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DEPREZ, Director

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COMMISSION STAFF WORKING DOCUMENT
EVALUATION

European Maritime, Fisheries and Aquaculture Fund mid-term evaluation

{SWD(2026) 88 final}

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Glossary

Term or acronym	Meaning or definition
AC	Advisory Council
AMIF	Asylum and Migration Fund
BMVI	Border Management and Visa Instrument
CAP	Common Agricultural Policy
CFP	Common Fisheries Policy
CINEA	Climate, Infrastructure, and Environment Executive Agency
CLLD	Community Led Local Development
CMO	Common Market Organisation
CPR	Common Provisions Regulation
CR	Common Result Indicator
EAFRD	European Agricultural Fund for Rural Development
EIB	European Investment Bank
EFF	European Fisheries Fund
EMFAF	European Maritime, Fisheries and Aquaculture Fund
EMFF	European Maritime and Fisheries Fund
EMODNET	European Marine Observation and Data Network
ERDF	European Regional Development Fund
ESF+	European Social Fund Plus
ESIF	European Structural and Investment Funds
EU	European Union
EUMOFA	European Union Market Observatory for Fisheries and Aquaculture products
FAMENET	Fisheries and Aquaculture Monitoring, Evaluation and Local Support Network
FLAGs	Fisheries Local Action Groups
FIs	Financial Instruments

GES	Good Environmental Status
HEC	Horizontal Enabling Condition
ISF	Internal Security Fund
IUU Fishing	Illegal, Unreported and Unregulated Fishing
MAPs	Multiannual Plans
MAs	Managing Authorities
MEF	Monitoring and Evaluation Framework
MFF	Multiannual Financial Framework
MNSPAs	Multiannual National Strategic Plans for Aquaculture
MSFD	Marine Strategy Framework Directive
OR	EU Outermost Regions
RFMOs	Regional Fisheries Management Organisation
SCOs	Simplified Cost Options
SDG	Sustainable Development Goals
SFPAs	Sustainable Fisheries Partnership Agreements
SME	Small and Medium Enterprises
SO	Specific Objectives
SSCF	Small Scale Coastal Fisheries
SWD	Staff Working Document
SWOT	Strengths, Weaknesses, Opportunities, and Threats
TFEU	Treaty on the Functioning of the European Union
UN	United Nations

1. INTRODUCTION

1.1. THE EUROPEAN MARITIME, FISHERIES AND AQUACULTURE FUND

The European Maritime Fisheries and Aquaculture Fund (EMFAF) established under Regulation (EU) 2021/1139¹ (hereinafter referred to as the EMFAF Regulation) channels funding from the Union budget to support the Common Fisheries Policy (CFP)², the Union's maritime policy and the Union's international commitments in the field of ocean governance. Such funding is a key enabler for sustainable fisheries and aquaculture and the conservation of marine biological resources, for food security through the supply of aquatic food products, for the growth of a sustainable blue economy and for healthy, safe, secure, clean and sustainably managed seas and oceans.

The EMFAF applies from 2021 to 2027³, aligned with the duration of the multiannual financial framework (the 'MFF 2021-2027'⁴) and supports EU and Member States action through shared management (87% of the budget) and direct and indirect management (13% of the budget):

- **shared management** – €5.311 billion allocated to the Member States⁵ and managed through national programmes cofinanced by the EU budget and Member States, for which the Common Provisions Regulation (CPR⁶) is applicable.

The funding under shared management mostly supports the implementation of the CFP and is made conditional upon strict compliance with the CFP rules, restricted to avoid disbursement of harmful subsidies⁷ and subject to compliance with the horizontal enabling conditions (HECs)⁸ set out in the CPR.

- **(in)direct management** – €797 million managed directly by Commission. About half of this is dedicated to the implementation of the CFP providing support to scientific advice, fisheries control, monitoring, and data collection (activities which are also covered under shared management) and dissemination and provision of market information. The maritime policy component covers the blue economy and international ocean governance. It includes support for reliable marine data, cross-

¹ Regulation (EU) 2021/1139 of the European Parliament and of the Council of 7 July 2021 establishing the European Maritime, Fisheries and Aquaculture Fund and amending Regulation (EU) 2017/1004.

² Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013 on the Common Fisheries Policy, amending Council Regulations (EC) No 1954/2003 and (EC) No 1224/2009 and repealing Council Regulations (EC) No 2371/2002 and (EC) No 639/2004 and Council Decision 2004/585/EC.

³ Article 63 of Regulation (EU) 2021/1060 defines eligibility period for shared management until 31/12/2029 (N+2 rule).

⁴ Regulation (EU, Euratom) 2020/2093 laying down the multiannual financial framework for the years 2021 to 2027.

⁵ The budget is allocated in accordance with Annex V of the EMFAF Regulation.

⁶ Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy.

⁷ https://environment.ec.europa.eu/economy-and-finance/phasing-out-environmentally-harmful-subsidies_en

⁸ https://ec.europa.eu/regional_policy/policy/what/glossary/enabling-conditions_en

border spatial planning, ocean literacy, skills, sea-basin cooperation, maritime surveillance and innovation in SMEs. The rest is dedicated to meeting the aims of the EU's maritime policy.

1.2. PURPOSE AND SCOPE OF THE EVALUATION

Article 45(1) of the CPR stipulates that the “Commission shall carry out a mid-term evaluation to examine the effectiveness, efficiency, relevance, coherence and Union added value of each Fund by the end of 2024.”

This evaluation covers the period from the start of the programming period until the first quarter of 2024⁹ and covers the totality of EMFAF direct management and shared management including the 26 national EMFAF programmes¹⁰. **It aims to provide a mid-term evaluation of how EMFAF is delivering on its objectives, taking stock of the progress halfway through its seven-year cycle and indicates a way forward to evaluate its impact in the future.** It aims to inform the work on the design of the future EU instrument investing in fisheries, aquaculture and maritime policies as well as to identify lessons learnt which can be still used to improve the implementation of the EMFAF 2021-2027 programming period.

Given the timing of this evaluation, it does not deliver a fully-fledged impact evaluation, rather it reports on the progress made to date. In particular, the start of the shared management component of the EMFAF programming has been marked by delays due to the late adoption of the EMFAF Regulation, the general crisis context of COVID-19, Brexit, the Russian military aggression against Ukraine, and the challenges for Member States in managing both the closure of the European Maritime and Fisheries Fund (EMFF), the processor of the EMFAF, and the initiation of the EMFAF, among others. Most Managing Authorities cited the difficulty to manage both the closing the EMFF and start of the EMFAF at the same time without additional support. Additionally, structural changes within organisations contributed to capacity constraints. The deterioration of the economic situation in relation to Russia's military aggression against Ukraine is reflected in the ability of beneficiaries to complete the implementation of their projects. Moreover, challenges related to Brexit, reduced economic activity, and conditions stemming from new or ongoing environmental regulations further hindered the effective start of the implementation.

Given that the evaluation comes too early to capture the EMFAF results and impacts, they will be assessed in the retrospective evaluation due in 2031. **On the other hand, the impacts of the CFP and maritime policy are subject to regular stock-tacking and reporting¹¹ and a full evaluation of the CFP Regulation has been launched in 2024 which provides concrete elements to demonstrate progress in the policy implementation and the concrete policy objectives to which the EMFAF is contributing.**

⁹ Where possible, in the context of the SWD the latest data of the third quarter of 2024 are provided.

¹⁰ Representing all EU Member States except Luxembourg, which has no national EMFAF programme.

¹¹ AER Annual Communication, The 2024 annual economic report on the EU fishing fleet (STECF 24-07) Report from the Commission to the European Parliament and the Council Implementation of the Technical Measures Regulation (Article 31 of Regulation (EU) 2019/1241) The EU blue economy report 2024

Therefore, this mid-term evaluation focuses mostly on the progress in the EMFAF implementation at the end of 2023, and on the criteria of coherence and relevance. Under the criteria of effectiveness and efficiency, given the above-mentioned constraints, it assesses the effects of changes introduced in the 2021-2027 programming period to improve the fund's implementation and performance. A particular emphasis is put on the effects of the simplification in the legislative framework on the programming and implementation.

1.3. METHODOLOGICAL FRAMEWORK AND DATA LIMITATIONS

This Staff Working Document draws on evidence from the **supporting study** carried out by the consortium formed by Tetra tech¹². As regards the methodology used to process the data, the analysis relied on desk research, data analysis, extensive stakeholder consultation activities and case studies. The study team¹³ conducted a quantitative and qualitative analysis of data gathered through the different consultation activities. The quantitative analysis included a descriptive statistical analysis of the results of the surveys of the EMFAF target group¹⁴ and of the managing authorities in the Member States. Methodological information on how the evaluation was conducted is detailed in Annex II, including a section on limitations and robustness of findings.

This work has been complemented by extensive stakeholder consultation (see also Annex V):

- A survey of the managing authorities (26 responses),
- A survey of the EMFAF target groups (223 responses),
- 14 interviews with 26 key stakeholders at the European level, including representatives from DG MARE, the Directorate-General for Environment (DG ENV), and the Fisheries and Aquaculture Monitoring, Evaluation and Local Support Network (FAMENET), as well as interest groups (social partners) and fisheries and aquaculture experts,
- Nine complementary interviews with national stakeholders, including intermediary bodies and (potential) beneficiaries, in six selected Member States (Czechia, Denmark, France, Germany, Latvia, and Spain) on specific topics, such as innovation, synergies, etc., as well as written feedback from the Estonian stakeholder consulted.

Additional sources of the evaluation were several reports prepared by the **Fisheries and Aquaculture Monitoring, Evaluation and Local Support Network (FAMENET)**¹⁵ which supports the Commission and stakeholders in the implementation of the EMFF and

¹² The study will be published together with this Staff Working Document.

¹³ Specific contract (3) implementing framework contract No: CINEA/2021/OP/0011 [Inter-Institutional multiple framework contract for supporting better regulation-related activities, with reopening of competition (LOT 1)] led by Tetra Tech International Development Sp. z o.o. The study team was tasked to provide support with a study according to the Terms of Reference (tender specifications).

¹⁴ Key stakeholders at the European level, the social partners, advisory councils, EU-level interest groups from fisheries and aquaculture representative organisations, non-governmental organisations (NGOs), intermediary bodies, potential direct and indirect beneficiaries, namely EU, national, regional and local target groups, including fishers, fish farmers, processors and their representative organisations, relevant public bodies, research centres, etc.

¹⁵ https://oceans-and-fisheries.ec.europa.eu/funding/famenet_en

EMFAF and in the set-up and implementation of the EMFAF's monitoring and evaluation framework.

For the analysis made, the Commission and FAMENET provided data based on the **Infosys database**¹⁶ covering all operations, both under shared and (in)direct management. **Infosys** is a unique, powerful and valuable database with constantly quality-checked and readily available data that can be used for information and evaluation purposes¹⁷ (see Annex VI). Moreover, as indicated above, the Commission and scientific reports on the implementation of fisheries and maritime policies provide information illustrating concrete elements that demonstrate progress in delivery on the concrete policy objectives to which the EMFAF is contributing.

Still, this stage, information is mostly available on outputs rather than on results and impacts which will be assessed in full at the time of the ex-post evaluation. Particularly for investments, the results and impacts that have been achieved at the mid-term point cover initial steps, such as a launch of calls for tenders, proposals and projects, or signing of procurement contracts; whilst the final milestones and targets due in the second half of the Fund's lifetime will increasingly cover final investment outputs.

Overall, the evaluation process went as planned, and the data gathered is considered reliable. No significant difficulties were encountered in reaching key stakeholders involved in the design and implementation of EMFAF. **Therefore, even with the limitations linked to the early state in EMFAF's implementation, the conclusions and lessons learnt can be considered reliable for a mid-term evaluation, especially since the Infosys tool which provides very detailed reporting has been used.**

The results of the evaluation help identify potential weaknesses in the design of the current Fund in view of taking necessary steps to improve implementation or correct identified problems, as well as providing perspectives for the design of future financial support to ensure efficient achievements of policy objectives. **In this context, the timing of the evaluation is important to provide evidence to inform the design of support under the next EU Multi-annual Financial Framework period to start in 2028.**

¹⁶ Commission Implementing Regulation (EU) 2022/79 of 19 January 2022 laying down rules for the application of Regulation (EU) 2021/1139 of the European Parliament and of the Council as regards the recording, transmission and presentation of operation-level implementation data.

2. WHAT WAS THE EXPECTED OUTCOME OF THE INTERVENTION?

2.1. DESCRIPTION OF THE INTERVENTION AND ITS OBJECTIVES

The Common Provisions Regulation (CPR)² and the EMFAF Regulation for 2021-2027 entered into force in July 2021. The EMFAF is a funding instrument with a budget exceeding EUR 6 billion for 2021–2027. Its central mission is to advance sustainable fisheries and aquaculture, support healthy and resilient marine ecosystems, and foster a robust and innovative blue economy. It is implemented through direct management and a shared management approach, empowering Member States to tailor national and regional programmes under a harmonized EU framework.

EMFAF INTERVENTION LOGIC

In view of the direct link to established and vastly regulated policies, the general objectives of the EMFAF were formulated with the aim to address the main challenges in the policy areas it supports (for graphical depiction of the Intervention Logic see Annex VII). The general priorities are translated into 10 specific objectives covering the policy areas (see table below).

Table 1: EMFAF Priorities and Specific Objectives under shared management (Annex II EMFAF Regulation)

Priorities (P)	Specific objectives (SO)
P1: Fostering sustainable fisheries and the restoration and conservation of aquatic biological resources	<p>SO 1.1: Strengthening economically, socially, and environmentally sustainable fishing activities.</p> <p>SO 1.2: Increasing energy efficiency and reducing CO2 emissions through modernising or replacing fishing vessel engines.</p> <p>SO 1.3: Adjusting fishing capacity in cases of permanent or temporary cessation of activities.</p> <p>SO 1.4: Fostering efficient fisheries control, enforcement, and fighting IUU (Illegal, Unreported, and Unregulated) fishing, as well as reliable data for knowledge-based decision-making.</p> <p>SO 1.5: Promoting a level-playing field for fishery and aquaculture products from the outermost regions.</p> <p>SO 1.6: Contributing to the protection and restoration of aquatic biodiversity and ecosystems.</p>
P2: Fostering sustainable aquaculture activities, and processing and marketing of fishery and aquaculture products, thus contributing to food security in the Union	<p>SO 2.1: Promoting sustainable aquaculture activities, especially strengthening the competitiveness of aquaculture production, while ensuring that the activities are environmentally sustainable in the long-term.</p> <p>SO 2.2: Promoting marketing, quality and added value of fishery and aquaculture products, as well as processing of those products.</p>
P3: Enabling a sustainable blue economy in coastal, island and inland areas, and fostering the development of fishing and aquaculture communities	<p>SO 3.1: Enabling a sustainable blue economy in coastal, island and inland areas, and fostering the sustainable development of fishing and aquaculture communities.</p>

Priorities (P)	Specific objectives (SO)
P4: Strengthening international ocean governance and enabling seas and oceans to be safe, secure, clean and sustainably managed	SO 4.1: Strengthening sustainable sea and ocean management through the promotion of marine knowledge, maritime surveillance or coast guard cooperation.

Source: EMFAF regulation

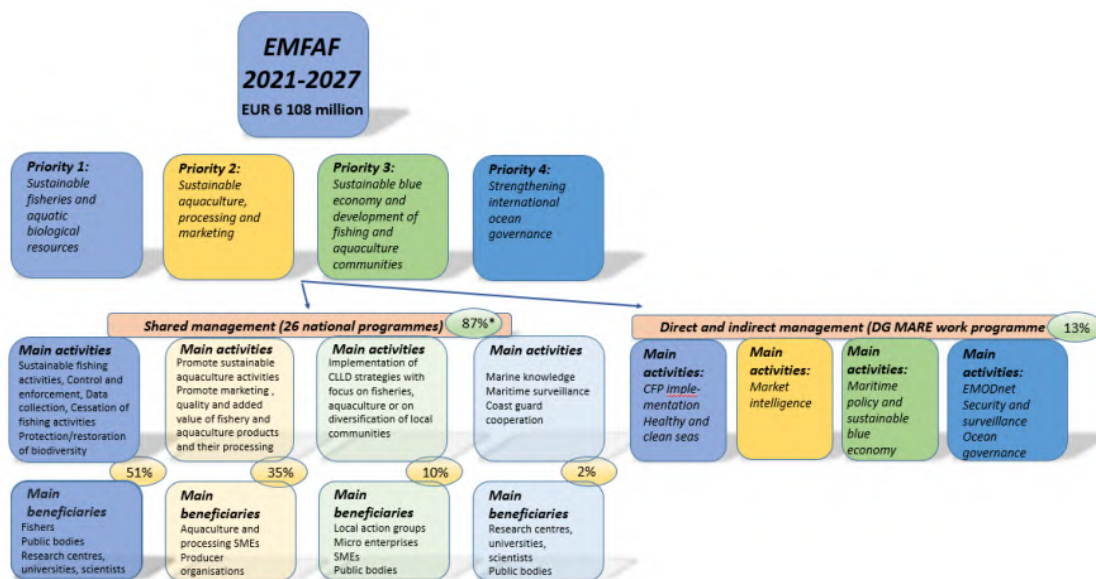
EMFAF Specific Objectives (SO) at regulation level are necessarily broad to cover all aspects relevant to the fund and the Member States. They become specific through their operationalisation in the Member States programmes. For each specific objective the programmes define in the programme documents the following elements to make the SO specific and measurable (SMART):

- type of actions (defined by the MS)
- type of intervention (selected) and related funding (set) and
- output indicator targets (set)
- common result indicators (selected and baselines and targets (set).

