

TRANSPARENCY INTERNATIONAL EU

A WIDE NET? WHO REALLY SITS ON THE EU'S FISHERIES ADVISORY COUNCILS

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TABLE OF CONTENTS

1 INTRODUCTION

2 METHODOLOGY

NOTE ON METHODOLOGY AND DATA ANALYSIS

CLASSIFYING MEMBERS OF EUROPEAN COMMISSION ADVISORY COUNCILS

1. PURPOSE AND SCOPE
2. CLASSIFICATION CATEGORIES
3. DETAILED DEFINITIONS
4. CLASSIFICATION PROCEDURE
5. HANDLING AMBIGUOUS CASES

3 COMPOSITION OF THE ADVISORY COUNCILS: AN OVERVIEW

4 CONCLUSION

5 RECOMMENDATIONS

1. INTRODUCTION

Since it became an EU competence in 1983, fisheries policy has been hotly contested at EU level. No wonder: the EU has 68,000km of coastline, and actively manages the world's largest collective maritime area at 25 million km. 22 of 27 EU Member States have direct access to the sea. EU fish landings were valued at 5.5 billion euros in 2024, and 155,200 people were employed across the fishing sector in 2023, often concentrated in coastal regions where the industry takes up a significant share of employment. Given this salience, EU fishing policy is subject to intense scrutiny by Member States and industry players alike.

Fishing policy at EU level has been in place since 1983, marking the establishment of the Common Fisheries Policy (CFP). It was last reformed in 2013, although the European Commission presented an improvement package to the policy in 2023. Fishing policy aims to regulate the sector across the EU, focusing on productivity, market stabilisation, health and consumer prices, according to the Commission. It can do so by setting fishing quotas or subsidising fishing vessels, or allowing third parties to fish in EU waters.

While the CFP's headline aims are therefore economic, the environmental consequences of any fisheries policy are potentially serious. Overfishing (resulting from too high quotas, for example) risks depleting fish stocks and wrecking ecological damage on the EU's waters; limiting overfishing was an aim of the 2013 reform. The European Parliament itself states that the current CFP must take "precautionary" approach to fisheries management. The CFP must therefore balance economic gains with adequate environmental safeguards, potentially risking short-term profit losses in order to achieve stock sustainability.

However, civil society organisations active in the field have stated that, despite a science-based regulatory framework, fisheries policy outcomes continue to diverge from scientific advice. In particular, it has been reported that in the EU framework pressure from the fishing industry still results in, for example, catch limits being set above those recommended by scientific bodies. Indeed, legal NGO ClientEarth has taken the EU to court over fishing limits it deems illegal under the CFP's own laws. In addition, the CFP appears to be dictated by political considerations, leading to structural misapplication and insufficient enforcement by Member States.

The divergence between scientific advice and policy outcomes necessitates investigation of the location of and reasons for such divergence. Fisheries policy is brokered through the EU's normal legislative channels, across the Commission, Parliament and European Council. Its wide-ranging economic and environmental ramifications and political salience make it subject to heavy attempts to influence it. Yet, fisheries policy is also subject to consistent stakeholder input via fisheries Advisory Councils (ACs), which provide the Commission with policy recommendations. According to the Commission's website, "Advisory Councils are composed of representatives from the industry and from other interest groups (with a 60% - 40% allocation of the seats in the general assembly and the executive committee)". While these committees ostensibly comprise stakeholders from across fisheries policy, we find that their real composition skews heavily towards large industry voices.

This report therefore examines the dynamics within fisheries Advisory Committees in full. It maps all stakeholders involved across all Advisory Committees, finding in particular that:

- Fisheries ACs are disproportionately skewed towards large industry interests. These voices dominate: **70% of all AC seats are allocated to large industry players**. One Advisory Committee, the North Western Waters AC, allocates 83 % of seats to industry players.
- **Small-scale fisheries**, which make up 77% of the EU fishing fleet, **only take up 8% of all seats** and are not represented at all on two ACs (Aquaculture and Long Distance AC).
- Despite an obligation for these Councils to maintain a 60-40 split between "industry" and "other interest groups", NGOs are consistently underrepresented. **NGOs represent only 12% of all AC seats.**
- **In general, 78% of all AC seats are occupied by industry representatives, substantially exceeding the 60% quota stipulated by the rules, while other interest groups account for only 22% of seats**, falling short of the required 40%.

