

Vision 2040 for fisheries and aquaculture

Response to the Call for Evidence

With the Vision 2040 for fisheries and aquaculture, the Commission can provide a **real, coherent pathway**, aligning all stakeholders **behind the same objective to turn the tide for fishers and coastal communities, and ensuring a resilient and sovereign Europe**.

Today's unstable supply chains and tense geopolitical context demand strong action to ensure Europe's strategic autonomy and resilience. Protecting marine waters and safeguarding Europe's own fish populations is not an option – it is the very foundation for a resilient, sovereign and prosperous Europe. The World Economic Forum declares biodiversity loss and ecosystem collapse – including the marine ecosystem – as one of the most severe risks in the next decade¹. And yet, Europe's seas are “generally in poor condition due to increasing pressures from human activities”, with more than “93% of Europe's marine areas (...) already under pressure from human activities². It is estimated that 40% of fish and shellfish populations in Europe's seas are “still not in good status or fished sustainably”³. Climate change may also “account for up to half of the combined impacts on marine ecosystems”⁴. While EU's Member States have not achieved the goal of Good Environmental Status of marine waters by 2020, overfishing is still happening despite the legal deadline to end it by 2020, and we are still far away from having enough effectively managed Marine Protected Areas by 2030. Without fish, there is no fishing, and these imminent threats endanger both the autonomy of European food supply and the livelihood of coastal communities who depend on the availability of organic resources.

At the same time, case law from the world's top courts – the International Tribunal of the Law of the Sea and the International Court of Justice, both spelling out the content and standards of marine obligations

¹ World Economic Forum, [Global Risks Report 2025](#).

² EEA Report, [“Healthy Seas, thriving fisheries: transitioning to an environmentally sustainable sector”](#), August 2024.

³ EEA Report, [“Healthy Seas, thriving fisheries: transitioning to an environmentally sustainable sector”](#), August 2024.

⁴ EEA, [“How climate change impacts marine life”](#), November 2023.

resulting from customary law and international agreements to which the EU and all EU Member States are parties to⁵ – have never been more clear by asking for a “stringent” due diligence standard when protecting the marine environment and fight climate change⁶. Measures taken in this regard must be based on best available science and the precautionary approach⁷. It follows from this case law that the time of thinking in siloes has passed and real policy coherence across all relevant laws and policies – including environmental, climate and fisheries law – is needed to deliver results in practice. Moreover, State action is not limited to promises on paper in visions or legislation – the EU and Member States need to include monitoring and enforcement mechanisms, requiring a “certain level of vigilance in their enforcement and the exercise of administrative control”⁸.

The Vision 2040 for fisheries and aquaculture can now translate these opportunities and requirements into a **clear pathway** and – fully in line with the simplification agenda – provide for utmost clarity for all stakeholders involved. To avoid becoming another ‘paper commitment’, it should focus on how to support all actors involved in **effective implementation and safeguarding compliance** with the international and European environmental and fisheries targets and commitments in practice. The Vision 2040 can and must also be embedded in the broader context of the ocean laws and policies and **strengthen coherence** among the upcoming European Ocean Act, the revision of the Marine Strategy Framework Directive, the Energy Transition Roadmap and the next EU Multiannual Financial Framework.

Key priorities for the Vision 2040

1. New political commitment to apply legislation in a truly coherent manner

First and foremost, the Vision 2040 for fisheries and aquaculture is a key opportunity to renew the political commitment of all relevant stakeholders and institutions to work towards achieving a healthy Ocean as the fundament for healthy fisheries and thriving coastal communities in a truly policy coherent manner. This Vision 2040 should be built on the “Blue Manifesto” – signed by more than 140 organisations – that sets out a vision and clear roadmap for EU action to address systemic problems and ensure a healthy and resilient ocean by 2030⁹.

The Commission itself has already made it crystal clear: **“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**

⁵ See recent landmark advisory opinions: International Tribunal of the Law of the Sea (ITLOS), Request for an Advisory Opinion Submitted by the Commission of Small Island States on Climate Change and International Law, Advisory Opinion, No. 31, 21 of May 2024 (**ITLOS, AO 2024**); have been issued by the International Court of Justice (ICJ); International Court of Justice (ICJ), Obligations of States in Respect of Climate Change, Advisory Opinion, I.C.J. Reports 2025, 21 of July 2025 (**ICJ, AO 2025**). Another breakthrough advisory opinion has been issued by the Inter-American Court of Human Rights (IACtHR), The Climate Emergency and Human Rights, Advisory Opinion OC-32/25, 29 April 2025, (**IACtHR, AO 2025**), although the latter is not directing binding on the EU / its Member States.

