

# CFP Implementation and Enforcement – The Simple Plan

## Response to the public consultation for the CFP evaluation

ClientEarth welcomes the opportunity to provide a response to the European Commission's public consultation for an **evaluation** of the Common Fisheries Policy (CFP). The CFP, governed by Regulation (EU) 1380/2013 (the CFP Regulation), is vital to preserving the long-term sustainability of fisheries and aquaculture, to contributing to the protection of the marine environment and the availability of food supplies, and to providing a fair standard of living for fisheries and aquaculture communities.

According to ClientEarth's assessment, the CFP Regulation can be – if well implemented – **effective** in meeting its objectives; **efficient** and **proportionate** in terms of cost-benefit; **relevant** to addressing the current and emerging needs; **coherent** with other EU actions; and can **add value** beyond what would have been achieved by EU Member States alone. However, there is great untapped potential to achieve the CFP's objectives which would be released by fully **implementing** and **enforcing** its provisions as well as other EU environmental legislation in order to protect fishers, coastal communities and the environment.

Full application of the existing instruments of the CFP and its related laws and policies – **not revising** the CFP Regulation – will deliver the EU's transition to sustainable fisheries. This assessment builds on and is supported by previous reports and briefings.<sup>1</sup> The **European Commission** itself highlighted several times the need for full implementation of the CFP to restore a healthy marine environment and help the sector become more resilient, and the need for clear political commitment of all stakeholders and

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<sup>1</sup> See e.g. European Environment Agency, "[Healthy seas, thriving fisheries: transitioning to an environmentally sustainable sector](#)", 2024; Birdlife, ClientEarth, the Fisheries Secretariat, Oceana, Our Fish, Seas At Risk and WWF, "[Common Fisheries Policy: Mission not yet accomplished](#)", 2021.

institutions to make the current CFP policy tools work.<sup>2</sup> Finally, more than 140 organisations endorsing the Blue Manifesto – The roadmap to a healthy Ocean by 2030,<sup>3</sup> support the call for better implementation and enforcement of the CFP, instead of revising it – and provide for further solutions for ocean-related laws and policies.

In addition to ClientEarth's feedback to the call for evidence for an evaluation of the CFP,<sup>4</sup> as well as our response to the survey of this public consultation, we submit this **"Implementation and Enforcement Action Plan"** that supports the full use of the CFP's potential in practice.

## Implementation and Enforcement as the Simple Plan

The European Environment Agency's findings leave no room for doubt: overfishing, bycatch, and habitat degradation are destroying marine biodiversity.<sup>5</sup> 90% of Europe's marine area is over-exploited by human activities,<sup>6</sup> while invasive alien species, rising temperatures, and pollution are pushing the ocean to the brink. At the same time, the **World Economic Forum** declares biodiversity loss and ecosystem collapse – including the marine ecosystem – as **one of the most severe risks facing humanity in the next decade**.<sup>7</sup> We must act now: the costs of not addressing the greatest threats for our very fundamentals of life, health and economy are high – and anticipated to increase even more.<sup>8</sup>

The good news: the European Environment Agency outlines that a "range of **clear, proven, beneficial measures are available** for the EU and its Member States **to address the biodiversity, pollution and climate crises**".<sup>9</sup> These include "ensuring all harvested stocks are exploited at sustainable levels, promoting low-impact activities, and establishing a large-scale, well-designed and effectively managed network of marine protected areas" – hence, all tools available under today's CFP and environmental policies. It further outlines that transitioning to sustainable fisheries "requires the **full implementation and enforcement** of existing management tools, especially those targeted at reducing the negative impacts of these pressures on marine resources. This is **vital for improving the social, economic and environmental dimensions of fisheries**".

