



*European Economic and Social Committee*

**NAT/749**  
**European Maritime and Fisheries Fund (EMFF)**

## **OPINION**

European Economic and Social Committee

**Proposal for a Regulation of the European Parliament and the Council  
on the European Maritime and Fisheries Fund and repealing Regulation (EU) No 508/2014 of  
the European Parliament and the Council  
[COM(2018) 390 final – 2018/0210 (COD)]**

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Council referral	12/07/2018
European Parliament referral	02/07/2018
Legal basis	Articles 42, 43(2), 91(1), 100(2), 173(3), 175, 188, 192(1), 194(2), 304 and 349 of TFEU
Bureau decision	22/05/2018 (in anticipation of the referral)
Section responsible	Agriculture, Rural Development and the Environment
Adopted in section	27/11/2018
Adopted at plenary	12/12/2018
Plenary session No	539
Outcome of vote (for/against/abstentions)	214/1/3

## 1. **Conclusions and recommendations**

- 1.1 The EESC welcomes the Commission proposal, which provides a more flexible system for the Member States in line with their strategic priorities, and aims to support a sustainable business model for fishers and maintain the competitiveness of the fisheries sector. In particular, the EESC asks for rapid approval, a more accessible financing mechanism and a more proportionate and harmonised sanctions system. The organised civil society and the regional stakeholder platforms should be involved at every stage of the process, from drafting national plans to implementation and final assessment.
- 1.2 The EESC considers that the current budget for the EMFF should be maintained (EUR 6.4 billion). This is crucial to achieving the radical changes and upgrades requested by the European Union to the fisheries sector. In particular, it should be noted that the current EMFF amounts to 0.6% of the MFF 2014-2020, meaning that any reduction in its funding will have a negligible impact on the overall EU budget but may have dire consequences for many coastal regions.
- 1.3 The EESC notes that the Commission proposal is not based on a detailed economic and social impact assessment. This shortcoming is aggravated by the fact that the fisheries sector has been in crisis for more than 20 years. The Committee therefore requires the prompt involvement of the European Commission (specifically DG Employment) and the launch of sector-based social dialogue to identify the most appropriate measures to compensate for the economic and social impact.
- 1.4 The EESC points out that aquaculture and the blue economy are still very far from compensating for the loss of enterprises and workplaces. The Committee encourages the Commission and the Member States to establish a simplified mechanism both for new aquaculture projects and for modernising existing ones.
- 1.5 The new EMFF should give priority to the social dimension to strengthen and fund measures for the promotion and support of social dialogue, safety, working conditions and capacity building, enhancing the competence of workers and the "generational renewal".
- 1.6 The Committee encourages the European Commission and the Member States to take stronger action by enforcing the full traceability of imports, from both an IUU and a food safety perspective. The fight against any form of slavery and exploitation either on board or during on-shore processing should be a cornerstone of the new global EU strategy on fishery and ocean governance.
- 1.7 The EESC recommends the financing of new ships to replace old ones provided that the fleet concerned has no excess capacity and the target species are fished at MSY levels. This measure should include the use of more sustainable and efficient engines to reduce CO<sub>2</sub> emissions and to ensure crew safety.
- 1.8 The Committee recommends maintaining the current criteria for providing financial support and compensation in case of temporary or permanent cessation of fishing activity. It is important that both fishers and the owners of fishing vessels can benefit from these financial tools.

1.9 The Committee endorses the proposal for specific measures in favour of small-scale coastal fishing, which is a vital driver for the livelihoods and cultural heritage of many coastal communities. Nevertheless, in order to support a sustainable business model for small-scale fishing it is also important to establish tailored conservation and technical measures where it is more widespread (e.g. the Mediterranean Sea). Such measures should be adapted to the different forms of fishing and the biological characteristics of each sea. The EESC considers that effective data collection, control and enforcement are essential pre-conditions for responsible fisheries management that boosts social and economic benefits for fishers and local communities.

## 2. Introduction and methodology

2.1 The new European Maritime and Fisheries Fund (EMFF) is part of the Multiannual Financial Framework (MFF) 2021-2027. The EMFF is a fundamental tool to support the achievement of the objectives of the Common Fisheries Policy (CFP), foster the implementation of the Union's maritime policy and strengthen international ocean governance, especially in the framework of the 2030 Agenda for Sustainable Development.