Each MS programme intervention logic considers the following principles:

- EMFAF is structured along the priorities defined in the EMFAF regulation; MS can chose all or some of them
- each priority is broken down in specific objectives (see Annex section 3.1)
- for each specific objective:
 - types of actions are defined
 - main target groups are defined
 - types of interventions are selected
 - target values and milestones for output indicators are set
 - common result indicator are selected, and baseline and target values are set

Figure 1: Intervention logic EMFAF 2021-2027



*Around EUR 123 million or 2% of shared management funding is allocated to technical assistance

Source: DG MARE

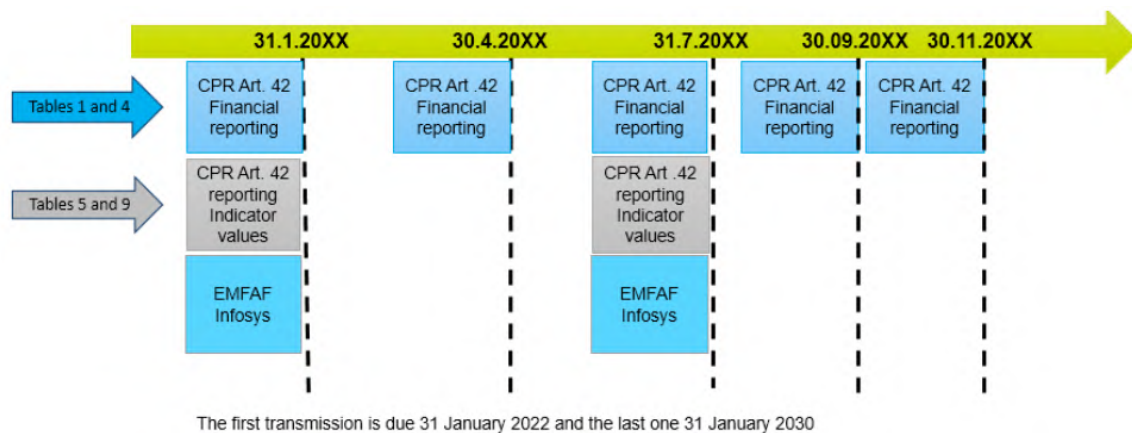
Member States developed their national EMFAF Programmes tailored to their needs, choosing from the Priorities and Specific Objectives (SOs) set out in the EMFAF Regulation. The Programmes were based on SWOT¹⁸ analyses and needs assessments conducted by each MS. For each Specific Objective, MS Programmes defined interventions, addressing some or all 4 Priorities and 10 Specific Objectives.

During the implementation, the elements above become more specific through the provision of information at the level of the single operation (including type of beneficiary, type of operation etc.). This is the Monitoring and Evaluation Framework (MEF) (EMFAF regulation Article 46 and Commission Implementing Regulation 2022/79).

The MEF has three different levels, one pursuant to Article 46 of the EMFAF and two pursuant to Article 42 of the CPR.

1. the operations' level, that is Infosys in the narrow sense, pursuant to EMFAF Article 46 is like the 2014–2020 Infosys (reporting twice a year, 31 January and 31 July every year)
2. the aggregated values of output indicators (Table 5 of Annex VII of CPR) and result indicators (Table 9 of Annex VII of CPR) based on Infosys (same reporting timing as Infosys, i.e. 31 January and 31 July every year)
3. the aggregated financial data, i.e. the number of all selected operations, their total eligible cost, the contribution from the EMFAF and the total eligible expenditure declared by the beneficiaries to the MA, all broken down by specific objective (Table 1 of Annex VII of CPR) and by type of intervention (Table 4 of Annex VII of CPR) (reporting five times per year, 31 January, 30 April, 31 July, 30 September, 30 November).

Figure 2: Timeline of CPR Article 42 and EMFAF Article 46 reporting



Source: FAMENET 2023

EMFAF CONTRIBUTION TO THE CFP

Fisheries and aquaculture are an integral part of EU food production. Sustainability is the core principle of the CFP, allowing it to easily integrate under the European Green Deal and be the basis to contribute to the biodiversity and climate objectives and targets for marine and coastal areas. The CFP and EMFAF are moreover instrumental in guiding the energy transition of the sector in the coming years, whilst recognising the critical role of

¹⁸ Strengths, Weaknesses, Opportunities and Threats

oceans and their ecosystems in providing services beyond the fisheries sector – where carbon sink functions should be well recognised and enhanced.

The exclusive competence for the conservation of marine resources under the CFP puts a responsibility on the Union in terms of policy making and financing. This requires continued support to build up the evidence base for fisheries conservation and management decisions, including through support of the collection by Member States of scientific data, the provision of scientific advice and knowledge, and to contribute to the control and enforcement of the policy through the implementation by Member States of the Control Regulation¹⁹. With negative externalities and fluctuating environmental factors being the norm for the fisheries sector, it is moreover especially important that the proper financial means are in place to support adaptation and transition when needed, as well as to provide a more strategic planning in terms of innovation, while promoting the sustainability agenda for fisheries and aquaculture.

Moreover, the EMFAF provides support to the EU's coastal communities which are the most exposed and vulnerable to climate change and need support especially in terms of adaptation.

For the EU Outermost Regions (OR), the fund is a key instrument to compensate the additional costs that operators in fisheries, aquaculture and processing incur as compared to mainland Europe, for which the EMFAF provides a substantial ringfenced budget allocation.

Under (in)direct management, the EMFAF provides funding to finance the international cooperation on Regional Fisheries Management Organisations (RFMOs), creating the appropriate levers and enabling outcomes as well as promoting high global standards and advancing the EU agenda on ocean governance.

Direct management support is moreover provided for the set up and the functioning of the 11 Advisory Councils (ACs)²⁰ under the CFP, to finance the European Union Market Observatory for Fisheries and Aquaculture products (EUMOFA), which performs data collection on markets, and produces reports, studies and market analysis as well as actions under the **maritime policy**.

EMFAF UNDER THE BROAD EU POLICY OBJECTIVES

The EMFAF is well placed to help reduce the carbon footprint of fisheries and aquaculture through measures such as innovation in CO₂-efficient technology and improving the energy efficiency of fishing vessels and of aquaculture production systems, although the net impact of the reduction of CO₂ resulting from the implementation of these measures is still to be seen. The fund will also contribute to the target of providing 7.5% of annual spending under the multiannual financial framework to biodiversity objectives in 2024 and

¹⁹ Regulation (EU) 2023/2842 of the European Parliament and of the Council of 22 November 2023 amending Council Regulation (EC) No 1224/2009 and amending Council Regulations (EC) No 1967/2006 and (EC) No 1005/2008 and Regulations (EU) 2016/1139, (EU) 2017/2403 and (EU) 2019/473 of the European Parliament and of the Council as regards fisheries control.

²⁰ Articles 43 and 44 of Regulation (EU) 1380/2013 and Commission Delegated Regulation (EU) 2015/242 laying down detailed rules on the functioning of the Advisory Councils under the common fisheries policy.

10% of annual spending under the multiannual financial framework to biodiversity objectives in 2026 and 2027.

These objectives should be met quite comfortably. Based on currently available data from the Member State programmes²¹, 55% of the amount allocated to the EMFAF is planned to contribute to the climate change objective (coverage by Member State ranges from 41% to 77%). For biodiversity objectives, the corresponding contribution is 28%, ranging from 14% to 56% at Member State level.

The contribution of the EMFAF to EU climate and environmental objectives is tracked through the application of environmental and climate markers and reported on in the Transmission of Data reports²² within the monitoring framework of the fund.

EMFAF has introduced “Rio markers”²³ for tracing expenditure at the level of the national programmes by applying standard contribution percentages to the so-called types of intervention, established in the EMFAF Regulation. Furthermore, the level of detail included in the bi-annual Infosys reports²⁴ allow for the evaluation of biodiversity-relevant projects at a more detailed level.

The link between the types of interventions and the biodiversity coefficients is pragmatic but seems rather loose at the moment. A future case study of types of operations effectively supporting biodiversity (i.e. linking types of action with the contribution to the biodiversity strategy) can help to orient more precise future tools.

In addition, the EMFAF can improve the CFP contribution to biodiversity objectives through, for instance:

- Continuing to ensure that fishing activities under the CFP are managed in accordance with the principle of maximum sustainable yield (MSY), which aims to achieve a balance between harvesting fish stocks at sustainable levels and promote stocks recovery.
- Improving the financing, monitoring and management of Marine Protected Areas (MPAs). MPAs are essential to support biodiversity conservation targets and the sustainability of fisheries operators in the long term.
- Increasing the investment in scientific research, monitoring, and data collection efforts to improve understanding of fish stocks and marine ecosystem functioning and the impacts of fishing/human activities on ecosystems.

When it comes to direct management, 40% of the budget is committed to actions that contributed to a Good Environmental Status (GES), including nature restoration, conservation, protection of ecosystems, biodiversity, animal health and welfare. In general, these are not on-the ground nature restoration projects but enablers that provide better data, improving spatial plans, supporting investment.

Alignment between the EMFAF and the Multiannual National Strategic Plans for Aquaculture (MNSPAs) is also enhanced. In 2021, the EU updated the 2013 strategic guidelines for the sustainable development of aquaculture and according to these revised

²¹ Aggregated percentages established via Infosys.

²² <https://sfc.ec.europa.eu/en>

²³ https://capacity4dev.europa.eu/groups/public-environment-climate/info/short-guide-use-rio-markers_en

²⁴ The latest is the EMFAF Implementation Report 2023: https://oceans-and-fisheries.ec.europa.eu/system/files/2023-12/2023-FAMENET-EMFAF-implementation-report_en.pdf

guidelines, the EU Member States reviewed their MNSPAs accordingly. The EMFAF offers an opportunity for Member States to support the sustainable development of aquaculture through targeted investments. Member States have elaborated both MNSPAs and national EMFAF programmes simultaneously. The analysis of a sample of project calls included in the supporting study confirmed that Member States have used selective criteria that emphasise environmental and socio-economic priorities when choosing aquaculture projects. Under shared management, the selection criteria are established by the Member States and tailored to the type of support; in some decentralised countries (e.g. Spain, Belgium) the selection criteria are established at regional level to better address regional specificities. The use of scoring systems allows to prioritise operations that most closely align with the MS national aquaculture plans. Member States also set minimum overall passing scores for the selection criteria to ensure that only applications of sufficient quality are supported.

THE EMFAF OFFERS BETTER ALIGNMENT WITH POLICY OBJECTIVES

In addition to the changes in the EMFAF highlighted above, the impact assessment²⁵ highlighted some of the most important new concrete features of the EMFAF under its four priorities, as compared to the previous programming period, which have been taken up under the current legal framework:

- Aid intensity for small scale fisheries is increased from 80 to 100%.
- There is a stronger link to national strategic plans for aquaculture.
- Aid intensity for operations in relation to the landing obligation now ranging from 75% (infrastructure and marketing for unwanted catches) to 100% (gear selectivity).
- Community-led local development (CLLD) extended to whole blue economy.
- Increased support for international governance, including for coast guard cooperation.
- Action plans to be developed for the sustainable development of blue economy in outermost regions.
- The scope of marine knowledge under the EMFAF extended from covering the Maritime Strategy Framework Directive and the Common Information Sharing System to also covering Maritime Spatial Planning, EMODNET and coast guard cooperation.
- Increased synergies between fisheries and maritime science when collecting scientific data.

Considering the sensitive nature of some types of support in view of the EU commitment to eliminate subsidies contributing to fisheries overcapacity and overfishing, the EMFAF **prohibits certain types of support**²⁶ and includes a **financial capping** of certain aid categories –referred to as “fleet measures”²⁷. This includes support for the first acquisition of fishing vessels and specific investments related to fishing vessel operations, as well as the permanent and temporary cessation of fishing activities, are financially capped. Collectively, they cannot exceed 6 million Euro or 15% of each Member State’s allocated budget (whichever is higher) to avoid diverting funds from higher value-added actions.

²⁵ 12.6.2018 SWD(2018) 295 final.

²⁶ Article 13 of Regulation (EU) 2021/1139.

²⁷ Articles 17,18, 19 of Regulation (EU) 2021/1139.

The financial capping applies to the total of the Union financial support allocated to these operations. The distribution of financial resources across the five fleet measures is not ring-fenced.

Additionally, with a view to prioritising Member States' spending in support of the evidence base and control and enforcement, at least 15% of the budget for each Member State is ring-fenced and must be dedicated to two core areas of the CFP: the control of fishing activities and the collection of scientific data for fisheries management.

2.2. POINTS OF COMPARISON

For the mid-term evaluation, the points of comparison reflect the comprehensive structure of objectives, priorities, and implementation mechanisms for EU fisheries and maritime policies 2021-2027:

- **Effectiveness:** Degree to which the interventions have achieved the specific objectives: sustainable fisheries and reduction in EU fishing fleet capacity, improvement in fleet competitiveness, and modernization efforts (e.g. health and safety, energy efficiency, product quality), improvement of scientific knowledge, enforcement, biodiversity conservation (such as the management of Natura 2000 sites and marine litter), blue economy sectors, innovation, local development, GDP evolution, and job creation in maritime/coastal NUTS 3 regions etc. Alignment with the CFP, contribution to international ocean governance, and horizontal impacts such as marine scientific knowledge and cooperation against marine pollution.
- **Efficiency:** Progress on simplification, flexibility, and the use of financial instruments (loans, guarantees, repayable grants) relative to past programming periods. Costs per output (e.g., cost of creating production capacity in aquaculture, costs for fleet measures), competition for grants, and use of simplified cost options.
- **Relevance:** alignment between programme priorities and actual sectoral needs, addressing identified gaps from stakeholder consultation (e.g., adequacy for small-scale fisheries and regional sea-basin challenges).
- **Coherence:** degree of synergy with other EU funding programmes (ERDF, ESF, LIFE), and whether the intervention supports broader EU strategies like the European Green Deal and Farm to Fork.
- **Administrative Implementation and Monitoring:** implementation and use of the Common Monitoring and Evaluation System (CMES), the Infosys data reporting, and result/impact indicators (jobs created/maintained, surface of protected areas, aquaculture value/volume, shared coastguard operations). Effectiveness of baseline, output, and result indicators between the current and previous programming periods.

EMFAF performance at the EU level is measured by the Core Performance Indicators (see Table 2) monitored in MFF Performance Results Reports²⁸. These indicators represent some of the main results at the level of the operations to be achieved by the fund by 2029, therefore they are used as the quantitative points of comparison for the progress in implementation.

²⁸ https://commission.europa.eu/document/download/4e8f26d1-6604-496f-87c4-0b9a886adf29_en?filename=Core%20performance%20indicators%20%28new%29.pdf

Table 2: Overview of core performance indicators and their link with common result indicators/Infosys

Core performance indicators	Unit	Common result indicators/Infosys
CI 01 - Businesses created	Number of entities	CR03 - Businesses created
CI 02 - Businesses with higher turnover	Number of entities	CR04 - Businesses with higher turnover
CI 03 - Jobs created	Number of persons	CR06 - Jobs created
CI 04 - Jobs maintained	Number of persons	CR07 - Jobs maintained
CI 05 - Persons benefitting	Number of persons	CR08 - Persons benefitting
CI 06 - Actions contributing to a good environmental status, including nature restoration, conservation, protection of ecosystems, biodiversity, animal health and welfare	Number of actions	CR10 - Actions contributing to a good environmental status, including nature restoration, conservation, protection of ecosystems, biodiversity, animal health and welfare
CI 07 - Energy consumption leading to CO ₂ emissions reduction	CO ₂ emissions reduction	CR18 – Energy consumption leading to CO ₂ emissions reduction
CI 08 - Number of SMEs supported	Number of SMEs	Infosys data extraction and manipulation
CI 09 - Number of fishing vessels equipped with electronic position and catch reporting devices	Number of vessels	Infosys data extraction and manipulation
CI 10 - Number of local action groups	Number of LAGs	FAMENET will contact the MS to obtain this information.
CI 11 - Number of small scale coastal fishing vessels supported	Number of SSCF vessels	Infosys data extraction and manipulation
CI 12 - Usage of data and information platforms	Number of page views	CR22 - Usage of data and information platforms

Source: Regulation (EU) 2021/1139 (EMFAF), Annex I

However, the EMFAF Midterm evaluation comes in a very early stage bearing in mind the delayed implementation of the EMFAF. Thus, there is only a limited number of outcomes which can be analysed. Due to the late adoption of the EMFAF and the CPR in July 2021 the adoption of the EMFAF programmes was also delayed: 25 out of 26 national EMFAF programmes were adopted by the end of 2022 and one last programme was adopted in March 2023. For this reason, it is considered appropriate to compare the implementation of EMFAF shared management up 30 June 2024 with the achievements of the EMFF up to 31 December 2016²⁹.

²⁹ Due to differences in the start of the implementation of the two programming periods, the timeline is approximative, and one-to-one comparison cannot be made at this point of the evaluation.

Therefore, throughout this Staff Working Document, the EMFAF is compared to the fund implemented in the previous programming period, namely the EMFF (2014-2020). The effects of the changes in the design on programming and implementation are compared in qualitative and quantitative terms across the evaluation criteria.

The table provides the link between EMFF Union Priorities and EMFAF priorities comparable with each other.

Table 3: EMFF Union Priorities, EMFAF Priorities

EMFF Union Priorities	EMFAF Priorities
Union Priority 1	Priority 1 excluding SO 1.4
Union Priority 2	Priority 2 SO 2.1
Union Priority 3	Priority 1 SO 1.4
Union Priority 4	Priority 3
Union Priority 5	Priority 2 SO 2.2
Union Priority 6	Priority 4

Source: FAMENET 2025

The table below provides indicators selected for the quantitative comparison. It is to be noted that this is a restricted selection made for the purposes of this initial analysis, whereas the Infosys contains very granular data for all the other EMFAF indicators, which can be further analysed in the context of the retrospective evaluation. At the same time, at this point in time the expected outcomes and objectives on aggregate level for the Fund cannot be provided, due to the lack of counterfactual analyses, that would allow for casual attribution of impacts. The future actions to address this point in the final evaluation are laid down in section 4.1.

Table 4: Selection of quantitative indicators

Indicator	Period
Allocation for jobs created	2014-2020
Allocation for jobs maintained	2014-2020
Allocation for small-scale coastal fishing vessels supported	2014-2020
Allocation for SMEs supported	2014-2020
Allocation for local strategies selected by Fisheries Local Actions Groups	2014-2020

In Section 3.1, which describes the state of play of EMFAF during the evaluation period, their achievement in 2024 are compared to the values achieved in 2016 by the EMFF . Reference to Section 4.1 on effectiveness is also made.