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<sup>2</sup> **"The 2013 CFP Regulation provides the stability needed by the fisheries sector.** (...) However, several challenges remain for the CFP **to be fully implemented**. Faster and more structural transformation is needed to reduce environmental and climate impacts of fishing and aquaculture. This is necessary to restore a healthy marine environment and ensure food security, as well as to help the sector become more resilient, increase energy efficiency and contribute to climate neutrality quickly. This will help to save on fuel costs and thrive on green energy", European Commission, Fisheries and Oceans Pact 2023, COM(2023) 103 final. "A healthy marine environment with healthy fish stocks and rich biodiversity is **the only way we make sure that our fisheries communities have a prosperous future** over the medium and long term. (...) There is a need to renew the EU's collective commitment to marine conservation and secure a clear political commitment of all stakeholders and institutions to **implement** the environmental legislation effectively, use the current CFP policy tools and make them work.", see European Commission, Marine Action Plan 2023, COM(2023) 102 final. For more, see also "State of play and orientations for 2025", COM(2024) 235 final.

<sup>3</sup> Birdlife, ClientEarth, Oceana, Surfrider, Seas at Risk, WWF, "Blue Manifesto – The roadmap to a healthy Ocean by 2030", 2024.

<sup>4</sup> ClientEarth, "Common Fisheries Policy evaluation - Response to the call for evidence", 2024.

<sup>5</sup> European Environment Agency, "Healthy seas, thriving fisheries: transitioning to an environmentally sustainable sector", 2024.

<sup>6</sup> European Environment Agency, "Multiple pressures and their combined effects in Europe's seas", 2020.

<sup>7</sup> World Economic Forum, "Global Risks Report 2025", 2025.

<sup>8</sup> European Commission, "An Advocacy Toolkit for Nature", 2021.

<sup>9</sup> European Environment Agency, "Healthy seas, thriving fisheries: transitioning to an environmentally sustainable sector", 2024.

Applying EU law is not only a legal obligation under the EU Treaties and a necessity of the functioning of a democratic EU – it is also economically profitable and **needed for a competitive and thriving EU**: Fully implementing existing EU environmental legislation could **save the EU economy around €55 billion per year**<sup>10</sup> – and avoid further penalty costs (one case in the fisheries sector accounted for the highest sanctions in 31 years<sup>11</sup>). On the contrary, the inaction puts our very fundamentals of life, health and economy at risk – **trillion of euros per year are already lost in ecosystem services**.<sup>12</sup> Simply put, without fish, there are no fishers, without clean and healthy waters, there is no blue tourism. In the context of increasing insecurity, marine health is an essential contributor to economic resilience and political stability.

## The Simple Plan

Strengthening the implementation and enforcement of existing ocean-related legislation **is the simplest way** to reap the environmental, social and economic benefits of the CFP, as well as guarantee the wellbeing of coastal communities including traditional fishers. There is no time nor need to go through another legislative process on the CFP unnecessarily consuming time, capacities and resources at EU and Member State level, while risking legal uncertainties. Fully applying the existing rules is the **fastest and most effective way to have immediate impact** on the ground right away. It is essential for a **competitive and thriving EU**.

The European Ocean Pact should provide for an **Implementation and Enforcement action plan** for all ocean-related legislation and policies, including the CFP. **It is the “Simple Plan”**. It would outline what the Commission could already be doing today to ensure the objectives of marine and fisheries policies are achieved, including ending overfishing under the CFP and ensuring a blue just transition supporting small-scale, low-impact fishers (SSF). ‘Simplification’ can be found in stringent and consistent implementation of already agreed international and EU targets and objectives, a reliable enforcement framework, and providing for support of SSF (e.g. via access to quota allocation and funding) – as a straightforward way. A revision of the CFP would not address the actual reasons for poor implementation and enforcement. Instead, it would imply further burden and adaptation efforts for all relevant stakeholders including national authorities which would in turn delay the benefits of the law to be felt on the ground. A revision would come too late, at too high costs, distracting from allocating all resources and efforts needed into solutions today – while SSF would face further uncertainties and years where their livelihood is put at risk.

