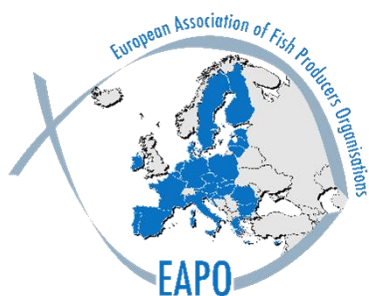


**European Association of Fish Producers Organisations**

**Association Européenne des Organisations de Producteurs dans le secteur de la pêche**



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EAPO

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## **EAPO answer to the EC call for evidence on the EU Vision 2040 for fisheries and aquaculture**

The European Association of fish Producers Organisations welcomes the initiative of the European Commission to develop an ambitious EU Vision for fisheries and aquaculture for 2040. EAPO has already contributed significantly to consultations of this Commission's mandate, over the last year and half, by publishing position papers, participating in implementation dialogues, public meetings, and numerous debates organized within European institutions and more broadly, in order to represent the EU fishing industry's views on the CFP evaluation, the development of the European Ocean Pact and the Ocean Act, etc. Since EAPO was founded in 1980, we have always been supporting the establishment of a comprehensive vision for ocean-related policies in the EU, bridging the gap between fishers, producers organisations and the institutions.

At the time of developing a medium- to long-term vision for EU fisheries, we would like to begin by highlighting the many challenges facing the sector across Europe, which are threatening its very existence and even calling its future into question. These numerous issues require an immediate response in order to urgently address what could ultimately lead to an irreversible decline of our fisheries.

## Reality-check of the EU fisheries

In an increasingly complex global geopolitical landscape, the fisheries sector has not been spared in recent years. The fishing industry has faced many challenges, among which Covid-19 crisis, Brexit and the inflation crisis following the unlawful invasion of Ukraine by Russia, or more lately the conflict in the Middle East, having a considerable impact on the sector. The most recent political agendas around the world have raised fears of new shocks, also on markets, and territorial and maritime sovereignties for the fishing industry, whose resilience has *de facto* been greatly reduced.

Other structural challenges are also threatening fishing: ageing of the fleet (the average age of the EU fishing fleet is now close to 40 years) and workforce with difficulties in generational renewal, access to resources and competition for maritime space, external shocks like the ones mentioned above, etc. Moreover, fishers are on the front lines of climate change, as fish populations across the EU continue to decline despite sustainable fishing regulations being in place.

The marine space is increasingly subject to competition between sectors, creating activity hotspots where pressures accumulate. Offshore renewable energy developments in particular are expanding rapidly to meet EU climate and energy targets. While these projects contribute to reducing overall carbon emissions at EU level, they also directly impact other traditional maritime users such as fisheries, by limiting access to fishing grounds, pushing operators further away from shore, increasing fuel and thus operational costs, and reshaping the socio-economic balance of coastal communities.

As mentioned by the Commissioner for Oceans and Fisheries, Mr. Kadis, "oceans are of vital importance to our security and competitiveness and to the health of our planet, providing opportunity for many sectors". Supporting emerging maritime sectors is important, but not at the expense of fisheries, which should be prioritized as a key guarantor of food sovereignty and security, as they play a crucial role in providing the population with high-quality protein and micronutrients, with a low carbon footprint while serving as the foundation of the marine-industrial economy.

From a global perspective, and as the world population is expected to reach 9 billion people in 2037 (and continue growing for another fifty years and reach a peak of more than 10 billion people in the mid 2080s), the EU has a responsibility to participate in increasing protein production in the least carbon-intensive way possible. According to the FAO's Blue Transformation call, we must "build more efficient, more inclusive, more resilient and more sustainable aquatic food systems to increase their contribution to global food security, meet nutrition requirements and improve livelihoods of a growing population".

We call on the Commission to fully draw on the United Nations guidelines to develop the Vision 2040 and take into account the underpinning and necessary level-playing with third countries, which implies an optimized worldwide production, without under-exploitation in the EU leading to reverse over-exploitation in less developed countries.

EAPO members provide a large amount of Blue Foods - low carbon, sustainable and highly nutritious - to the EU consumers, contributing to the EU's food sovereignty, food security as well as ensuring that EU consumers can lower their environmental footprint while meeting their nutritional needs.