2. METHODOLOGY

Note on methodology and data analysis:
Information on fisheries-related Advisory Councils (ACs) is scattered and incomplete. For this analysis, we reviewed all Advisory Councils websites listed by the European Commission and categorised member organisations according to the methodology described below. Because the European Commission and the Advisory Councils do not publish this information in a consistent or standardised format, the data collection has inherent limitations, and the figures should be read as indicative rather than exact.

CLASSIFYING MEMBERS OF EUROPEAN COMMISSION ADVISORY COUNCILS

1. PURPOSE AND SCOPE

This methodology provides a systematic approach for classifying the member organisations of European Commission (EC) Advisory Councils into one of four categories (Small-scale fisheries, Large industry, NGO/civil society and Additional organisations). It is designed to support comparative analysis of stakeholder composition across different Advisory Councils, including those covering fisheries, aquaculture, and related sectors.

It relies on publicly available information about each member organisation (website, mission statement, founding documents) rather than self-reported classifications.

Scope

The methodology applies to all organisations holding formal membership in an EC Advisory Council. It covers:

- Both EU-level and national/regional member organisations.
- Organisations operating across fisheries, aquaculture, processing, trade, civil society, and research.

2. CLASSIFICATION CATEGORIES

Each member organisation is assigned to exactly one of the following four categories. The categories are mutually exclusive and exhaustive.

- **Small-scale fisheries**
- **Large industry**
- **NGO/civil society**
- **Additional organisations**

3. DETAILED DEFINITIONS

3.1. Small-scale fisheries

Organisations whose membership consists primarily of individual owner-operators, family enterprises, or small cooperatives engaged in fishing or aquaculture at small scale. In capture fisheries, "small-scale coastal fishing" is formally defined in EU law as fishing carried out by fishing vessels of an overall length of less than 12 metres and not using towed fishing gear (source: EMFF Regulation 508/2014, Article 3(14), EUR-Lex). The European Commission further characterises these as family-based businesses, where owners are directly involved in the fishing activity (source: European Commission, Small-scale fisheries page). For aquaculture specifically, the enterprises are primarily small and family owned (source: European Commission, Overview of EU aquaculture).

3.2. Large industry

Organisations primarily representing the commercial fishing or aquaculture sector at scale, including trade associations, national or EU-level producer organisations, and supply-chain actors (processing, feed, trading).

Note: The distinction between large industry and small-scale producers can be difficult when an organisation spans both groups (e.g. a national producer organisation with both small and large members). In such cases, classification was done according to the organisation's dominant membership profile and primary advocacy focus. Ambiguous cases defaulted to large industry and were flagged for review.

3.3 NGO/civil society

Non-governmental, not-for-profit organisations whose primary mandate is advocacy, conservation, animal welfare, or consumer protection in the public interest, not representing a commercial sector.

3.4. Additional organisations

Organisations that do not fit into any of the three categories above. This includes entities such as research institutes, academia, professional associations, standards bodies, technology platforms, and intergovernmental bodies.

4. CLASSIFICATION PROCEDURE

4.1. Decision sequence

Step	Question	If YES → assign
Q1	Is the entity a non-profit, non-governmental organisation whose stated primary mission is advocacy, conservation, animal welfare, or public-interest research — with no commercial sector to represent?	→ **NGO/civil society**
Q2	Does the entity primarily represent the interests of large-scale commercial operators, processing/trading companies, or constitute an EU- or national-level industry federation or trade association?	→ **Large industry**
Q3	Does the entity primarily represent individual small-scale producers (owner-operators, family enterprises, cooperatives) using low-intensity or traditional methods?	→ **Small-scale fisheries**
Q4	None of the above apply (e.g. research platform, standards body, professional association, inter-governmental body, technology platform).	→ **Additional organisations**

Ambiguous cases: If the analyst was uncertain between two categories, the most likely category was assigned, the entry flagged, the alternative noted. When relevant, flagged cases should be reviewed by a second person.

4.2. Information sources (in order of preference)

- Organisation's official website (mission, 'about us', membership/governance pages).
- Founding statutes or by-laws (where publicly available).
- The Advisory Council's own membership descriptions or categorisations.
- European Commission or STECF documentation referencing the organisation.
- Independent secondary sources (academic literature, news), for verification only.

5. CLASSIFICATION PROCEDURE

5.1. Tie-breaking rule

Where an organisation could plausibly belong to two categories, the following tie-breaking hierarchy was applied:

- NGO/civil society vs large industry: if the organisation receives most of its funding from industry sources or has industry representatives on its governance board, classify as large industry.
- Small-scale producers vs large industry: if the organisation's membership includes both small and large operators with no clear dominant profile, classify as large industry.

