

# Position paper

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## What future for SFPAs? Proposals for their evaluation by the Commission

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*Summary* - In view of the global evaluation of the Sustainable Fisheries Partnership Agreements (SFPAs) that will be carried out by the Commission in 2021, the author highlights the key points which will need to be assessed from the perspective of the impacts on African coastal communities. The author also suggests essential improvements to be made for the future of SFPAs so that they better respond to the needs of these communities.

## Introduction

In line with the ten recommendations made by a collective of NGOs and artisanal professional fisheries organisations (CFFA, May 2020), CFFA is taking the opportunity of the global evaluation of the Sustainable Fisheries Partnership Agreements (SFPAs) that will be carried out by the European Commission in 2021. The aim is to deepen the reflection on the implementation of SFPA provisions which are impacting African coastal communities, and to make a series of proposals so that they can better respond to the needs of these communities in the long term.

In 2013, the basic regulation of the Common Fisheries Policy (CFP) (1380/2013) introduced significant advances to the legal framework of the SFPAs by taking into account the needs of local communities (Art. 31.2, 1380/2013) [1].

[1] "[...] of mutual benefit to the Union and to the third country concerned, including its local population and fishing industry [...]."

In practice too, there have been improvements in the management of the SFPAs, especially with regard to the transparency of activities concerning the EU fleets and to contributions to the fisheries sectors of the partner countries, particularly for the artisanal sector. In particular, the European Union (EU) has made progress on the publication of lists of fishing authorisations for vessels in its external fleet and we encourage it to continue to monitor these vessels in a transparent manner.

However, there is a need for a paradigm shift so that the European taxpayer can be assured that the EU is working coherently through its various policies for responsible fisheries outside its waters. We believe that for these SFPAs to be truly sustainable and equitable, some adjustments are unavoidable, in particular in terms of promoting sustainable fisheries management and the sustainable development of the local sector, especially the artisanal sector, as provided for in the Regulation.

As the Commission is carrying out an evaluation of SFPAs, we would like the focus to be placed on fundamental aspects of their implementation, which need to be reviewed in order to ensure their sustainability. In this document, we identify a series of aspects, relevant to the sustainable development of the local sector, especially the craft sector, and then make proposals for necessary adjustments to be made.

## **1. Clarifying governance objectives of SFPAs in relation to the new EU commitments**

Overall, the general and even specific objectives of SFPAs need to be made explicit in order to really assess the impact of SFPAs on sustainable fisheries management and the development of artisanal fisheries in the countries of the region. For example, SFPAs should promote governance, without it being clearly explained what this may consist of, other than ensuring data collection, monitoring, control and surveillance [2]. Furthermore, fisheries governance involves much more than that, if SFPAs are integrated into the Sustainable Development Goals (SDGs), and the current work on International Ocean Governance, which aims to develop a sustainable blue economy worldwide. It is therefore fundamental that transparency and civil society participation are also at the heart of fisheries governance priorities.

[2] See Preamble §51, 1380/2013: "should contribute to the establishment of a high quality governance framework to ensure, in particular, efficient data collection, monitoring, control and surveillance measures."

The ambitions of the **EU Green deal** must also be reflected in EU external fisheries policy. Concretely, SFPAs must promote respect for human rights, including the right to food and food security, and contribute to the realisation of these rights in partner countries, and not simply expect the partner state alone to respect human rights, as enshrined in the SFPAs (Art. 31.6, 1380/2013) [3].

This must also be done in line with the **Farm to Fork strategy**, which includes a section on the external dimension entitled 'Promoting global transition', and which emphasises that *"the EU will support the global transition towards sustainable agri-food systems, in line with the objectives of this strategy and the SDGs"*. Although it almost completely ignores seafood production, it states that the EU should *"ensure that international cooperation is used to build sustainable food systems in partner countries"*. In addition, it proposes to develop legislation which would prevent imports of products linked to deforestation and human rights violations.