It should be noted that given the limited implementation of the EMFAF so far, the present comparison between the EMFAF and the EMFF is very preliminary, and a qualitative

comparison under section 4.2 (efficiency) is provided, highlighting key design shifts and delivery improvements that differentiate the EMFAF from the previous Fund. A more comprehensive comparison with outputs and achieved targets at the level of results will be provided in the context of the retrospective evaluation of the EMFAF.

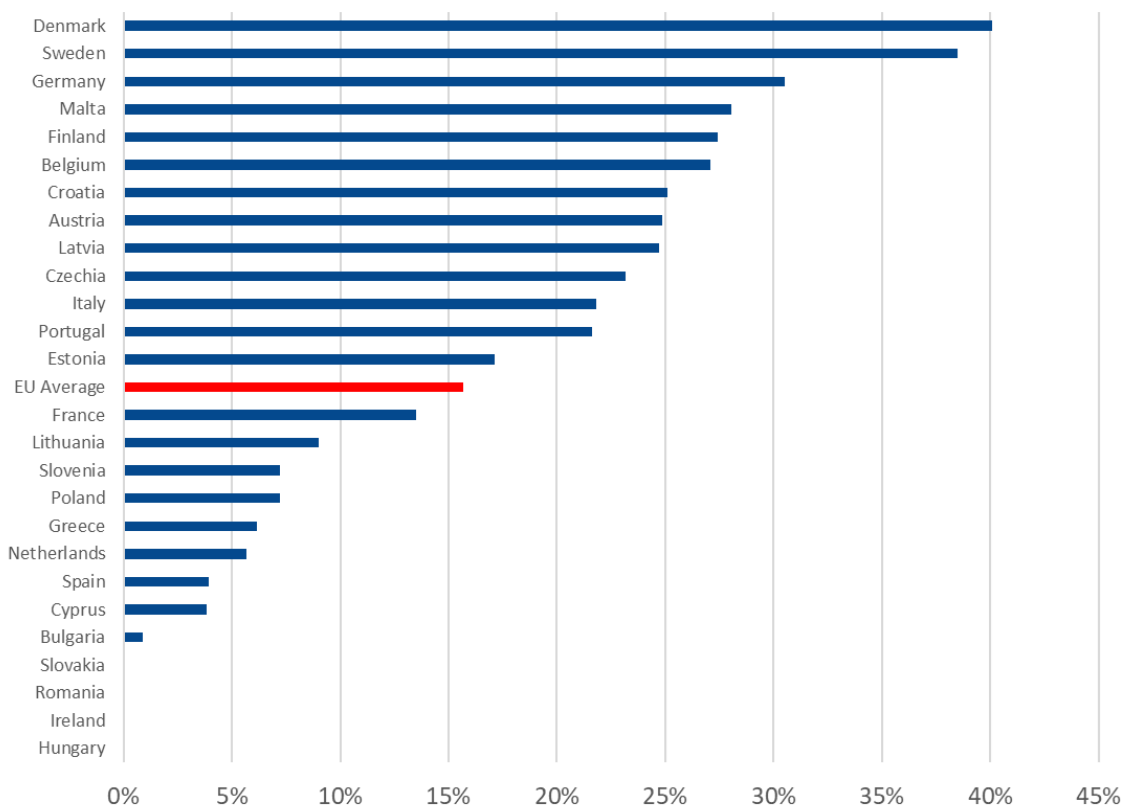
3. HOW HAS THE SITUATION EVOLVED OVER THE EVALUATION PERIOD?

3.1. STATE OF PLAY OF THE EMFAF SHARED MANAGEMENT IMPLEMENTATION

Based on transmission of data info for the reporting period until 30 June 2024, commitments reached 16% on average, with 10 Member States well below 10% and even 4 Member States still at 0% commitments at 4 years into the programme period and 2 years after programme adoption. The level of commitments is calculated against the total EMFAF allocation as provided in Member States' EMFAF programmes.

Figure 3: EMFAF Implementation rate- June 2024

EUR 739m committed
EUR 110m paid



Source: DG MARE

There is a high variability in the implementation between Member States and specific objectives. At the EU level Priority 1 has 59% of total committed amounts; Priority 2 – 20%, Priority 3 – 8%, Priority 4 – 2% and Technical Assistance – 4%. Progress is visible particularly in operations implemented by public bodies, especially for data collection and control, research institutes for projects on innovation and improving knowledge, and ongoing progress to operationalise Local Action Groups (LAGs) is noted with differences across Member States.

Beyond activation of the specific objectives, at this early implementation stage, it is possible to identify the following indicators' values: the target 2029 value of CR10 *Actions contributing to Good Environmental Status (GES), animal health and welfare, provided in*

EMFAF programmes is 22 010, with 4 551 such actions indicated for selected operations and 1 534 actions already implemented.

Significant progress has also been seen for the result indicator CR13 *Cooperation activities between stakeholders*: indicative result expected for already selected operations is 1 569 operations and it considerably exceeds the number of actions planned in programmes (891). From a socio-economic point of view, the target value in the programmes for new businesses created is 491, the indicative result expected for already selected operations – 145 and ex-post result – 49 new businesses. The target value in the programmes for businesses with higher turnover is 2 073 entities and the ex-post result – 145 entities. The evaluation findings also suggest that 3 498 jobs are planned to be created in programmes; the indicative result expected for already selected operations – 2 900 and ex-post result – 254 new jobs. EMFAF programmes plan to maintain 17 266 jobs to be maintained; the indicative result expected for already selected operations – 2 391 and ex-post result – 425 jobs maintained.

The delay with the adoption of the EMFAF Regulation and the CPR are the main factors of this low implementation rate. **Error! Reference source not found.** The simultaneous finalisation of the EMFF and the start of EMFAF also contributed to implementation delays, which were further complicated by the lack of additional support with the same staff in the managing authorities managing both programmes in parallel and structural changes taking place within organisations at Member State levels. This situation was exacerbated further in the Member States strongly impacted by Brexit, where the managing authorities had to develop and implement State aid schemes under the Brexit Adjustment Reserve³⁰ in the same period (2021-2023).

The Member States that reported the most progress in the implementation of their national EMFAF programme during the evaluation, identified several **enabling factors** that contributed to their capacity to make progress. These factors included having pre-existing procedures and processes, effective communication, and partnerships with the sector, and reduced administrative burdens for beneficiaries through SCOs and efficient IT application and management tools.

Challenges in implementation

2023 was the last year of EMFF implementation, causing the Managing Authorities (which manage both funds, which overlap in time) to focus heavily on maximising the absorption of the remaining available EMFF monies. This limited their ability to further accelerate the EMFAF programmes' implementation. The speed of this process (notably the launch of calls for proposals, the assessment of applications, and the award of contracts) depends on national administrative procedures, which vary between Member States. DG Maritime Affairs and Fisheries is taking all reasonable steps to assist Member States in accelerating EMFAF programme implementation.

³⁰ Regulation (EU) 2021/1755 of the European Parliament and of the Council of 6 October 2021 establishing the Brexit Adjustment Reserve (BAR). In the Member States where fisheries and aquaculture were most heavily impacted by Brexit, the EMFF/EMFAF managing authorities had to manage the support schemes under the Brexit Adjustment Reserve in the same period. The eligibility period of the BAR ended on 31/12/2023, as the same as for the EMFF, thus coinciding fully in terms of management of support schemes in the period 2021-2023 with both EMFF and EMFAF. This concerned in particular the following Member States: Ireland, France, Belgium, the Netherlands, Denmark and Germany.

Achievements and challenges regarding programme performance

The achievements and challenges relating to performance are directly tied to those of implementation, and the data remain very limited. The picture will become clearer in subsequent years.

The initiatives supported were in the field of maritime policy, scientific advice, international ocean governance, regional fisheries organisations and activities delegated to the agencies under the United Nations' umbrella.

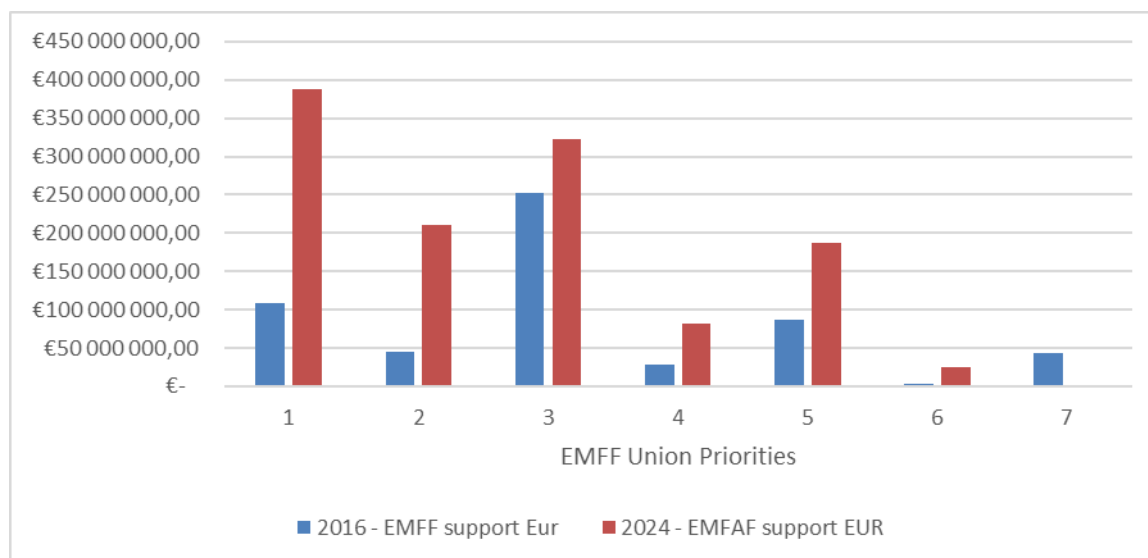
For shared management at the level of specific objectives, the highest commitment rates can be observed for the specific objectives 'Technical assistance' and 'Control and data collection', with 15.4% and 14.6% respectively of the total available allocations provided for these specific objectives.³¹

COMPARISON BETWEEN IMPLEMENTATION RATE OF THE EMFF AND THE EMFAF

The absorption rate is higher (15.33%) than the equivalent absorption rate of the EMFF (9.85%) for the same time-span of the programming period (beginning-until mid-term). This can indicate that even with the slow start of the EMFAF, Member States are better placed to advance on the implementation of their programmes than the position they were in the previous programming period.

When comparing the two funds per EMFF Union Priority, all Priorities but especially Priority 1 and Priority 2 of the EMFAF have succeeded the EMFF commitments in the comparable timeframe.

Table 5: Comparison of EMFF 2016 and EMFAF 2024 committed (selected and to be paid) EU support per priority



Source: FAMENET based on Infosys data

³¹ https://commission.europa.eu/strategy-and-policy/eu-budget/performance-and-reporting/programme-performance-statements/european-maritime-fisheries-and-aquaculture-fund-performance_en

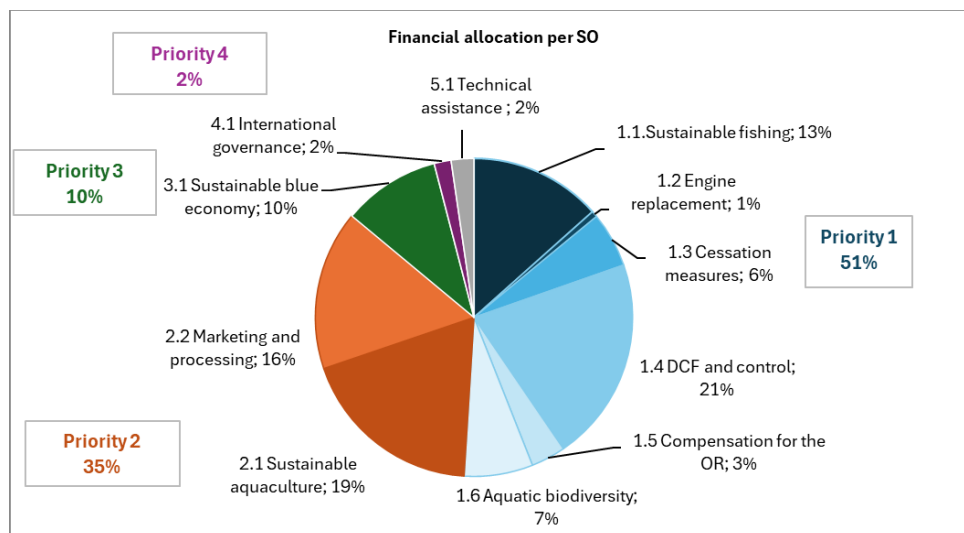
FINANCIAL ALLOCATION BY PRIORITY AND SPECIFIC OBJECTIVE UNDER SHARED MANAGEMENT

About half of the overall EMFAF financial allocation (51%) under shared management has been allocated to support sustainable fisheries and the restoration and conservation of aquatic biological resources (Priority 1). Within this priority, the focus is on data collection and control and enforcement (SO 1.4), with 21% of the total EMFAF financial allocation and 41% of the total financial allocation to Priority 1.

The support to the sustainable development of aquaculture and to marketing and processing activities of fishery and aquaculture products (Priority 2) has received 35% of the total financial allocation, with respectively 19% for aquaculture and 16% for marketing and processing activities.

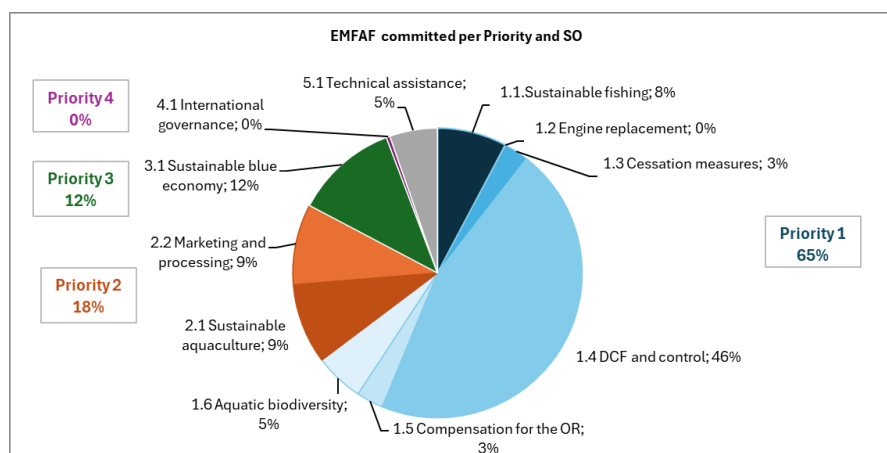
In comparison, 10% have been allocated to supporting the blue economy in coastal and rural areas (Priority 3) and 2% to the strengthening of international governance and maritime surveillance (Priority 4) (see figures below).

Figure 4: Financial allocation per SO



Source: National EMFAF programmes

Figure 5: Breakdown of EMFAF committed under shared management by priority and specific objective



Source: Infosys, 31 December 2023

Sustainable Fisheries and Data (SO 1.1, 1.4, 1.6): These areas receive the largest share of funding, aligning with the enduring sector need to tackle overcapacity, ensure scientific management, and conserve marine resources. Persistent challenges—such as overfishing, the need for improved data and control, and ecosystem-based management—justify the high allocations. The requirement that at least 15% of each country’s budget be dedicated to control and data collection was directly set to address these critical needs, especially in areas and basins facing stock declines or information gaps.

Sustainable Aquaculture and Processing (SO 2.1, 2.2): Substantial investment here matches the EU’s dependence on seafood imports and the strategic priority to boost self-sufficiency and value-added production. Needs assessments, SWOT analyses, and stakeholder consultations highlighted innovation, competitiveness, and food security in aquaculture as major gaps, which the current allocations aim to fill. Special attention is given to financing innovation, environmental sustainability, and market development.

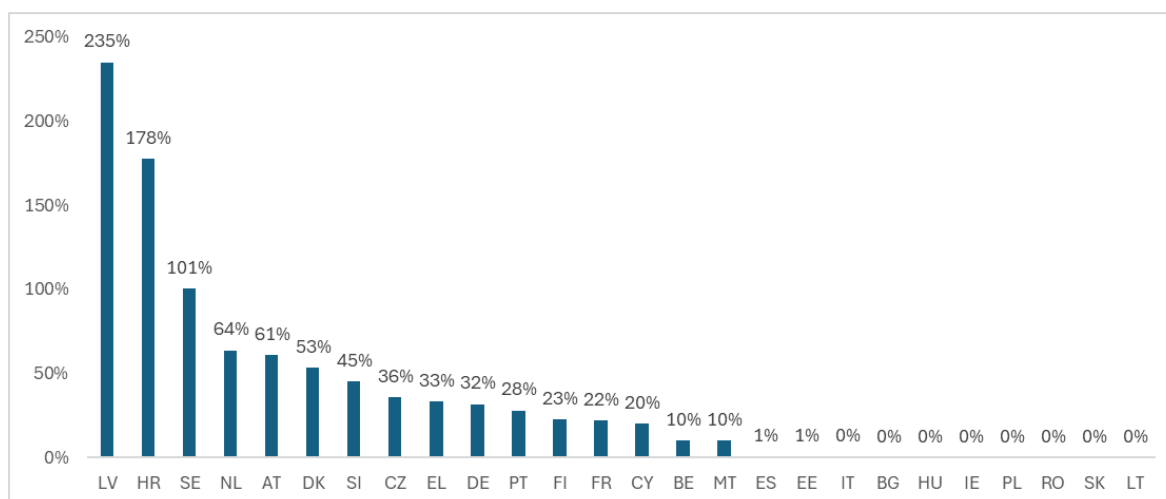
Blue Economy and Local Development (SO 3.1): Funding for coastal and community-led development addresses persistent social and demographic decline in many fishing areas, as well as the emerging need to diversify local economies. However, the allocation here is proportionally smaller, reflecting both the scale of the challenge and complementary support available from other EU funds (e.g., ERDF, CAP for rural development).

