



# The Seas and Oceans: A Key Issue for the Future of the European Union

(Approved by the CPMR Political Bureau on 10 March 2017, Gozo-Malta)

The coming months will be decisive for the future of maritime Europe. Against the backdrop of Brexit, the European Commission will publish proposals on the future of the European project as from March 2017. On 20 April 2017, EU member states will adopt a ministerial declaration on maritime policies. In October 2017, a ministerial conference will open the question of the future of the European Maritime and Fisheries Fund (EMFF) for the post-2020 period.

The CPMR calls on the EU to use these opportunities in order to:

1. place the seas and oceans at the heart of its future;
2. act in partnership with the regions to invest effectively in the maritime economy;
3. further develop thematic European maritime policies.

In addition to the different sections of this political position, there are annexes on:

- the potential impact of Brexit on European Maritime Policy ([Annex 1](#));
- CPMR action in the field of international maritime governance ([Annex 2](#));
- the future of European support for fisheries and aquaculture ([Annex 3](#)).

## 1. Place the seas and oceans at the heart of the EU's future project

Great enthusiasm for Europe can be forged around the seas and oceans, because of what they have contributed to people's lives in the past, and because of what they still and will continue to contribute in future.

### 1.1. The need to assert the importance of the seas and oceans during the Maltese Presidency

The CPMR calls upon the EU to:

- **consider the seas and oceans as a major topic in the discussions which will take place when the Commission publishes its proposals for the future of Europe.** The CPMR will widely include maritime issues in its own work on the subject. Six key messages can support this:
  - The seas and oceans are essential to life on Earth;
  - The seas and oceans represent huge potential in terms of growth and jobs;
  - The maritime economy involves all territories, and not just coastal ones;

- o Maritime culture helps to promote unity and good neighbourliness in Europe;
  - o The seas and oceans are an object of fascination for Europe's people;
  - o The seas and oceans are a key dimension among the new challenges facing the EU today. These issues include defence and security, migration, energy independence and efficiency, the environment and climate change, food and, more broadly, economic development and growth.
- **adopt, at the informal maritime affairs Council meeting of 20 April 2017, an ambitious declaration reaffirming the importance of the Integrated Maritime Policy and identifying key maritime projects for the post-2020 period.**

## 1.2. Developing a European maritime strategy for the post-2020 period

The CPMR calls upon the EU to:

- **update the economic analysis underpinning the blue growth strategy launched in 2012.** This analysis was initially limited to five sectors. It should be expanded to better reflect synergies between emerging sectors such as marine energy, blue biotechnology and aquaculture on the one hand, and existing industries such as shipbuilding and fishing on the other hand. European economic maritime strategy needs to take greater account of this interdependence between emerging and existing sectors. To do so, the European Commission should publish an updated economic analysis of the maritime economy. This would renew the economic rationale underpinning future European marine strategy;
- **seize the opportunity of Brexit to deepen Europe's economic, environmental and social maritime model.** Brexit will have a particularly strong impact on European Maritime Policy. The EU must protect its interests and avoid the emergence of a platform for social/fiscal dumping and deregulation in the United Kingdom;
- **strengthen the governance of maritime policies of the EU. Integrated Maritime Policy could be strengthened through:**
  - o the appointment of a Vice-President of the European Commission specifically responsible for maritime affairs or the creation of a maritime affairs task force under the authority of a Commissioner responsible for maritime affairs and the President of the European Commission. A similar task force existed when the Integrated Maritime Policy was launched in 2007 and it played a significant role in driving cross-sectoral maritime affairs issues;
  - o the creation of a maritime affairs committee within the European Parliament and the maritime affairs "configuration" within the Council of the EU. This would allow more integrated and strategic management of maritime matters, which are today dispersed among several different European Parliament committees and Council configurations. It would also give more political weight to the European maritime strategy;
- **establish ambitious financing capabilities for the maritime economy.** Use of the European budget must be underpinned by a guiding cross-sectoral strategy to integrate maritime issues into different programmes.