As a framework communication, the 2040 Vision for fisheries must adopt a holistic approach that integrates the environmental, economic, and social dimensions of Blue Foods consumption. It is essential to recognize that a thriving Blue Foods market is not only a driver of consumer well-being but also a fundamental pillar of the Blue Economy, ensuring the viability of fishing. A strong demand for high-quality, sustainably sourced Blue Foods contributes to the resilience of coastal and rural communities, fosters innovation in the sector, and supports the EU's broader sustainability goals.

## The underlying principle of the 2040 Vision will be to connect the dots between the European Ocean Pact and the ongoing evaluation of the Common Fisheries Policy Regulation

The role of the 2040 Vision will be to provide an overarching strategic direction to all EU action in the area of fisheries and aquaculture, and to ensure coherent action, giving perspective and direction to the future EU fisheries and aquaculture sector. As it will cover the future of the Common Fisheries Policy (CFP), we would like to recall that EAPO, in its position paper to answer to the EC public consultation on the CFP regulation evaluation<sup>1</sup>, has been asking for an urgent reform. Indeed, this evaluation is coming at a critical time and offers a valuable opportunity to assess the policy's performance over the past decade and its capacity to meet the new geopolitical, environmental and socio-economic challenges currently facing the EU fishing sector. The context in which the CFP operates has evolved significantly due to geopolitical changes like Brexit, climate impacts, and socioeconomic challenges that have reshaped the fisheries sector, calling for changes in the architecture of the European fisheries management policy.

On the other hand, the European Ocean Pact and Ocean Act come at a pivotal moment when the focus is increasingly directed towards ocean issues, amidst prevailing global uncertainties. It is imperative for the EU to implement robust and committed measures to ensure a healthy and productive ocean, boost a competitive, resilient, and sustainable

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<sup>1</sup> <https://www.eapo.com/swfiles/files/download.php?myfile=EAPO-position-paper-on-the-CFP-evaluation.pdf>

EU blue economy, and consolidate, simplify, and extend the EU's marine knowledge framework. To pursue these objectives defined by the European Commission, EAPO firmly asserts that EU fisheries represent an undeniable asset on which the Ocean Pact and Act<sup>2,3</sup> should build and while guaranteeing its prosperity and future.

EAPO members are convinced that the current Ocean momentum creates a unique opportunity to redefine strategies by placing fisheries and fishers at the heart of blue economy policies. We believe that improving the coherence of policies as part of a global approach at the crossroads of environmental, economic and social issues should enable more effective, coordinated and ambitious action. Healthy, productive oceans combined with a competitive, resilient and sustainable EU fishing industry must be objectives of the same level that can be achieved together over the long term. EAPO encourages the European Commission to continue along the path of harmonizing regulations and adapting existing legal frameworks (such as the Common Fisheries Policy, about which we support a forthcoming reform) to avoid contradictions between environmental, economic and social policies and various sectors, while relying on relevant stakeholder participation.

As we call for a revision of the CFP, it is important to point out that the social dimension of fisheries is frequently overlooked, despite its critical importance to the sector's identity and value. Fishing communities face challenges such as an aging workforce, outdated working conditions, and the growing amount of increasingly complex administrative burdens. Addressing these issues requires prioritising social objectives within the CFP, alongside environmental and economic goals.

The generational renewal is a key challenge that the sector is already facing and posing a serious threat to the sector's future. The current labour market crisis is the consequence of the falling inflow into maritime professions, this dynamic being even faster in fisheries. This may lead to a situation where at some point we can no longer meet the minimum crew requirements that member states impose on the fishing fleet under their flag.

To ensure long-term economic viability and the preservation of cultural heritage, the CFP must introduce targeted initiatives to attract new generations to the fishing profession. These initiatives should facilitate vocational training programs, apprenticeships, financial incentives, and mentorship schemes. Encouraging generational renewal is essential for maintaining a sustainable and resilient fishing sector.

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

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<sup>2</sup> <https://www.eapo.com/swfiles/files/download.php?myfile=EAPO-contribution---call-for-evidence-European-Oceans-Pact.pdf>

<sup>3</sup> <https://www.eapo.com/swfiles/files/download.php?myfile=EAPO-Po--European-Ocean-Act.pdf>

to reduce bureaucracy and allow fishers to focus on their core activities without being overburdened by excessive paperwork.