International Ocean Governance (SO 4.1): This has a minor allocation but still reflects a growing need for international cooperation, marine knowledge, and maritime security—key themes in global ocean policy and crisis response.

PROGRESS TOWARDS TARGETS BY MEMBER STATE

Spain, France, Italy, Poland, Portugal, and Greece have the highest EMFAF financial allocations, accounting when combined for almost two-thirds of the total EMFAF budget under shared management. These Member States have a slow implementation rate compared with their milestones and targets for output indicators. In Spain the implementation rate is below 5% and Poland did not implement any operation by 31 December 2023. Four Member States have made no progress towards their milestones and targets, with no operations approved by 30 June 2024. For the remaining Member States, progress towards milestones at the level of outputs reaches up to 235% in Latvia, due to operations related to compensation types of actions, which were likely not considered in the initial milestone values. In addition, progress towards targets at the level of outputs only goes up to 24% in two Member States (Netherlands and Croatia).

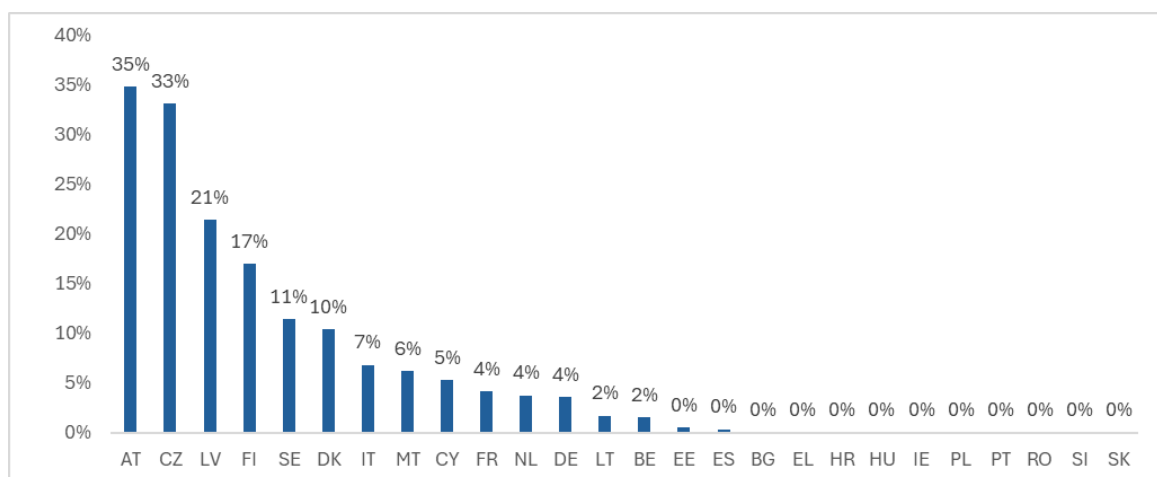
Figure 6: Progress towards milestones at the level of outputs by Member States by 31 December 2023



Source: National EMFAF programmes and Infosys

Based on the financial allocations by year provided in the EMFAF programmes, it was possible to compare actual commitments to the cumulative financial allocations for the 2021-2023 period. The figure below shows that commitment levels reach up to 33% in Czechia and 35% in Austria of their indicative EMFAF budget allocation for 2021-2023. In both Member States, the main progress has been made in SO 1.4 (data collection and control) and SO 2.1 (sustainable aquaculture).

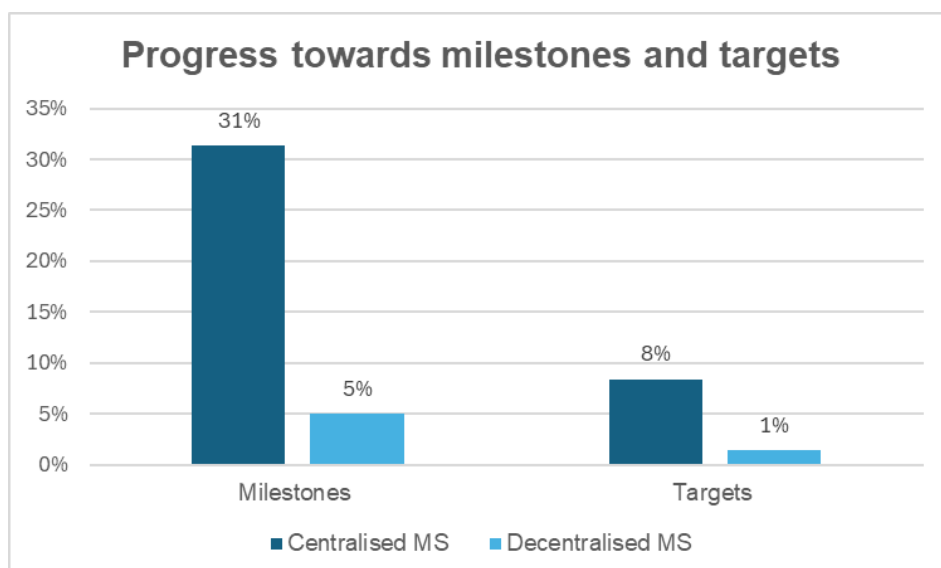
Figure 7: EMFAF expenditure committed by 2023 against the 2021-2023 budget allocation by Member State



Source: National EMFAF programmes and Infosys, 31 December 2023

There is distinct difference in progress made in Member States with a centralised versus a decentralised governance structure where those with centralised structures are more advanced as they started EMFAF implementation earlier than Member States with a more decentralised management set-up. This discrepancy, observed in previous programming phases, is mainly attributed to the time needed for Member States with a decentralised approach to establish governance structures and procedures at both central and regional levels, which also demonstrates the complexity in regionalised Member States to establish a national EMFAF programme.

Figure 8: Progress towards milestones and targets for centralised and decentralised Member States



Source: National EMFAF programmes and Infosys, 31 December 2023

IMPLEMENTATION BY PRIORITY BETWEEN MEMBER STATES

Progress in EMFAF implementation is underway in all Member States, but with differences.

Priority 1: Fostering sustainable fisheries and the restoration and conservation of aquatic biological resources

By the end of 2023, Denmark, Germany, Italy, and France carried out 71% of their commitments of the total financial allocations under this priority. On the contrary, seven Member States (Bulgaria, Estonia, Hungary, Ireland, Poland, Romania and Slovakia) had not started selecting projects under Priority 1.

Germany, Austria, and Denmark have made the most significant progress with 41%, 39% and 32% of their total financial allocations to P1 already committed, respectively. This progress is primarily due to the implementation of SO 1.4 (data collection and control) in these countries.

Priority 2: Aquaculture, marketing and processing of fishery and aquaculture products

By the end of 2023, ten Member States (Bulgaria, Greece, Croatia, Hungary, Ireland, Poland, Portugal, Romania, Slovenia, and Slovakia) had not started selecting projects for any of the specific objectives under Priority 2. Meanwhile, the commitments made by Italy, Latvia, France, and Denmark account for 65% of the total commitments of the financial allocations under Priority 2. **Error! Reference source not found.**

Priority 3: Sustainable blue economy

Only eight Member States have planned financial allocations and started implementing operations under Priority 3 by the end of 2023. Croatia alone accounts for 77% of the commitments of the total financial allocation under Priority 3. Italy accounts for 11% of commitments while the remaining 12% of commitments is shared among Finland, France, Germany, Latvia, Lithuania, and Slovenia.

Priority 4: International ocean governance and sustainable management

Only three Member States have planned financial allocations and started to implement Priority 4 by the end of 2023: France with 68% of the commitments of the financial allocation, Finland and Slovenia. National authorities explained the delay of implementing priority 4 with the need for familiarisation of this new area.

FEEDBACK FROM MANAGING AUTHORITIES

According to feedback from the survey of managing authorities carried out in the context of the supporting study, implementation levels are expected to increase in 2024, but with high variability between Member States and specific objectives. The specific objectives where the highest number of Member States expects to achieve milestones by the end of 2024 are:

- SO 1.3 (cessation of fishing activities)
- SO 1.4 (data collection and control)
- SO 1.6 (biodiversity and ecosystems)
- SO 2.2 (marketing and processing)
- SO 3.1 (CLLD)

In contrast, Member States reported significant challenges in implementing SO 1.2 (energy efficiency) often linked to the lack of balanced fleets which can be considered as eligible under the EMFAF legal framework, SO 4.1 (sustainable ocean management) and SO 1.5 (compensation for ORs). Some managing authorities mentioned the fact that they are not familiar with areas under Priority 4, leading to delays in planning and committing budget for types of actions under this priority. In the French Outermost Regions, changes in the organisational structure for managing the fund were cited as the primary reason for delays in implementing SO 1.5.

FINANCIAL EXECUTION ON SPECIFIC TOPICS

Small scale coastal fisheries

Small scale coastal fisheries (SSCF) received support³² through a total of 1 273 operations, with EMFAF planned support of EUR 121.2 million and EMFAF eligible expenditure (incurred and paid) of EUR 47.9 million as of the end of 2023.

Private operators, including micro and SMEs, predominantly benefited from actions involving SSCF, accounting for 55% of the total operations. However, research centres and public bodies received the majority of the EMFAF commitments, with 47% and 15% respectively of total EMFAF committed for operations involving SSCF.

Specifically, regarding SO 1.4 (data collection and control), research centres and universities were the primary beneficiaries of the funding supporting projects benefiting SSCF in terms of funding. Despite micro private enterprises benefiting the most under this specific objective in terms of the number of operations (12 operations), the corresponding

³² Based on Infosys field 29 Operation relevant to SSCF; Table 1 of Annex I of CIR (EU) 2022/79; calculation based on CFR number might differ.

EMFAF commitment was relatively low (only EUR 22 500), attributed to the small investments required for compliance with control requirements.

The same observation applies to SO 1.1 (sustainable fishing activities), where private enterprises benefitted from the largest number of operations (216 operations) while the largest amount of the EMFAF goes to research institutes and universities (EUR 4.3 million versus EUR 2.9 million).

Focus on temporary cessation of fishing activities

As SO 1.3 includes both temporary and permanent cessation of fishing activities, a total of 640 operations had been approved by the end of 2023, including 420 operations fully paid, amounting to an EMFAF commitment of EUR 9.7 million, which represents only 7% of the total financial allocation. The EMFAF payments accounted for 4% of the total financial allocation (EUR 6.1 million).

Focus on Energy transition

Different SOs can contribute to energy transition, but this has to be looked in light of the very specific eligibility rules that concern balanced fleet segments. Based on the screening of projects descriptions for operations tagged as contributing to climate change mitigation and adaptation, only few operations could be identified as clearly contributing to energy transition mostly beyond the operations supported under SO 1.2, focusing on increasing energy efficiency and reducing CO2 emissions through the replacement or modernisation of engines of fishing vessels. Only 27 operations were carried out under this SO in Finland and France, representing 8% of the 2024 milestone for outputs and 2% of the final target. The EMFAF committed for this SO reached EU 184 000 by the end of 2023, which represents 2% of the total financial allocation to this SO.

DIRECT AND INDIRECT MANAGEMENT

The financial envelopes for direct management (excl. TA at the initiative of the Commission) for FY 2021-2024 was EUR 90 million annually. Direct management supports voluntary contributions to RFMOs and international organisations in order to:

- Promote the long-term sustainability of the stocks and the fishers that depend on them.
- Adopt management measures based on transparent and independent scientific advice.
- Promote better compliance to combat illegal unreported and unregulated fishing activities.
- Promote better governance in the RFMOs including their administration decision-making process and their progress.
- Promote greater participation from developing countries to build consensus and improve acceptance and implementation of decisions taken.

The annual budget need of the RFMO compulsory contributions is EUR 190 million.

The 11 ACs were established under the 2013 CFP Reform. Under the EMFAF EUR 14.1 million has been committed and EUR 12.5 million paid between 2021 and 2024. In line with the objective of moving to financial instruments and simplified cost options, the

Commission moreover changed the annual grant procedures for the AC to lump-sum based approach.

The EMFAF direct management is also used to finance the EUMOFA that receives annually EUR 3.648 million, which performs data collection on markets, and produces reports, studies and market analysis to the attention of sector's stakeholders.

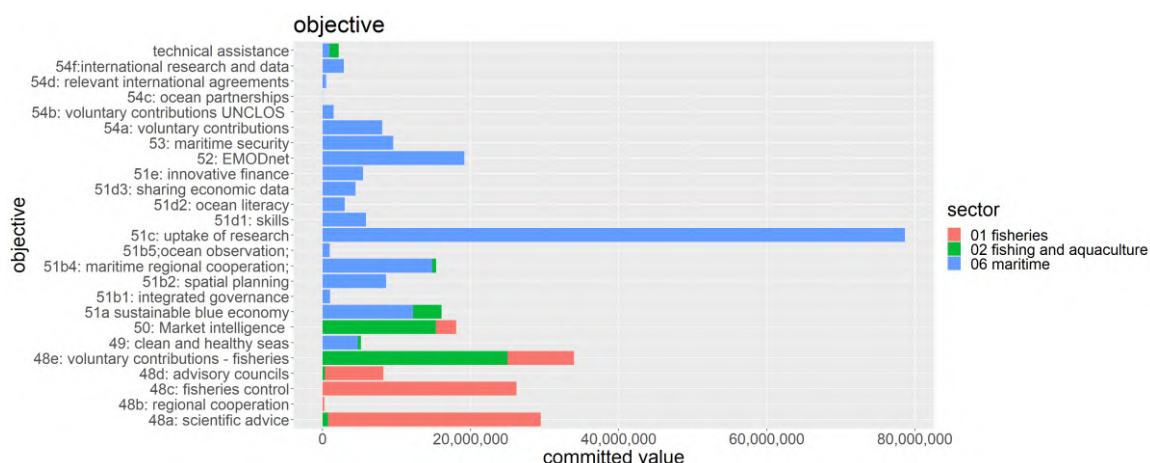
The EUR 206.7 million of the EMFAF that has already been committed correspond to 26% of the total EMFAF funding available for operations implemented under (in)direct management. While 65% of the operations have been implemented under Priority 1, the highest committed amount is for operations under Priority 3 (54% of the total committed of the allocated budget so far).

As such, the financial execution under the two-year work programmes does not show a slow rollout in the implementation of the Fund that is observed in the national EMFAF programmes, which relates to the differing nature of this management mode.

Result indicators have already been reported for the operations under (in)direct management. For example, 210 jobs were created (CR06) as a result of three operations (under the ‘Blue careers for a sustainable blue economy’ call³³), and another 149 maintained (CR07) as a result of 21 operations, while 4 906 people have benefitted (CR08) from 26 operations under (in)direct management as of 31 January 2024.

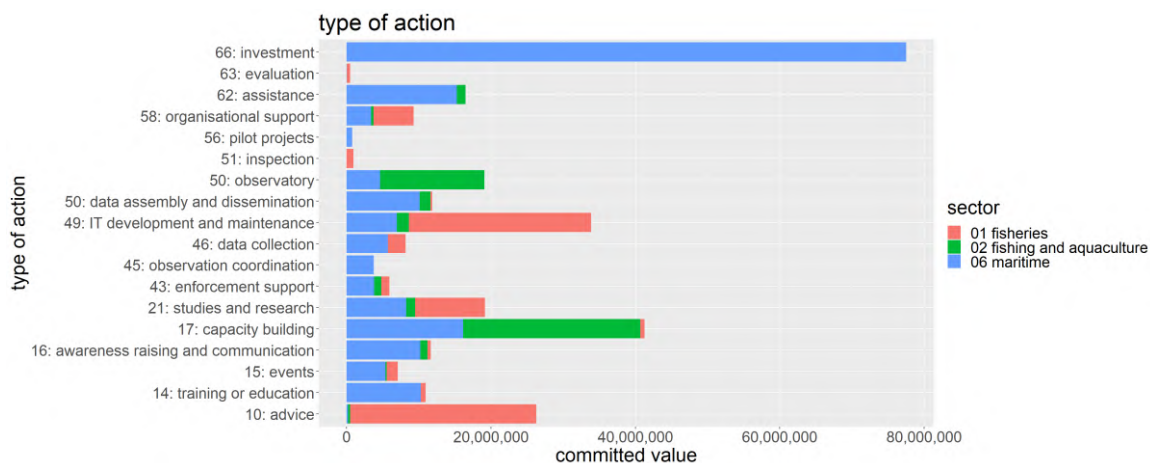
Figure 9 shows how much of the direct management budget was committed for each objective and Figure 10 indicates the type of action. The largest amount in each case was for the financial instrument to help SMEs develop innovative new products and services in the blue economy. The figures only include the EMFAF share and the contributions from InvestEU are not included.

Figure 9: Financing of specific objectives under (in)direct management as of November 2024



Source: supporting study

Figure 10: Types of action financed under (in)direct management as of November 2024



Source: supporting study

³³ See European Commission, Eight EMFAF projects kickstarted their work to develop the next generation of blue skills, available at: https://maritime-forum.ec.europa.eu/eight-emfaf-projects-kickstarted-their-work-develop-next-generation-blue-skills_en#:~:text=BLUE%20PORTS%20%2D%20BLUE%20CAREERS%20IN,Strategy%20until%202030%20and%202050.

IMPROVEMENTS IN EMFAF IMPLEMENTATION OVER THE EVALUATION PERIOD

Since the adoption of the EMFAF Regulation, the Commission has been in close contact with Member States and also with other EU institutions, notably the European Parliament and European Court of Auditors, to discuss implementation challenges as they emerged. Against the background of constant dialogue and feedback, the Commission has taken various steps, to improve the implementation of the Fund within the mandate of the legal framework.

The Commission's Geographical Units are constantly monitoring the implementation of the EMFAF programmes and assist the Member States in solving challenges linked to implementation. The same units have specifically addressed the low absorption rate of the EMFF operational programmes and have been closely monitoring the implementation of the EMFAF programmes through attending Annual Review Meetings and Annual Performance Review Meetings, Monitoring Committee Meetings, specific technical meetings, seminars and workshops with national authorities and stakeholders, daily telephone correspondence/video conferences with Managing Authorities (MAs), addressing legal interpretation questions and sending official letters to call the attention of the MS to implementation issues.

