



Feedback from the European Marine Board Secretariat to the European Commission's call for evidence on the [EU strategy for fisheries external action](#)

(12 September 2025)

The European Marine Board (EMB) Secretariat welcomes this initiative to update the EU's strategic approach to external action on fisheries and on EU Ocean diplomacy, and to ensure a level playing field.

We would start by recalling the importance of ecosystem-based fisheries management (EBFM) to inform any fisheries action: The need to implement EBFM is enshrined in many EU and internal policies and agreements, but its implementation is still lagging behind. In this context, ecosystem models are an important instrument to inform fisheries action because they can integrate a wide variety of environmental, economic and social data, examine multiple and complex ecosystem interactions, and can make forecasts based on specific management scenarios. Moreover, ecosystem models such as Ecopath with Ecosim (<https://ecopath.org/>) also have the capability to do value chain analysis, which can be used to investigate how different parts of the fishing industry contribute to the overall economy and social systems (including job creation, availability of fish to consumers, etc.). This analysis can help build a more sustainable value chain through trade and market measures and promote fair social conditions and labour standards internationally. The new Horizon Europe project Surimi (<https://www.surimi-project.eu/>) will use this and other tools to ensure that the EU Digital Twin of the Ocean can be used to manage our fisheries better, both within and outwith Europe. However, lack of data and/or difficulties in accessing relevant data at the required resolution to limits our ability to do such analyses even in Europe.

Ensuring that RFMOs decisions are based on robust science also requires capacity development and training. The recently concluded Horizon 2020 project EcoScope (<https://ecoscopium.eu/>) developed an Academy (<https://ecoscope.getlearnworlds.com/>), specifically aimed at training people in applying EBFM through the use of these tools.

The consultation text highlights that the economic profitability of the EU fleet depends on access to fishing grounds and that designing a coherent and complete sustainable trade and market policy for aquatic food will contribute to both reducing the environmental impacts of EU trade and levelling the playing field on the EU market. The aim of this policy is also to improve fisheries workers' conditions by encouraging the full transposition and implementation. However, for this policy to be truly sustainable and improve fisheries workers' conditions, it is critical to ensure that EU fisheries do not overfish local fish stocks, creating unemployment for third countries, particularly for the small-scale fisheries that depend on these stocks.

Regarding the 12-month study on feed for aquaculture which aims to provide, among other, information on feed ingredients, including fishmeal and fish oil in aquaculture feed, we would like to stress the importance of also considering environmental implications of these feeds, specifically for the ecosystems and species where these fishmeal and fish oil originate.

Finally, our recently published Policy Brief on citizens' views and preferences for ecosystem-based fisheries management (<https://marineboard.eu/publications/citizens-views-and-preferences-ecosystem-based-fisheries-management>) provides important information for the planned study on labelling and consumer information (also covering imports), which the Commission plans to deliver in Q2/Q3 2025.