In conjunction with SFPAs, the implementation of this strategy should therefore consider activities that threaten the right to food, and protect the activities of the artisanal fisheries sector (access, social protection, etc.) and regulate imports of fishmeal and fish oil that threaten small pelagics, a staple food for local communities (CFFA, October 2020).

The EU should also develop ambitious legislation to ensure that the highest standards of environmental and social sustainability apply to all products consumed on EU markets, including imports. In this context, the EU should help developing third countries to engage and make the necessary changes to meet these sustainability standards, through all its external policies, including the SFPAs.

On the other hand, as the EU is pledged to participate in the implementation of the **FAO Guidelines on Small-scale Fisheries**, this should be reflected in the objectives of the SFPAs, particularly as the guidelines are rooted in a human rights approach. The "SMEFF" regulation on the external fleet (2017/2403) already integrates the implementation of these Guidelines in its preamble [4].

If the governance objectives of SFPAs are clarified, those of the ex-ante ex-post evaluation studies will also be better defined. This is in line with the recommendation of the Court of Auditors in its Special Report (ECA, 2015) *"to focus the ex-post evaluations on better selected aspects in order to achieve a coherent and comparable analysis of the return on public investments under the protocols, as well as a comprehensive critical analysis of their effectiveness for the EU and for the partner country concerned"*.

[3] "The Union shall ensure that Sustainable fisheries partnership agreements include a clause concerning respect for democratic principles and human rights, which constitutes an essential element of such agreements."

[4] See Preamble §5 : "In 2014, all members of the FAO, including the Union and its developing country partners, unanimously adopted the Voluntary Guidelines on Securing Sustainable Small-scale Fisheries in the Context of Food Security and Poverty Eradication. Point 5.7 of those Guidelines highlights that small-scale fisheries should be given due consideration before agreements on resource access are entered into with third countries and third parties. Those Guidelines call for the adoption of measures for the long-term conservation and sustainable use of fisheries resources and for the securing of the ecological foundation for food production, underlining the importance of environmental standards for fishing activities outside Union waters that include an ecosystem-based approach to fisheries management together with the precautionary approach."

The Long Distance Fisheries Advisory Council has recently issued a recommendation (LDAC, September 2020) on ex ante ex post evaluations, recommending, inter alia, more transparency and governance, including enhancing civil society understanding of the SFPAs in partner countries, market access for products fished under the SFPAs and impacts on women working in the sector.

### More can be done to...

- Clarify the governance objectives of the SFPAs in terms of their contribution to the fulfilment of human rights, including the **right to food and food security**, as well as **gender** issues, bearing in mind that women are key players and contributors in the sector;
- Take into account and implement the **FAO Guidelines on Small-scale Fisheries** as a general objective in the basic regulation and as a specific objective of the SFPAs, particularly in view of the upcoming International Year of Artisanal Fisheries in 2022 (IYAFA). Support for the artisanal fisheries sector should be made explicit; and to
- Consider the new EU commitments (**Farm to Fork Strategy, IOG, EU Green Deal**) in a coherent way within the regulatory framework of the SFPAs.

## 2. Improving the definition of stocks and the way in which they are allocated

The current basic Regulation does not provide a clear explanation of which fish stocks are subject to an access on the basis of a surplus (to be defined by the coastal State) and which are subject to quotas defined by RFMOs (Art. 31.1,4, 1380/2013). The management of these stocks is totally different and has distinct implications in the partner countries.

Indeed, access to **surplus** for **artisanal fisheries** is of crucial importance for fleets in waters under national jurisdiction, while the notion of surplus is meaningless for tuna fisheries in EEZs (CAOPA, November 2011).

