

## MEDAC RESPONSE TO THE CALL FOR EVIDENCE ON THE EUROPEAN OCEANS PACT

### Whereas:

- in the *“Political guidelines for the next European Commission 2024-2029”*, President Ursula von der Leyen declared that *“the European Oceans Pact will focus on boosting the blue economy and ensuring the good governance and sustainability of our oceans in all of their dimensions”*;
- on 20/01/2025, the MEDAC duly noted the call to make contributions and/or propose possible solutions, and to submit any and all available information relative to the “European Oceans Pact” initiative, on which the Commission plans to issue an official communication in the second quarter of 2025;
- the formal aim of the Commission’s initiative is to improve the governance of oceans and promote a sustainable blue economy, in light of the fact that *“our seas, oceans, waters and their ecosystems sit at the heart of many of our global challenges: climate regulation, food security, provision of medicines, new sources of clean energy, job creation, resilience and competitiveness, inclusive growth and cohesion, security and strategic autonomy”*;
- the Commission acknowledges that the EU’s blue economy is based on some of the most dynamic sectors of the economy: renewable energy, aquaculture, blue technology and ocean observation, blue biotechnology, shipping, ports, coastal and maritime tourism, but that these policies *“still remain rather too fragmented to contribute to the achievement of Sustainable Development Goal 14 of the 2030 Agenda for Sustainable Development”*;
- the Commission states in the document that the Pact will foster a holistic approach, integrating environmental, economic, and social dimensions, and will ensure that all stakeholders (including local communities, authorities, industries and NGOs) are engaged in ocean governance.

### Noting that

- from a legal point of view, the EC emphasises that since 2007, with its Integrated Maritime Policy and Blue Growth Policy, the EU has been developing a cross-sectorial approach to the blue economy, building notably on the EU policies for fisheries (TFEU art. 43), environment (TFEU art. 192), transport (TFEU art. 100) and research (TFEU art. 182), and that it is necessary to develop a single framework for all ocean-related policies, both within the Commission and in relation to stakeholders;
- the document cites the powerful synergies with other political and legal instruments that are relevant to an Oceans Pact, in areas such as the marine environment, waterways, ports, maritime transport, fisheries and aquaculture, blue biotechnology, marine genetic resources, the bioeconomy, the new European Internal Security Strategy (for cybersecurity and critical maritime infrastructure), the circular economy, among others;

In consideration of the above, the MEDAC concurs in general terms with the need to protect the Oceans, taking all their various components into account, so as to conserve them for the future

while exploiting their living and non-living resources sustainably. In view of this, the MEDAC provides the following remarks and observations:

- the fisheries sector is key to guaranteeing food in coastal communities. The socio-economic component is fundamental and cuts across the sector, from the work carried out at sea to processing activities on land, and every stage of the production chain; The fisheries sector includes recreational fishing and its contribution to jobs and economy [LINK](#) and tourism all year round.<sup>1</sup>
- the MEDAC is willing to cooperate to ensure that the fisheries sector remains sustainable, competitive and resilient, and to guarantee a level playing field for European fisheries at all stages of the production chain, with due consideration of the other sectors within the blue economy and their integration (pursuant to Commission Delegated Regulation (EU) 2022/204 of 8 December 2021 laying down detailed rules on the functioning of the Advisory Councils under the CFP). Lastly, the MEDAC members wish to recall the fundamental importance of fisheries management based on achieving due balance between the three sustainability pillars of the CFP: environmental, economic and social;
- the time allocated to the consultation is excessively short (fewer than 30 calendar days) given the underlying issues. It is unthinkable to request contributions and proposals with such a tight deadline, which does leave time for thorough, collaborative examination of the subject matter within the working groups;
- equating the responses provided by individual EU citizens (while absolutely legitimate) with the replies from collective organisations, such as Advisory Councils like the MEDAC, does not provide a representative picture of the current situation ([LINK](#));
- it is felt that there is a lack of coherence regarding the substantive issue, between the recitals and the analysis in the document of the underlying causes and the necessary course of action. In several parts, it is emphasised that a holistic approach will be followed in the Oceans Pact, also listing the different policies which have an impact on the sea. However, where the causes and possible remedies are concerned, the document continues place a great deal of blame on fisheries activities and mentions controls and restrictions, justifying this decision with the fact that “the initiative falls within an area” (conservation of marine biological resources under the Common Fisheries Policy) in which the EU has exclusive competence pursuant to Article 3(1)(d) of the TFEU;
- nor should it be forgotten that the impact of the European fishing fleet in the oceans is low compared to that of non-EU fleets ([LINK](#));
- pollution of the seas caused by waste and by-products from agro-industrial activities on land, as well as from other anthropogenic pursuits, has an enormous impact which is not emphasised nearly enough. The vast majority of pollutants in the oceans (including plastics) are produced on land by industrial and civil run-off, fertilisers, and chemicals used in agriculture. It should be added that the relative impact of EU countries is low compared to that of non-EU countries due to the controls and standards that need to be met in the EU;