2.2 The European Economic and Social Committee (EESC) sees the EU's new long-term budget as a crucial factor for sustainable development, growth and cohesion, and more generally for the future of Europe. For this reason, this opinion is closely connected to all the others analysing specific funds under the new MFF 2021-2027<sup>1</sup>.

## 3. Gist of the proposal

3.1 The new EMFF 2021-2027 will focus on four priorities:

- Fostering sustainable fisheries and the conservation of marine biological resources;
- Contributing to food security through sustainable and competitive aquaculture and markets;
- Enabling the growth of a sustainable blue economy and fostering prosperous coastal communities;
- Strengthening international ocean governance and enabling safe, secure, clean and sustainably managed seas and oceans.

3.2 The new EMFF budget will amount to EUR 6.14 billion in current prices. The resources are mainly split between shared and direct management. EUR 5.31 billion are allocated under shared management with Member States and EUR 0.83 billion under direct management by the European Commission.

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<sup>1</sup>

EESC opinions: [Multiannual Financial Framework after 2020](#), OJ C 440, 6.12.2018, p. 106; [Common Provisions Regulation 2021-2027](#) (not yet published in the OJ); [Regulation on the European Regional Development Fund and Cohesion Fund 2021-2027](#) (not yet published in the OJ); [Regulation on European Territorial Cooperation 2021-2027](#), OJ C 440, 6.12.2018, p. 116; [Regulation on cross-border cooperation 2021-2027](#), OJ C 440, 6.12.2018, p. 124; [European Social Fund +](#) (not yet published in the OJ); [Proposal for Horizon Europe \(the new FP9\)](#), (not yet published in the OJ).

3.3 The Commission proposal aims to overcome the limitations of the EMFF 2014-2020 and to establish a financing system able to cope with new challenges in the framework of the Sustainable Development Goals. The main features of the new EMFF are as follows:

#### 3.3.1 *Simplification*

The 2014-2020 EMFF is based on a rigid description of financing possibilities and eligibility rules, which has complicated implementation for Member States and beneficiaries. The 2021-2027 EMFF provides a wider range of possibilities whereby Member States can target support for their strategic priorities. In particular, the regulation describes different areas of support under each priority, providing a flexible framework for implementation. Member States will prepare their programme indicating the most appropriate methods for achieving the priorities. They will be granted flexibility with regard to the eligibility rules.

#### 3.3.2 *Alignment with other EU funds*

In the new MFF, rules applying to all the funds are set out in a Common Provisions Regulation (CPR). In particular, specific synergies with other funds (ERDF, ESF, etc.) will be developed.

#### 3.3.3 *Conditionality*

In line with the UN Conference on Sustainable Development (Rio+20) and SDG No 14 on conservation and sustainable use of oceans, the EU is committed to promoting a sustainable blue economy, the conservation of biological resources and the achievement of good environmental status, to prohibiting certain forms of fisheries subsidies which contribute to overcapacity and overfishing, to eliminating subsidies that contribute to illegal, unreported and unregulated (IUU) fishing and to refraining from introducing such subsidies. For this reason, the regulation establishes restrictions and conditions ("ineligible operations") in order to avoid negative impacts on fisheries conservation.

#### 3.3.4 *Focus on performance*

The performance of EMFF support will be assessed on the basis of indicators. Member States will report on progress towards established milestones and targets. The Commission will carry out an annual performance review based on performance reports prepared by the Member States, allowing for early detection of potential implementation issues and corrective actions.

#### 3.3.5 *Environmental, social and economic sustainability*

Sustainable fishing and aquaculture are amongst the main goals of CFP. In line with a broad concept of sustainability, economic, social and employment benefits should be pursued along with environmental objectives. Maximum sustainable yield (MSY) will remain the key method for ensuring sustainable fishing. Support will be provided for the transition to more sustainable activities. Compensation for the extraordinary cessation of fishing activities will be granted only

if the impact of such circumstances on fishers is significant<sup>2</sup>. Small-scale coastal fishing, outermost regions, generational renewal, education and training, and health and safety at work will all have a specific focus and support under the new EMFF. The landing obligation could remain a critical aspect due to its huge financial implications. For this reason, the EMFF will support innovation and investments that contribute to the implementation of the landing obligation, such as investments in selective fishing gears, in the improvement of port infrastructure and in the marketing of unwanted catches. Finally, support will be provided for fishers and ports for modern collection and waste management of lost fishing gears and marine litter.