## 2. Secure the regions' support in order to invest effectively

**The CPMR urges the EU to draw inspiration from the regions' development strategies, and particularly their smart specialisation strategies, in order to direct investment.** The implementation of these strategies is the result of obligations established by the EU. They reflect economic interaction between the maritime sectors that make up the maritime economy. They are thus a legitimate linchpin which can be used to guide and mobilise:

- **Cohesion Policy.** As reflected in an analysis drawn up by the CPMR, many regions consider seas and oceans to be a priority within their smart specialisation strategies. This demonstrates the possibility of using the ERDF to support the maritime economy. In the future, Regional Policy must continue to benefit all regions in order to support the maritime economy across Europe;

- **The EMFF.** The EMFF must be maintained in order to support:

- Integrated Maritime Policy. The EMFF is useful for new initiatives, which then inspire other European programmes. For example, the Blue Careers scheme launched under the EMFF may be taken up by future Erasmus+ calls for proposals. In this area, the regions' specialisation strategies can be a source of inspiration for projects funded under the EMFF;
- Fishing and Aquaculture. The EMFF is the financial instrument of the CFP, which is one of the EU's few common policies. The regions play an important role in its management across the EU;

- **Access to finance and financial packages.** Initiatives such as the Juncker Plan must be directed more clearly at the maritime economy, which includes promising sectors such as marine energy and blue biotechnology. Regional specialisation strategies can be used to highlight the lack of support for risky maritime projects, and to set up schemes to remedy the problem. Such schemes can be launched as part of the territorial platforms foreseen under the Juncker Plan, in which the regions can play an important role;

- **Funding of collaborative projects, through the Horizon 2020, Cosme and Territorial Cooperation programmes.** If greater consideration were given to the priorities of regions' specialisation strategies, it would be possible to improve synergies between these programmes and EU regional policy.

**The CPMR also urges the EU to continue to develop sea basin strategies and the maritime dimension of macro-regional strategies across Europe.** Sea basins themselves can adopt a specialisation approach, in consultation with the regions, to give a greater focus to European funding.

### 3. Further develop Europe's thematic maritime ambitions

The themes below are those upon which the CPMR is actively working with its member regions.

#### Marine and maritime culture

The CPMR calls upon the EU to:

- continue developing knowledge about Europe's maritime culture through the Horizon 2020 Programme;
- develop campaigns to raise EU citizens' awareness about maritime issues. For example, the EU could provide significant financial support for media aids such as webserials and European maritime exhibitions.

#### Education

The CPMR calls upon the EU to:

- develop a maritime dimension to the Skills Agenda for Europe in order to create a common European vocational training framework up to master's level;

- anticipate training needs to provide the skills of the future through a close partnership between education and training institutions, national and regional authorities, and representatives of the private sector. The maritime Blueprint initiative is a step in the right direction;
- develop networks, especially via Erasmus+ and Interreg, to strengthen cooperation between universities, vocational training institutes and the private sector at the European and sea basin level;
- finance innovative maritime education projects. The EMFF's Blue Careers scheme is a very positive initiative.

The CPMR will continue its commitment in this area through its Vasco da Gama initiative.

## **Industrial maritime development**

The CPMR calls upon the EU to:

- develop a more ambitious renewable energy target in Europe than that currently proposed by the Commission (27% by 2030)<sup>1</sup>. The development of marine energy and related industrial development will depend on the achievement of such targets;
- be more flexible about the principle of technological neutrality advocated in the energy package proposed by the European Commission in November 2016, and allow interested member states to introduce market access conditions that are more favourable for electricity produced by marine energy;
- strengthen funding to support projects concerned with the testing and demonstration of maritime technology. Programmes such as NER 300 are very useful for bringing marine energy technologies into the market. A similar programme could be launched to support the development of blue biotechnology;
- continue implementing the LeaderShip 2020 report for maritime industries.