## Fixing the real problems...

The deregulation mantra that “there are too many rules” will not enable the EU to address its most pressing challenges,<sup>13</sup> nor the actual bottlenecks in practice:

The Commission’s Environmental Implementation Review<sup>14</sup> highlights the key reasons for implementation shortages, including **“insufficient integration of the environmental objectives** in the framing and execution of public policies with a significant environmental footprint, **ineffectiveness of environmental**

<sup>10</sup> European Commission, “[Environmental Implementation Review](#)”, 2022.

<sup>11</sup> European Court of Auditors, “[Special report 28/2024: Enforcing EU law – The Commission has improved its management of infringement cases, but closing them still takes too long](#)”, 2024.

<sup>12</sup> European Commission, “[An Advocacy Toolkit for Nature](#)”, 2021.

<sup>13</sup> CAN Europe, Corporate Europe Observatory, EEB, European Public Service Union, Syndicat European Trade Union, Friends of the Earth Europe, “[Ursula von der Leyen: Protect people, nature, and democracy in EU regulations](#)”, 2025.

<sup>14</sup> European Commission, “[Environmental Implementation Review](#)”, 2022.

**governance**, including by those responsible for ensuring compliance on the ground, and **lack of transparency** on environmental information, which would enable those concerned, be they authorities or ordinary members of the public, to mobilise and act. The country reports also point to shortcomings in implementing the three pillars of the Aarhus Convention: access to information, public participation and access to justice, which affects implementation and enforcement at national level”. It stresses that the **“political will is the crucial ingredient for governments and decision-makers** to drive the timely, correct and efficient implementation of EU environmental policies and regulations, achieve their objectives and reap their benefits”. Also in the 2023 Marine Action Plan, the Commission states there is a need for **clear political commitment of all stakeholders and institutions** to make the current CFP policy tools work.<sup>15</sup>

The Commission – as the ‘Guardian of the Treaties’ – is the only EU institution who has the power to initiate infringement proceedings against EU Member States not complying with EU law. And yet, during its last mandate, the Commission opened fewer than 560 legal proceedings against EU Member States breaching environmental law – the lowest number in two decades.<sup>16</sup> When looking at maritime affairs and fisheries, DG MARE only opened one new case in 2023.<sup>17</sup> Therefore, we welcome President von der Leyen’s call on the new Commissioners in their Mission Letters to **“make full use of all instruments for implementation and enforcement, including infringement proceedings”**.<sup>18</sup> To ensure this mission becomes a reality, a **systemic approach** to improve proper implementation and enforcement is needed.<sup>19</sup>

## ...with efficient measures today

Making full use of the existing power of the Commission – next to ensuring sufficient funding via an EU Ocean Fund – can contribute to reap the environmental, social and economic benefits of the CFP, as exemplified by the following:

- MSY:** The legal obligation to achieve sustainable fish stocks (achieving the maximum sustainable yield (MSY) exploitation rate) by 2020 has already passed – although rebuilding stocks to MSY levels and above can **increase fleet profitability**. In areas where it has been implemented, “stocks have recovered and **catches and incomes have increased**”.<sup>20</sup> For the **Baltic**, the Commission couldn’t be clearer: **“unless the Member States apply and implement EU legislation in full, fish stocks will not recover.”**<sup>21</sup>
- LO:** The landing obligation (LO) fully entered into force in 2019 and the **2024 Fisheries Control Regulation enables new ways of control** – including modernised registration and monitoring tools such as remote electronic monitoring (REM). The Commission highlights that the principles of the LO, “particularly regarding **avoiding**

<sup>15</sup> European Commission, Marine Action Plan 2023, COM(2023) 102 final.

<sup>16</sup> POLITICO, “Ursula von der Leyen has taken green enforcement behind closed doors”, 2024.

<sup>17</sup> Latest data available in the overview of the European Commission, “2023 Annual Report on monitoring the application of EU law”, 2024.

<sup>18</sup> European Commission, Mission Letter to Costas Kadis, 2024.