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<sup>1</sup>EAA and IFSUA recall that: “The EU recognises the role of recreational fishers in promoting the prosperity of (coastal) communities across Europe. In addition to being a leisure activity, recreational fishing serves the cultural ecosystems with individual benefits of and by recreational fishers’ spending.” [LINK](#)

- nothing is said about the hazards of maritime transport. How often is serious damage caused by oil tankers flying non-EU flags? There have been numerous episodes of this nature in the past, including disasters. Every year, the Mediterranean Sea is subjected to oil spills totaling around 600 000 tonnes. There have been 27 accidents in the Mediterranean Sea over the last 30 years, resulting in the spillage of around 272 000 tonnes of crude oil into the sea ([LINK](#)) In addition to these episodes, there are also all the intentional oil spills from ships, called “operational spills”, which stress the ecosystem considerably, sometimes causing environmental damage that is difficult to calculate, even using current scientific evaluation systems; shipping is also the cause of the introduction of invasive species in many places.
- the Mediterranean is still a hotspot of biodiversity, it is home to over 12 000 marine species, around 10% of the all the inhabitants of the planet’s seas ([LINK](#)). Its coastline of more than 46 000 km has hosted and nourished a great many populations for thousands of years. It is a precious area for marine organisms, but also for the survival of humankind. The renewal capacity of the surface water mass alone has been calculated to be as much as one hundred years, and this sea is stressed by the high urbanisation rate caused by the ever-increasing human population, and by the consequent uses of the sea, such as the exploitation of mineral and edible resources, maritime transport, and the tourist industry; as well the negative consequences of climate change both on fish stocks and consequently to fishing activity. Furthermore, the decrease in freshwater floating into marine waters is an overlooked problem. [LINK](#)
- where maritime traffic is concerned, around 200 000 large vessels operate in the Mediterranean every year representing around the 20% of global marine traffic. This includes ferries, cargo ships, and commercial vessels, among which on a daily basis there are around 300 tankers transporting oil - more than 350 million tonnes (over 25% of the global total) pass through its waters by ship per year. Large fishing vessels operating in the Mediterranean account for less than 3% of commercial vessels ([https://webgate.ec.europa.eu/fleet-europa/index\\_en](https://webgate.ec.europa.eu/fleet-europa/index_en)). This figure hardly needs further comment.

The MEDAC proposes the application of a truly holistic approach, to be implemented in a framework that goes beyond the EU: limiting EU citizens in order to work towards a goal that will never be achieved without wider collaboration would be a brake on the development and competitiveness of the EU itself.

Maintaining viable oceans that are rich in biodiversity is a goal that the fisheries sector sets itself too, but it is not the weakest link in the chain that should be made to pay for it.

The MEDAC recalls the key role of commercial and recreational fisheries for coastal populations. These activities are the bedrock of their historical and cultural traditions, and they ensure the livelihoods of these communities.

If a Pact is to be made for the Oceans, it must involve **ALL THE COUNTRIES** that border the Oceans in question.