Despite the different pace of preparatory work by Member States during the programme preparation period, after programme adoption, all Member States have made efforts to move forward with the implementation as quickly as possible. In this regard, the level of preparedness varies considerably depending on the administrative capacity of each Managing Authority (and their Intermediate Bodies), the Member States' internal administrative and political priorities and the level of advancement of the EMFF Operational Programmes.

4. EVALUATION FINDINGS

4.1 EFFECTIVENESS

This section presents an assessment of how successful the EMFAF has been, mid-way through its lifetime, in progressing towards the specific objectives and the extent to which the delivery system is effective.

As explained, the start of the EMFAF has been marked by delays due to the late adoption of the EMFAF Regulation, the general crisis context of COVID-19, Brexit, the unjustified Russian military aggression against Ukraine, and the challenges for Member States in managing both the closure of the EMFF and the initiation of the EMFAF, among others. Most Managing Authorities cited the difficulty to manage both the closing the EMFF and start of the EMFAF at the same time without additional support. Additionally, structural changes within organisations contributed to capacity constraints. The deterioration of the economic situation in relation to Russia's military aggression against Ukraine is reflected in the ability of beneficiaries to complete the implementation of their projects. Moreover, challenges related to Brexit, reduced economic activity, and conditions stemming from new or ongoing environmental regulations further hindered effective start of the implementation.

Even though, it is too early to systematically assess the impact of the EMFAF, **Error! Reference source not found.**the analysis of the EMFAF programmes and feedback gathered from the Member States in the context of the evaluation show that the planned budget allocation and types of actions demonstrate **both continuity with the EMFF and capitalisation on lessons learnt.**

The implementation of the EMFAF appears to be more advanced than the mid-term implementation of the EMFF. Using the selected performance indicators to make the comparison between the EMFF and the EMFAF (Table 1), it is evident that even if both Funds were faced with implementation delays, the EMFAF is progressing better than the EMFF in the middle of the programming period. The reason behind this is attributed to the fact that the EMFAF contains various novelties in its delivery system, with a more simplified design, as explained in section 4.2

Table 6: Comparison between EMFF (up to 31 December 2016) and EMFAF (up to 30 July 2024) at the level of outputs for certain key performance indicators.

SMEs		
Number of Operations, with beneficiary = SME	871	1.533
EMFF/EMFAF Support (EUR)	82.235.382,08	138.667.260,91
EMFF/EMFAF Eligible Expenditure (EUR)	3.050.400,22	54.685.582,84
SSCF		
Number of Operations with vessel = SSCF	1.811	2.405
EMFF/EMFAF Support (EUR)	10.143.410,93	68.422.638,29
EMFF/EMFAF Eligible Expenditure (EUR)	811.107,60	12.657.929,92
CLLD		
Number of Operations under Priority = UP4 (EMFF) or P3 (EMFAF)	161	363
EMFF/EMFAF Support (EUR)	16.029.012,49	62.643.373,62
EMFF/EMFAF Eligible Expenditure (EUR)	204.195,26	3.681.559,60
Employment, result achieved, with status = fully implemented		
Employment created	8	254
Employment maintained	584	425

OUTPUT ACHIEVEMENTS

Although the implementation is still at an early stage, some achievements can already be seen in the monitoring data concerning output indicators (see table below), even if these are behind the 2024 milestones for output indicators. These concern both economic and environmental results (e.g., actions contributing to GES, animal health and welfare, cooperation between stakeholders, jobs created or maintained, etc.) (see table below).

Table 7: Achievements of output indicators compared to the milestones in programmes 2024

Priority	SO	Milestones for number of operations set in programmes for 2023	Number of Operations achieved 2024	%
1	1.1	3 929	938	23,9%
1	1.2	355	39	11,0%
1	1.3	14 309	2 916	20,4%
1	1.4	1 635	142	8,7%
1	1.5	1 520	1 524	100,3%
1	1.6	2 174	452	20,8%
2	2.1	3 462	819	23,7%
2	2.2	2 092	710	33,9%
3	3.1	2 235	363	16,2%
4	4.1	101	17	16,8%
5	5.1	577	52	9,0%
Totals		32 386	7 972	24,6%

Source: Infosys, 31 December 2024

Sustainable Fisheries and Data (SO 1.1, 1.4, 1.6) receive the highest share of funding, ensuring that essential scientific data, monitoring capacity, and conservation actions are supported across all Member States. The regulation’s requirement for each country to dedicate at least 15% of its budget to data collection and control helps close long-standing knowledge and enforcement gaps, particularly in regions with declining fish stocks.

However, progress in turning this funding into tangible outputs has been slow. 2024 milestone achievements remain low—23.9% for sustainable fisheries, 8.7% for data and control, and 20.8% for biodiversity and ecosystems. This suggests that challenges lie less in budget allocation and more in administrative and operational execution. Streamlining procedures and accelerating project uptake will be crucial for translating this strong financial foundation into measurable environmental and management results.

Sustainable Aquaculture and Processing (SO 2.1, 2.2) with nearly €1 billion for aquaculture and €862 million for marketing and processing. Milestone progress, however, shows uneven implementation. Aquaculture (SO 2.1) has achieved around 23.7% of its planned milestones, while marketing and processing (SO 2.2) stand at 34%. The faster progress in SO 2.2 partly reflects temporary crisis measures—such as compensation linked to the Ukraine war—rather than steady structural growth.

Blue Economy and Local Development (SO 3.1) with around €528 million is dedicated to community-led local development (CLLD) in coastal regions.

Progress so far is limited, with only 16.2% of milestones achieved. This delay is mainly procedural: local action groups take time to set up governance structures, draft territorial strategies, and launch calls. Still, the principle of bottom-up development remains central—empowering communities to design local solutions for economic renewal, environmental stewardship, and social inclusion.

International Ocean Governance (SO 4.1) receives a relatively small budget—€91.9 million. The low milestone achievement rate (9%) is in line with the nature of these activities, which often involve indirect action, long-term policy engagement, and complex multilateral initiatives. While the financial scale is modest, the value lies in the influence and coordination the EU can exercise globally—areas where tangible outputs are slow to materialize but critical for long-term ocean health and governance. This measured approach is appropriate given the challenges and timelines inherent in international ocean policy.

RESULT ACHIEVEMENTS

Although the implementation is still at an early stage, some results can already be seen in the monitoring data (see table below), even if these are behind the 2024 milestones for output indicators. These concern both economic and environmental results (e.g., actions contributing to GES, animal health and welfare, cooperation between stakeholders, jobs created or maintained, etc.).

On the achievement of results, a first analysis of the data reported by Member States on the common indicators sheds light on the overall progress made under the Fund. To date, the data of four Transmission of Data reporting rounds have been reviewed to ensure comparability. Implementation data covering the progress achieved will be published on the Open Data Platform in 2025³⁴. The picture will evolve once the implementation of EMFAF progresses further and supported operations are finalised by beneficiaries, allowing Member States to report more advanced and mature data on the result indicators in particular. **Therefore, an assessment on the delivery of the targets at the level of the result indicators will only become possible towards the end of the programme period.**

Scientific literature³⁵ which is available, suggests that support to types of actions on data collection, control and enforcement, the management of MPAs, and CLLD, can bring long-term benefits, for the fisheries sector. **However, the potential long-term economic,**

³⁴ [Open Data Portal for the European Structural Investment Funds - European Commission | Cohesion Open Data](#)

³⁵ Skerritt DJ, Arthur R, Ebrahim N, Le Brenne V, Le Manach F, Schuhbauer A, et al. *A 20-year retrospective on the provision of fisheries subsidies in the European Union*. ICES Journal of Marine Science. 2020;77(7-8):2741-52.

environmental, and social impacts of the Fund will depend on the actual projects supported by the end of the programming period. It is the implementation of these projects included in the programmes, that will allow for an assessment of the full impact of the Fund. This is why the Commission is already taking steps to develop impact pathways in order to analyse the cause-effect chain and estimate broader impacts of the Fund, especially in view of the ex-post evaluation of the EMFAF.

The reflections among the Commission services have already started in order to identify specific case studies and counter-factual analyses on different policy dimensions which can provide an outlook into the long-term effects of the EMFAF.

Stakeholder feedback

Stakeholder respondents in surveys and interviews conducted during the supporting study emphasised that the success of EU fisheries and aquaculture policies depends on establishing clear, measurable sustainability and animal welfare indicators to track progress and ensure funding supports environmentally responsible practices. They stress that transitioning to low-impact, climate-smart fisheries requires targeted investments in vessel modernisation, energy-efficient technology, and infrastructure. Equitable growth through the EMFAF relies on prioritising small-scale and coastal fisheries, which are both environmentally sustainable and financially vulnerable. Effective policy implementation also demands adaptability to regional conditions, including inland and outermost regions. Overall, public consultation participants viewed the EMFF and the EMFAF as reasonably effective in meeting their objectives, particularly in supporting the Common Fisheries Policy (see table below with summarized positive comments from the stakeholder survey).

Table 8 : Stakeholder opinions

Type of stakeholder	Positive Feedback:
Managing Authorities (National & Regional)	<ul style="list-style-type: none"> • Strong stakeholder involvement in programme design. • Effective performance framework with historical data. • High flexibility, enabling quick adaptation during crises (e.g., COVID-19). • Improved governance and administrative processes since the previous funding period (EMFF).
Fisheries & Aquaculture Sector	<ul style="list-style-type: none"> • Supports investment in production capacity, job creation, and innovation. • Perceived economic benefits through increased competitiveness.
Non-Governmental Organizations (NGOs)	<ul style="list-style-type: none"> • Recognition of environmental and sustainability efforts. • Fund aligns with EU Green Deal objectives.
Producer Organizations & Trade Unions	<ul style="list-style-type: none"> • Financial support for fleet modernization and competitiveness. • Strong focus on social sustainability (worker conditions, wages).
Research Institutions & Universities	<ul style="list-style-type: none"> • Support for data collection, scientific studies, and innovation. • Coordination with other EU-funded research projects.
Market Actors & Supply Chain Stakeholders	<ul style="list-style-type: none"> • Acknowledged support for sustainable seafood supply chains.

Source: EMFAF MTE ANNEX V

However, it is too early to assess the Member State programmes' effectiveness towards reaching the specific objectives of the Fund in terms of results and impacts.

Whether budget take-up will be better/quicker for the EMFAF than the EMFF will depend on the capacity and time needed for the Member States to adopt national legislation, work with different delivery models, implement the calls, selections, manage the contracts, payments, and certifications. Also, the economic situation and prospects of private operators are key for their investment capacity and take-up of the fund.

LIMITING FACTORS FOR THE EFFECTIVENESS OF THE FUND

The EMFAF faces challenges, notably in terms of organisational capacity, and the need for consistent training and skills development, especially at the national level. Addressing these areas can further enhance the effectiveness of the EMFAF in achieving its goals of sustainable structural changes in the maritime and fisheries sectors.

The study shows varied perceptions exist regarding staff capacity and resource allocation. Some authorities have had to hire external consultants, and simultaneous management of multiple funds (EMFAF, EMFF, BAR, state aid) has posed capacity challenges. There is a recognised need for updating skills and training, with concerns about staff turnover affecting institutional memory. Managing authorities largely view their governance structures as effective, with 77% rating them highly effective. However, application and selection procedures and monitoring systems show room for improvement.

The study shows that stakeholder involvement during the preparation of national EMFAF programmes has been largely effective, with strong support and satisfaction for the managing authorities. However, there is room for more innovative contributions and better alignment of stakeholder expectations with practical realities.

There is room for more simplification at national level. While there is wide-spread appetite for using more SCOs, managing authorities have limited resources and find it methodologically challenging to develop them. There is also concern about the high control efforts that Member States have to apply; e.g. for real cost based support, many Member States still apply a 100% of invoices before payments to beneficiaries and they do not use risk-based approaches, often due to negative experiences with recoveries from beneficiaries in funding periods before 2014.

There are cases where efficient IT tools for programme management take long to be developed and are challenging to implement when they have to be linked up with existing national/regional IT tools.

The EMFAF delivery system provides enhanced flexibility to accommodate different governance models within the Member States and achieving a high level of perceived effectiveness. However, the evaluation findings point to specific areas, particularly the application and selection procedures, and monitoring and reporting systems, where there is scope to optimise the EMFAF delivery system's effectiveness. Seven Member States have established intermediate bodies at the regional level to oversee the implementation and distribution of the fund, namely Belgium, France, Italy, Poland, Portugal, Austria and Spain. In Germany, the implementing bodies in the Lander have the formal status of managing authority due to the federal constitutional set-up.

In contrast, the remaining Member States opted for a centralised approach, where the central administration fully governs the fund's management at the national level directly or with the support of an intermediate body at the National level. In the case of decentralised countries, usually intermediate bodies support the implementation both at

central and regional level. These differences in governance structures underscore the varying administrative frameworks within the EU but also illustrate the flexibility of the EMFAF delivery system.

Stakeholder feedback

According to the supporting study, the managing authorities' feedback on the effectiveness of the structure and processes administering the EMFAF reveals varying perceptions across different aspects (see table below with summarized challenges raised by stakeholder).

Table9 : Stakeholder opinions on challenges

Type of stakeholder	Challenges
Managing Authorities (National & Regional)	<ul style="list-style-type: none"> • Administrative burden remains an issue despite simplification efforts. • Resource constraints lead to implementation delays. • Need for improved informal exchanges between managing authorities.
Fisheries & Aquaculture Sector	<ul style="list-style-type: none"> • Bureaucratic complexity in applying for funding. • Concerns over fund allocation and access for small-scale fishers. • Regulatory inconsistencies between national and EU-level rules.
Non-Governmental Organizations (NGOs)	<ul style="list-style-type: none"> • Funding mechanisms favour large enterprises over small-scale initiatives. • Lack of clear sustainability indicators to track real impact. • Complex application process prevents some stakeholders from applying.
Producer Organizations & Trade Unions	<ul style="list-style-type: none"> • Limited support for workforce renewal and youth entry into fisheries. • Lack of incentives for small producers and micro-enterprises. • Financial instruments are underutilized due to complexity.
Research Institutions & Universities	<ul style="list-style-type: none"> • Insufficient long-term research funding. • Need for improved integration of research into policy decisions.
Market Actors & Supply Chain Stakeholders	<ul style="list-style-type: none"> • Fund access is too complex for smaller market players. • More transparency needed in distribution of financial resources.

Source: EMFAF MTE ANNEX V

Most managing authorities (20 out of 26, 77%) assessed their governance structure as highly effective. In addition, slightly more than half of the managing authorities (58%, 15 out of 26), also rated the application and selection procedures as highly effective. However, a notable proportion (38%, 10 out of 26), rated its effectiveness as medium only, indicating some room for improvement of the application and selection procedures. Most managing authorities (64%, 16 out of 25) also rated the monitoring and reporting system as having a medium level of effectiveness, indicating some level of satisfaction but also room for improvement in terms of clarity or comprehensiveness in reporting mechanisms. In addition, 10 out of 16 managing authorities (62%) noted improved communication between relevant parties involved in EMFAF implementation, fostering better coordination and collaboration. Regarding (in)direct management, the EMFAF delivery

system introduced flexible bi-annual work programmes, improving in this way planning and internal tracking, and consolidating monitoring efforts.

Moreover, the EMFAF includes a list of ineligible operations (e.g. building new fishing vessels, increasing the power of fishing vessels) and a set of conditions to prevent harmful effects, including indirect effects (e.g. certain investments can be supported only in segments of the fishing fleet without structural overcapacity). Member States have identified these legal restrictions as one of the reasons for the low absorption of the Fund³⁶.

4.2 EFFICIENCY

This section addresses the efficiency of the EMFAF design and management, including potential areas for further simplification. Due to the low levels of the EMFAF implementation under shared management, it is not yet possible to compare the costs and outcomes of operations. Whenever possible, the impact assessment and previous evaluations are used as point of comparison.

The 2018 EMFAF impact assessment identified several key structural and operational challenges and the needs which the fund had to tackle. In relation to **fisheries**, it identified that **overcapacity** remained a significant issue in many segments, particularly in the Mediterranean, where fishing often exceeds sustainable limits. It also showed that successful **implementation of the CFP** would depend on ongoing support for fisheries control, data collection, and combating illegal, unreported, and unregulated (IUU) fishing both within the EU and internationally. Furthermore, the information collected must be utilised for broader purposes (for surveillance and marine knowledge), necessitating more interoperable systems. **Small-scale coastal fisheries**, representing 74% of all active vessels in the EU, remain crucial for the resilience of coastal communities. While the sector was profitable in 2015 and has seen increased labour productivity, the situation varies regionally, with many small-scale fleets facing net losses. The **fisheries sector's lack of attractiveness**, due to safety concerns and poor working conditions requires ongoing attention. **Although the core issues the EMFAF seeks to address - such as market failures and the implementation of the CFP- remain consistent with past programmes, lessons learnt have prompted adjustments in its delivery system.** The broader regulatory and policy environment has also evolved, requiring updates in the Fund's design.

The EMFF ongoing ex-post evaluation³⁷ also shows that the set-up of that fund did not allow for rapid reactions to crisis, as has been experienced in relation to the COVID-19 crisis and the Russian aggression in Ukraine. Unspent funds were available under the EMFF, but they could not be easily redirected to help tackle the above-mentioned crises because of inflexible EMFF rules.

In response to these needs and findings, the design of the EMFAF has been guided by the following principles: a more flexible and simplified fund including through greater use of financial instruments, more synergies and better alignment with EU policy objectives and international obligations, and provisions. Moreover, in response to the finding that the EMFF was not sufficiently reactive and flexible in times of crisis (ex. COVID), the EMFAF provides for the possibility to trigger a crisis mechanism in case certain conditions

³⁶ Minutes of the Expert Group of 6 November 2024.

³⁷ To be finalised mid-2025.