The decline in employment within the fishing sector has far-reaching consequences for coastal communities. Each job at sea supports up to five jobs on land, meaning that a shrinking fishing workforce also impacts related industries such as processing, logistics, and equipment supply. The 2040 Vision must strengthen the seafood value chain to ensure resilience against economic pressures, globalization, and environmental changes, while harmonizing with the future EU Coastal Communities Strategy. Additionally, the cumulative impact of regulatory measures must be assessed, and compensatory mechanisms should be introduced where necessary to support affected communities. Modernising the fleet with energy-efficient and safer vessels, improving working conditions, and promoting gender equality are also essential steps to ensure the sector's long-term viability. This positive effect could help to attract younger generations.

## The 2040 Vision will incorporate the energy transition roadmap for EU fisheries and aquaculture

EAPO is engaged in the current Energy Transition Partnership, as support group coordinator for the Large-Scale Fleet, and through its members, playing an important role in the ETP community<sup>4</sup>. We would like to recall the efforts already undertaken by the EU fleets, achieving a 52 % reduction in Greenhouse gases (GHG) emissions between 1990 and 2021. Moreover, between 2005 and 2022, GHG emissions of EU fisheries decreased from around 7,5 to 4,5 M tons CO<sub>2</sub> equivalent and GHG intensity (kg CO<sub>2</sub> equivalent/kg of landings) decreased from around 1,85 to 1,35, equal to a decrease of more than 25% in less than 20 years, according to the

Nevertheless, we truly consider that the energy transition represents an exceptional opportunity to change the narrative of EU Fisheries. We are at a point where the energy transition is both an opportunity to focus on workforce training and safety and security considerations on board, while building on these aspects to ensure the renewal of skilled and motivated generations to work in the fisheries sector. A virtuous circle could be established by encouraging and supporting the energy transition: a more decarbonized fishing industry in order to provide more low-carbon Blue Foods from responsible sources. This requires a forward looking approach socio-economically viable that not only encourages innovation and attractiveness but also ensures that regulatory constraints do not hinder progress.

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<sup>4</sup> [https://maritime-forum.ec.europa.eu/document/download/72169690-fa50-482d-9b44-b9237eff733f\\_en?filename=LSF%20WG\\_Recommendations.pdf](https://maritime-forum.ec.europa.eu/document/download/72169690-fa50-482d-9b44-b9237eff733f_en?filename=LSF%20WG_Recommendations.pdf)

A crucial element in this transition is the availability of targeted funding instruments and access to affordable finance. Without adequate support, the financial risks linked to innovation and vessel renewal will fall disproportionately on small and medium-sized companies, which form the backbone of the European fishing fleet. These enterprises often operate with limited margins and restricted investment capacity, making them less able to absorb the uncertainties and upfront costs of adopting new technologies. By minimizing these risks through dedicated financial support, the EU will not only ensure a level playing field but also encourage broad participation in the transition. This is essential to avoid a two-speed sector in which only a limited number of players can afford to modernize, while others are left behind. The energy transition being both a necessity and a challenge: investments in fuel-efficient technologies, alternative propulsion systems, and low-carbon practices are vital but difficult given the fragile economic situation of many operators, especially with soaring energy prices.

## The 2040 Vision will provide the overarching framework for the EU strategy for fisheries external action

The European Association of fish Producers Organisations is witnessing the changing global context in which EU fisheries are evolving, since the emergence of the Regulation on the CFP, and more recently, the inclusion of the Part VI, on External Action in the CFP, with the aim to contribute to more responsible international fisheries governance<sup>5</sup>.

As mentioned in the introduction, the fishing industry has faced many external challenges, among which the Brexit and the following paradigm shift in the negotiations on shared stocks with Coastal States. In parallel, the EU is highly depending on imports, with 80% of EU consumption of seafood products being imported from third countries, requiring attention, both in terms of production and from a trade perspective. The context in which the CFP operates has evolved significantly, requiring an overhaul of the fisheries sector, with changes in the architecture of the European external fisheries management policy.

We would like to reiterate the need to develop an ambitious strategic approach to the fisheries external action and to protect the European fisheries chain from unfair competition through a strong EU ocean diplomacy to promote a coherent approach for sustainable fisheries in all multilateral fora and bilateral dialogues.

