Ms. Charlina Vitcheva
Directorate-General for Maritime Affairs and Fisheries
European Commission
Rue Joseph II, 99B-1000
Brussels, Belgium

10th September 2025

Subject: **Comments on the Proposal for a New Advisory Council Dedicated to Small-Scale Fisheries, as Referred to in the Communication on the European Ocean Pact**

Dear Ms. Charlina Vitcheva,

The subscribing Advisory Councils (ACs) would like to express our concerns regarding the proposal for the establishment of a new Advisory Council dedicated to Small-Scale Fisheries (SSF), as mentioned on page 10 of the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on The European Ocean Pact: "*Support for small scale fisheries as a priority. Relevant actions include the issuance of a vademecum presenting best practices the Member States could use in the allocation of fishing opportunities in order to improve transparency, and promote sustainable fishing, and a dedicated implementation dialogue. The Commission will also consider the establishment of a dedicated Advisory Council"*.

While we fully acknowledge and support the European Commission's efforts to further strengthen support for small-scale or artisanal fisheries, we believe that the creation of a new AC risks introducing greater fragmentation, overlapping responsibilities, and added complexity for the Commission when seeking to collect structured input from the small-scale coastal fisheries sector — especially in the context of the Outermost Regions (ORs) and along the continental coasts of Portugal, Spain, France, and including the Mediterranean basin.

SSF already has significant representation within many ACs which has enabled us to

provide meaningful contributions aligned with the goals set out in the European Ocean Pact. For instance, approximately 90% of Outermost Regions Advisory Council (CCRUP) members and the majority of Mediterranean Advisory Council (MEDAC) members represent the small-scale sector. These figures are regularly reported in the annual grant application process, which requires the ACs to identify their SSF representation. Moreover, the MEDAC is one of the active partners of the SSF Forum (composed of GFCM, WWF, LIFE, AKTEA and others) and it has recently created a new Focus Group on SSF, which strongly supports the continuations of collaboration within ACs of all fishing fleet representatives. In addition, it is important to highlight that other issues included in the European Ocean Pact, such as fleet and fisher renewal as well coastal and island communities have common issues to address across different fleet segments, involving both SSF and large-scale fisheries (LSF), and thus separating the discussion into different AC's could complicate the solutions further. Alignment of different fleets within AC's common areas is the only way to gain consensus and solve issues. The SWWAC as well as being the AC with the largest number of members is the only one that already has a permanent Working Group created in its statutes on traditional fisheries, which has been in full operation since the beginning of its existence. In addition, an ad hoc Group is currently working on the definition of SSF, with the fundamental objective of reaching an adequate definition of what "SSF" are, a participation that has been shared with the MEDAC and the CCRUP for more general and joint work between all.

Therefore, we recommend that, rather than establishing a new AC, the European Commission should encourage the integration of SSF organisations into the existing ACs corresponding to their respective sea basins. This would enhance inclusive participation and reinforce a more unified and coherent approach to fisheries governance, in line with the Common Fisheries Policy (CFP)'s goals of increased regionalisation. The establishment of a separate AC for SSF could create a dichotomy between SSF and LSF, which would be counterproductive to integrated and collaborative fisheries management, while also preventing meaningful exchanges with stakeholders representing other parts of the value chain and potentially even of other interest groups, in contradiction with the aims of Article 45 of the CFP Regulation.

To foster the full integration of SSF within existing ACs, we reiterate the support of AC to participatory mechanisms that include SSF representation, both at national and regional level, such as co-management committees, dedicated SSF working groups or focus groups within each AC, and rotational SSF representation in Executive Committees, especially where SSF remains underrepresented. These mechanisms can improve dialogue, ensure more equitable (and gender balanced) participation, and foster shared governance. Furthermore, we recommend that the European Commission provides translation support and other support, including capacity building to access funding, that can support participation in ACs to remove linguistic, technical, or procedural barriers that may hinder effective SSF participation, particularly for organisations operating at local or community level.

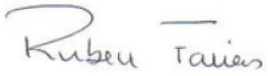
It is important to recall that the current AC structure is mainly designed around the principle of regionalisation, enabling stakeholders to develop advice that reflects the unique ecological, economic, and social specificities of each sea basin or area. This approach has been a key element of the CFP since its latest reform and is instrumental to the effectiveness and added value of the ACs. The new AC could potentially weaken the existing regional dimension and dilute the coherence of the system.

We are committed to working together with the European Commission to ensure that the voices of SSF are heard and that policies continue to reflect their realities and needs in a meaningful and operationally efficient manner. In support of this approach, we recall Article 4(3) of the Commission Delegated Regulation (EU) 2017/1575, which reads «*Based on designations from the sector organisations and from the other interest groups for the seats allotted to them respectively, the general assembly appoints an executive committee of up to 25 members. After consultation of the Commission, the general assembly may decide to appoint an executive committee of up to 30 members to ensure appropriate representation of small-scale fleets*», and that demonstrates that the existing legal framework already foresees methods to strengthen and increase the representation of SSF within the Executive Committees of the ACs. Moreover, Article 2(h) of Annex III of the CFP Regulation highlights the responsibility of Member States to determine the composition of ACs, which may be used to further enhance SSF inclusion.

We are also committed to work together aiming to increase coordination on SSF issues by scheduling specific inter-AC meetings. We could also consider establishing an informal group among all ACs to address SSF-related issues horizontally and to exchange best practices across European basins.

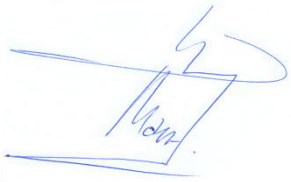
We remain at your disposal to further contribute to this important discussion and to the ongoing development of inclusive and sustainable EU fisheries policy.

Yours sincerely,



(Ruben Farias)
Chair of CCRUP

(Yobana Bermúdez)
Chair of MAC



(Antonio Marzoa Notlevsen)
Chair of MEDAC

(Kenn Skau Fischer)
Chair of NSAC

(Sergio López)
Chair of CC SUD