<sup>19</sup> ClientEarth and others have already initiated national litigation across Europe, but the Commission could address systemic failures. See e.g. ClientEarth, “NGOs take France to court over trawling in Mediterranean ‘protected’ marine areas”, 2024; “NGOs continue fight against bottom trawling in marine protected areas with lawsuit in Spain”, 2024; “Netherlands faces court as pressure to end bottom trawling in marine protected areas mounts”, 2025.

<sup>20</sup> European Commission, Fisheries and Oceans Pact 2023, COM(2023) 103 final.

<sup>21</sup> European Commission, “State of play and orientations for 2025”, COM(2024) 235 final.

**the waste of precious resources, are more relevant than ever**” – and that technological innovation is beneficial for developing **new business opportunities**, promoting **economic diversification**, providing a **competitive advantage**, enhancing data collection, control and enforcement, traceability and consumer information, and creating a **new generation of jobs**. It can also **simplify processes and reduce the administrative burden on operators**, being key to fostering a **level playing field**.<sup>22</sup>

**Policy coherence:** As already stemming from the EU Treaties and repeated in the CFP, policy coherence between environmental and fisheries legislation is mandatory. Especially **bottom trawling in European waters costs up to 10.8 billion euros annually to EU taxpayers** – and the economic costs far exceed the benefits.<sup>23</sup> In contrast, conserving and restoring fish stocks, which properly managed marine protected areas (MPAs) enable, could **increase annual profits of the seafood industry by more than €49 billion**.<sup>24</sup> Still, where Member States can protect the marine environment via joint recommendations under the CFP, it often had the consequence that “commercial fisheries interests were favoured over nature conservation requirements”.<sup>25</sup>

**Supporting SSF:** Allocating fishing opportunities by applying environmental and social criteria in a transparent and objective manner is a legal, enforceable obligation (Article 17: “shall”). Quota-allocation criteria can ensure a blue just transition and “support small-scale and coastal fishers, which represent nearly **75% of all fishing vessels registered in the EU and nearly half of all employment in the fishing sector**”.<sup>26</sup> Positive impacts of the full use of Article 17 and setting the right incentives exist on **the GDP and employment**,<sup>27</sup> and best practice examples are already known.<sup>28</sup>

<sup>22</sup> European Commission, Fisheries and Oceans Pact 2023, COM(2023) 103 final.

<sup>23</sup> National Geographic, “Press Release: Study: Bottom Trawling in European Waters Costs Society up to €11 Billion Annually”, 2025.

<sup>24</sup> European Commission, “The business case for biodiversity”, 2020.

<sup>25</sup> European Court of Auditors, “Special Report Marine environment: EU protection is wide but not deep”, 2020.

<sup>26</sup> European Commission, Fisheries and Oceans Pact 2023, COM(2023) 103 final.

<sup>27</sup> VertigoLab, “Study on Article 17 of the Common Fisheries Policy. Methodological considerations of an allocation of fishing quotas based on social and environmental criteria”, 2022.

<sup>28</sup> Seas at Risk, “Allocating fishing opportunities with environmental, social, and economic criteria in mind”, 2024.

## CFP Implementation and Enforcement Action Plan

**Better Implementation and Enforcement is the “Simple Plan”:** The following **list of key action points** with a clear timeline outlines what the Commission should focus on under the current **CFP**, linked with some of its related laws and policies. *This is a **non-exhaustive** list.*