## **Knowledge about the seas and oceans**

The CPMR calls upon the EU to continue funding marine and maritime research related to:

- the maritime economy and the marine environment. 1,258 marine and maritime research projects were supported via the FP7. This effort can be improved by financing;
  - projects which are as market- and innovation-oriented as possible;
  - the inclusion of a maritime dimension within projects. For example, the idea of setting up an innovation and knowledge community dedicated to maritime issues through the European Institute of Innovation and Technology should be revived;
- knowledge of the maritime economy per se. In the same way that the European Environment Agency has produced expertise on the marine environment, the analytical capacity of the EU's maritime economy could be strengthened through more direct involvement of the Joint Research Centre and Eurostat;
- bathymetric data, which is essential for the development of all maritime activities. In this field, the EU must develop a specific strategy to harmonise technical standards more closely and improve the interoperability of the bathymetric data it finances through its programmes.

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<sup>1</sup> Gozo (Malta) expressed reservations on this point

## Management and protection of maritime and coastal areas

The CPMR calls upon the EU to:

- continue implementing the regulations of the Marine Strategy Framework Directive and the Directive establishing a framework for maritime spatial planning. These give maritime stakeholders a common framework for the sustainable development of their activities;
- interpret these regulations bearing regional development strategies in mind. Such strategies can direct the implementation of these regulations in a manner which is integrated and consistent with different territories' circumstances. Working together with the regions is particularly useful when it comes to addressing the essential question of land-sea links and interpreting the concept of the ecosystem approach.

## Fisheries and aquaculture

The CPMR calls upon the EU to:

- involve the regions more directly in CFP decision-making processes and governance. This could be achieved by giving them a bigger role in advisory committees or naming them as EMFF management authorities if they wish. This would be consistent with the major role the regions already play in several member states in delivering the EMFF and through their own funds;
- introduce a two-year moratorium for the implementation of the new landing obligation, particularly for mixed demersal fisheries. This moratorium would allow member states to conduct studies on the socio-economic impacts of this new provision in collaboration with the regions and the European Commission. A moratorium would also make it possible to adapt port infrastructure to facilitate discard management;
- strengthen dialogue between fishing professionals, scientists and institutional representatives on the setting of total allowable catches and annual quotas. This is necessary because scientists are noting considerable improvements in the status of certain commercial stocks, particularly in the East and North East Atlantic;
- incorporate the following principles into the design of the post-2020 EMFF:
  - cooperation programmes involving the regions. This would allow more direct dialogue between the regions, EMFF beneficiaries and the European Commission;
  - greater flexibility in the eligibility criteria for measures financed by the EMFF. This would make it possible to adapt these measures to the specific development needs of the regions, for example concerning the financing of infrastructure such as auction halls and contingency measures;
  - better anticipate the difficulties of interpreting EMFF measures, which currently make it too burdensome and too complex to administer and generates legal uncertainty for project holders. The development of more specific guidelines from the European Commission would be useful;
  - widen the legal scope of Regulation 508/2014 to take into account all investment support needs identified by the fishing industry, which differ according to regions' different circumstances (for example island communities, outermost regions, etc.).

## Tourism

The CPMR calls upon the EU to:

- continue implementing the European strategy for marine and coastal tourism. It is helping to identify areas for joint work at European level, which will determine funding and guide discussions between different territories. Nautical tourism is for example a subject which meets with very strong interest throughout Europe;
- continue supporting the financing of collaborative projects in this area, through programmes such as Cosme and Interreg. The tourism sector generates a very large number of collaborative projects involving the regions, reflecting a strong interest for this type of financing.

## SUMMARY

The CPMR calls upon the European Union to act in partnership with the regions in order to:

- place the seas and oceans at the heart the EU's future project, which will be defined further to the proposals of the European Commission expected in March 2017;
- adopt an ambitious ministerial declaration under the Maltese Presidency concerning the future of the Integrated Maritime Policy and European maritime policies;
- enter a new phase of the European maritime strategy by updating the blue growth approach, promoting a European maritime model in the context of Brexit, forging stronger maritime governance within the institutions and offering funding opportunities commensurate with the issues at stake;
- use regional strategies to direct European investment effectively through regional policy, the EMFF, funding access support measures such as Juncker Plan and collaborative programmes;
- continue developing sea basin strategies and the maritime dimension of the macro-regional strategies;
- develop initiatives to promote Europe's maritime culture and raise citizens' awareness;
- pursue efforts to develop the CFP and the maritime dimension of sectoral policies, particularly in the areas of education, marine and maritime energies and industries, blue biotechnology industries, coastal management and protection, and coastal and maritime tourism.