### More can be done to...

- Clarify the difference in access to different stocks between stocks defined by surplus and stocks defined by quotas within RFMOs; and

### The evaluators...

...will have to assess the **implementation of the commitment to governance objectives**, in the light of the priorities of transparency and civil society participation, as we will develop further;

...should look at the **implementation of the human rights clause** and the contribution of SFPAs to the implementation of the FAO Guidelines on Small-scale Fisheries and how this could be taken into account through SFPAs (through sectoral support and access conditions);

...will have to assess how the **Commission integrates, and/or is preparing to integrate into its external dimension the commitments** made in the Green Deal, IOG, etc.

### The evaluators...

...will have to analyse the **surplus definition clause** in light of the resources which are shared with neighbouring countries and how each agreement fits into the region, especially in terms of the **management of small pelagics**.

- Apprehend the access to small pelagics in a more regional basis. Under the SFPAs, the Commission should encourage a concerted and coordinated management of small pelagics between the different coastal States sharing these stocks.

### 3. Enhancing stakeholder's participation, especially civil society

Although the CFP Regulation states that the SFPAs "*shall be in the mutual interest of the Union and the third countries concerned, including their local populations and fishing industry*" (Art. 31.2, 1380/2013), and that they allow "*to establish the governance framework, including [...] promoting the consultation processes of interest groups*" (Art. 32.1.b....), they are also a means of "*establishing the governance framework, including [...] promoting the consultation processes of interest groups*" (Art. 32.1.b...), 1380/2013), SFPAs are still being negotiated without adequate consultation with all stakeholders, particularly in partner countries. Likewise, the needs of the communities most affected by the SFPAs are often not properly taken into account.

The EU, for its part, organises a broad consultation that takes into account the interests of the sector and civil society (notably via the LDAC). However, the EU must ensure that this is also the case in the partner country, particularly in view of its obligation to ensure "*that EU fishing activities outside EU waters are based on the same principles and standards as EU law applicable in the area of the CFP, while promoting a level playing field for EU operators compared to other third country operators*" (Art. 28.2.d, 1380/2013).

The Court of Auditors recommended "*to better analyse the possible effect of the SFPA clauses on the use of the SFPA Protocol, while preserving mutual benefits for the EU and the partner countries concerned, possibly by consulting the relevant stakeholders to determine in which cases a more detailed analysis of the key provisions is needed*" (ECA, 2015).

#### More can be done to...

...make sure that the consultation with **stakeholders, including civil society**, is an element in the negotiation and implementation of SFPAs at two levels:

- The partner State has consulted its stakeholders before and during the negotiations of the Protocol; and that

#### The evaluators...

...will have to assess the implementation of this commitment on **consultation and on the effective participation of stakeholders**, including civil society, and the consideration of their needs in the negotiations.

- The consultation was organised specifically to define the priorities for sectoral support so that the process is as consensual as possible.

## 4. Assessing the implementation of the transparency clause

Transparency is key in fisheries governance. Publishing information related to SFPAs is crucial for local stakeholders.

We recommend an increased effort in this area on the following points:

### 4.1. PUBLISHING DATA CONCERNING ACCESS AND FISHING EFFORT IN PARTNER COUNTRIES' WATERS

It is essential to know the **overall fishing effort** in the waters of the partner countries. The Commission has gradually incorporated clauses in SFPAs encouraging, and even obliging, coastal partner states to be **transparent** about the agreements they have with countries other than the EU (as is the case with many RFMOs).

This has been done within the framework of the basic regulation, which stipulates that agreements must contain a clause prohibiting the granting of more favourable conditions to other fleets present in these waters than those granted to EU economic actors (Art. 31.6.a and 32.9.a, 1380/2013) implying non-discrimination (in order to promote the establishment of a level playing field).

Some agreements, such as those with Mauritania and Côte d'Ivoire, have included a **more robust transparency clause** [5]. This is a significant step forward; non-discrimination between EU and other foreign fleets can only be achieved if there is transparency between partners.

This transparency clause included in the SFPAs should be evaluated on the basis of the international standards established by FiTI. Similarly, it would be necessary to include provisions in the basic regulation to ensure the **publication of credible information, and accessible to citizens**, on the conditions of access of all fleets and the overall fishing effort in the waters of the partner countries.