- 3.4 More than 60% of the fish consumed in the EU is imported from third countries<sup>3</sup>. In order to fill the gap it is even necessary, besides fishing activities, to support aquaculture, which provides fish which meet high quality standards and which are available at affordable prices. For this reason, the EMFF will support the promotion and sustainable development of aquaculture, including freshwater aquaculture.
- 3.5 60% of the oceans are beyond the borders of national jurisdiction. This means that the EU will need to be more active and play a stronger role in the global challenge of ocean governance. The EMFF will support this commitment for safe, secure, clean and sustainably managed oceans under direct management. Finally, improved border protection (coastguard cooperation) and maritime surveillance are emerging challenges that will be financed by the 2021-2017 EMFF.
- 3.6 This support will be complemented by specific funding for the European Fisheries Control Agency, the sustainable fisheries partnership agreements (SFPAs) and the Union's membership in regional fisheries management organisations (RFMOs) and other international organisations, which also contribute to the enforcement of the Union's policies in the fisheries and maritime sectors.

#### 4. **General comments**

- 4.1 The EESC welcomes the Commission proposal which provides a more flexible system for the Member States in line with their strategic priorities, and aims to support a sustainable business model for fishers and maintain the competitiveness of the fisheries sector. In particular, the Committee points out that the main problem of the current EMFF is the low level of implementation<sup>4</sup>. This situation has two main causes:
- Late approval and consequent late implementation. The co-legislators only adopted the EMFF Regulation in May 2014, and then the Member States needed additional time to devise and approve their national programmes.

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<sup>2</sup> If the commercial activities of the vessel concerned are stopped for at least 90 consecutive days and if the economic losses resulting from the cessation amount to more than 30% of the average annual turnover of the business concerned during a specified period of time.

<sup>3</sup> COM(2018) 390 p. 12.

<sup>4</sup> The current EMFF 2014-2020 has been implemented to a very limited extent. In particular, 29% of financial resources have been allocated to selected projects and just 8% of the total budget has been spent by the selected projects. Data: European Commission. <https://cohesiondata.ec.europa.eu/funds/emff#>

- The current system is too complicated and bureaucratic. Moreover, many fishers hesitate before applying for funding due to the disproportionate financial risk they may incur. According to Article 12.2 of the proposal (which maintains the existing provisions), if during a period of five years following the final payment, they commit any serious infringement<sup>5</sup>, they will become retroactively ineligible and be obliged to refund everything they received. Such a requirement should be removed.
- 4.2 For the reasons outlined above, the EESC asks for rapid approval, a more accessible financing mechanism and a more proportionate and harmonised sanctions system. All fishers should consider the EMFF to be a user-friendly system intended to improve their activity in terms of sustainability and quality. This aspect will play a crucial role for the implementation and respect of the new fishing control system recently proposed by the European Commission<sup>6</sup>. The Committee recommends that organised civil society and the regional stakeholder platforms be involved at every stage of the process, from drafting national plans to implementation and final assessment.
- 4.3 The new EMFF budget (EUR 6.14 billion) has been reduced (-4%) compared to the ongoing 2014-2020 EMFF (EUR 6.4 billion). The EESC is aware that Brexit is a solid reason for this financial cut. Nevertheless, the EESC points out that the radical changes requested by the European Union of the fisheries sector, which employs 150 000 fishers and, throughout the whole value chain, 730 000 workers generating almost EUR 400 billion a year in wages and net profit, need a higher amount or, at least, no cut to the current budget. It should be noted that the current EMFF amounts to 0.6% of the MFF 2014-2020, meaning that any reduction in its funding will have a negligible impact on the overall EU budget but may have dire consequences for many coastal regions.
- 4.4 The EESC notes that the Commission proposal is not based on a detailed economic and social impact assessment. This shortcoming is aggravated by the fact that the fisheries sector has been in crisis for more than 20 years and the measures provided for to achieve more sustainable fisheries and aquaculture were unable to reverse the trend<sup>7</sup>. The Committee therefore requires the prompt involvement of the European Commission (specifically DG Employment) and the launch of sector-based social dialogue<sup>8</sup> to identify the most appropriate measures to compensate for the economic and social impact.

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<sup>5</sup> A serious infringement carries a penalty. Such a penalty may vary in proportion to the seriousness of the infringement. In Spain, for example, it may vary between 601 and 60 000 euros. This means that a fisher could be sentenced to a penalty, proportionate to the gravity of the infringement, of only 601 euros, but as a result of Article 10.2 he could lose up to hundreds of thousands of euros of support for an investment which may have been completed and paid for five years earlier. This impact is particularly huge on small-scale fishing.