⁶ ITLOS, AO 2024, para. 239; ICJ, AO 2025, paras. 138 and 343.

⁷ The precautionary approach is an “integral part of the general obligation of due diligence” under the duty to prevent significant harm to the environment, ICJ, AO 2025, para. 294, quoting from para. 131 of ITLOS, Responsibilities and obligations of States with respect to activities in the Area, Advisory Opinion, 1 February 2011, ITLOS Reports 2011, p. 10, at p. 47, para. 135.

⁸ ICJ, AO 2025, para 281; ITLOS, AO 2024, para 235.

⁹ Joint NGOs, Blue Manifesto: the roadmap to a healthy ocean in 2030, October 2024.

stakeholders and institutions to implement the environmental legislation effectively, use the current CFP policy tools and make them work”¹⁰.

The EU Treaties already prescribe coherence as a core feature of the EU acquis (Art. 7 TFEU), especially when it comes to environmental protection (Art. 11 TFEU). Moreover, both the EU and its Member States need to adhere to the principle of sincere cooperation. This includes the obligation for Member States to ensure the fulfilment of the obligations resulting from EU law, as well as the obligation to refrain from any measure which could jeopardise the attainment of the EU’s objectives (Art. 4(3) TEU).

The Vision 2040 should now bring about this new political commitment to make full use of environmental legislation and the Common Fisheries Policy (CFP) and its related laws and policies. It should also re-affirm the ecosystem-based approach as the foundation of ocean governance¹¹, including fisheries, as well as the science-based approach and precautionary principle. These principles have already been outlined as key ones in the European Ocean Pact¹².

2. Provide for a clear pathway in Vision 2040 and related laws and policies (esp. Ocean Act)

The Vision 2040 for fisheries and aquaculture must also **align with the objectives and targets set out in the upcoming European Ocean Act, which should be to achieve Good Environmental Status as the overarching objective for ocean policy**. Overall, the EU framework must provide for a clear pathway for all sectors involved, including fisheries and aquaculture, and outline the commitments and targets in a **tangible manner** – i.e. targets should be clear, timebound (including intermediate targets), measurable and enforceable. A comparison can be made with criteria set out in the recent judgment of the European Court of Human Rights (ECtHR) in light of climate change (Klimaseniorinnen)¹³. This included the finding that in working towards achieving carbon neutrality States needed to set out clear, **tangible intermediate targets, timelines and pathways**. The ECtHR also outlined that these targets need to be updated with due diligence, and in line with the best available science.

While the Vision can include what’s needed from the fisheries sector to achieve those targets, the new **EU Ocean Dashboard** should also be used as a monitoring and tracking instrument.

3. Enabling implementation and safeguarding compliance of commitments

To avoid another “paper commitment” without real impact on the ground, the Vision 2040 must fully take into account the objectives of existing legislation and focus on how to support its implementation and compliance – including enforcement actions, where needed. In particular, the Vision should outline in much

¹⁰ European Commission, [Marine Action Plan 2023, COM\(2023\) 102 final](#), February 2023 For more, see also [State of play and orientations for 2025, COM\(2024\) 235 final](#), June 2024.

¹¹ Be it in the “Guidelines for implementing an ecosystem-based approach in maritime spatial planning” from CINEA in 2021, or in the MSFD evaluation report 2025, the European Commission stresses that both, the MSFD and MSPD, follow a ‘strong sustainability’ perspective. This means that “economic goals can only be pursued if the basic societal needs are fulfilled which, in turn, can only be achieved within the limits of a healthy environment. This implies that the environmental goals should take precedence, followed by the social and economic goals. Decision-making should thus always occur within the environmentally safe and socially just space. In practice this implies that environmental thresholds are not exceeded”; see European Commission, [MSFD evaluation report](#), March 2025, p. 39, 40, and footnote 139; European Commission, [Guidelines for implementing an Ecosystem-based Approach in Maritime Spatial Planning](#), September 2021, p. 20.

¹² See European Ocean Pact: “This Communication proposes actions based on four key principles: a source-to-sea approach on tackling pollution; a precautionary principle; a science-based approach to policy decisions; and an ecosystems-based approach.”, page 6.

¹³ See ECtHR, 9 April 2024, [Verein KlimaSeniorinnen Schweiz and Others v. Switzerland \(application no. 53600/20\)](#) (esp. §550).

more detail how to support the implementation of the CFP and environmental laws in order to address the current flaws in practice.

The European Environment Agency already confirms 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”¹⁴. 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”.