## ANNEX 1

# WHAT CONSEQUENCES WILL BREXIT HAVE ON THE MARITIME POLICY OF THE EUROPEAN UNION?

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Brexit will have a particularly strong impact on European marine policies.

For this reason, the Final Declaration of the Annual CPMR General Assembly in November 2016 (Ponta Delgada, Azores), and its policy position “The Seas and Oceans, a future theme for the European Union” in March 2017 (Gozo, Malta) call on the EU to:

- Pay special attention to maritime issues within the context of the UK's exit from the EU;
- Seize the opportunity of Brexit to intensify the European maritime economic, environmental and social model;
- Protect its interests and prevent the emergence of social, fiscal and deregulation dumping in the UK.

This paper presents elements concerning the potential consequences of Brexit on the European Union's Maritime Policy. These elements relate to the following topics:

- the Common Fisheries Policy;
- International Ocean Governance;
- Marine Environment and Marine Spatial Planning;
- Marine and Maritime Research;
- Marine Energy.

## 1. The Common Fisheries Policy

The United Kingdom's exit from the European Union means the end of the application of the Common Fisheries Policy (CFP) in British waters. An agreement will have to be signed with the United Kingdom, modelled, for example, on agreements with other non-EU countries, such as Norway or Iceland.

This raises two major and sensitive issues:

- **European fishermen's access to British waters.** In 2015, European vessels caught 683,000 tonnes of fish in British waters. The issue is particularly sensitive for fisheries in the North of France, Ireland and the North Sea;
- **British fishermen's access to the European market.** In 2015, British vessels caught 111,000 tonnes of fish in the waters of Member States. Most of the British catch is destined for export to the single market of the European Union.

## 2. International Ocean Governance

On 10 November 2016, the European Commission adopted a Memorandum on “*International ocean governance: the EU contribution to safe, secure, clean and sustainably managed oceans*”. The High Representative for Foreign Affairs and Security of the European Union was associated with this memorandum.

Brexit does not call into question international agreements and commitments that link the European Union and its member states.

However, the loss of a powerful member state in the maritime sector could reduce the EU's ability to exert its influence internationally.

The European Union will therefore have to mobilise even more of its marine and maritime community in its actions at international level. The involvement of the Regions, particularly the Outermost Regions, will be even more necessary.

### 3. Marine Environment and Marine Spatial Planning

Two reports by the European Institute for Environmental Policy show that the impact of Brexit on environmental policy may vary considerably depending on the nature of the agreements concluded between the EU and the UK.

Nevertheless, the United Kingdom's exit from the European Union will end the application on its territory of important regulations such as the following Directives:

- Birds and Habitats (Natura 2000);
- Marine Spatial Planning;
- Bathing Waters.

This means that Brexit could potentially create a large area at the heart of the European maritime space in the Atlantic, North Sea and English Channel in which EU law does not apply. Such a situation would cause a discontinuity in the implementation of policies relating to the marine environment and marine spatial planning.

The agreement with the United Kingdom must therefore avoid this risk. There are several encouraging elements regarding the possibility of a positive agreement being reached in this domain:

- The UK has already implemented plans for its marine spatial planning in line with other relevant Member States;
- The United Kingdom may decide to incorporate all the marine environmental Directives into its own body of law;
- However, the Marine Strategy Framework Directive could be considered relevant to the EEA, although clarification is needed on this point. The UK could be required to continue its application;
- All international agreements and commitments such as the UN Convention on the Law of the Sea (UNCLOS), the International Maritime Organisation (IMO) or OSPAR will remain in place and will apply to both British and European Union waters.

### 4. Marine and Maritime Research

British Universities and Research Centres, as well as many public and private stakeholders, are highly involved in marine and maritime research projects as part of the Horizon 2020 and Interreg programmes (Interreg Europe and Northwest Europe, North Sea, Atlantic, 2 Seas, Channel, Ireland-UK Programmes).