### The evaluators...

...will have to assess how these **non-discrimination and transparency clauses are implemented**, in line with the FiTI standard, particularly with regard to catches and the prices paid for access; and

...will have to evaluate whether they can be included in all SFPAs.

[5] Article 2 of the Protocol on the implementation of the Fisheries Partnership Agreement between the European Union and the Republic of Côte d'Ivoire, 2018-2024 and Articles 1.4, 1.5, 1.6 and 1.7 of the Protocol setting out the fishing opportunities and financial contribution provided for in the Fisheries Partnership Agreement between the European Community and the Islamic Republic of Mauritania for a period of four years.

### More can be done to...

Effectively implement non-discrimination and ensure that the conditions of access of non-EU fleets to partner countries' waters are known, in order to better measure the overall fishing effort.

This is in line with the work of the FiTi:

- Increase transparency with regard to the overall fishing effort in third country waters by including specific clauses in the protocols;
- Publish the list of vessels under licence;
- Publish existing agreements with other foreign fleets;
- Publish EU catch levels (at least); and
- Publish EU licence fees (at least).

## 4.2 TRANSPARENCY ON THE USE OF PUBLIC MONEY: PUBLICATION OF SECTORAL SUPPORT ACHIEVEMENTS

Sectoral support is financed by the **public money** of European citizens. The Joint Commissions and the monitoring that is done by DG MARE agents allow the follow-up on the implementation. However, the publication on the achievements made with the sectoral support is still too incomplete. This is necessary for issues of transparency and ownership of results by the communities concerned, and that they can be seen in particular when their authorities do not publish them.

### More can be done to...

- Publish the sectoral support matrixes (FiTi B.11);
- Publish an annual report on the implementation of the actions in the matrix, including a list of the projects carried out with sectoral support funds and the amounts spent, so that a public debate can take place on how to improve the planning and use of sector support;
- Publish the minutes of the Joint Committees; and
- Publish the guidelines the Commission has developed on sectoral support (Council Conclusions 2012, p. 6). In the longer term, we believe that these guidelines should be given legal status to provide a clear and binding framework for the use of sectoral support.

### The evaluators...

...will have to assess the real contributions of sectoral support to the **needs of the sector, including artisanal fisheries**, identified in the matrixes beforehand; and

...should examine ways in which the Commission could, by involving the various departments concerned, better communicate on the implementation of sectoral support and on the projects carried out, in order to better track the use of public money.

## 5. Analysing in-depth the budgetary efficiency and economic viability of SFPAs

The budgets allocated to the SFPAs should be dedicated to the **development of a framework for sustainable fisheries in the partner countries**, in consultation with all other EU actions affecting fisheries in the partner country, combining budgetary rigour and capacity building, for an efficient use of funding, and a fruitful partnership. Our objective is to encourage the EU to carry out a real strengthening of fisheries management policies in the framework of its partnership with developing countries (CFFA, August 2020).

The sectoral support tool must evolve to be more effective and accountable to partner countries [6], based on **budget support**. The EU must evolve from a simple donor approach to a **partner** approach. Thus, support for fisheries management and the development of the sector in third countries could effectively be implemented using existing tools developed by the Directorate-General for International Cooperation and Development (DG DEVCO), the DG for European Neighbourhood Policy and Enlargement Negotiations (NEAR) and the European External Action Service (EEAS), while remaining steered by the Directorate-General for Maritime Affairs and Fisheries (MARE).

Furthermore, **public money** from European citizens should no longer be used to support fleets but to support fisheries governance and the development of robust fisheries management policies in partner countries, in line with the objectives of the external dimension of the CFP (in particular in the fight against IUU fishing). The basic regulation talks about contributing "*to the sustainability of economically viable fishing activities*" and not about maintaining fleets that are in deficit and cannot finance themselves in activity (art. 28.2, 1380/2013). It is therefore no longer justified for the EU to pay for part of the access of EU fleets to the detriment of strengthening the partnership for sustainable fisheries.