5.2. Hybrid organisations

Some organisations have a dual character (e.g. an interprofessional body spanning producers, processors, and retailers). In such cases:

- Classify according to the primary function as articulated in the organisation's mandate.
- Where the primary function itself is hybrid (e.g. a statutory inter-professional body with both industry and public governance roles), classify as Additional Organisations and note the hybrid nature.

5.3. Organisations with multiple memberships

Where the same organisation is a member of more than one Advisory Council, it receives the same classification in each, unless the role in which it participates differs substantively between councils.

3. COMPOSITION OF THE ADVISORY COUNCILS: AN OVERVIEW

The analysis in this report turns to the EU's ACs on fisheries policy, which are an under-researched channel of policy influence.

ACs are part of an institutional framework specific to the fisheries sector, as stakeholder-led organisations that provide advice to the Commission and Member States on fisheries and aquaculture management, conservation and regionalisation. ACs were originally established as "Regional Advisory Councils" (RACs) under a 2002 CFP reform and were later further integrated into the post-2013 CFP reform framework. Under the current CFP, ACs are also referenced in regard to regionalisation and consultation obligations (e.g., regarding joint recommendations and national urgent measures), giving them a semi-formal role in regional governance.

Their composition mandates a 60% to 40% split between "industry" and "other interest groups". Not only is civil society representation on ACs therefore capped at a 40% minority stake as per the Advisory Committees' own statutes, but this proportion may in practice be far lower. Thus, as has been observed in legal systems with similar frameworks, policy outcomes seem to, by design, favour short-term industry priorities over sustainability goals.

EU fisheries policy is currently subject to the following eleven ACs:

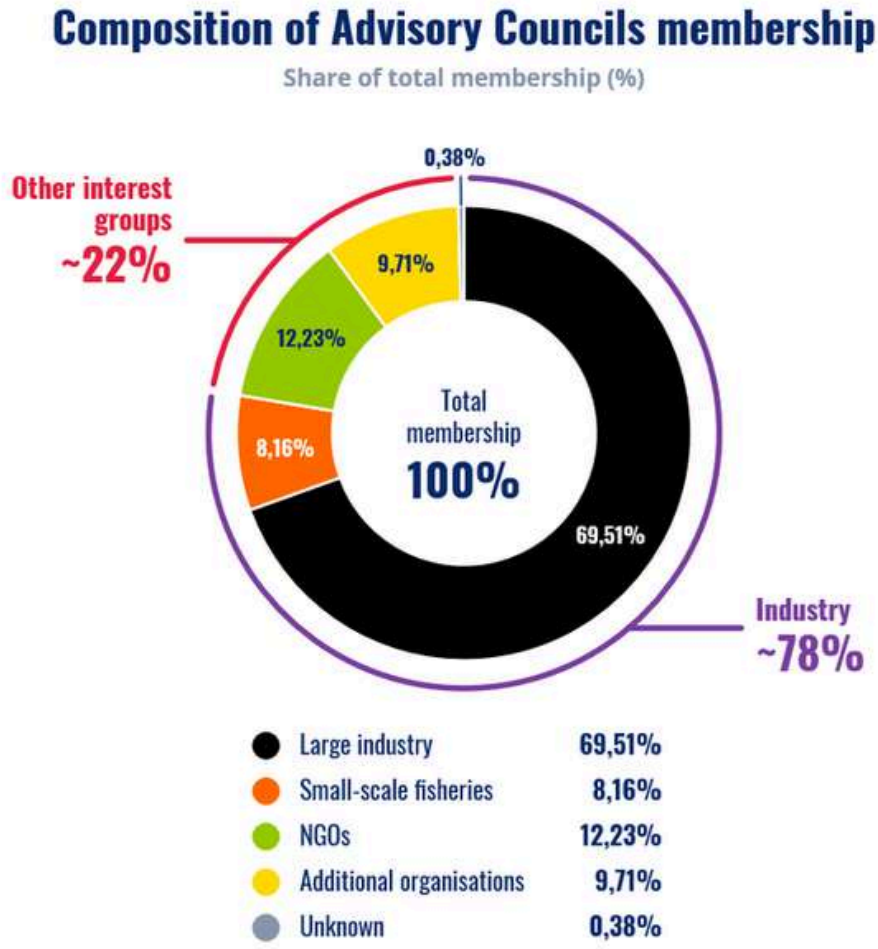
- Aquaculture AC
- Baltic Sea AC
- Black Sea AC·

- Long Distance AC
- Market AC
- Mediterranean Sea AC
- North Sea AC
- North-western waters AC
- Outermost regions AC
- Pelagic stocks AC
- South-western waters AC

As per their names, these ACs often have a specific regional focus. The Market AC advises the Commission on the fisheries market itself.