An agreement between the United Kingdom and the European Union on the model of Norway or Switzerland or other non-EU states, may allow the participation of British organisations in Horizon 2020. However, agreements with non-EU states up to now do not allow organisations in their territories to coordinate Horizon 2020 projects, which limits their capacity for influence and also funding.



## 5. Marine Energy

The UK is a very ambitious state concerning marine renewable energies. This is particularly evidenced by the installation of many major sites in this area such as the National Renewable Energy Centre based in Blyth (Northumberland), the Wave Hub off Hayle (Cornwall) and the European Marine Energy Centre located in the Orkney Islands (Scotland).

It is unlikely that Brexit will challenge this dynamic. However, it could affect:

- The transnational dynamic that is developing in the marine renewable energy sector. The content of the agreement with the United Kingdom will be decisive for its involvement in cooperation programmes, such as Horizon 2020 and Interreg, but also structuring approaches like the Ocean Energy Forum;
- Support for access to funding for marine energy. The Juncker Plan has made a significant contribution to the development of certain wind projects. Thus, the [Gallopier](#) and [Beatrice](#) projects combined involve a commitment from the European Investment Bank in excess of a billion Euros. Brexit will therefore involve developers seeking additional funding sources.

## ANNEX 2

# ACTIONS OF THE CPMR IN THE AREA OF INTERNATIONAL MARITIME GOVERNANCE

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On 10th November 2016, the European Commission published the Communication “International ocean governance agenda for the future of our oceans”<sup>2</sup>. The CPMR had answered to the consultation launched before the publication of this communication. Since then, it has been following-up this issue<sup>3</sup>.

This paper provides information about the actions of the CPMR in line with the priorities described in the communication. It focuses on a limited number of topics, which are the most relevant for the CPMR and its member regions. These topics are the following:

- International ocean governance framework;
- Climate change;
- Maritime Spatial Planning and Marine Protected Areas.

Other topics mentioned in the communication, such as the fight against illegal fishing, or international cooperation in the areas of marine research and marine data, are also of interest for the regions, and notably for outermost regions. In this area, the CPMR will be available to support initiatives that might be undertaken by its members.

## 1. International ocean governance framework

### 1.1. Marine biodiversity and mineral resources

The European Commission will undertake several initiatives that are of direct interest for Outermost regions. In particular, it will:

- Keep on supporting the adoption of new international agreements about biodiversity beyond national jurisdictions. This is important for the economy of all maritime regions that are active in the field of marine living resources, notably via the development of blue biotechnologies;
- Publish guidelines concerning the exploration and exploitation of marine mineral resources. This is important for outermost regions such as the Azores, which have specific powers for the management of marine areas and ecosystems, and which have important marine mineral resources.

The CPMR will contribute to ensure that the opinions of its members are taken into account in European debates. As an example, the CPMR will help its members to promote their views in the context of the preparation of the report “An Agenda for the future of our oceans in the context of the 2030 Sustainable Development Goals” prepared by Mr José Inácio FARIA, member of the European Parliament. This report will develop a position of the European Parliament in areas covered by the European Commission’s Communication on international maritime governance.

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<sup>2</sup> Joint communication: [International ocean governance agenda for the future of our oceans](#)

<sup>3</sup> The CPMR took part in the [debate](#) on 30 January 2017 organised by the EP’s Searica Intergroup, with the participation of Commissioner Karmenu VELLA, in charge of maritime affairs, fisheries and environment. This debate was an opportunity to discuss the preparation of the own initiative report of the EP following the publication of the EC’s communication “An Agenda for the future of our oceans in the context of the 2030 Sustainable Development Goals”, prepared by Mr José Inácio FARIA.

## 1.2. Strengthening of maritime governance capacity building

The European Commission will undertake several initiatives aiming at strengthening cooperation with third countries, mainly in geographical areas where the CPMR is not active.

However, the initiatives proposed by the European Commission also include support to several initiatives in Mediterranean Sea. These initiatives are:

- The activities of the Union for the Mediterranean concerning the maritime economy. The CPMR Intermediterranean Commission is a member of the UfM's working group on blue growth;
- The BlueMed initiative on marine and maritime research. The CPMR Intermediterranean Commission is also a member of this initiative;
- The activities of the Barcelona convention. Protocols elaborated in the framework of this convention aim at protecting the marine environment. The Intermediterranean Commission of the CPMR is very active in this field, notably via cooperation projects.