Therefore, the Vision 2040 should address the current gap of implementation and take into account the recommendation made by various stakeholders in this context, including:

- ClientEarth’s **“CFP Implementation and Enforcement Action Plan”**¹⁵, suggests a way forward for strengthening the implementation and safeguarding compliance of the CFP and its related policies as 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.
- Joint Briefing Series **“Recommendations to the EU and the UK on fishing opportunities”**¹⁶, that assist the responsible decision-makers in the European Union (the European Commission, the Council of the EU and the Member States) and the United Kingdom (the UK Government and devolved administrations) in managing fishing opportunities in a way that:
 - Finally ends overfishing,
 - Significantly contributes to restoring and/or maintaining all fish stocks above healthy levels and to minimising levels of incidental catches, and
 - Safeguards marine ecosystem functioning and resilience, also in light of mounting pressures like climate change.
- Joint NGO **“Working Group Recommendations”** on the Energy Transition Partnership for EU Fisheries & Aquaculture
- The **“Make Fishing Fair Roadmap”**, led by small-scale fishers (SSF) from across Europe and coordinated by Blue Ventures and the Low Impact Fishers of Europe, that outlines how to support SSF.

4. Enabling achieving a vision with adequate financial support

A Vision without a strong financial basis will not translate into impact in practice. Therefore, the Vision 2040, together with the negotiations on the next EU Multiannual Financial Framework (MFF), must ensure adequate funding.

¹⁴ Birdlife, Bloom, ClientEarth, Coalition Clean Baltic, EBCD, MSC, ProSea, SDG4Med, Sciaena, Seas at Risk, [“Working Group Recommendations”](#).

¹⁵ ClientEarth, [CFP Implementation and Enforcement – The Simple Plan](#), April 2025.

¹⁶ Joint Briefing Series, [“Recommendations to the EU and the UK on fishing opportunities”](#).

Experience has shown how EU marine and fisheries goals can remain ineffective unless directly linked to public spending. **In the past, instruments such as the MFF and the European Maritime, Fisheries and Aquaculture Fund (EMFAF) were not sufficiently aligned with binding policy objectives, resulting in investments that often undermined the CFP objectives rather than support them.** Past and current EU fisheries and ocean subsidies illustrate this challenge. Between 5% and 12% of the funds distributed by Member States through the EMFAF (between €59-138 millions) were channelled into harmful subsidies for the marine environment – more than twice the amount of the funding dedicated to protecting and restoring biodiversity¹⁷. **At the same time, most vulnerable part of the blue economy, such as the small-scale coastal fishing sector, remain under-supported:** despite representing 75% of the total EU fleet, the small-scale fishers received only about 20% of funding from the past European Maritime and Fisheries Fund (EMFF)¹⁸.

Any future financial framework – and the Vision 2040 – must:

- explicitly acknowledge the objective to phase out harmful subsidies as already agreed under Target 18 of the GBF;
- ensure coherence with new international fisheries commitments, including the phase-out of harmful subsidies under the WTO Fisheries Subsidies Agreement; and
- explicitly acknowledge the need for coherence between ocean governance objectives and EU budgetary instruments, in particular the upcoming Multiannual Financial Framework (MFF).

Ensuring such coherence is not merely a matter of ambition, but of effectiveness. Public funding that directly or indirectly supports activities undermining marine ecosystems weakens the credibility of EU ocean policy, distorts markets, and delays the transition towards a sustainable, low-impact blue economy. Conversely, aligning financial instruments with ocean objectives can reduce policy fragmentation, support long-term economic resilience, and ensure a fair transition for ocean-based sectors and coastal communities.

For the Vision 2040 to have a genuine meaning, its development and implementation must therefore be supported by EU and national public funding fully aligned with its objectives. This includes the systematic exclusion of public support for environmentally harmful activities, as well as the prioritisation of investments in marine protection, restoration and sustainable practices across all ocean-related sectors, including fisheries. For more details, please refer to our joint NGO paper “The next EU budget: Investing in ocean resilience and thriving coastal communities”¹⁹.

¹⁷ WWF Report, Can your Money Do Better ? Member States spend billions of EU funds on activities that harm nature, May 2024.

¹⁸ ClientEarth, Small-scale fishers revealed as least supported recipients of EU funds, March 2023.

¹⁹ ClientEarth, BirdLife Europe and Central Asia, BLOOM, Blue Marine Foundation and Seas At Risk, The next EU budget: Investing in ocean resilience and thriving coastal communities, NGO policy briefing on the post-2027 Multiannual Financial Framework (MFF), February 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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