<sup>6</sup> EESC opinion on [Fisheries control](#), (see page XX in the OJ).

<sup>7</sup> For example, in Italy, on 8 000 km of coasts, the number of fishing vessels fell by around 33% in the last 30 years. Ships are on average 34 years old and need urgent upgrades or to be replaced with new ones. 18 000 workplaces were lost in this period (the fishing sector in Italy has 25 000 workers). Data: Mipaaf, 2016.

<sup>8</sup> EU Sectoral Social Dialogue Committee - Sea Fisheries (EUSSDC).

- 4.5 The EESC points out that the measures undertaken to develop aquaculture and the blue economy are still very far from compensating for the loss of enterprises and workplaces, mainly due to an excessively bureaucratic system. The Committee encourages the Commission and the Member States to facilitate a simplified mechanism both for new aquaculture projects and for modernising existing ones with a specific focus, at regional level, with a definition of allocation zones of aquaculture (AZA).
- 4.6 Sustainable fisheries remains the main goal and the fisheries sector should be enabled to achieve it. However, this priority as proposed by the Commission does not clarify whether measures financed under the current EMFF are included for the improvement of working and security conditions, e.g. for training, advisory services, promotion of human capital, social dialogue, young fishers or health and safety. As identified by industry and administrations, there is a problem of shortages of skilled professionals, which hinders the "generational renewal". The EESC urges the co-legislators to give priority to the social dimension to strengthen and fund measures for the promotion and support of social dialogue, safety, working conditions and capacity building, enhancing the competence of workers. Otherwise, young professionals will not be attracted by this industry.
- 4.7 Modernisation of vessels to increase safety on board without increasing fishing capacity, generational renewal and adequate working conditions, training and salaries are crucial indicators of the EU's shortcomings in growth and strength. The EMFF should engage fishers in marine biodiversity conservation also through the support of innovative gears to increase selectivity, impact studies or mitigation of fisheries impacts, among others. In this framework, the "downshifting" approach taken by the Commission will not be able to solve all problems linked to sustainability and competitiveness.
- 4.8 The EESC notes that most of the fish imported from third countries have been fished less sustainably than comparable EU catches, not to mention working conditions either on board or for on-shore processing. The resulting lower prices amount to unfair competition with EU fishers, harming any prospects of achieving stable minimum prices "at the first sale" which are a prerequisite for their survival. The Committee encourages the European Commission and the Member States to take stronger action by enforcing the full traceability of imports, from both an IUU and a food safety perspective, and to organise awareness-raising campaigns to inform consumers about European fish quality. Dubious retail practices such as displaying thawed fish on fresh fish counters without clear and unequivocal labelling must also be reined in.

## 5. **Specific comments**

- 5.1 The Committee endorses the new approach taken by the European Commission, which aims to establish a general framework without prescriptive measures, offering more flexibility for Member States, implementing authorities and beneficiaries. In particular, this simplified system should give the opportunity to create tailor-made national programmes. This, however, needs to take place ensuring a level playing field for the access to funding across the EU. Moreover, the CPR, which includes all implementing rules, should facilitate joint use of different EU financing programmes. Clear mechanisms should be established to verify that public money is in fact



spent where it is most needed and that financial aid is allocated for the sustainable management of the oceans.

- 5.2 The EESC supports the proposal to establish four main priorities. In particular, the Committee welcomes the specific focus on ocean governance and local development, in line with its previous opinions, in order to meet the SDGs and support small-scale fisheries<sup>9</sup>. Nevertheless, the EESC, points out that recently cases of slavery and exploitation have been discovered on European vessels<sup>10</sup> and unfortunately, such practices are even more widespread in third countries (including child slavery). The Committee considers that the new global strategy undertaken by the Commission should consider the fight against every form of human exploitation as a cornerstone.
- 5.3 The Committee considers the renewal of the fleet to be a key problem because, on average, European fishing vessels are more than 30 years old and a simple upgrade is often not enough. It is for this reason that the EESC recommends encouraging the financing of new ships to replace old ones provided that the fleet concerned has no excess capacity and the target species are fished at MSY levels. In addition, in view of the IMO strategy on the reduction of greenhouse gas emissions from ships that aims to reduce total annual emissions by at least 50 % by 2050, larger ships need to change their engines to adapt to and comply with this international objective. It is therefore essential to include the procurement of more sustainable and efficient engines to reduce CO<sub>2</sub> emissions and to ensure crew safety. In fact, as estimated by the FAO, fishing is a potentially dangerous activity and proper training for health and safety at work is needed in order to reduce the number of fatalities, injuries and work-related illnesses<sup>11</sup>. For all these reasons, it should be important to separate fishing capacity and biodiversity protection from fleet and engine renewal.
- 5.4 Support for temporary cessation has played a crucial role in improving the status of stocks, particularly as regards closed seasons, while at the same time partially compensating fishers for their loss of income. The Commission maintains this measure in the new financial framework but proposes new requirements which did not exist in the previous regulation. In view of the absence of reports on the misuse of funds for the purpose of temporary cessation, the Commission should respect and maintain the previous criteria in order to provide this assistance to the largest number of fishers who may need it. The same principle should be applied to permanent cessation. In both cases, it is important that fishers benefit from this financial support and not just the owner of fishing vessels, as established by the current EMFF.
- 5.5 Fishing is a seasonal activity and catches can be uncertain, exceeding at times the needs of the market. It is therefore necessary to have the means to manage production surpluses properly, helping to stabilise part of the production before putting it up for sale, in particular in the event of a reduction in catches. To achieve this, the EMFF should continue to support producer