The CPMR will therefore keep on working in these areas through its Intermediterranean Commission.

## 2. Climate change

The European Commission is willing to contribute to the implementation of the COP21 agreement, and to mitigate the harmful impact of climate change on oceans, coastlines and ecosystems. Oceans were explicitly mentioned in the COP21 Agreement.

In this area, the CPMR is active at international level via its partnership with the [Oceans and Climate](#) platform. This platform acts for a better recognition of Oceans as challenges in international negotiations on climate related issues.

Messages put forward by the CPMR in this context are linked to its activities concerning European policies. More specifically, the CPMR is active in the following areas via:

- Its support to marine energies, and to collaborations between regions in this area, at European level and at the level of sea basins. The development of marine energies is an important strand of actions against climate change;
- Adaptation to climate change in coastal areas. In this area, the CPMR is active via collaborations involving regions. As an example, the CPMR is active at the level of the Mediterranean Sea via the activities of the [Bologna Charter](#), which structures the collaboration of 20 regions on issues such as adaptation to climate change in coastal areas.

## 3. Maritime Spatial Planning and Marine Protected Areas

The European Commission will make propositions for the development of international guidelines on maritime spatial planning in 2017. It has also indicated that it will contribute to the efficiency and the expansion of Marine Protected Areas in the world by promoting the exchange of best practice. These issues are important for CPMR member regions, since they have a direct impact on the management of human activities in coastal areas around maritime areas shared with third-countries.

The CPMR is active in order to promote the involvement of the regions in the implementation of the European Directive on Maritime Spatial Planning, and to ensure that land-sea interactions are taken into account in this framework. The issue includes the implementation of other regulations that have impact on

the management of coastal and maritime areas, such as the Birds and Habitat Directive, and the Marine Strategy Framework Directive.

CPMR action is carried out through:

- Its participation in the European Commission's Expert Group on Maritime Spatial Planning. Its involvement in the SIMNORAT and SIMWESTMED projects. These projects are funded by European Commission in order to support the implementation of the European Directive on Maritime Spatial Planning in the Atlantic and in the Western Mediterranean area;
- Other cooperation, such as the PANACEA project, which is carried out with the CPMR Intermediterranean Commission, or via regular collaboration with the MedPan network (Network of marine protected area managers in the Mediterranean).

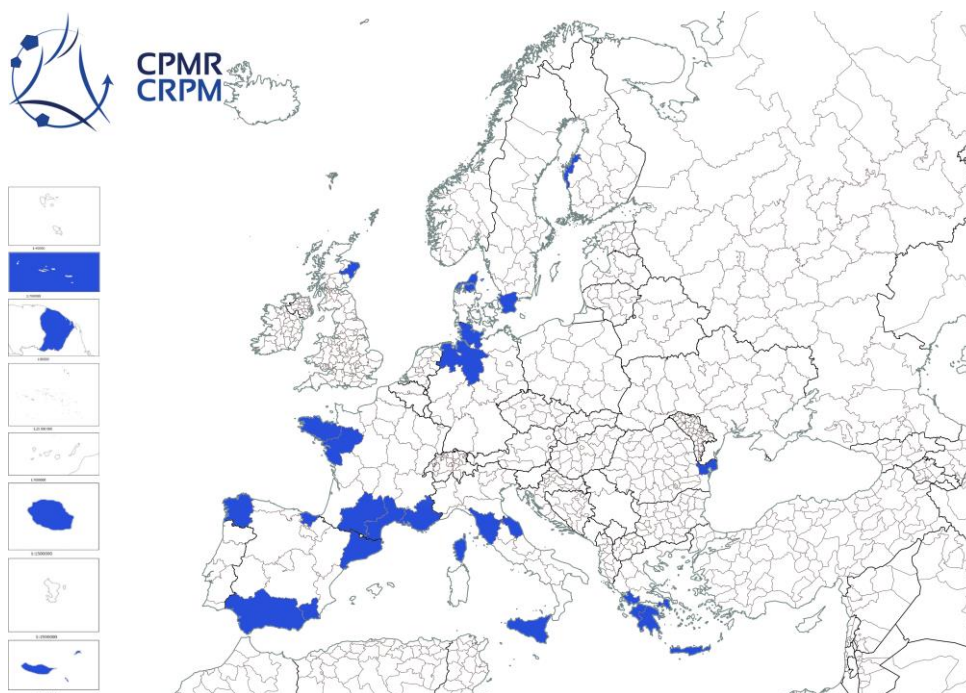
The CPMR will rely on these initiatives in order to express, when relevant, its opinions about the initiatives proposed by the European Commission.