No	Action	Timeline
<b>GENERAL IMPLEMENTATION AND ENFORCEMENT ACTIONS</b>		
1.	The European Ocean Pact provides for an <b>Implementation and Enforcement Action Plan</b> for all ocean-related legislation and policies, including the CFP.	June 2025
2.	The Commission <b>increases the staff and capacity allocated to its legal and enforcement units</b> (e.g. by indicating a certain percentage or certain number of new staff) to enable proper oversight, enforcement and implementation of EU rules. <sup>29</sup>	June 2025 / throughout mandate
3.	The Commission adopts a <b>zero-tolerance policy against</b> infringements of EU ocean-related legislation and increases its number of enforcement actions, including <b>suspension and recovery of EU funds and infringement procedures</b> against Member States who violate the law.	June 2025 / throughout mandate
4.	The Commission organises regular Implementation Dialogues with a <b>balanced representation from civil society and other key stakeholders, like small-scale and low-impact fishers</b> . The dialogues must be open and transparent and aiming for ways to <b>improve actual application of existing EU law in practice</b> . DG MARE expands its Annual Progress Report on Enforcement and Implementation to a real <b>Implementation and Enforcement Mechanism</b> to ensure actual implementation and enforcement of existing laws and policies. Similar to the “Environmental Implementation Review” (EIR), DG MARE regularly publishes a <b>“Fisheries Implementation Review”</b> (FIR).	Throughout mandate
5.	The Commission commits to an <b>EU Ocean Fund</b> that strengthens implementation and enforcement of existing ocean-related legislation, including the Common Fisheries Policy, the Nature Directives and the Nature Restoration Regulation, and contributes to international targets. The Ocean Fund will increase the EU financial resources available for the Ocean, and will be based on two pillars, to (1) <b>support the long-term restoration and conservation of the marine environment</b> , and (2) redirect subsidies from large-scale fisheries to <b>support a just transition towards small-scale, low-impact fisheries</b> .	June / July 2025 / throughout MFF / EMFAF revision

<sup>29</sup> The new report of the European Court of Auditors also suggests, among others, improving planning of the work required for enforcing directives as early as possible (including the **need for staffing**); and reinforcing infringement case management, see “[Special report 28/2024: Enforcing EU law – The Commission has improved its management of infringement cases, but closing them still takes too long](#)”, 2024.

SPECIFIC CFP IMPLEMENTATION AND ENFORCEMENT ACTIONS		
6.	As already committed to in the 2023 Marine Action Plan, the Commission “steps up implementation and enforcement of environment and fisheries rules” by “continuing or initiating <b>infringement proceedings</b> ,” and “by using the tools available under the CFP, such as <b>audits and monitoring action plans</b> together with the Member States”. <sup>30</sup>	2025 / throughout mandate
ENDING OVERFISHING: MAXIMUM SUSTAINABLE YIELD (MSY)		
7.	The Commission <b>renews its Specific Agreement with the International Council for the Exploration of the Sea (ICES)</b> that requests ICES advice on fishing opportunities fully in line with the legal requirements and objectives of <b>Articles 2 and 3 of the CFP</b> , including the ecosystem-based approach and the precautionary approach. The Commission must ask for advice on fishing opportunities that is explicitly geared towards (1) recovering fish populations within a concrete timeframe and maintaining them above sustainable levels, (2) preventing fish populations from, or minimising the risk of, falling outside safe biological limits, respecting legal safeguards in the EU’s Multi-Annual Plans, and (3) delivering on all relevant elements of “Good Environmental Status” (GES) under the Marine Strategy Framework Directive (MSFD), such as healthy population structures and/or food web integrity (e.g. leaving enough food in the sea for other marine life). <sup>31</sup>	Q2 2025 / throughout mandate
8.	Fully in line with the legal requirements and objectives of Articles 2 and 3 of the CFP, the Commission adopts <b>proposals on sustainable, ecosystem-based and precautionary limits on fishing opportunities</b> and the best available scientific advice in an era of climate change. The Commission does not adopt fishing limits above the <b>best available scientific advice</b> provided by the ICES when setting fishing opportunities for EU waters as well as for stocks shared with third parties. <sup>32</sup>	2025 / throughout mandate
9.	Fully in line with the legal requirements and objectives of Articles 2 and 3 of the CFP, where fully ecosystem-based and recovery-focused advice is not yet available, the Commission <b>needs to incorporate the necessary precaution</b> into the setting of fishing opportunities (e.g. based on the concept of maximum economic yield (MEY)) <sup>33</sup> or by setting total allowable catches (TACs) no higher than a certain fraction (e.g. 80% of the single-stock ICES headline advice)).	2025 / throughout mandate

<sup>30</sup> European Commission, [Marine Action Plan 2023](#), COM(2023) 102 final.