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<sup>9</sup> EESC opinion on *Multiannual plan for small pelagic fisheries in the Adriatic Sea*, O.J. C 288, 31.08.2017, p. 68.

<sup>10</sup> <https://www.theguardian.com/world/2018/may/18/we-thought-slavery-had-gone-away-african-men-exploited-on-irish-boats>

<sup>11</sup> FAO estimates over 32 000 fatalities in the fishery sector per year at global level (<https://safety4sea.com/fishers-fatalities-give-impetus-to-fishing-vessel-safety-work/>).

organisations that need a temporary storage mechanism for fishery products intended for human consumption. To ensure its full operability, this aid should be made available without delay. In this regard, the EESC supports the maintenance of mechanisms to compensate for the cost of storage.

- 5.6 Generational renewal is another critical issue for the future of the sector. Some new initiatives to facilitate the purchase of a second-hand vessel, vocational training and improved working conditions can be useful, but they do not solve the main problem: low return on investments. This is particularly clear in small-scale fisheries, with vessels below 12 m operated at family level. The EESC notes that the constant loss of vessels and workplaces contradicts the Commission forecast of doubling the output of the EU fishing sector by 2030, in line with estimated global growth<sup>12</sup>.
- 5.7 The Committee endorses the proposal for specific measures in favour of small-scale coastal fishing, which is a vital driver for the livelihoods and cultural heritage of many coastal communities. This represents 75% of all fishing vessels registered in the EU and nearly half of all jobs. During the last decades, traditional and small-scale fisheries paid the highest price for the crisis and need a specific strategy to recover a solid position in the market. This initiative will also have positive effects on depressed local communities.
- 5.8 The Committee considers that innovative approaches are needed to manage small-scale fishing rights, and further collaboration is essential to help the sector to manage their quotas/days at sea, link production with marketing, or solve choke species issues. Coastal communities and the marine environment will benefit most when fishing opportunities are allocated on the basis of transparent environmental, social and economic criteria. Funds promoting sustainability and participatory processes may contribute to tackling these challenges and include actions such as facilitating workshops or designing participatory processes to interact with scientist and other stakeholders.
- 5.9 Community-led local development (CLLD) has been a very useful tool during the 2014-2020 programming period. This strategy played an important role in boosting economic diversification in local communities. For this reason, the Committee endorses the proposal to extend it to cover all blue economy sectors. The allocation of funding for a sustainable blue economy should however ensure social and economic benefits for current and future generations, restore and protect the diversity, productivity, resilience, and intrinsic value of marine ecosystems; and promote clean technologies, renewable energy and circular material flows.
- 5.10 The Committee sees the 2017 Malta Declaration "MedFish4Ever" as a cornerstone of EU action. Nevertheless, the EESC believes that specific conservation and technical measures should be adapted to the different forms of fishing and the biological characteristics of the Mediterranean Sea. In fact, the EESC has noted that the successful model offered by the multiannual plan for single-species fisheries (e.g. Baltic Sea) is less effective for mixed fisheries

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<sup>12</sup> OECD, *Ocean Economy in 2030*, 2016.