We call for the external policy to better align with the CFP, as projecting the CFP internationally entails clear environmental benefits in terms of improvement of fisheries resources, as demonstrated in most RFMOs over the past decade, while increasing food

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<sup>5</sup> <https://www.eapo.com/swfiles/files/download.php?myfile=EAP0---EU-strategy-for-fisheries-external-action.pdf>

security for external coastal communities and enhancing the social dimension especially with improving fisheries workers' conditions.

the Commission must adapt to post-Brexit realities recognising the new state of negotiations with third countries on shared stocks and avoiding excessive differences in fisheries management for activities both in EU and third country waters. It is vital that the Commission keeps the pressure on the other parties who continue to fish unsustainably, jeopardising certain stocks. The state of play in the Coastal States sharing arrangements negotiations lack of a level playing field for fishers in the Northeast Atlantic. We are witnessing the current overfishing of important pelagic fish stocks by third countries such as Norway. Despite a stated ambition of sustainable fishing and strong control and enforcement, some stocks are threatened and are approaching breaking point, as Coastal States claim to be entitled to high levels of catches and shares based on zonal attachment, relying on flawed science.

If we emphasize the need for unity and positive relationships to improve the current situation, we urge EU institutions to consider linking fisheries and markets as an important step to level the playing field. The EU market has a high dependency on imports of fishery and aquaculture products and on shared fisheries stocks. We strongly encourage EC to take measures in order to ensure a level-playing field with third countries in terms of sustainability standards, to meet EU requirements, and avoid any unfair competition. This commitment also applies to fight against illegal unregulated and unregulated (IUU) fishing outside of the EU, which can sometimes lead to cases of forced labour.

EAPO would like to recall in preamble the need for consistency between the objectives of the CFP and EU trade policy, the respect of a framework of fair competition between imported products and EU products. In this context, we are supporting the introduction of sustainability criteria under the EU Autonomous Tariff Quota (ATQ) regulation, at a time when the number of ATQ and the associated volumes have increased. It is essential to complement the ATQ regime with a focus on maximising internal supply to achieve a balance between imports and EU fisheries products, in order to avoid harming EU production capacities, and resulting in a fair competition between imported and EU products. Indirectly, over the past years, the benefits given in the ATQ regulation, have been promoting imported products, sometimes at the expense of and contrary to the goals set in the CFP regarding environmental, economic and social sustainability, and especially those aimed at reducing dependence on imports, to foster the positive economic and social benefits generated by its own production. In this regard, the ATQ regime must be solely used when there is not sufficient supply in the EU market and cannot be intended to import non-sustainable products nor put pressure on the prices of EU producers. Thus, the EU must ensure that all products destined for the EU market are subject to the same requirements and seek to align them as closely as possible with the CFP, corresponding to the environmental and social ambitions it also promotes in international forums, in order to achieve a true level playing field between EU produced and third country produced seafood.

The ATQ regime could play a strong role for certain third countries to improve the sustainability of their fisheries from an environmental point of view, while having a direct impact on IUU activities, by preventing the import of products from these fisheries. Sustainability criteria could encourage countries to ratify key international agreements on labour conditions and fisheries management, including membership in relevant RFMO.

## The 2040 Vision will fall within the Commission's current agenda for the proposed EU budget for 2028-2034

The next Multiannual Financial Framework (2028-2034) proposed by the European Commission on summer 2025 is aiming at focusing on security, competitiveness, resilience, and sustainability for a total of almost 2 000 billion euros. The Commission is proposing a radical overhaul of the Union funds based on the need to ensure coherence, achieve simplification and better value for money, and address new political priorities. The Commission has repeatedly underlined that food security is a core component of the Union's strategic autonomy. Fisheries are indispensable in this regard. They provide high-quality, low-carbon protein, support diversified supply chains and reduce dependence on imports in a global context marked by increasing geopolitical and climate-related uncertainty. However, the current MFF 2028–2034 proposal foresees a reduction of more than 67% in the ring-fenced budget for fisheries and aquaculture compared to the current programming period. Restoring fisheries funding to a level that reflects proportional treatment across primary sectors would require a limited budgetary adjustment at EU level, while delivering substantial returns in terms of food security, resilience and territorial cohesion.