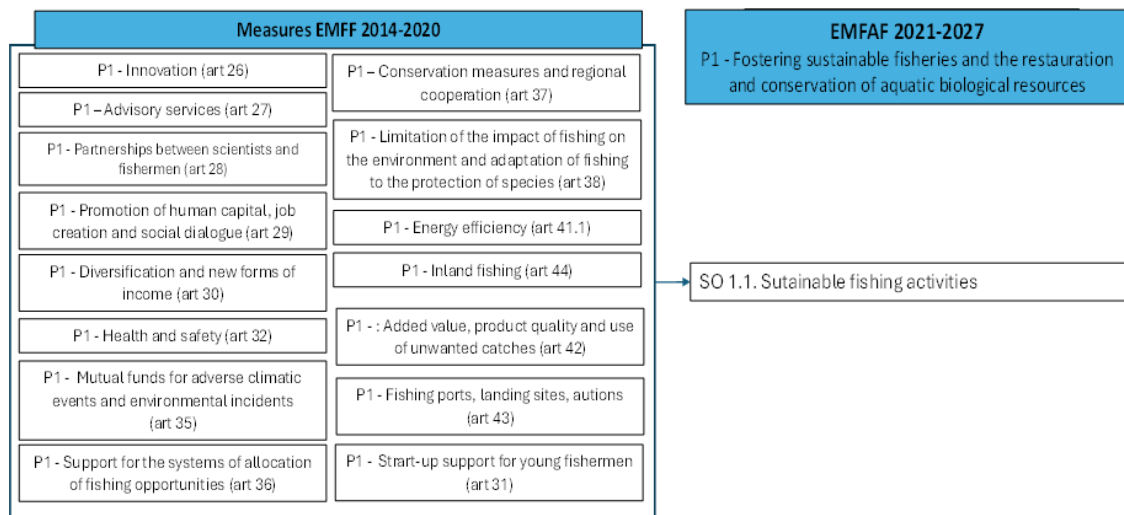
are met, which would result in compensation in case of exceptional events causing a significant disruption of markets.

A MORE FLEXIBLE AND SIMPLIFIED FUND

The EMFAF’s four priorities broadly outline the scope of support in line with the fund's objectives. Specific objectives further clarify areas of support, and a more limited number of eligibility criteria are specified in the EMFAF Regulation, as compared to the EMFF. This approach created a flexible implementation framework, allowing Member States to pursue strategic national priorities based on their SWOT analysis and the Commission’s needs assessment by sea basin. In contrast to the EMFF, which relied on rigid financing descriptions and eligibility rules, and a detailed set of eligible “measures”, the EMFAF seeks to streamline delivery systems and enhance flexibility.

A novelty of the EMFAF is its new architecture, namely a move away from predefined measures, allowing Member States greater flexibility to pursue strategic objectives based on an assessment of their needs. The analysis shows that despite the increased flexibility, in practice the national EMFAF programmes are broadly a continuation of the EMFF. The simplified structure of the EMFAF, particularly for its first two priorities, illustrates the simplification of the Fund’s set-up:

Figure 11: Indicative illustrations of how the architecture of the EMFF compares with the EMFAF (Priority I)



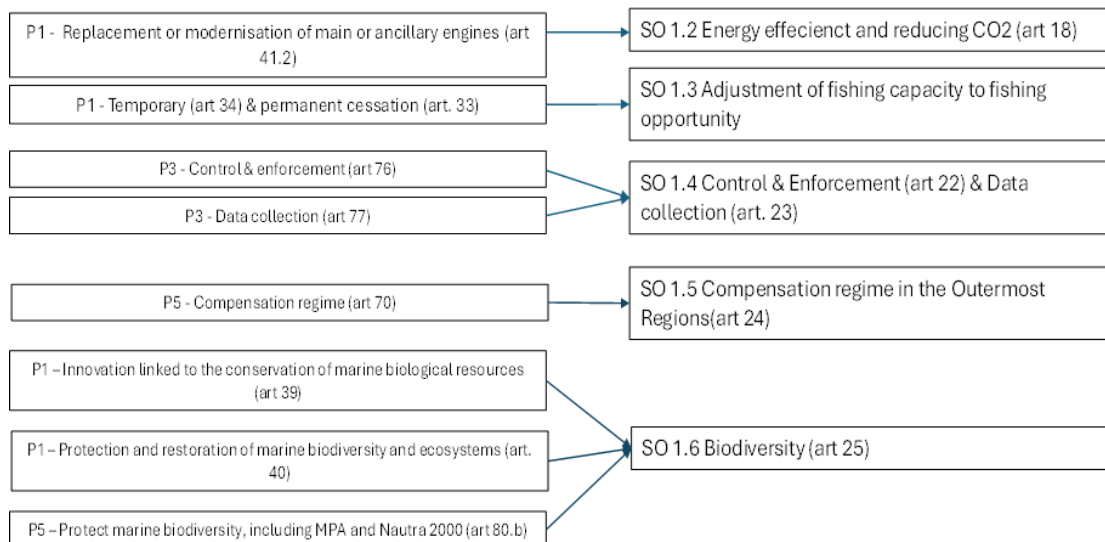
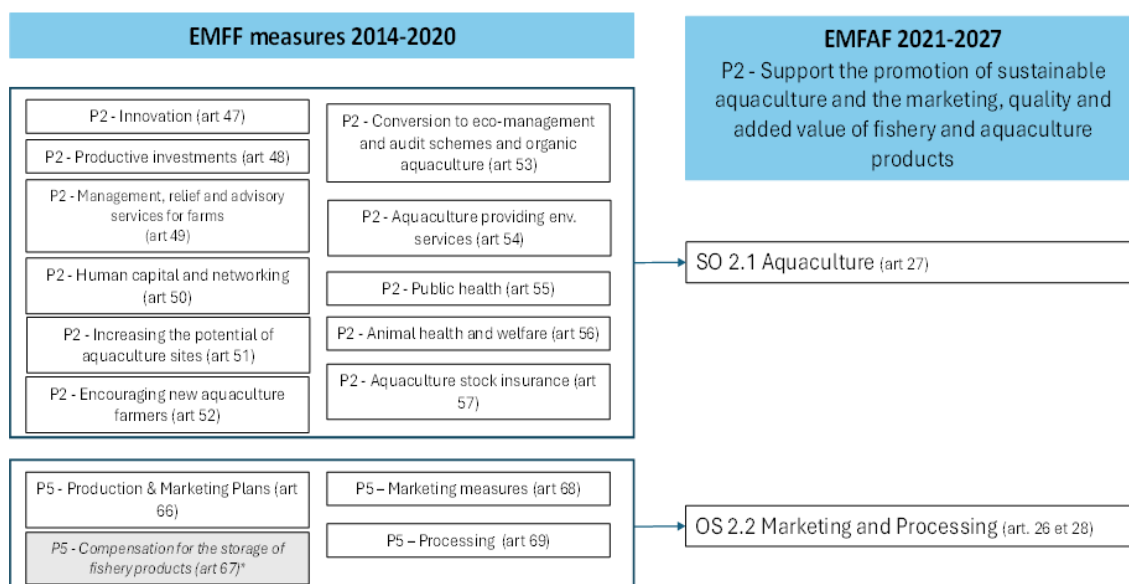


Figure 12: Indicative illustrations of how the architecture of the EMFF compares with the EMFAF (Priority 2)



Source: extract from the supporting evaluation study

Based on the lessons learnt in the previous programming period as regards operational management, EMFAF procedures became simpler, and the administrative burden lighter compared to the EMFF. Key sources of simplification include:

- The ability to reallocate budgets within specific objectives without revising national programmes.
- The use of simplified cost options and financing not linked to costs to streamline financial management and reporting both in the areas of shared and direct management.
- The implementation of risk-based analysis to ease application procedures.
- The shift to digital processes aiming at reducing paperwork and enhancing project management efficiency.
- The streamlining of monitoring requirements through a reduction of the number of common result and output indicators.

- A simplified conditionality system with support being conditional upon compliance with the objectives and rules of the CFP and with the eligibility rules of the EMFAF regulation.

In addition, the EMFAF-specific simplifications, the new CPR regulation also introduced several simplifications:

- **Streamlining of ex-ante conditionalities into enabling conditions** – The number of conditionalities was reduced from 36 ex-ante conditionalities to 20 enabling conditions of which the 7 general ex-ante conditionalities were replaced by 4 horizontal enabling conditions on public procurement, State aid, the EU Charter of Fundamental Rights and the UN Convention on the Rights of Persons with Disabilities which are also relevant for the EMFAF.
- **Simplified identification of programme authorities** – The process of designating managing, certifying, and audit authorities, under the previous programming period, was simplified for the new programming period which among others made it possible to “roll over” existing systems from the previous programming period and, in particular in case of newly identified authorities, rely on early system audits for assurance.
- The **streamlining and simplification of evaluation requirements**: all requirements have basically been reduced to a mid-term and an ex-post evaluation to be done by the Commission and the mid-term evaluations to be done by the Member States during programme implementation.
- **Reduction in audit and control requirements** – a risk-based approach for management verifications and audits was introduced, focusing on higher-risk areas rather than aiming for 100% coverage. In addition, the 'Single Audit' principle was strengthened to reduce the administrative burden on beneficiaries and administrative costs as well as to avoid duplication of audits and management verifications of the same expenditure declared to the Commission.

ADMINISTRATIVE COSTS

Administrative costs represent approximately 1.2–1.5% of the total EMFAF public contribution under shared management. The bulk of these costs arises from fulfilling reporting and auditing obligations. Administrative costs and benefits are unevenly distributed across stakeholder groups:

- **Managing Authorities and Intermediate Bodies** bear the majority of recurrent administrative costs (labour, IT, and control mechanisms) but benefit from long-term system-level efficiency for example through simplified verification and integrated IT tools.
- **Project Beneficiaries** experience reduced reporting load under SCOs during the implementation. However, SCO require more effort in the preparation phase due to adaptation costs for digital tools and audit requirements. Respondents of the survey were quite positive. **67% responding the stakeholders survey stated that** costs if administrative work are reasonable relative to funding value. However Small-Scale Coastal Fisheries representatives consider the administrative most

burdensome. Most (63%^{*38}) of the survey respondents spent more than three days on the application process, plus external costs for 31%, but a large majority (67%) considered the total cost reasonable compared with the amount of support received (compared with 10% who disagreed). Application processes tend to be more time-consuming for beneficiaries other than businesses (producer organisations (POs), research, local action groups setting up). Only 50% of respondents other than private enterprises agreed that the application costs were reasonable, and 28% disagreed. The most negative assessments came from Research centres and POs

- **Commission and EU-level bodies** benefit from simplified monitoring through **Infosys and data transparency**, with reduced duplication in audit and reporting tasks.

According to the supporting study, future EU funds regulations should include flexible funding mechanisms that allow for rapid reallocation of resources in response to unforeseen (external) crises, such as economic downturns or environmental emergencies. Finally, the evaluation recommends that future programs should focus on reducing administrative burdens, providing more targeted technical assistance, and ensuring that the application and reporting processes are straightforward and user-friendly.

The recent study on the Assessment of the administrative costs and burden of CPR funds 2021-2027³⁹, found that the average administrative costs (i.e., costs for all tasks assigned to authorities to prepare and implement programmes) are estimated at 4.84% of allocated funds. ERDF, ESF+, and multi-fund programmes show lower costs, and Interreg, EMFAF, and HOME Funds report higher and more variable figures. The most resource-intensive tasks remain project selection and verification. Programmes with limited allocation have on average significantly higher costs per million EUR spent. The elevated costs in these programmes are attributable to their complex governance structures, cross-border requirements, and, in the case of EMFAF, smaller average programme budgets which increase per-unit administrative intensity. On the administrative burden, the same study shows that the application process for ERDF, ESF+, Cohesion Fund, and EMFAF shows burden reductions of 42%, 53%, 89%, and 77%, respectively.

The EMFF evaluation study also finds that the performance of the result indicators system was not fully optimal⁴⁰ mainly due to the fact that the definition of the context and result indicators, part of a more complex monitoring and evaluation system, was set up after adoption of the operational programmes leading to poor target-setting in 2014-2015, raising challenges with the collection of reliable data.

Notwithstanding some room for improvement overall the situation under the EMFAF has improved considerably through the early development of indicators in consultation with the Member States, the provision of guidance on the indicators and the performance

³⁸ French outermost regions were over-represented in the sample and provided significantly different answers from the rest of the respondents (see Annex V. Synopsis report). They are not included in the overall figures represented in the table. Their answers are coherent with the analysis above but indicate a heavier administrative cost, which could be related to the fact that a large share of this group of respondents applied for investments. 82% of them agreed that applications costs were reasonable against 6% who disagreed.

³⁹ <https://op.europa.eu/en/publication-detail/-/publication/1cacec43-d187-11f0-8da2-01aa75ed71a1>

⁴⁰ See also Common Monitoring and Evaluation System for the European Maritime and Fisheries Fund reports 2017 (2018) and 2021 (2022), as required by the EMFF Regulation 508/2014, Article 107.

framework methodology for target setting, establishing a more flexible Monitoring and Evaluation Framework (see Annex VII).

Thus, the EMFAF is expected to provide more reliable data and show more concretely how the Fund contributes to the objectives of the CFP as well as to the horizontal policy priorities of resilience, green and digital transition. These contributions are expected to become clearer in the context of the retrospective evaluation.

4.3 OVERALL COST-EFFECTIVENESS OF THE FUND

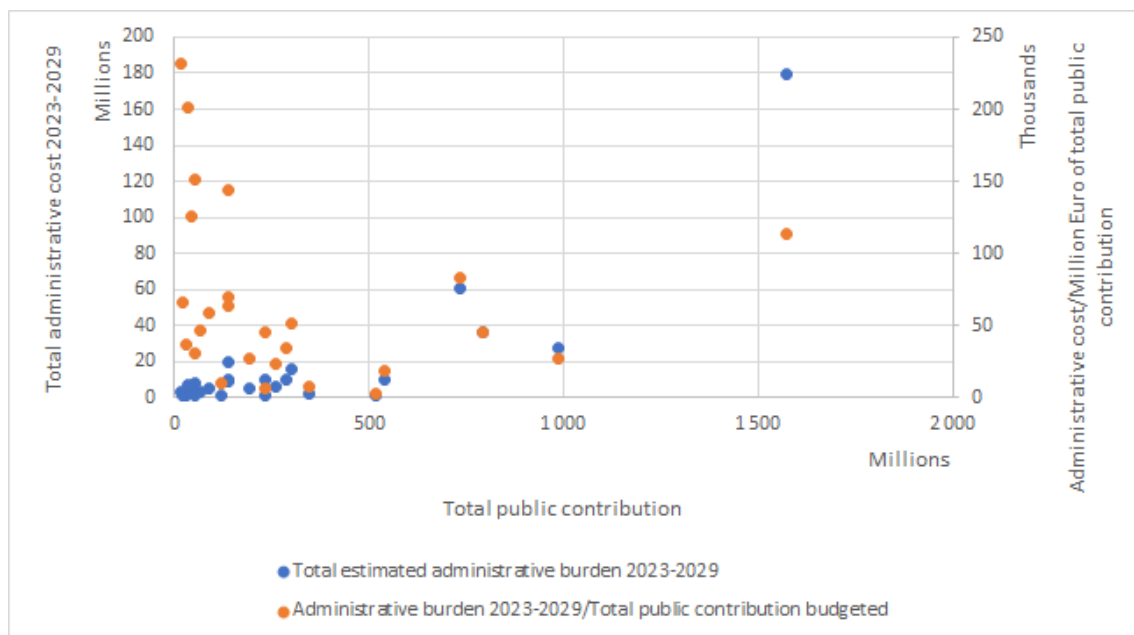
A cost-benefit analysis is not appropriate for EMFAF interventions because many of its objectives—such as environmental protection, regulatory compliance, and social outcomes—cannot be easily monetized. Instead, cost-effectiveness analysis is preferred, as it focuses on achieving the best results for the resources invested, aligning with the fund’s emphasis on effectiveness, efficiency, and qualitative outcomes rather than strict economic returns. However, in the absence of results of the EMFAF at the date of the evaluation it was not possible to provide a cost-effectiveness assessment. At the time of the retrospective evaluation more elements may emerge for feeding any cost-effective analyses and the Commission will take steps to advance on such analysis in the future.

The supporting study finds though that 21 Member States (out of 26 with a national EMFAF programme) anticipate that the EMFAF will achieve more than the EMFF. The supporting study also indicates that operations are implemented at a reasonable cost to the administration and beneficiaries, but the data available also suggests a possible increase of the administrative costs for administrations in Member States, compared to the EMFF.

Overall, based on the evaluation findings, the administrative burden resulting from **the programming, management, and implementation of the EMFAF, is assessed to be reasonable, compared with what has been observed for the EMFF and other CPR Funds, during the previous programming period.**

The administrative burden for beneficiaries is also considered reasonable by most of the survey respondents in the supporting study and seems stable overall, with almost an even breakdown of the respondents to the target group survey between those who assess it has decreased, those who assess it is stable and those who assess it has increased. **For Member States with low EMFAF budget, however, in particular the landlocked countries, the administrative costs remain proportionately significantly higher than the average.** Specifically, the five Member States with the smallest public contributions (including three of the four landlocked countries) spent on average eight times more than other Member States per million euros of EMFAF public contribution, and almost 2.5 times more for management and implementation. Nevertheless, the cost-effectiveness of the money spent under shared management cannot be assessed at this stage considering the small number of projects implemented.

Figure 13: Distribution of recurrent administrative costs per Member State in relation with the total public contribution



Source: supporting study, based on the survey of managing authorities

4.4 COHERENCE

The assessment of coherence considers the extent to which the EMFAF is internally and externally coherent. In practice, this means how well different interventions that share common objectives work together.

ASSESSMENT OF THE INTERNAL COHERENCE

The **internal coherence** of the EMFAF relates both to the internal coherence of the Fund interventions and the alignment of the EMFAF with the policy framework. The analysis focuses on the extent to which the different EMFAF interventions are complementary and coherent with the objectives and priorities of the CFP and the extent to which the EMFAF different interventions generate synergies and/or compensate trade-offs between them.