The 2011 Communication already provided for "*a progressive increase in the contribution of shipowners to the cost of access rights*" (EC, 2011). We believe that it is necessary to go beyond this and that **shipowners should fully finance their access**.

Therefore, sectoral support should not be linked to access rights, but should be based on the needs of the country, which makes synergies with the EDF necessary, given the relatively small amounts of sectoral support (especially for tuna agreements).

### The evaluators...

...will have to carry out a comprehensive review of the **implementation and monitoring of sectoral support**, and of the effectiveness of this tool;

...will need to examine **opportunities for capacity building**, with partnerships such as with EFCA (e.g. EFCA-DEVCO); and

...will also need to revise the **cost of access**, and the capacity of fleets to bear the costs of access.

[6] SFPAs still retain in substance the characteristics of trade agreements (notably because of the annual disbursement and the calculation of the amount of sectoral support based on access rights). Moreover, the current sectoral support (which leads to the verification of invoices, among other things) is not making the partner State accountable and is too close to the model of targeted action, which was not originally in the spirit of sectoral support.



The regulation also provides for **capacity building**, but this has not been implemented through SFPAs for some time and yet it is an important means in the implementation of policies (art. 31.c., 1380/2013)[7], which is also used in the framework of a DEVCO-EFCA partnership.

Legally, the basic regulation in fact provides for a distinction between financial assistance for sectoral support and for the payment of access, though leaving the methods of distribution and calculation unspecified (art. 32.2, 1380/2013)[8].

### More can be done to...

- Transition from sectoral support to **budget support**. As we suggest, this could be done from now on with partners who meet the eligibility criteria;
- Make shipowners bear the full cost of access payments, so that public money is freed up to support fisheries management and the development of the local sector in third countries; and
- Encourage EU partners to put in place a transparent system to ensure that all shipowners, European and others, pay the same fair price for access to their waters.

[7] "Other elements to strengthen the capacity of the third country to develop a sustainable fisheries policy".

[8] The only conditions are quite flexible: "As a condition for payments under the financial assistance, the EU requires specific results and closely monitors progress". They can be strengthened through a more empowering and efficient budgetary tool.

## 6. Reviewing the basis for calculating financial compensation

The amounts of financial compensation are currently calculated separately for the different fisheries. For tuna vessels, the amount is calculated in relation to a reference catch tonnage. For other fleets, it is calculated on the basis of the fishing possibilities offered for a certain number of vessels (small pelagic trawlers), or a certain capacity (for coastal trawlers).

When the amount depends on the quantities that have been captured, there is a danger of under-reporting of catches in order to pay less.

Although the SFPAs include strict catch reporting measures, landings are rarely made in partner countries' harbours, making catch monitoring complex, all the more so because of the shortcomings of the monitoring, control and surveillance (MCS) systems of the partner states. Flag States are also not always very active in monitoring and sharing catch data.

### The evaluators...

...will have to evaluate the **methods and bases of calculation**, comparing them with other systems, in order to identify the most suitable systems to enable third countries to receive fair compensation for the access offered to European vessels; and

.... will have to study the possibility of creating mechanisms for sharing information with coastal states, via the ERS.

### More can be done to....

- Re-evaluate the **basis of the calculations** for a more reliable and accurate system; and
- Work towards **standardisation and harmonisation of financial compensation.**

## 7. Evaluating control procedures and their shortcomings

We have seen that despite the Commission's efforts, **shortcomings remain in the control of European fleets outside EU waters**, even though Member States have an obligation to control the activities of their fishing vessels inside and outside EU waters (Preamble §17, 1224/2009).