## ANNEX 3

### EMFF SUPPORT FOR FISHERIES AND AQUACULTURE

#### Elements concerning the current programme and the EMFF post-2020

1. This document presents the first results of a study by the CPMR on the implementation of the European Maritime and Fisheries Fund (EMFF) in the Regions. To date, 28 Regions have contributed.



**Contributing regions:** Ostrobothnia, Skåne, Nordjylland, Schleswig-Holstein, Niedersachsen, Aberdeenshire, Brittany, Pays de la Loire, Basque Country, Galicia, Andalucia, Murcia, Catalunya, Provence-Alpes Côte d’Azur, Corsica, Tuscany, Sicily, Marche, Western Greece, Peloponnese, Attica, Crete, Tulcea, Réunion, Azores, Madeira, Occitanie, Guyane.

2. These findings provide a first basis for the consideration of the future of the EMFF post-2020. They cover the following topics:
  - Building a more inclusive governance of the Regions;
  - Relaxing regulations in view of requirements;
  - Resolving the problems of interpretation of certain EMFF measures;
  - Adjusting the scope of the EMFF Regulations.
3. The elements presented in this document will need to be completed. In fact, the EMFF has only been implemented for a year in most member states, which further limits the deferment of its implementation. The delay in the implementation of the EMFF is due to the length of the political negotiation process and complex national administrative governance.
4. The CPMR will therefore pursue its analysis of the EMFF implementation. More detailed elements will be presented at the Annual CPMR General Assembly in October 2017.

## BUILDING A MORE INCLUSIVE GOVERNANCE OF THE REGIONS

5. **The governance of the EMFF needs to be more significantly decentralised. This could consist of developing regional Operational Programmes in the Regions that want this.** Such a change would improve the efficiency of the administrative process by creating a direct link between the European Commission and the Regions. This would also be consistent with the major role played by Regional Authorities in supporting investment in fisheries and aquaculture in Europe.
6. **More direct involvement of the Regions in the Advisory Boards.** An Advisory Board might also be created in the Indian Ocean.
7. **Cooperation programmes that bring the Regions together could be set up.** This would help develop a more direct dialogue between the Regions, the beneficiaries of the funds and the European Commission.

## RELAXING THE REGULATIONS IN VIEW OF REQUIREMENTS

Furthermore, many Regions have been facing fund implementation problems related to the “inability” of the EMFF to provide effective responses to the technical challenges affecting the fishing and aquaculture sector. In this regard, it is important to emphasise that certain measures provided for in Regulation 508/2014 have been subject to eligibility criteria that are sometimes too rigid and/or hard to interpret, which has caused very dangerous legislative uncertainty both for fund management authorities and the final beneficiaries of grants.

8. Regions point to problems related to the excessive rigidity of certain criteria and/or recommendations of Regulation 508/2014. Although the Regions welcome the legislator's intention to establish a clear legal framework, they fear being unable to effectively undertake the financing of certain measures because of the inability to adapt the legislative framework of the funds to the realities of the sector. Below are some examples put forward by the Regions reflecting this excessive rigidity:
  - Article 32, whose scope is limited to provisions under Article 3 of Delegate Regulation 2015/531;
  - Article 41.2.b/c, establishing constraints on vessels of over 12 metres long to reduce their power. In some Regions, this provision weakens energy transition objectives and/or causes fishing work to be transferred to the coastline where fish stocks are under the most pressure;
  - Article 43.4, rendering landing sites or new auction houses ineligible for financing for the construction of new ports. This prevents direct sales from being developed in some coastal communities.