As explained **the EMFAF is the main financing instrument for the implementation of the CFP**. The CFP aims to ensure that fishing and aquaculture activities are environmentally sustainable in the long-term and are managed in a way that is consistent with the objectives of achieving economic, social and employment benefits, and of contributing to the availability of food supplies⁴¹.

The alignment between the EMFAF and the CFP is reflected in the Member States EMFAF programme design, both in terms of the types of actions included and the allocation of resources, as well linked reporting on these objectives through Transmission of Data and Infosys reports.

The EMFAF supports the CFP objectives through the following main actions:

⁴¹ Article 2 of the CFP Regulation.

- **Fostering sustainable fishing activities:** support to the implementation of the landing obligation, promoting the use of selective gears, etc.
- **Providing conditions for the fisheries sector to be competitive:** support to improving quality of catches, to increase energy efficiency to reduce operating costs, for the development of skills and knowledge, etc.
- **Supporting the structural management of fisheries and fishing fleets:** promoting balance between fishing capacity and fishing opportunities, supporting the implementation of conservation measures, including through operations of permanent and temporary cessation of fishing activities.
- **Supporting sustainable aquaculture:** support to environmental sustainability, productive investments, innovation, aquaculture stock insurance schemes, etc.
- **Promoting an efficient market for fishery and aquaculture products:** supporting the structuring of the sector and processing and marketing operations (e.g., structuring of the market through producer organisations, develop new market outlets, add value to products, etc.).
- Contributing to a fair standard of living in coastal and rural areas: supporting the sustainable development of blue economy.
- **Collecting scientific data to underpin management of economic activities:** support data collection in line with the Data Collection Framework through shared and direct management and data collection operations to strengthen the sustainable management of the marine environment under direct management (e.g. EMODnet⁴²).
- **Supporting the control of fishing activities:** support to Member States and operators to implement the fisheries control system (e.g., investments in digital tools).

The regulatory framework reinforces the internal coherence between the EMFAF and the CFP objectives by:

- Possibility of setting targets to specific CFP areas, such as biodiversity protection and minimum budget allocations for data collection and control.
- **Establishing higher intensity aid for certain types of actions and beneficiaries**, as provided by Annex III of the EMFAF Regulation. This includes operations related to the landing obligation for instance (the maximum aid intensity rate for operations improving size selectivity of fishing gear is established at 100%), support for small-scale coastal fisheries (maximum aid intensity rate of 100%) and support for ORs and other remote islands (maximum aid intensity of 85% vs 50% for other geographical areas).
- **Establishing means to reinforce monitoring of EMFAF contributions to specific CFP areas.** The contribution of the EMFAF to different CFP areas is tracked through the use of markers that are reported on a regular basis within the MEF.

Member States' budget allocations further support this coherence by allocating budgets often exceeding the mandatory minimum allocations. For instance, while the financial framework mandates that at least 15% of each national allocation be allocated to fisheries

⁴² <https://emodnet.ec.europa.eu/en>

control and data collection, data from national EMFAF programmes indicates that SO 1.4 (data collection and control) received the highest planned budget allocation, accounting for 21% of the total budget allocation for shared management.

During the implementation of the Fund, internal coherence is maintained through the application of eligibility criteria and compliance requirements that ensure that EMFAF beneficiaries and their projects adhere to CFP rules.

Regarding direct management, the interim evaluation of the implementation of the direct management component of the EMFF has not revealed any major internal incoherence but recommends to develop more synergies with Horizon Europe and EMFF and to reinforce the development of a coordinated approach to maritime issues.

ASSESSMENT OF THE EXTERNAL COHERENCE

The assessment of **external coherence** considers the complementarities and synergies between the EMFAF and other EU funding instruments, legislation and strategies, such as the European Green Deal, the Habitats and Birds Directives, the Marine Strategy Framework Directive (MSFD), as well as international obligations and commitments such as the Paris agreement.

The EMFAF **aligns with and complements the other EU funds**. Article 5(3) of the CPR mandates coordination, complementarity, and synergies between EU funds, and while the instruments' legal bases and programming documents include provisions to foster complementarity between EMFAF and the other funds covered by the CPR, the degree of coherence and complementarity varies across funds, with the strongest synergies seen between the **EMFAF, ERDF⁴³ and ESF⁴⁴**. The EMFAF has the same rules of management and programming as the ERDF and ESF+, and includes a possibility of implementing the multi-fund approach under the CLLD, even though there is very limited uptake across Member States. The complementarities between the EMFAF and the ERDF investments are particularly emphasised in the support to coastal communities, while with ESF+ there are synergies on the support to skills, training, working conditions and attractiveness of the sector.

There is good coherence and complementarity between the objectives of the **Common Agricultural Policy (CAP) funds⁴⁵** but some overlapping priorities could lead to challenges in implementation: originally being an integral part of the CAP, the EMFAF has synergies with the CAP when it comes to providing food and it is a vital contributor to the overarching food security ambitions, maintaining a well-functioning internal market for fisheries and aquaculture products and sustainability (Common Market Organisation, similar to agriculture). On rural development, synergies and overlap are possible when aquaculture activities are involved and/or coastal areas are concerned, but such support is still limited, and more efforts are necessary to reinforce these synergies.

⁴³ Regulation (EU) 2021/1058 of the European Parliament and of the Council of 24 June 2021 on the European Regional Development Fund and on the Cohesion Fund.

⁴⁴ Regulation (EU) 2021/1057 establishing the European Social Fund Plus.

⁴⁵ Regulation (EU) 2021/2115 – rules on support for strategic plans to be drawn up by Member States under the common agricultural policy (CAP strategic plans) and financed by the European Agricultural Guarantee Fund and by the European Agricultural Fund for Rural Development .

Overall good coherence is demonstrated between the EMFAF and **Horizon Europe**⁴⁶ with good examples of synergies, but there is scope to improve coordination between the funds, in particular for cluster 6 on 'food, bioeconomy, natural resources, agriculture & environment'. There is also a dedicated Mission under Horizon Europe to 'Restore our Ocean and Waters by 2030'.

There is potential to establish synergies with **external action instruments**, as the EMFAF has an international cooperation angle. Nevertheless, these complementarities are not identified, which shows that there is still a lot of room for improvement. The same applies to the complementarity between the EMFAF and the **AMIF**⁴⁷ where synergies can occur regarding maritime surveillance, however this is still a dimension which needs further development.

There is relatively good complementarity between the EMFAF and the **LIFE programme**⁴⁸ as the EMFAF supports operations to protect and restore marine biodiversity and ecosystems in the framework of sustainable fishing activities.

Finally, there is strong potential for synergies between the EMFAF and **InvestEU** as both funding instruments can be complementary, and the Commission is already working together with the EIB in order to identify these possibilities and promote them further with the managing authorities.

Coherence is further reinforced through **partnership agreements** prepared by Member States for the 2021-2027 period, which include orientations on the efficient use of the different EU funds, ensuring complementarities and synergies between them. In line with the mandatory template included in the CPR, complementarities and synergies are defined in the Partnership Agreements and then further detailed in the programmes. The principle of partnership - a key feature in the implementation of EU structural funds - builds on the multi-level governance approach and ensures the involvement of regional, local, and other public authorities, civil society, economic and social partners, research organisations and universities. Member States must involve these partners throughout the preparation, implementation and evaluation of their EMFAF programme.

The implementation of the partnership principle is usually well respected in EMFAF, mainly due to the relatively small number of stakeholders (compared to other funds like ERDF). Consultations during negotiation and periodical consultations foreseen by CPR are carried out without major issues. As in other ESI Funds, EMFAF programmes are prepared through consultations among relevant stakeholders, and they are also represented in the Programmes' Monitoring Committees.

The **external coherence** of the EMFAF with the other EU policies is reflected in the **importance of the contribution of the EMFAF to tackling climate change in line with the European Green Deal** and the EU's commitments to implement the Paris Agreement. The EMFAF contributes to reducing the carbon footprint of fisheries and aquaculture

⁴⁶ Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013.

⁴⁷ Regulation (EU) 2021/1147 of the European Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund.

⁴⁸ Regulation (EU) 2021/783 of the European Parliament and of the Council of 29 April 2021 establishing a Programme for the Environment and Climate Action (LIFE), and repealing Regulation (EU) No 1293/2013.

through different types of actions, including replacing and modernising engines of fishing vessels, shifting to energy-efficient production methods in fisheries and aquaculture (e.g., CO₂-efficient technology for the propulsion of fishing vessels, use of renewable energy in aquaculture, etc.). However, the use of EMFAF for these types of action is subject to strict eligibility rules to avoid overcapacity and overfishing, notably by allowing support only for fishing vessels that are part of a fleet segment for which fishing capacity is in balance with its fishing opportunities.

The EMFAF also aligns with the Farm to Fork Strategy by, supporting sustainable (environmental, economic and social) fishing and aquaculture activities, biodiversity protection and restoration, carbon emissions reduction and improvement of products quality. Finally, **the EMFAF plays a role in preserving and restoring ecosystems and biodiversity by supporting environmental legislation**, including the Habitat and Birds Directives and the MSFD, and actions within the Natura 2000 network. The EMFAF contributes to protecting and restoring biodiversity by providing support to promote circular economy or activities with environmental services (e.g. pond farming); sustainable, low-impact and low-carbon fishing activities and aquaculture practices and sustainable and energy-efficient aquaculture production.

4.5. HOW DID THE EU INTERVENTION MAKE A DIFFERENCE AND TO WHOM?

EU ADDED VALUE

EU added value is the value that results from an EU intervention and that is additional to the value that Member States would have otherwise created individually.

Given the limitations related to the limited implementation, the absence of counter-factual analysis and the lack of mature data to measure the impact of the Fund, qualitative evidence in the study is used from the previous programming period and through interviews carried out with national stakeholders in the context of the evaluation, which provide preliminary indications regarding the EU added value of the EMFAF.

With the CFP being an exclusive competence, the role of the EU in implementation and funding is indispensable. The general notion of the common policy, the mobile nature of fisheries, and the duty to manage the resources responsibly, means that **without adequate oversight Member States would not be incentivised to manage the common resources.** Hence, **EU intervention is essential to ensure a coherent approach**, in complementing to the strict implementation of directly applicable legal requirements, striving for a level playing field across all EU sea basins. EU funding opportunities are complementary to national means, but importantly also help to strictly frame conditionalities of use, in line with the common objectives.

Similarly, beyond Union waters, EU funds provide the framework for following up on international obligations, but also protect economic interests in fisheries worldwide. **Again, leaving this up to individual Member States would likely not lead to desirable outcomes, with a lack of consistency in approach and the prioritisation of Member States aspirations rather than EU goals.**

Overall, the added value of the EMFAF is to promote sustainable fishing and aquaculture practices and to sustain the competitiveness of fishing and aquaculture enterprises. In particular, through specific investments under Priority 3, EMFAF aims at supporting the coastal fishing communities and local aquaculture communities, improving their

generational renewal and enhancing innovation in the local fisheries, aquaculture and maritime economies. The transitions (digital, environmental) that blue economy actors are facing need to be tackled at international level, and the EMFAF – through its different management modes – makes the necessary link between European and (sub)national interventions.

Sustainable fishing means catching no more fish than stocks can reproduce each year. Thanks to the investments made by fishers and national administrations, and through the support of the EMFF and in continuation of the EMFAF, **fishing has become more sustainable and far fewer stocks are now overfished in the EU**. In 2003, most stocks of commercial interest to the EU were heavily overfished (68% above the maximum rate in the Northeast Atlantic). The rate has since fallen, reaching the lowest value in 2021 at 24% below the maximum rate. **In the Mediterranean and Black Seas, the situation has improved but the rate of overfishing is still too high, and more efforts are needed to restore stocks to healthy levels. These positive trends in stock recovery would not have been observed without EU funds aiding implementation.** The EMFF and in continuation the EMFAF helps creating a robust science base, incentivising fleet capacity reduction, improving selectivity of fishing gear, and helping to implement measures to protect vulnerable marine species and habitats.

Regarding why the EU should provide funds to implement the CFP instead of focusing solely on Member States' contributions, there are several reasons supporting this approach:

- EMFAF promotes a level playing field for all EU stakeholders operating in the blue economy sectors.
- All Member States receive support and are incentivized to support research, data collection efforts, fisheries control and facilitate the adoption of sustainable fishing practices.
- To ensure Member States' compliance with CFP rules, the EU needs an effective system of control, inspection and enforcement. This should also include financial support to Member States for them to develop and implement comparable and effective systems for control, inspection, and enforcement that would ensure a level playing field between Member States on fisheries control.
- To ensure implementation of the CFP the EU needs to support Member States in development of efficient data collection as an essential part of the establishment of a high-quality fisheries governance framework.
- The Fund works as a leverage for the negotiation and the consequent implementation of the annually agreed fishing opportunities. As a matter of fact, the implementation of the Council agreements requires financial contributions to support compliance measures, capacity-building initiatives, and sustainable fisheries management efforts at the EU and international levels (e.g. GFCM⁴⁹, WestMed MAP⁵⁰).

Based on stakeholders' and the Managing authorities' feedback in the context of the evaluation, there are additional benefits for the EMFAF:

⁴⁹ www.fao.org/gfcm/en/

⁵⁰ Regulation (EU) 2019/1022 of the European Parliament and of the Council of 20 June 2019 establishing a multiannual plan for the fisheries exploiting demersal stocks in the western Mediterranean Sea and amending Regulation (EU) No 508/2014.

- Having a common fund ensures a unified approach to supporting the fisheries and aquaculture sectors. This unified approach is crucial for the balanced sustainability and resilience aimed for under the CFP and European Green Deal. In that sense, the EMFAF extends the coverage of EU policy objectives at the national level and offers increased benefits compared with the EMFF, according to managing authorities' feedback.
- The EMFAF emphasises EU-added value by **enhancing coordinated efforts and shared benefits** across Member States. This focus makes interventions more effective and efficient compared with what Member States could achieve through national-level actions alone. Managing authorities responding to the survey indicated that the EMFAF marked a significant improvement over its predecessor in terms of EU-added value, reinforcing the effectiveness of a coordinated EU-level approach.
- The EMFAF fosters **networking** and the sharing of best practices among Member States, creating an environment of mutual learning and improvement that national-level interventions are less likely to replicate. The EMFAF (or its predecessor) has established **permanent structures and platforms for collaboration** among Member States. This includes initiatives like FLAGS and FAMENET, which have diversified local tourism and supported activities such as seaweed cultivation, according to stakeholders interviewed.
- The drafting of an action plan for the outermost regions and the allocation of resources reflects the unique benefits of EU-level strategic planning. This strategic approach allows the national EMFAF programme to address specific regional needs effectively by leveraging collective resources and expertise. Feedback from managing authorities indicates that this strategic EU-level planning has enabled the EMFAF to achieve outcomes that would have been difficult or impossible for individual Member States to accomplish alone.

Below, two examples from the EMFF illustrate how the Fund delivers on the ground, indicating that the EMFAF, especially due to its new design, can deliver similar achievements.

Text box 1: CLLD achievements under the EMFF ⁵¹

Community-led Local Development (CLLD) was funded under the EMFF (2024-2020) in fisheries and aquaculture areas for the second programming period, and continues to receive funding under the EMFAF. Approximately 10% of the EMFF budget was allocated to CLLD - and managed by 348 Fisheries Local Action Groups (FLAGS). Together, these FLAGS financed 14,700 local projects in 19 Member States.

In April 2024, FAMENET collected and analysed information to ascertain what CLLD under the EMFF had achieved in fisheries and aquaculture areas. The results of the analysis of data reported by Managing Authorities in Infosys, and of information provided by 149 FLAGS that responded to a survey on their achievements under the EMFF demonstrate the following:

Three common result indicators were used for EMFF CLLD: jobs created, jobs maintained and businesses created. Data reported in Infosys by December 2023 for the EMFF funding period reveals:

⁵¹ <https://preview.mailerlite.com/c4f5n8g1j4/2631223102519908789/16w0/>

- CLLD was by far the most effective EMFF measure for job creation. 4,245 new jobs were reported, almost five times as many jobs created than under aquaculture investments (the second most important measure for job creation with 880 jobs created).
- 10,325 jobs were reported to have been maintained with FLAG support. This put CLLD as the second most important measure for maintaining jobs (behind fishing infrastructure with 19,250 jobs maintained).
- 1,020 new businesses were created with CLLD support. CLLD was the only measure to report on the creation of new businesses.

Qualitative information collected offers examples of these new businesses, ranging from the development of processing facilities to make use of unwanted by-catch, to the setting up of one of Europe's first commercial coral farms and the creation of Spain's first sailing school for people with disabilities.

On top of these result indicators that Member States were obliged to report on, FAMENET's survey to FLAGs revealed a range of additional results:

- FLAGs had also helped local companies to diversify revenue sources. On average, responding FLAGs had each supported 12 companies to develop new sources of revenue through diversified activities. Extrapolated to all 348 FLAGs, this would imply over 4,000 companies that had developed new revenue sources.
- Local supply chains for fish and seafood were strengthened. On average, FLAGs had supported the creation of two new local sales channels in each area and introduced or boosted sales of local fish in three existing local sales channels. In total, just over 600 sales channels had been created or extended their offer of local fish. Extrapolation to the whole FLAG community would put this figure at around 1,400 new or improved sales channels.
- Over 1,300 new and/or improved activities and services were reported in the responding FLAG areas (on average 10 per local area), helping to improve the quality of life in these communities.
FLAGs reported almost 700 actions to contribute to good environmental status, an extrapolation to the whole EMFF FLAG community would point to around 1,600 environmental actions.
- FLAGs also reported over 700 local entities that had been supported to improve resource efficiency. Extrapolated to all FLAGs, this would imply around 1,600 entities that have introduced measures to save water, energy or other natural resources.

Finally, a key achievement of CLLD has been to generate local participation in the development and coordination of blue economy activities and increased collaboration between blue economy stakeholders. FLAGs estimated to have mobilised around 120 people each to provide input to their local development strategies; extrapolated to all 348 FLAGs, this would imply over 40 000 people EU-wide. They also estimated to have mobilised an average of 520 young people each for education and awareness-raising activities, e.g. linked to the local fisheries sector, marine conservation, coastal heritage, etc. (extrapolation: 180,000 young people mobilised).