The basic regulation states that *"should contribute to the establishment of a good governance framework to ensure, inter alia, the implementation of effective data collection, monitoring, control and surveillance measures"*(Preamble §51, 1380/2013). It also stresses that the EU must make *"efforts"* to monitor EU-flagged vessels under an SFPAs, and that flag States must provide detailed information and documentation on the activities of vessels flying their flag (Art. 31.7 and 31.8, 1380/2013).

However, it is known that Member States do not always communicate the information and that fleets do not always carry out activities in compliance with the regulations (SFPAs, SMEFF) and that sanctions are too often absent (CFFA, July 2020).

The 2011 Communication stated that the Commission should *"ensure that Member States comply with the catch reporting rules applying in the waters of partner countries, in particular by making full use of existing legal instruments, such as the IUU Regulation"* (EC, 2011: point 3.2). The Commission should also seek to introduce provisions in bilateral agreements to prevent abusive reflagging (Ibid.: point 3.3).

Coastal states are responsible for control in waters under their jurisdiction. Nevertheless, the capacities of EU partner states in terms of MCS are often limited. Although SFPAs encourage MCS capacity building, particularly through sectoral support, this can only be done concretely through capacity building in addition to the allocation of funds.

### The evaluators...

...will have to assess what is Commission doing concretely to **monitor the activity of EU fleets;**

...will have to evaluate whether and how **Member States** are effectively providing **detailed information on the activities of their fleets** and whether accountability mechanisms are in place; and

...will also need to assess how sectoral support contributes concretely to the partner state's MCS capacity building (see below).

To this end, the basic regulation provides for *"establishing the governance framework, including the establishment and maintenance of the necessary scientific and research institutes, promoting consultation processes with interest groups and providing for monitoring, control and surveillance capacities, as well as other elements relating to capacity building for the development of a sustainable fisheries policy by the third country"* (art. 32.1.b., 1380/2013).

The opinion of the European Parliament's Environment Committee (ENV) on the revision of the Control Regulation contains proposals for measures for more transparency in the EU fish value chain, with more effective traceability systems (Transparent Fisheries, September 2020).

### More can be done to...

- Ensure Member States systematically communicate regarding their fleets activities. The Commission should ensure its right to follow up (infringement proceedings) if necessary;
- Publish the audit on the external fleet that has been carried out on the occasion of a pilot case; and
- Better provide for capacity building in SFPAs, particularly on MCS, based on the model of technical assistance such as exists between EFCA and DEVCO.

## 8. Assessing fish value chains

Very few European catches enter third countries because, in general, resources fished by European vessels for the EU market are not landed or processed in partner countries. The possible entry-points for assessing value chains are based on catches landed in third countries and on the arrangements that sectoral support puts in place to bolster processing and commercialisation processes in partner countries.

Some SFPAs include provisions on compulsory landings for local markets (2% in Mauritania for example [9]) and on voluntary landings ("faux thon" in Côte d'Ivoire). We know very little about the value chain following the landings of European catches.

As women are particularly involved in the processing and marketing, the impacts of the SFPAs on women in fisheries in the partner country, on land (trade and processing) or at sea, as well as their needs, should also be studied.

### The evaluators...

...should make an inventory of the value chains of European catches landed, of their landings (see if the landing clauses are respected, and if so why not) and tracking of the catches landed; and

...should study the impacts of the SFPAs on women in third country fisheries in order to identify needs that could be taken into account in sectoral support.

[9] See Annex 1 of the Protocol to the EU-Mauritania DPAA, Chapter III: Fees, Article 2 "Fees in kind".

This would help to identify, including through interviews with local women's groups, the needs that should be duly taken into account when part of the sectoral support is earmarked for the development of local fisheries.

### More can be done to...

- Systematize the tracing and monitoring of EU catches in partner countries ;
- Strengthen supply and processing arrangements for EU catches when they are landed in partner countries for the local market with help from sectoral support funds; and
- Specifically support women's work and needs (sectoral support and targeted landings).

