



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MARITIME AFFAIRS AND FISHERIES

The Director-General

Brussels
MARE/C1/CA/ms

Subject: Response to the opinions of the South-Western Waters Advisory Council (SWWAC) on Vulnerable Marine Ecosystems (VMEs) and on the resilience of pelagic fisheries to climate change

Dear Mr Lopez, dear Members of the South-Western Waters Advisory Council,

I would like to thank you for sharing with the Commission your opinions on the protection of VMEs and on the resilience of pelagic fisheries to climate change¹. I will address the key aspects of your opinions below.

On the protection of Vulnerable Marine Ecosystems (VMEs)

The SWWAC opinion calls for the revision of Implementing Regulation (EU) 2022/1614 in order to safeguard food sovereignty and to foster the socio-economic development of marine territories, and it also presents a minority opinion by NGOs.

The General Court of the European Union has delivered its judgment on 11 June 2025 in the cases T-681/22 (Spain v Commission) and T-781/22 (Madre Querida and Others v Commission) and it touches on many aspects raised in your Opinion 177, notably the assessment of gear's impact and the methodology followed in determining the VMEs areas (²).

The Commission welcomes the General Court's rulings and the confirmation that the 87 areas listed in the Commission's implementing act were established in a proportionate manner and in accordance with the Deep-Sea Access Regulation.

As set out in this Regulation, the Commission will endeavor to continue the implementation of its obligations, including reviewing and updating the list of VMEs,

(¹) Your Opinions No 177 and 188 – Our references Ares(2025)965300 and Ares(2025)4313067.

(²) The judgements are available here: [T-681/22](#) and [T-781/22](#).

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working closely with the concerned Member States and Advisory Councils, and relying on the most up-to-date scientific advice and expertise.

The importance of healthy marine ecosystems was reconfirmed at the UN Ocean Conference in Nice and is central to the European Ocean Pact ⁽³⁾ which aims in particular to “*protect and restore marine life and essential ecosystem services of the ocean*” via a “*a science-based approach to policy decisions*”.

On the resilience of pelagic fisheries to climate change

The implementation of an ecosystem-based approach to fisheries management is pivotal to the Common Fisheries Policy (CFP) since 2002. Its application has mainly focused on mitigating fishing impacts on marine ecosystems, in particular thanks to the successful implementation of technical conservation measures (e.g. on VMEs, on target and bycatch stocks) ⁽⁴⁾.

Ecosystems considerations are also enshrined in the European Ocean Pact, which recalls the need to strengthen the ecosystem-based approach to fisheries management by fostering socio-economic and environmental objectives. Therefore, I support the SWWAC suggestions to further develop research and to better integrate ecosystem considerations into fisheries management. A substantial amount of scientific work on supporting an ecosystem-based approach to fisheries management has already been completed or is ongoing. The International Council for the Exploration of the Sea (ICES) continues to advance this work through the development of integrated ecosystem assessments and ecosystem overviews for several regions. It has also proposed a Framework for Ecosystem-Informed Science and Advice (FEISA).

With regard to research, it is indeed becoming increasingly clear that a better understanding about the impact of climate change on fisheries resources (such as sardines, anchovies and tuna-like species) is needed. To this end, the Commission highly supports the continuation of research projects (as those mentioned in your opinion), as well as scientific work within ICES and regional fisheries management organisations such as the International Commission for the Conservation of Atlantic Tuna (ICCAT). Additionally, in recent years, DG MARE commissioned several scientific studies to assess the current state of implementation of the ecosystem-based approach to fisheries management and get recommendation to advance its implementation. There is clear evidence that science and scientific advice are advancing to include wider environmental aspects (e.g. climate change) and the “human dimension”.

I am deeply convinced that stakeholders should be involved in all steps of this ecosystem-based approach (e.g. advisory process, implementation) and the “ICES Stakeholder Engagement Strategy” ⁽⁵⁾ reflects a good opportunity to express the views of the advisory councils. I encourage you to continue working with the scientific community and institutions/governments. The Commission takes good note of your

⁽³⁾ [COM\(2025\)281](#). Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: The European Ocean Pact

⁽⁴⁾ EAFM studies commissioned by DG MARE: [Piet, G.J. and Arthur, R. \(2022\)](#). The implementation of ecosystem-based approaches applied to fisheries management under the CFP EASME/EMFF/2018/011 Specific Contract Lot 1 No.1 and EASME/EMFF/2018/011 Specific Contract Lot 2 No.3. Final report, pp 110.

⁽⁵⁾ [ICES\(2023\)](#). ICES Stakeholder Engagement Strategy. Version 01. ICES Guidelines and Policies. 12 pp.

contribution and remains open to discuss suggestions for the future improvement in the management of pelagic fisheries taking into account ecosystems considerations.

I am looking forward to our continued cooperation and dialogue. Should you have any further questions on this reply, please do not hesitate to contact our policy officers, Ms Caroline Alibert-Deprez (Caroline.ALIBERT-DEPREZ@ec.europa.eu) and Ms Amanda Perez-Perera (Amanda.PEREZ-PERERA@ec.europa.eu), as well as our coordinator of Advisory Councils, Ms Julia Rubeck (MARE-AC@ec.europa.eu).

Kind regards,

Charlina VITCHEVA

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