(e.g. Mediterranean Sea)<sup>13</sup>. Moreover, fishing methods in Northern and Southern Europe are completely different. In particular, fishing in the Mediterranean Sea is characterised by small-scale and traditional fisheries<sup>14</sup>. For this reason, the Committee recommends promoting research into stock assessment and data collection in order to prepare tailored, more efficient systems to protect biodiversity. Effective data collection, control and enforcement are essential pre-conditions for responsible fisheries management that boost social and economic benefits for fishers and local communities.

- 5.11 As already forecast by the EESC<sup>15</sup>, the landing obligation is one of the main problems for the sector, both for fishing companies and for the national authorities, due to its complexity and the high costs of transitioning to more sustainable fishing (i.e. use of specific selective gears). The new Commission proposal on fisheries control<sup>16</sup> should extend the current obligations for small-scale vessels and, in general, will establish new duties and tasks for the entire sector (i.e. CCTV compulsory on board). The EESC considers that a more simplified, flexible and pragmatic control system is needed, and proper support should be provided at national level to a high number of vessels. For this reason, the successful implementation of the new control system is strictly linked to the rapid and full implementation of the EMFF 2021-2027 in order to help all fishers to comply with the new regulation<sup>17</sup>.
- 5.12 The EESC points out that the new EU directive on reducing the impact of certain plastic products<sup>18</sup> (i.e. used fishing gears) combined with the new directive on port reception facilities<sup>19</sup> open up new scenarios and opportunities for sustainable fisheries and the circular economy. The measure intended to encourage the return of fishing gear through incentives for fishers should be extended to the return of all other waste and marine litter collected during fishing activities.
- 5.13 This initiative should be fundamental for the sector because, according to the laws currently in force, fishers are obliged to pay to dispose of them in the ports. This means that, nowadays, fishers pay to clean up the ocean and dispose of waste that they have not themselves produced, but rather collected. The EESC believes that fishers could provide important added value and, with adequate training, the act of cleaning up could become another profitable economic activity along the same lines as fishing tourism (the blue economy)<sup>20</sup>.

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13 GFCM, *The State of Mediterranean and Black Sea Fisheries*, 2016, p. 26. As highlighted by the GFCM-FAO, in single-species seas it is easier to carry out targeted fishing because few types of fish coexist there and so it is easy to set catch limitations. In contrast, in multi-species seas many species of fish can be found in the same area.

14 EESC opinion on *Reform of CFP*, point 1.3, [O.J. C 181, 21.6.2012, p. 183](#) and *Multiannual plan for small pelagic fisheries in the Adriatic Sea*, [O.J. C 288, 31.08.2017, p. 68](#).

15 EESC opinion on *Landing Obligation*, [O.J.C 311, 12.9.2014, p. 68](#). Point 1.2 “*Commission's proposal is unnecessarily complicated and will generate an undue and disproportionate amount of additional work for fishing operators when it comes to applying the landing obligation. As a result, it advocates opting for more pragmatic, clear, straightforward and flexible rules that genuinely give fishing operators time to adapt during a transitional period, without facing heavy penalties*”

16 COM(2018) 368

17 EESC opinion on [Fisheries control](#), (See page XX in the OJ).

18 COM(2018) 340 final.

19 COM(2018) 33 final.

20 EESC opinion on [Single use of plastics](#), (not yet published in the OJ).

- 5.14 The EESC, in line with the Commission proposal to allocate 25% of the entire EU budget to action for climate change, proposes that a significant share of this money be allocated to the renovation of ports, in order to "close the loop" of marine litter management and foster a circular economy. Specific funds, in the framework of a broader strategy of marine litter prevention, should be allocated to cleaning up rivers<sup>21</sup>. The EESC considers that models of open governance involving public authorities and organised civil society at local level, such as "river contracts", could be replicated with a structured approach, promoting the creation of cross-border networks<sup>22</sup>.
- 5.15 Many stakeholders have pinpointed difficulties in achieving a level playing field in areas where there are other uses of the sea, particularly in areas shared with fleets from third countries<sup>23</sup>. For this reason, a stronger EU role in international ocean governance could offer more opportunities in terms of environmental sustainability and fair competition.
- 5.16 The EESC supports the enforcement of controls on ships from third countries. Moreover, the Committee points out that a better traceability system for fish from third countries would be useful for tackling fraud and guaranteeing food safety.

Brussels, 12 December 2018

Luca JAHIER

The president of the European Economic and Social Committee

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21 UNEP Report, 2016. 80% of marine litter proceeds from rivers.

22 EESC opinion on [Single use of plastics](#), (not yet published in the O.J.).

23 MEDAC, questions on post-2020 EU funding for fisheries and maritime sector, February 2018.