## RESOLVING THE DIFFICULTIES IN INTERPRETING CERTAIN EMFF MEASURES

9. The development of more specific guidelines from the European Commission would be useful to better anticipate the difficulties in interpreting EMFF measures.
10. Interpretation difficulties encountered today actually make the implementation of the EMFF too heavy and complex and generate legislative uncertainties that affect project developers. For example:
  - Article 11.a, which makes operations that increase fishing capacity, or the ability to find fish, ineligible, does not clearly define the equipment concerned;
  - Article 69.1.1.f, establishing that investments in fishery and aquaculture products should give rise to “new” or “better” management and organisation products, processes or systems. The terms “new” and “better” raise different interpretations.

## ADJUSTING THE SCOPE OF THE EMFF REGULATIONS

**11. The legislative scope of Regulation 508/2014 needs to change to take better account of the overall need for investment support that differs from one territorial reality to another** (for example: island communities, outermost regions, etc.).

**12.** For example, it would be useful to:

- Amend Article 11 to make investments for the construction of new ships eligible;
- Allow the EMFF to support the work of Multi-Stakeholder Management Committees for fishing to promote collaboration among regional governments, fishermen, scientists and other relevant industry players. This type of collaboration allows for a more effective governance of the CFP on the ground. However, financing them is currently impossible under Article 28 of Regulation 508/2014;
- Enable the aid granted under Article 31 of Regulation 508/2014 to go beyond the provisions of paragraph 4 of that Article. Currently, this article provides a double ceiling of 25% of the acquisition cost of the fishing vessel and €75,000 per young fisherman. This does not permit the objectives of the European Union in terms of installation support and attracting young people to the sector to be implemented;
- Remove Article 34.4 (limit of 31 December 2017 for application of the measure), whose spirit they consider incompatible with Article 22 of Regulation 1380/2013 which sets no time limit for its application;
- Create a European register of persons and companies not eligible for assistance under the Regulation 508/2014. Such a register would ensure better implementation of Article 10 of Regulation 508/2014. Currently, the EMFF management authorities must verify, before approving the payment of aid, that the applicant has not committed an offence. The absence of such a register therefore directly affects the work of the management authorities to the extent that checks are limited to a national level and are therefore insufficient.
- Amend Article 33 of Regulation 508/2014 so that it can support compensation for fishermen during the temporary suspension of fishing activity for public health reasons. This is already provided for aquaculture under Article 55 of the Regulations;
- Ensure that the eligibility conditions in terms of fishing days at sea, particularly in the context of Article 33.3.b of Regulation 508/2014, do not affect the rational management of fishing work. In fact, in the particular case of bluefin tuna and eel fisheries in the Mediterranean, effective stock management involves optimising fishing work at quite low levels which effectively excludes the operators from eligibility criteria;
- Ensure that the implementation of Article 38 of Regulation 508/2014 be accompanied by effective monitoring mechanisms both at sea and at landing sites. The information currently available on the instruments, procedures and mechanisms for controlling the classification of catches subject to landing obligations is currently insufficient. The development of a guide would improve these aspects;
- Permit Article 55 of Regulation 508/2014 to provide for compensation for shellfish farmers affected by red tides. Indeed, in its current formulation, Article 55.2 does not cover this type of pollution characterised by episodes shorter than the period provided by the Regulations but also by a very high frequency;
- Enable financing from the EMFF for the collection of data to be open to all formally adopted management plans within the scope of the Mediterranean Regulation (1967/2006). Indeed, some fisheries currently managed within the scope of the mandatory management plans of Regulation 1967/2006 are excluded from EMFF funding for data collection insofar as these plans do not meet the eligibility criteria of national programmes of the Data Collection Framework.



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**The Conference of Peripheral Maritime Regions brings together 160 Regions in 25 States from the European Union & beyond.**

Representing about 200 million people, the CPMR campaigns in favour of a more balanced development of the European territory.

It operates both as a think tank and as a lobby for Regions, focusing mainly on social, economic and territorial cohesion, maritime policies and blue growth, and accessibility

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