<sup>31</sup> ClientEarth and others, [“Letter to European Commissioner Kadis regarding the renewal of the Specific Grant Agreement with ICES”](#), 2025.

<sup>32</sup> See for more: ClientEarth, [“Taking stock 2024 – are TACs set to achieve MSY?”](#), 2024; ClientEarth and others, [“Joint NGO recommendations to the EU on fishing opportunities for 2025”](#), 2024; [“Joint NGO recommendations to the UK on fishing opportunities for 2025”](#), 2024.

<sup>33</sup> E.g. as already used in Australia, see Australian Government, [“Guidelines for the Implementation of the Commonwealth Fisheries Harvest Strategy Policy”](#), 2018.



10.	The Commission ensures full <b>public transparency in the process of setting fishing opportunities</b> following the finding of maladministration of the European Ombudsman in 2019/2020 <sup>34</sup> and following improvements in <b>Article 113 of the Fisheries Control Regulation</b> on access to fisheries data.	2025 / throughout mandate
11.	To reduce the risk of IUU fish entering the EU market, the Commission encourages <b>swift implementation of the mandatory IT CATCH system</b> , taking action against Member States that fail to implement the new requirements.	2026 / throughout mandate
<b>ENDING OVERFISHING: LANDING OBLIGATION (LO)</b>		
12.	To fully implement and enforce the LO under Article 15 CFP, the Commission supports and accelerates <b>the swift roll-out of Remote Electronic Monitoring (REM)</b> and ensuring full implementation and enforcement of the registration and monitoring tools in the new <b>Fisheries Control Regulation</b> .	Throughout mandate
13.	The Commission <b>adopts delegated and implementing acts to strengthen the EU fisheries control system</b> , including digital traceability of all seafood products, engine power monitoring, and REM of vessels at high risk of violating EU fisheries rules.	2025
14.	The Commission supports the role and responsibilities of the <b>European Fisheries Control Agency (EFCA)</b> in assisting the Member States to implement and monitor the LO fully.	2025 / throughout mandate
15.	In the absence of robust, comprehensive control and monitoring, the Commission <b>factors in poor compliance with the LO by proposing and setting TACs lower than the ICES maximum catch advice</b> , to ensure that the agreed TACs do not lead to fishing mortality beyond sustainable levels.	Throughout mandate
16.	The Commission makes <b>access to quota ‘top-ups’ conditional on demonstrated vessel compliance with the LO and full catch documentation</b> , notably through REM, supported by independent observer coverage as appropriate. <sup>35</sup>	Throughout mandate
17.	The Commission supports Member States in <b>creating and promoting quota redistribution solutions</b> , beyond traditional swaps, to avoid closing fisheries if quota is available elsewhere.	Throughout mandate

<sup>34</sup> Overview and documents to the complaint and finding, see ClientEarth, “[ClientEarth’s complaint to the European Ombudsman regarding the lack of transparency of the December Council TAC-setting process](#)”.

<sup>35</sup> Such top-ups were intended to allow fishers to legally land catches that would have been discarded prior to the LO, and therefore must not be made available to vessels that are not demonstrably complying with the LO.



