologies into fisheries management by conducting regular social impact assessments to understand how policy changes affect fishers and their communities. These assessments should consider the cultural, economic, and social dimensions of fisheries to ensure sustainable practices are culturally appropriate and socially equitable. Resilient, well addressed and informed communities with trust in the future for their activities are a vital component of sustainability transitions.

The fishing sector has long struggled with an increasing administrative burden, which negatively impacts both operational efficiency and fishers' motivation. While regulatory controls remain crucial for ensuring sustainability and safety, structural reforms are necessary to simplify administrative processes. A more pragmatic approach is required to reduce bureaucracy and allow fishers to focus on their core activities and necessary transitions without being overburdened by excessive paperwork.

The NSAC, together with the NWWAC, were the first ACs to establish a focus group dealing with various social aspects, such as occupational safety¹⁰, generational renewal¹¹, social data collection¹², recreational fisheries¹³ etc. The NSAC welcomes and commends the work carried out in the STECF Expert Working Group on Social data and particularly efforts to compile the first STECF Annual Social Report. The joint focus group maintains a strong link with the STECF EWG and both ACs strengthened their commitment to provide stakeholder inputs to its work. Only by addressing the full spectrum sustainability with its environmental, social and economic components, which are mutually reinforcing, can the EU spearhead its transition and ensure that the fishing sector will champion it.

¹⁰ https://www.nsrac.org/wp-content/uploads/2023/05/07-2223-NSAC-NWWAC-advice-on-Vessel-Safety-Directive_EN.pdf

¹¹ <https://www.nsrac.org/wp-content/uploads/2024/01/02-2324-NSAC-NWWAC-Advice-on-Generational-Renewal.pdf>

¹² https://www.nsrac.org/wp-content/uploads/2022/12/02-2223-NWWC-NSAC-advice-on-social-aspects-of-fisheries-2022_EN.pdf

¹³ <https://www.nsrac.org/wp-content/uploads/2024/01/03-2324-NSAC-NWWAC-Advice-on-Recreational-Fisheries.pdf>

5 Conclusion

We thank the EU Commission for considering our members' thinking on the direction the future fisheries management should be taking both in the North Sea and wider from the standpoint of governance, management and science. To ensure meaningful stakeholder engagement for targeted, more effective, and better implemented policies and management, new governance structures will need to be envisaged and sufficient funding sources secured, better catering for uncertain and volatile ecological and political environments. We stand ready to assist in designing new and refining old ways of managing our seas, stocks and society.