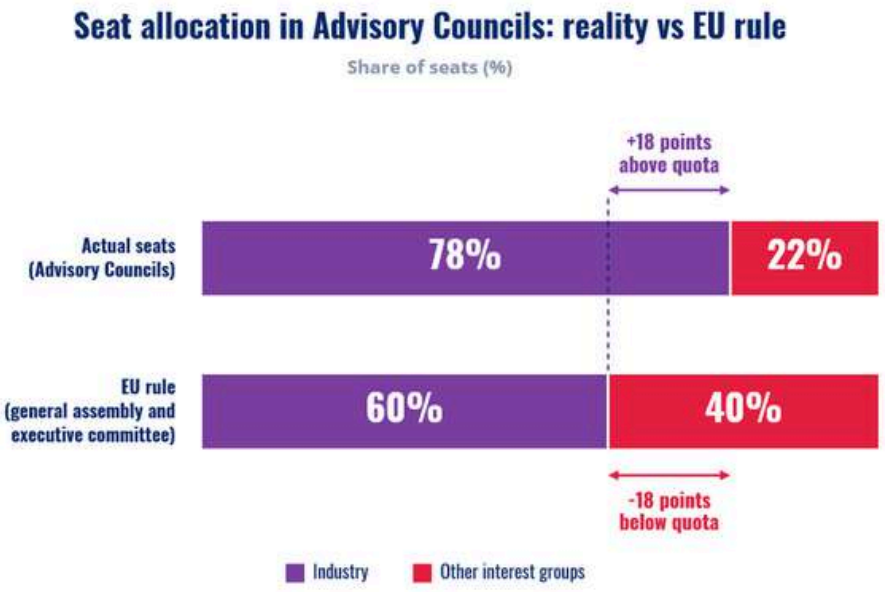
ACs comprise a total of 515 members, although some organisations are members of multiple ACs. They vary widely with regard to their membership numbers: the largest, the South-western Waters AC, hosts 79, while the smallest, the Black Sea AC, has 15.

Closer analysis reveals Council seat composition that is even further skewed towards industry than the original 60-40 ratio mandate might suggest. In fact, the term "industry" does not differentiate between large industry and small-scale fishers, potentially obscuring an imbalance in representation between the two.



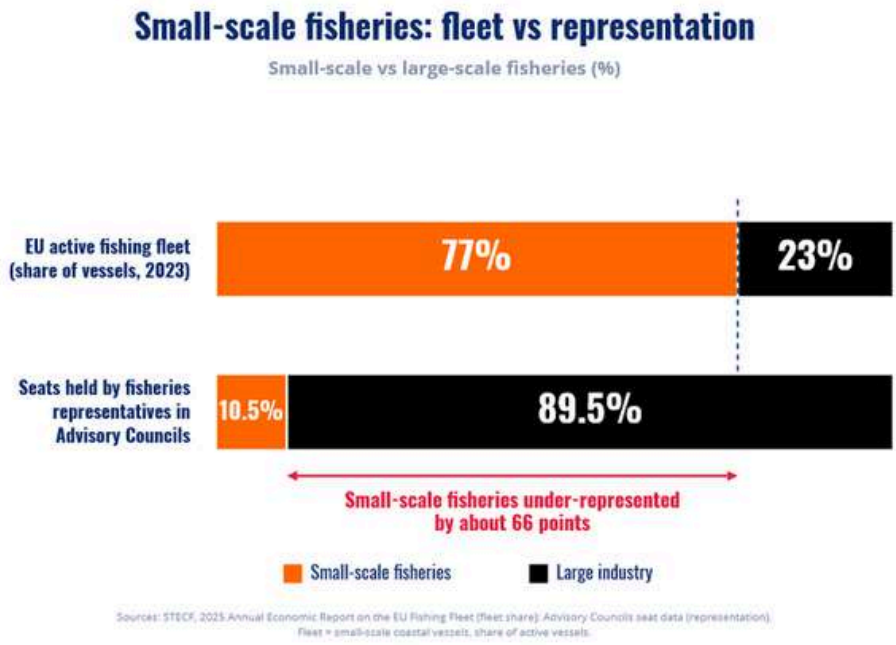
We find that:

- Large industry sits on the majority of the 515 seats, with 358, or almost 70% allocated to such actors.
- Only 42 seats, 8%, are held by small-scale fisheries.
- NGOs have 63 seats only, or 12%.
- This confirms the relegation of both small-scale fishers and NGOs to minor players across ACs.
- This also means that approximately **78% of seats are occupied by industry representatives, substantially exceeding the 60% quota stipulated by the rules, while other interest groups account for only 22% of seats,** falling short of the required 40%.[1]



It should be noted that small-scale fishers, despite their name, are responsible for **about three quarters (77%) of active EU vessels**. This calls into further question the domination of large industry to the detriment of small-scale fishers at ACs. That their representation is limited to 8% of seats, then, speaks to a stakeholder input forum that is in no way proportionate to all players with significant stakes in fisheries policy. It can be therefore be argued that the representation of small-scale fisheries within the ACs is insufficient. A more balanced approach would be to ensure equal representation of small- and large-scale fisheries, with each group holding 50% of the seats allocated to fisheries representatives.

[1] "Additional organisations'" interests hold 50 seats (10%). There are two organisations we could not classify.



Across all ACs combined, small-scale fisheries hold about 42 seats, roughly the number of seats held on average by large industry within a single Council (about 33).

Individual Advisory Council seat composition

Advisory Council	Large industry	Share	NGO/civil society	Share	Additional organisations	Share	Small-scale fisheries	Share	Unknown	Total seats
Aquaculture Advisory Council	40	80%	6	12%	4	8%	0	0%	0	50
Baltic Sea Advisory Council	19	53%	7	19%	5	14%	5	14%	0	36
Black Sea Advisory Council	11	73%	3	20%	0	0%	1	7%	0	15
Long Distance Advisory Council[2]	40	73%	12	22%	3	5%	0	0%	0	55
Market Advisory Council	59	79%	8	11%	4	5%	4	5%	0	75
Mediterranean Sea Advisory Council	22	49%	5	11%	13	29%	5	11%	0	45
North Sea Advisory Council	15	71%	2	10%	3	14%	1	5%	0	21
North-westerns Waters Advisory Council	30	83%	1	3%	4	11%	1	3%	0	36

[2] Although the Long Distance AC does not have any small-scale fisheries organisations among its members, it has a Memorandum of Understanding (2023) with AFRIFISH-Net, a Pan-African platform of non-state actors in fisheries and aquaculture with an emphasis on small-scale fisheries. The MoU is available at: "Additional organisations'" interests hold 50 seats (10%). There are two organisations we could not classify.

Outermost Regions Advisory Council	35	51%	9	13%	8	12%	16	23%	1	69
Pelagic Stocks Advisory Council	26	76%	5	15%	2	6%	1	3%	0	34
South-western Waters Advisory Council	61	77%	5	6%	4	5%	8	10%	1	79
TOTAL	358	70%	63	12%	50	10%	42	8%	2	515

Lopsided seat allocation is subsequently reflected in the composition of individual ACs, which is examined below.

The highest industry share is apparent in the North-western waters AC (83%), the Aquaculture AC (80%) and the Market AC (79%). The Baltic Sea (53%), Outermost Regions (51%) ACs are those with the smallest share of industry representation.

However, these individual-level figures obscure still the limited extent to which both small-scale fishers and NGOs enjoy representation at these ACs. Small-scale fishers have no presence whatsoever on two ACs, and a singular seat on four ACs.

Small-scale fisheries seats in each Advisory Council

Percentage of the available seats in each Advisory Council

Aquaculture AC	**No seat**	0 of 50 seats	0%
Long Distance AC	**No seat**	0 of 55 seats	0%
Black Sea AC	O	1 of 15 seats	7%
North Sea AC	O	1 of 21 seats	5%
North-Western Waters AC	O	1 of 36 seats	3%
Pelagic Stocks AC	O	1 of 34 seats	3%
Market AC	OOOO	4 of 75 seats	5%

Baltic Sea AC	OOOOO	5 of 36 seats	14%
Mediterranean Sea AC	OOOOO	5 of 45 seats	11%
South-Western Waters AC	OOOOOOOO	8 of 79 seats	10%
Outermost Regions AC	OOOOOOOOOOOOOOOO	16 of 69 seats	23%

NGO seat shares range from as little as one seat in the North-western waters AC to 12 seats, or 22%, in the Long-Distance AC.