18.	As already committed to in its 2023 Marine Action Plan <sup>36</sup> , the Commission, on the basis of new scientific advice, makes use of its <b>implementing powers under the Technical Measures Regulation (TMR)</b> .	2025
<b>MAKING POLICY COHERENCE BETWEEN FISHERIES AND ENVIRONMENTAL LEGISLATION A REALITY</b>		
19.	The Commission utilises its Joint Special Group on the EU Marine Action Plan and expands it to enable dialogue on <b>policy coherence between DG MARE and DG ENV</b> on a range of cross-cutting topics and on <b>implementation and enforcement</b> issues of environmental and fisheries related EU law – while accelerating infringement proceedings against Member States in breach of these laws.	June 2025 / throughout mandate
20.	The Commission carries out a comprehensive assessment of all the <b>EU MPA sites which are affected by mobile bottom contacting fishing gear</b> , and makes this assessment public.	Q4 2025
21.	Based on the assessment of the EU MPAs affected by bottom contacting fishing gear, the Commission adopts <b>Implementing Acts with emergency measures under Article 12 of the CFP</b> in order to alleviate the serious threat to the marine ecosystem or marine biological resources.	Q1 2026
22.	Based on the assessment of the EU MPAs affected by bottom contacting fishing gear, and as required <b>under Article 11(4) of the CFP</b> (“shall”), the Commission adopts <b>necessary emergency measures where Member States have failed to submit Joint Recommendations</b> where the absence of these measures would jeopardize the objectives of the Birds and Habitats Directives, the Marine Strategy Framework Directive or the Nature Restoration Regulation.	Q4 2026
23.	Where Member States do not submit Joint Recommendations in time or if they are deemed incompatible with the legal requirements, the Commission may <b>under Article 11(3) subparagraph 2 and 18(6) CFP submit a legislative proposal</b> for those conservation measures to be taken. The Commission should introduce <b>horizontal Joint Recommendations</b> covering multiple MPAs in entire regions/sub-regions, with straightforward and precautionary measures to prohibit mobile bottom fishing in these MPAs.	Throughout mandate

<sup>36</sup> European Commission, Marine Action Plan 2023, COM(2023) 102 final.

24.	The Commission ensures the <b>full implementation of the 2023 Marine Action Plan<sup>37</sup>, which calls on Member States to phase out bottom trawling in all MPAs by 2030</b> . In particular where Member States have not taken sufficient action on addressing bottom trawling in MPAs in their required roadmaps, <sup>38</sup> the Commission should prioritise emergency measures and joint recommendations under Articles 12(1) and 11(4) CFP.	2025 / throughout mandate
25.	The Commission strengthens the <b>implementation of the EU Mediterranean Sea Regulation</b> , particularly Article 4 prohibiting the use of trawl nets over specific habitats, including posidonia beds, coralligenous and maerl beds and in all Natura 2000 sites designated to protect these habitats.	2025 / throughout mandate
26.	The Commission adopts a <b>robust guidance on Natura 2000 and fisheries</b> , with standards such as prohibiting the most destructive fishing gears in MPAs, to ensure joint recommendations follow scientific advice and the precautionary principle.	2025
27.	The Commission, with the Member States, collects and consolidates data to establish the extent and threat posed by <b>bycatch of sensitive species and seabirds</b> , particularly species identified as being of conservation concern – especially by establishing an adequate observer programme to provide sound data collection on bycatch with adequate coverage and reliable information. That data on fisheries’ impact on wider ecosystems should be registered in accordance with the 2017 <b>Data Collection Framework Regulation</b> .	Throughout mandate
28.	The Commission sets <b>guidelines</b> for Member States to effectively implement threshold values <b>for all descriptors of Good Environmental Status under the MSFD</b> by 2030. As already committed in its 2023 Marine Action Plan, the Commission “step[s] up <b>enforcement under the MSFD</b> , which so far has only focused on reporting requirements, and it will pursue more substantive cases of incorrect implementation of the Directive.” <sup>39</sup>	2025 / throughout mandate
29.	The Commission fully monitors <b>National Restoration Plan implementation</b> by Member States, evaluating effectiveness and using its enforcement powers to ensure the goals of the Nature Restoration Regulation will be achieved in time.	2026

<sup>37</sup> European Commission, [Marine Action Plan 2023](#), COM(2023) 102 final.

<sup>38</sup> Seas at Risk, Oceana, ClientEarth, [“Multiple EU countries are failing to stop destructive fishing in Protected Areas, analysis finds, as several face legal action”](#), 2025.

<sup>39</sup> European Commission, [Marine Action Plan 2023](#), COM(2023) 102 final.

