Study supporting the evaluation of the Landing Obligation

Market Advisory Council. Working Group 1: EU Production, 17 September 2025

MARE D3 – CFP & Structural Support, Policy Development and Coordination



Content

Background & Scope

Limitations & Results

First Reactions



Why / When / How

- External study launched by the Commission (MARE/CINEA) in 2024.
- Objective: Gather evidence for an assessment on
 - How landing obligation has performed
 - How is working
 - Why it is performing as it does
- Study published 16 June 2025 https://cinea.ec.europa.eu/publications/digital-publications/study-supporting-evaluation-landing-obligation_en
- Study presented by authors 8 July 2025 https://cinea.ec.europa.eu/news-events/presentation-emfaf-study-supporting-evaluation-landing-obligation-2025-07-08 en
- EU Better Regulation method as it will feed into evaluation of CFP Regulation



Intervention logic

Needs	Objectives	Inputs	Activities/Measures	Outputs	Results	Impacts		
Sustainable exploitation of marine resources (recital 26)	Gradually eliminate discard and	Financial assistance	Setting standards and record keeping: Define and set conservation measures (article 7) List target fish species by region (article 15(1)) Mandate detailed documentation of fishing operations by member states, including discard atlas (article 14(2) and 15(13)) Structured planning and measurable targets: Set timebound targets for 2015 and 2020 (article 2(2)) Mandate member states multi-annual plans (article 14(5), 10(2)(a)) Others: Mandate fishing opportunities changes based on landing obligations (article 16(2)) Leverage scientific (e.g., STECF) consultations (article 26)	Understanding of progress on landing obligations across member states Alignment of multi-annual plans with landing obligation targets Incorporation of scientific advice and optimal practices in multi-annual plans	Clarity on 'where to focus' future efforts Reduction in unwanted catches Near-elimination of discard rates Viable use cases for part of landed 'waste'	Improved aquatic biodiversity and ecosystems		
Financial viability of fisheries (recital 26 and 27) Reasonable flexibility in	reduce waste (article 2(5))					Maximum level of production with sustainability limits		
opportunities and operations (recital 28, 29 and 32) Sync. of operations and	Provide conditions for sector's economic viability and contribute to fair living standards (article 2(5))	Scientific and technical support Standardized planning and coordination mechanisms	Avoiding business disruption: Introduce landing obligations gradually on a fishery-by-fishery basis (article 15(1) and 15(5)) Allow for ode minimis and other exemptions to landing based on scientific logic (article 15(5)) Provision of additional support: Encourage provision of member states' incentives for beneficial practices (article 17) Enable mechanisms for member states' pilot projects (article 14(1))	Fishing operators adapt to new rules and maintain viable profit margins Experiments conducted to increase understanding of 'what works'	Sustained financial health of companies and operators Increase or stability in sector employment numbers and income levels Steady production volumes Stable and affordable prices for end consumers Clarity on what constitutes good practices	Affordable access to nutrient dense food		
quotas with landing obligations (recital 29) Appropriate exemptions to landing obligations (recital	Contribute to food supply and security and consider consumer interests (article 2(5))					Sustainment of the fishery sector's economic health		
Recovery of/marked improvements in EU stock status and FMSY indicator	Ensure coherence with Union policies, foster member state		Policy coherence and continuity: Intervene with temporary plans in absence of member states' multiannual plans (article 15(6)) Liaise proactively with international bodies (article 29 and 30) Accord importance to member states' joint recommendation (article 18) Member states' contextual needs: Allow quota swaps between member states (article 16(2)) Allow member states to include additional species (article 14(3)) Permit year to year flexibility for landing obligations (article 15(9))	Policies in place for all territories or member states Addressing of EU concerns by international organizations Autonomy for member states to action priorities	Policy and regulatory continuity across territorial jurisdiction Fair access to and healthy competition in international waters Contribution towards environmental, economic, and social needs of member states	Smooth coordination between member states for optimal utilization of fishing opportunities		
Sync. of more effective technical measures to reduce unwanted catches (Article 7(2), 10)	participation, and promote internal market (article 2(5))					Improved responsible fishing practices (via increased selectivity of fishing gear- and methods)		
Other related policies, e.g. IMP, EMFF, Marine Strategy Framework Directive (MSFD), cohesion (CSF), the Green Deal ¹								
Other international obligations, such as the SDGs (especially SDG 14)								
External factors, such as COVID-19, Russian aggression against Ukraine, climate change, biodiversity Note: 1 Other relevant adoptions a.g. Amending Regulation (EU) 2022/1278: The recitals and articles mentioned are from the Regulation (EU) No 1380/2013 of 11 December 2013 on the Common Fisheries Policy.								