## 9. Evaluating the implementation of the social clause

SFPAs provide in the annex the conditions for the boarding of seafarers from partner countries, as well as seafarers from ACP countries. Since 2015, there has been a social clause agreed by the European social partners (Europêche shipowners and the ETF trade union), which they wanted to see inserted in SFPAs, relating to work and social protection standards. This clause aims to guarantee decent working conditions for non-European fishermen working on board vessels operating under SFPAs. It should also be noted that ILO Directive 2017/159 ILO C188 applies since 2019.

For example, the text of the current EU-Côte d'Ivoire Memorandum of Understanding includes the main elements of this social clause in Chapter VI for the boarding of seafarers. However, this is not sufficient in view of the difficulties encountered (insufficient training of seamen, numerous irregularities in the contracts, opacity in the setting and payment of wages).

The question of social conditions is fundamental for the artisanal sector, as boarding a vessel as crew is a source of employment for coastal communities.

More specifically on training, special attention could be paid to it via sectoral support, for example financial support for STCW (Standards of Training, Certification and Watchkeeping) training and, moreover, priority could be given to the enrolment of trained seafarers.

### The evaluators...

...will have to assess whether and how the **conditions for the boarding of seafarers** are respected and any **difficulties encountered**, and the modalities for the implementation of this social clause; and

...should explore the possibilities of **STCW trainings**.

### More can be done to...

- Better supervise and more transparency is needed for the conditions under which seafarers are taken on board;
- Integrate the social clause into all SFPAs and implement it as agreed by the European social partners; and
- Develop rigorous training systems.

## 10. Assessing the obligation for policy coherence for development

We would like to recall the European Commission's commitments to policy coherence for development and the importance of ensuring this coherence in the implementation of fisheries partnerships with partner countries.

The basic regulation recalls on several occasions the need for cohesion between the various external policies of the EU and in particular "*with the general objectives of the Union's development policy*" (preamble § 52, article 28.2.b, 1380/2013).

In order to ensure coherence, it will also be necessary to have a regional approach to all EU interventions in the fisheries sector in third countries, in coherence with all the tools operating in the same regions. From our point of view, negotiating several SFPAs in the same region is not a regional strategy.

Although efforts are being made for coordination between DG MARE and DG DEVCO, there is a need for a clear political commitment by the Council and the Parliament to develop coherent strategies in the Indian Ocean, Atlantic and Pacific, with the aim of promoting the development of sustainable fisheries, based on a regional approach and coherence between EU actions including fisheries, trade, development and all other policies that influence the development of fisheries in these regions.

The 2011 Communication already went in this direction by referring to regional strategies: "*The Commission will develop and implement regional strategies for sustainable fisheries at ocean or sea level, for example in the Pacific and Indian Oceans and in the Mediterranean Sea*" (EC, 2011).

### The evaluators...

...will have to assess the implementation of the **principle of coherence with other EU policies** and how "effective coordination" is achieved in practice; and

...will also have to evaluate the **political commitments for a coherent approach** of the Commission's actions and projects on the seas and fisheries at regional level.

This is also part of the recommendations of the Court of Auditors in its 2015 audit: "*(a) define regional strategies for the development of fisheries governance and ensure that protocols negotiated in the same region are consistent with the corresponding regional strategy as well as with the provisions relating to other EU funds*", and "*(b) ensure effective coordination on the subject of sectoral support of DPSAs with other development partners active in the fisheries sector*" (ECA, 2015).

### More can be done to....

- Align the budgetary and capacity building tools of the development cooperation policy at SFPA level for more visibility and cohesion with the partner country and increased budgetary rigour, while contributing effectively to the development of partner countries' fisheries policies; and
- Develop a strategy by regions, to ensure consistency between EU programmes and partnerships in the fisheries sector between the different stakeholders (MARE, DEVCO/NEAR, ENV, TRADE, etc.). For this, a clear political commitment is essential.

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