Critically, no AC boasts[3] either a small-scale fishers nor NGO share of over a quarter —three in four seats on each fisheries ACs are allocated to large industrial representatives.

On average, industry seats outnumber NGO seats by a ratio of almost 6:1 (358 to 63). The gap is widest in the North-western Waters AC (30 to 1), the South-western Waters AC (61 to 5) and the North Sea AC (15 to 2). At the same time, large industry seats also outnumber small-scale fisheries seats by a ratio of more than 8:1 (358 to 42).

The mandated 60-40 split therefore, while already placing civil society representation at a structural disadvantage, in practice appears to encroach on some voices even further. In fact, the division grossly downplays the extent to which large industry is present at Advisory Committees. Small-scale fishers face even more limited stakeholder input opportunities than NGOs do, and NGOs and small-scale fishers combined are still dwarfed by large industry players.

Our findings on this imbalanced access within ACs are corroborated by observations from other stakeholders. Indeed, it has been reported that industry representatives often exert greater influence than small-scale fishers and environmental NGOs here, and that the ACs' recommendations reflect industry preferences as a result. Given such lopsided composition, this is hardly surprising.

[3] xxxxx

4. CONCLUSION

This report set out to give an overview of how the ACs for EU fisheries policy are composed, and who therefore has a seat at the table when advice on fisheries management is prepared.

The data shows an imbalance both in the rules and in practice. The rules give industry a majority of seats: 60%, against 40% for other interest groups. In practice, industry holds approximately 78% of seats across the eleven ACs, well above its quota, while other interest groups hold approximately 22%, well short of theirs. Within industry, the balance is also lopsided: large industry holds almost 70% of all seats, and large industry seats outnumber NGO seats by almost 6 to 1 and small-scale fisheries seats by more than 8 to 1.

Small-scale fishers make up about three quarters of active EU fishing vessels, yet hold only 8% of seats across the eleven ACs. The same representation is true of NGOs, which hold 12% of seats. Together, these numbers suggest that the rule limiting non-industry stakeholders to a minority is not the only constraint: in practice, the seats reserved for industry go overwhelmingly to its largest players, and the voices of small-scale fishers and civil society are marginal in the ACs' composition.

This is particularly concerning in an area such as fisheries policy, which can have deleterious environmental and social effects if not properly managed. Here, large industry dominance risks privileging commercial interests over environmental and social considerations in the EU's policymaking processes. This report cannot assess how the policy outcomes would differ in a counter-scenario in which the representative proportions on the ACs are reversed, and its figures should be read as indicative. But as long as the structural neglect of small producer and civil society voices persists, citizens have little reason to believe that their voices carry equal weight against the privilege of commerce, and the policy outcomes may well reflect such an imbalance.

As such, the EU's approach to stakeholder engagement must be wholly reformed. In particular, we recommend:

5. RECOMMENDATIONS

- Introduce a clear definition of "industry" and "other interest groups" that specifies between different types of other actors, including verifiable objective criteria.
- Improve the balance of stakeholder representation on ACs. In particular, the participation of NGOs and small-scale fisheries should be strengthened to ensure a more equitable distribution of seats and a more balanced contribution to decision-making processes. Indeed, balanced access to decision-making comes with a cost. Policy is more likely to be poorly designed and less evidence-based. It also significantly increases the risk of outright policy capture.
- Encourage and facilitate the participation of smaller organisations in ACs, ensuring they have meaningful opportunities to contribute alongside larger organisations.

- The European Commission should publish open, standardised data on the membership of all ACs.
- Revise the 60/40 composition principle to ensure a more balanced allocation of seats between industry and other interest groups. Until then, strengthen the rules on monitoring and enforcement of the current principle.
- In the revision of the Guidelines on the Functioning of the Advisory Councils, particular attention should be given to addressing existing gaps in the framework and implementing the recommendations outlined in this report, within the limits of the existing legal framework. The revised Guidelines should also provide for a strong code of conduct, together with appropriate mechanisms for monitoring compliance and clear consequences where the applicable standards are not respected.[1]

Artificial Intelligence was used to aid the categorisation of AC members and generate some of the charts in this report. All outputs were verified by a human. All data analysis is human

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