Evaluation criteria

Evaluation criteria	Key evaluation question
Effectiveness	To what extent was the landing obligation implemented effectively?
Ellectivelless	To what extent did the landing obligation contribute to the objectives of the CFP?
Efficiency	To what extent has the landing obligation been implemented efficiently?
Relevance	To what extent is the landing obligation relevant to the needs of the target groups? To what extent is the intervention (landing obligation) still relevant? To what extent is the landing obligation relevant to European strategic objectives?
Coherence	To what extent is the landing obligation internally (within the EU) and externally coherent?
EU added value	To what extent could the identified outputs and results have been achieved without the landing obligation / EU intervention?
Complementarity	To what extent has the intervention proved complementary to other (Member States') interventions and initiatives in the field of fisheries management and conservation
Sustainability	If the landing obligation were to be removed, what might be the likely effects?



Ev. Question Matrix

ANNEX 2 of the Study

Evaluation Criteria	Evaluation Question	Indicative judgement criteria	Indicators for evaluation	Data collection method
	To what extent was the landing obligation implemented effectively?	Extent to which expectations have been met, if not, the hindrance factors have been identified (compliance and implementation)	Presence and comprehensiveness (as per CFP) of member states' multi-annual plans and applicable compliance reports	Desk research or secondary data Case study
				E-survey
Effectiveness		Extent to which expectations have been met, if not, the hindrance factors have been identified (landing obligations contributed to each of the CFP objectives, specifically Article 2(5)(a)) Article 2(5)(a)) = The CFP shall, in particular:(a) gradually eliminate discards, on a case-by-case basis, taking into account the best available scientific advice, by avoiding and reducing, as far as possible, unwanted catches, and by gradually ensuring that catches are landed	Comparison of performance versus target for the gradual elimination of discards	Descriptive statistics from FAMENET and EUROSTAT data Case study
				E-survey
				Interviews
		Extent to which expectations have been met, if not, the hindrance factors have been identified (the level of unwanted catches (<minimum catches="" conservation="" fisheries)<="" in="" juveniles)="" or="" reference="" size="" td="" the=""><td rowspan="3">Comparison of performance versus targets for unwanted catches including MCRS catches or juveniles</td><td>STECF FDI data descriptive statistics</td></minimum>	Comparison of performance versus targets for unwanted catches including MCRS catches or juveniles	STECF FDI data descriptive statistics
				Case study
				E-survey

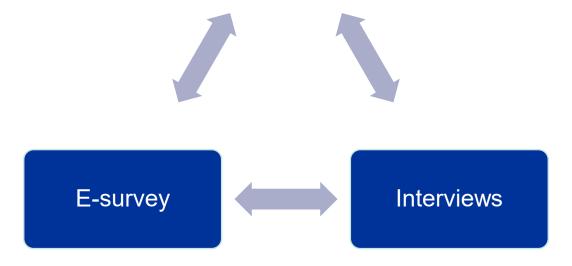
Key research quest.