We are calling for a specific and reinforced financial framework for fisheries, including a guaranteed allocation of at least EUR 6.1 billion – as in the current MFF – adjusted for inflation, reflecting the Common Fisheries Policy's (CFP) status as an exclusive EU competence and the strategic importance of fisheries and aquaculture for food security, sustainability, competitiveness and coastal cohesion.

A 2040 Vision for fisheries without adequate funding in the next MFF would be nothing more than an empty promise, whereas a suitable funding plan could deliver significant results and help achieve the CFP and meet the ambitions of the European Ocean Pact, whilst helping the fisheries sector to face its challenges and thrive.

## The 2040 Vision will fall within the Commission's current agenda for the vision for food and agriculture

As the vision for agriculture is including the word “food”, EAPO would like to recall our essential and legitimate role of food producers. We must adopt a fair approach between all food production systems and recognise that fisheries are already producing low-carbon, sustainable, highly nutritious source of protein and micronutrients: Blue Foods. Moreover, fish is already one of the most climate friendly sources of protein and fishing is unique in its potential for carbon neutral food production (the moment alternative energies are available, fish production can become carbon neutral).

Thus, EAPO is calling for an EU Blue Foods Action Plan fully integrated into the Vision 2040 and highlights the need to establish an EU Blue Foods Platform, backed by institutional and financial support to advance sustainability initiatives and foster research, innovation, and sustainable investments. Such a platform would provide a structured space for dialogue, at the interface between science, policy and producers.

By strengthening the visibility and appreciation of Blue Foods, the EU can ensure that consumers, policymakers, and industry stakeholders work together towards a sustainable, prosperous, and health-conscious future for Europe's seafood sector, addressing persistent misconceptions and highlighting their contribution to healthy diets, climate objectives and sustainable economic development.

## The 2040 Vision will fall within the Commission's current agenda for the Competitiveness Compass

Once again, whilst the 2040 Vision development is welcome, what is needed is not a new strategy, but rather a coherent and integrated policy framework. As mentioned, the European Union's fisheries sector faces numerous challenges, however, it must also address a glaring lack of profitability and remain economically viable. It is therefore important to ensure a robust market and a level playing field for EU seafood products in order to promote the transformation of the activity and secure better long-term prospects for the sector. EU fisheries must be a competitive sector able to invest in its own production tools and not depending on energy prizes, as it is today.

Given the challenges facing the European fishing industry and the gradual aging of production tools, the 2040 Vision represents an opportunity to reaffirm the vital role of fishing within the blue economy. Its strategic importance and contribution to the development of coastal areas and communities must be recognized and reinforced to ensure the sector's long-term sustainability and prosperity.

Its goals would include supporting the development of sustainable and digitalized ships and maritime technologies across blue economy sectors, ensuring supply chain resilience, and driving innovation and competitiveness. Because vessels and maritime technologies are one of the key common points across the maritime and blue economy sectors, it would be fruitful to bring together business stakeholders, research organizations, policymakers, and investors to promote collaboration and create networks.

EAPO recommends that the European Commission establishes an industrial alliance covering the entire Blue Economy value chain. This alliance should receive operational funding and have a dedicated secretariat to coordinate initiatives, studies, scientific advancements, and technological developments. Given the interdependence of maritime sectors in developing new technologies, such collaboration is key to competitiveness and innovation.

We would also like to point out the need to link the 2040 Vision with the EU Ports strategy. We believe that ports play a key role in investing and setting up the infrastructure and supply chains needed to achieve the energy transition of maritime activities. They are also at the interface between fisheries and other maritime sectors, such as shipping, allowing for further cooperation and interoperability to join forces in decarbonisation efforts for instance. In this regard, we also invite the Commission to further include the fishing sector in its Sustainable Transport Investment Plan, which will prioritize renewable and low-carbon fuels for waterborne transport and accelerate the rollout of recharging infrastructure.

The same applies with the EU Industrial Maritime strategy that is willing to outline measures to boost the transition, including measures on innovation, investment and promoting a global level playing field. More specifically we ask to integrate fisheries in this strategy to foster the fleet renewal and the retrofitting of fishing vessels, as well as the development of new technologies for fishing activities, through flexible regulations and financial schemes.

In this context, we ask the Commission not to leave behind the regional maritime industry, and the small fishing ports, which are playing a vital role for local coastal communities and participating in the economic activity of the territory.