30.	The Commission delivers an effective <b>evaluation of the Marine Spatial Planning Directive (MSPD)</b> . It considers the progress Member States have made towards achieving the goals outlined in the EU Biodiversity strategy and international commitments to achieve 30x30 and 10x30, in the Nature Restoration Regulation, as well as the impact of destructive fishing on MPAs to ensure better coherence between environmental and fisheries legislation. The evaluation should further consider how effective the current text was at implementing an ecosystem-based approach to planning.	2026
31.	Based on the results of the study launched by the Commission on seabed carbon sequestration in EU waters, <sup>40</sup> the Commission develops a <b>proposal to identify and effectively protect the most important carbon-rich habitats and carbon storage potential in EU waters</b> , particularly from the impacts of bottom fishing.	2026
32.	The Commission strengthens the <b>implementation and enforcement of the Deep-Sea Regulation</b> to delineate the trawling footprint and expedite the protection of Vulnerable Marine Ecosystems with closures for mobile bottom-contacting gear.	Throughout mandate
33.	The Commission uses other relevant, existing environmental legislation such as the <b>Water Framework Directive</b> to achieve greater biodiversity and habitat recovery, e.g. by removing barriers to the migration of diadromous species. The <b>Water Resilience Initiative</b> must fully support the objectives and ensure better implementation and enforcement of the Common Fisheries Policy.	Throughout mandate
<b>ENABLING A BLUE JUST TRANSITION AND SUPPORTING SMALL-SCALE, LOW IMPACT FISHERIES</b>		
34.	The Commission urges and, where needed, enforces Member States to <b>implement Article 17 of the CFP and monitors their compliance</b> by applying environmental and social criteria for national allocation of fishing opportunities, for example through incentivising the use of selective fishing gear and low-impact fishing practices, and reflecting the contribution to local fishing communities and the implementation of fair labour practices.	2025 / throughout mandate
35.	The Commission adopts, after a transparent exchange with key stakeholders including civil society and small-scale, low-impact fishers, a <b>vademecum on the allocation of fishing opportunities</b> in order to improve transparency, promote sustainable fishing practices across the EU, and to support and enable the transition towards small-scale, low-impact fishers.	2025
36.	The Commission provides further <b>guidance for the definition of low-impact fishing</b> . <sup>41</sup>	2025

<sup>40</sup> European Commission, “[Study on the seabed’s natural carbon sequestration capacity and related impacts from seabed-disturbing activities](#)”, 2024.

<sup>41</sup> See e.g. WWF, “[From Niche to Norm: Setting Sail for Low-Impact Fisheries in the EU](#)”, 2023.

37.	The Commission ensures, together with MS, full public transparency on the allocation of fisheries opportunities either by publishing <b>annual EU level reports or by creating a new database with precise catch and effort data</b> in a usable form <b>per Member State</b> .	Throughout mandate
38.	In line with Target 18 of the Global Biodiversity Framework, the Commission ensures the phase out of harmful subsidies by 2030 the latest. As outlined in action point No. 5, the Commission adopts a proposal for the Multiannual Financial Framework for 2028-2034 which includes an ambitious <b>EU Ocean Fund</b> that increases the EU financial resources available for the Ocean and is based on two pillars, to (1) <b>support the long-term restoration and conservation of the marine environment</b> , and (2) redirect subsidies from large-scale fisheries to <b>support a just transition towards small-scale, low-impact fisheries</b> .	June / July 2025 / throughout MFF / EMFAF revision
39.	The Commission releases a <b>roadmap to guide Member States in decarbonizing the fishing fleet</b> . This decarbonisation roadmap will include binding national targets to be achieved by 2030, 2040, and 2050, with the goal of making the fishing sector completely carbon neutral by 2050 within the existing capacity ceilings set by the CFP.	January 2026

## About ClientEarth

ClientEarth is a non-profit organisation that uses the law to create systemic change that protects the Earth for – and with – its inhabitants. We are tackling climate change, protecting nature and stopping pollution, with partners and citizens around the globe. We hold industry and governments to account, and defend everyone's right to a healthy world. From our offices in Europe, Asia and the USA we shape, implement and enforce the law, to build a future for our planet in which people and nature can thrive together.

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