- Whether or not discarding of species has been gradually or is being eliminated
- Have unwanted catches been reduced as far as possible
- **If and why**, in certain cases, the intervention **has not worked**. What challenges Member States and industry experience with its implementation
- If the landing obligation lacks full compliance and implementation because it is difficult to control. Could the new provisions on control under the new EU Control Regulation facilitate this difficulty?
- Whether or not the intervention creates the right positive incentives sufficiently for fishers to discontinue discarding
- Is the design of the landing obligation applicable the same way in all the sea basins, accounting for regional specificities



Methods

Desk Research (including data call)





What is / what isn't

IT IS

External study supporting Evaluation

Source of information for EC

Comprehensive evidencebased assessment

IT IS NOT

Evaluation per se

Official EC position / only source

Compliance / enforcement assessment



Limitations

- Large number of exemptions available to fishers
- Lack of EU wide data sources available which include exemptions applied directly linked to the logbook reporting
- Member State scientific data collection strategies not at the scale of the landing obligation implementation
- Natural annual variability
- Level of control and enforcement at local and regional levels
- Quantitative or published Qualitative information for some (sub)indicators lacking
- Subjectivity of insights from stakeholder consultation



Overall Findings

- Landing Obligation has not reached its full potential / not implemented as originally designed.
- It has not contributed to the objective of gradually eliminate discards.
- Why:
 - Disconnect between pilot study stage and level at which joint recommendations are made?
 - Low uptake and buy in at industry level together with ineffective enforcement?
 - Difficult to implement: lack of economic and / or technical feasibility?
 - High number of exemptions?
 - Lack of monitoring tools and data for analyses? ...



Overall Findings

From a Market Perspective:

- No motivation: extra workload, extra costs and no market (small fish)
- Potential market facing increased costs and logistical challenges:
 - lack of processing capacity and
 - limited market outlets
- LO did not contribute to other strategies like Farm to Fork: with targeted investments in value chains for previously discarded species, the LO could support sustainable food systems.
- Waste framework directive and SDG 12.3 reducing food losses: LO objective is coherent but the disposal of unwanted catch to land fill is not.



Identified challenges

- Insufficient incentives for fishers to comply with landing all catches and not discarding
- Ineffective monitoring and enforcement tools
- Conflicts with maintaining the economic viability of fisheries due to the loss of commercially valuable catches when increasing selectivity
- Difficulties in further improving species and gear selectivity in certain fisheries



- Strengthen monitoring and enforcement
- Enhance gear selectivity
- Improve data collection and analysis
- Provide economic and operational support
- Foster collaboration and targeted interventions

Recommendations



Recommendations

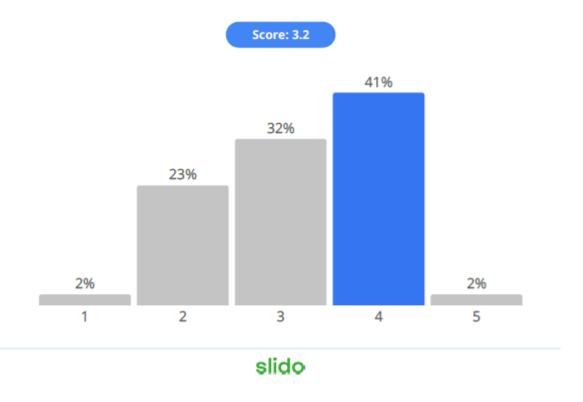
From a Market Perspective

- Better align LO with waste and food policies:
 - Stronger investments in processing infrastructure and innovation in byproduct valorisation.
 - More guidance for specific uses under "direct human consumption"
 - Cross DG dialogue (MARE-ENV)
- Support market development for unwanted catches:
 - New value chains (pet food, bio-based materials)
 - Public procurement for non-human consumption



First Reactions

Do you feel that the results presented today are aligned with your views on a range from 1 to 5? (1- not at all and 5- fully)



To the Study...

Very long to read

Time to digest it is needed

Too broad

Thank you



First Reactions

To the findings...

All efforts should be put into implementation and enforcement

More regional approach is needed

Amend the LO to make it relevant to the reality of EU fisheries

Modifying the LO should have been the main recommendation

It will not be implemented without sanctions

Better incentives to improve selectivity are needed Potential role of market incentives missing

All is about money and cost of implementing LO



First Reactions

Next steps

- This will feed into the full evaluation of the CFP Regulation: we cannot prejudge the outcome of this full evaluation
- The study highlights the need for **continued dialogue and collaboration** between regulators, fishers and scientists



Thank you

MARE D3