The results of such networking, capacity building and collaboration can be seen through, for example:

- Four new or strengthened networks reported in each FLAG area.

- 24% of all projects involving stakeholders from two or more sectors (50% of which involve the fisheries and/or aquaculture sector)
Small-scale fishers have been mobilised to play a leading role in developing the blue economy and have implemented approximately 23% of all CLLD projects.
- Improved local governance in many areas, though more participative decision-making and/or better coordination of blue economy activities. 64% of FLAGs reported improved governance versus 24% that did not feel governance had improved due to the FLAG (12% no information).
- Cooperation and transfer of knowledge across the EU with three cooperation projects per FLAG with other fisheries and aquaculture areas.
- 1,520 local innovations enabled (50% of which involving product/service innovation, followed by process innovation, new technologies/digitalisation, and social innovation).
- New beneficiaries have gained access to EU funding: 30% of project promoters received EU funding for the first time, thanks to the FLAG.

Despite significant differences from one FLAG to another, the overall picture of CLLD indicates that a relatively small amount of money (just under €2M per FLAG) can go a long way.

FLAGs responding to the FAMENET survey reported funding an average of 44 local projects each and estimated that 15,100 people benefited per FLAG area. While “persons benefiting” is subject to interpretation, the FLAGs’ estimation would imply that over 5 million people benefited from CLLD projects funded by the EMFF.

Under the EMFAF (2021-2027), not all LAGs are selected and operational yet. However, just over 300 FLAGs are expected, in 18 Member States. The overall budget is broadly similar to that of the EMFF and FLAGs have gained in experience, leading to expectations that some good results can be achieved again by the end of the programming period.

In the fishing sector, fishers often struggle to diversify their income. In the Mediterranean, the EMFF addressed this problem by supporting FLAGs in training fishers to diversify their incomes through pescaturism. Pescaturism comprises non-commercial fishing activities that use marine aquatic resources for recreation, tourism, or sport. Pescaturism allows fishers the opportunity to demonstrate their way of life to the general public, sharing the joy of preparing the fresh catch and enjoying a meal together with tourists onboard their boat. By engaging in pescaturism fishers also keep their income steady, even in the harder fishing months of July and August.

Recent changes to regulations on pescaturism in Greece have allowed fishermen to take tourists on their boats, boosting their income and offering an alternative to the practice of scrapping boats, which reduces the fleet and impacts Greece's rich maritime heritage. However, pescaturism has had a slow start, since fishers are unfamiliar with how to provide tourism services and many tourists are unaware of pescaturism.

To bridge this gap, 18 FLAGs joined forces to transform pescaturism into a unique 'slow tourism' experience, with the support of the EMFF. The FLAGs launched a comprehensive approach to promote pescaturism. They started by building rapport with fishermen through port visits and discussions. Informative sessions and surveys gauged fishermen's knowledge, interest, and obstacles. As interest rose, FLAGs organised training on legalities finances, and marketing.

To support fishers even further, the FLAGs coordinated with Italian counterparts, organising a study visit to learn from Sardinian fishers experienced in pescaturism. The visit allowed fishers from both countries to connect and discuss how to operate a pescaturism business, along with the challenges and best practices.

Increased awareness of pescaturism has breathed new life into the industry. Through this project, over 450 fishers explored pescaturism opportunities, while more than 100 received specific training. In addition, as of September 2023, 48 fishers took steps to obtain pescaturism licenses, while 157 fishers are currently engaged in pescaturism activities.

Pescaturism also reduces pressure on local fish species. For example, during a pescaturism trip, a gillnet fisher sets around 0.5 kilometres of net, compared to around 5 km for a day of professional fishing. The activity also provides opportunities for youth in the sector, preserving vital skills, as well as traditional vessels and the heritage they represent.

4.6. IS THE INTERVENTION STILL RELEVANT?

To assess relevance, the objectives of the EMFAF are assessed to determine how well they reflected needs at the time of adoption of the EMFAF Regulation and if/how they still reflect current and future needs.

The EMFAF was prepared in a policy context which was significantly different from the one in which its implementation started, mostly due to the Covid-19 pandemic and the impact of Russia's war of aggression on Ukraine. The EMFAF programmes were prepared by taking into account the 2019-2024 political guidelines on the acceleration of the green

and digital transition, resilience and EU added value. This is demonstrated on the summary of each EMFAF MS programme⁵². Moreover, the general political guidelines to ensure the fair transition of the sector, promote innovation and competitiveness⁵³ remain relevant for the implementation of the EMFAF.

The evaluation indicates that EMFAF continues to be a strategic instrument to address the EU policy priorities and national needs. The flexibility afforded to Member States to programme and reprogramme EMFAF under shared management in line with the changing policy context and priorities is a key factor ensuring the strand's continuous relevance. For instance, extensive work was undertaken during the programming phase by the Commission to ensure the Fund's relevance, including the impact assessment underpinning the Fund, the sea basin needs analysis, as well as Member States' process of designing their national EMFAF programmes, through strategic environmental assessments, and their SWOT and needs analyses. As demonstrated by the supporting study, the stakeholder consultation on the structure of the Fund, its priorities and objectives were positively assessed, confirming a positive perception of the alignment with EU policy objectives including more explicit focus on biodiversity and the use of selective criteria when choosing aquaculture projects for instance.

Since adoption in 2021, the EMFAF has **broadened its relevance**:

- The Fund's crisis-adaptation flexibility, tested through compensation measures in Latvia and Cyprus, has proven critical in maintaining competitiveness during market shocks.
- Emerging needs related to **decarbonisation, digitalisation, and generational renewal** have become central to the Fund's design, especially through projects promoting energy-efficient vessels and smart aquaculture.
- The emphasis on **innovation and research** under Priority 2 and 3 directly addresses the structural weaknesses identified by the European Court of Auditors in EU aquaculture competitiveness.

Sustainable Fisheries and Data (SO 1.1, 1.4, 1.6) directly reflect the EU's key priorities of sustainable resource management, biodiversity protection, and regulatory compliance. These areas rightly receive the highest share of funding, ensuring that essential scientific data, monitoring capacity, and conservation actions are supported across all Member States.

Sustainable Aquaculture and Processing (SO 2.1, 2.2) represent the Fund's strategic objective to improve the EU's seafood security and market competitiveness. These objectives address core needs: reducing import dependence, driving innovation, and building value chains with higher sustainability and quality standards.

Blue Economy and Local Development (SO 3.1) plays a vital but comparatively modest role in the Fund's structure. The smaller financial share reflects the expectation that other EU instruments, such as the ERDF and the CAP, will also contribute to coastal and rural diversification.

⁵² https://oceans-and-fisheries.ec.europa.eu/funding/emfaf-programmes-2021-2027_en

⁵³ https://commission.europa.eu/document/download/e6cd4328-673c-4e7a-8683-f63ffb2cf648_en?filename=Political%20Guidelines%202024-2029_EN.pdf

Given increasing socio-economic pressures on coastal populations—aging, depopulation, and climate vulnerability—the current funding level should be closely monitored. If these pressures continue to grow, future adjustments may be needed to ensure CLLD receives the scale of support required to sustain viable and resilient coastal communities.

International Ocean Governance (SO 4.1) receives a relatively small budget reflecting its specific, strategic focus rather than broad-scale investment. This funding supports the EU’s role in global ocean management, international cooperation, and crisis response, responding to needs like cross-border conservation, maritime security, and participation in international bodies and conventions.

Overall, the allocation of EMFAF resources per SO broadly mirrors the most pressing and strategic sectoral needs identified by the Commission, Member States, and stakeholder consultations. The Fund’s architecture allows for targeted intervention in the highest-need areas while maintaining flexibility to address unexpected crises and regional differences. Effectiveness in meeting all needs will ultimately depend on adaptive management as priorities evolve over the programming period.

The evaluation found that managing authorities appreciated that their programmes considered regional specificities, which ensured they were tailored to the unique conditions and needs of local communities. The delays in implementation make it hard to assess whether the expected results match those anticipated in the intervention logic of the Fund since there are limited results to date, which may even be influenced by the level of progress made by particular individual Member States. Yet, the review of the national EMFAF programmes confirms that the EMFAF support is foreseen to address each specific objective activated in the programme, with Member States providing clear justifications for not selecting certain specific objectives. These decisions often stemmed from lessons learnt from previous programming phases, allowing for a strategic focus on the most pertinent objectives, ensuring a high level of relevance.

There was almost unanimous agreement among the managing authorities that the national EMFAF programmes were drafted to leave room for uncertainty, either to a great or to some extent (just one managing authority disagreed), which shows that the **new structure is more suited to adapt to changing needs**. The lessons learnt from the previous programming period, not least the knowledge that the national EMFAF programmes may need to be adapted in the event of crises (like COVID-19 or the Russian military aggression on Ukraine), has been built into the EMFAF Regulation both structurally (with the possibility for funding to compensate for unexpected events) as well as materially (i.e. in the national EMFAF programmes themselves, which have provisions for unexpected events). Indeed, the review of the national EMFAF programmes confirmed that 20 Member States have specifically built-in flexibility to allow for changes in needs and uncertainty over the course of the programming period.

Meanwhile, the two-year work programme delivered under (in)direct management is, by virtue of being shorter in time span, also able to adapt to emerging needs on a more regular basis and serves as a complement to the national EMFAF programmes in addressing needs that transcend national boundaries.

Representatives of the EU fishing industry emphasised in the context of the evaluation, the importance of practical adaptability (i.e. responding to emerging unforeseen needs), especially during crises like COVID-19 or geopolitical events like the Russian war of

aggression in Ukraine. While the EMFAF showed flexibility in the cases mentioned above, specific events, like the non-renewal of protocols implementing fishing agreements with third countries (e.g. Morocco), were cited as a limitation.

There is however room for improvement in addressing the EU policy priority related to the social dimension and how this was taken on board in the development of the legal proposal for the EMFAF Regulation⁵⁴. Since the social aspects and challenges that the Fund seeks to address are expected to increase, this is a shortcoming and implies social dialogue continues to be critical to address sectoral needs.

⁵⁴ The opinion of the European Economic and Social Committee was that the EMFAF was the Commission proposal was not based on a detailed economic and social impact assessment.

5. WHAT ARE THE CONCLUSIONS AND LESSONS LEARNED?

5.1. CONCLUSIONS

EU funding for maritime, fisheries, and aquaculture policy has evolved gradually over time. The results and impacts from the funding described often take years to materialise, making it difficult to draw a clear line between results of different funding periods, as results are also influenced by external factors beyond the programmes' control. This is why the first general conclusion which emerges from this evaluation is that the regulatory deadline to deliver the evaluation was formulated rigidly and did not take into account the delay in the adoption and the implementation of the EMFAF, in particular for the shared management strand. In consequence, a conclusive analysis of the Fund's intermediate results, which should feature a mid-term evaluation, was not possible. The assessment of effectiveness and efficiency of the changes introduced in the design of the EMFAF remain promising but not definitive due to the early stage of the implementation.

Nonetheless, it is possible to draw some conclusions and lessons learnt to be taken into account for the ongoing implementation as well as for the preparation of the future funding instruments. The Commission services have started reflections⁵⁵ on how impact pathways can be created for the future evaluation of the Fund, assessing effectiveness and efficiency through qualitative methods like case studies and by linking the detailed reporting through Infosys with the scientific and Commission reports concerning the implementation of the CFP and the blue economy. The retrospective evaluation can be built on several data sources provided during the ongoing programming period:

- Infosys reports and additional analyses of specific sectors.
- Results of this mid-term evaluation.
- Additional desk and field research into specific thematic sectors.
- Data provided by the Member States (Art 42 CPR), final performance reports (Art 43 CPR) and the Member States' impact evaluations finalised by 2029 (Article 44 CPR).
- Scientific reports such as for example the annual reports on the state and economics of the fishing fleet, on the state of the fish stocks and the blue economy.
- The full evaluation of the CFP Regulation.

While the midterm timeframe limits the depth of impact analysis, the available qualitative evidence already demonstrates promising EU added value. At the halfway point, EMFAF was designed to ensure strong coherence with the CFP, to introduce a new crisis response capacity, and to provide alignment with EU environmental and food system priorities.

In any event, the qualitative evidence available so far provides first positive indications on the EU added value of the instrument at the half-way point. This evidence also provides potential areas for further exploration and suggestions for improvement for the ex-post EMFAF evaluation.

EFFECTIVENESS

The EMFAF appears to be more advanced than the EMFF in the middle of the programming period, indicating that Member States expect to make considerable headway in 2025 in most cases. By early 2024, about 9 % of EMFAF's total budget had been committed and 1 % paid. Progress towards milestones averaged 10 %, with significant variation across Specific Objectives. Implementation has advanced most under SO 1.4 (data and control), where the mandatory 15 % budget share ensured early momentum. The SO 2.2 (marketing and processing) also performs above average, helped by crisis-related compensations. Conversely, investment-heavy and community-driven areas—SO 3.1 (blue economy/CLLD) and small-vessel modernisation—lag behind. This pattern shows that administrative complexity, not lack of relevance, is the main constraint on short-term effectiveness.

Although output indicators show limited progress, the EMFAF has laid the groundwork for achieving results in the second half of its period. The integration of previous lessons—especially stronger links between national monitoring systems and the EU Infosys database—has improved data reliability and transparency. Managing Authorities that proactively used feedback mechanisms from the EMFF transition demonstrated better progress, underlining that institutional learning directly improves fund effectiveness.

Programme governance has improved, but several Managing Authorities face capacity and staffing challenges. The consolidation of EMFF and EMFAF portfolios placed temporary strain on human and technical resources. Where pre-existing systems and IT tools were in place, implementation advanced faster, confirming that institutional continuity is a key success factor. Increased guidance from FAMENET and DG MARE has supported problem-solving, but further capacity development is needed to enhance delivery speed and quality control.

However, **despite the increased flexibility of the EMFAF, in practice the national EMFAF programmes are broadly a continuation of the EMFF** with certain notable exceptions⁵⁶. The EMFAF also faces challenges, notably in terms of organisational capacity, and the need for consistent training and skills development, especially at the national level. Addressing these areas can further enhance the effectiveness of the EMFAF in achieving its goals of sustainable structural changes in the maritime and fisheries sectors.

Stakeholder involvement during the preparation of national EMFAF programmes has also been largely effective, with strong support and satisfaction for the managing authorities. However, there is room for more innovative contributions and better alignment of stakeholder expectations with the practical realities of the programmes. **There is also more room for simplification and optimisation of the effectiveness of the delivery system**, especially with enhanced use of SCOs and FIs, the application and selection procedures, and optimisation of the Member States' monitoring and reporting systems.

⁵⁶ For instance, the introduction of compensation types of action for exceptional events in the EMFAF Regulation, or the introduction of new types of actions at the national level, in particular under specific objective 1.6 (protection of biodiversity), or the possibility to fund large projects encompassing different types of activities (to support market development for instance).

EMFAF's simplification measures embody a long-term cost-saving strategy, but early implementation unavoidably generated short-term cost growth due to transition, training, and system alignment. These expenditures are consistent with EU policy principles favouring proportionality, accountability, and sustainability in fund administration. Over time, administrative costs could eventually decline as simplification tools mature and economies of scale materialise across Member States.

External disruptions (COVID-19, Brexit, and Russia's war against Ukraine) substantially affected project pipelines and economic behaviour in fisheries, aquaculture, and processing. Internally, prolonged negotiations over partnership agreements and delayed adoption of some national programmes postponed execution. Despite these setbacks, EMFAF's flexible design, including crisis mechanisms and reallocation capacity, has helped mitigate systemic risks and maintain momentum.

EFFICIENCY

Although the core issues the EMFAF seeks to address - such as market failures and the implementation of the CFP- remain consistent with past programmes, lessons learnt have prompted adjustments in its delivery system. The novel EMFAF architecture makes a shift from predefined measures to broad types of actions offering Member States greater flexibility to pursue strategic objectives based on an assessment of their needs. Moreover, the CPR introduced flexibilities, such as the streamlining of the enabling conditions, the reduction in control and audit requirements and the simplified identification of programme authorities, aiming to make the programming and implementation of the CPR Funds more efficient.

The EMFAF provides for the possibility to trigger a **crisis mechanism**, which would result in compensation in case of exceptional events causing a significant disruption of markets. Moreover, the EMFAF's **MEF** has improved considerably compared to the previous programming period, through the early development of indicators in consultation with the Member States, the provision of guidance on the indicators and the performance framework methodology for target setting. **The EMFAF is designed to provide more streamlined data and show more clearly how the Fund contributes to the objectives of the CFP as well as to the horizontal policy priorities of resilience, green and digital transition compared to the EMFF.** These contributions are expected to become clearer in the context of the retrospective evaluation.

Despite steps taken at the EU and national level to simplify the Fund and its implementation, administrative costs are assessed to have increased overall. While these costs are considered justified in general by the complexity and legal restrictions of the Fund, and comparable to what has been observed for other CPR Funds, they seem disproportionate for countries with a lower EMFAF budget allocation, in particular landlocked countries.

COHERENCE

On the internal coherence, the **alignment between the EMFAF and the CFP is reflected in the Member States' EMFAF programme** design, both in terms of the types of actions included and the allocation of resources. The EMFAF establishes higher intensity aid for certain types of actions and beneficiaries, for instance on the implementation of the landing obligation, support for small-scale coastal fisheries and support for ORs. During the

implementation of the Fund, internal coherence is maintained through the verification that EMFAF beneficiaries and their projects adhere to CFP rules.

On the **external coherence, the EMFAF aligns with and complements the other EU funds**, with the strongest synergies seen between the EMFAF, ERDF and the ESF+, especially on support to coastal communities, skills, training, working conditions and attractiveness of the sector. Coherence is further reinforced through partnership agreements prepared by Member States for the 2021-2027 period. While synergies and complementarities with other Funds are identified, there is still room of reinforcing this aspect.

The contribution of the EMFAF to tackling climate change is in line with the **European Green Deal** and the EU's commitments to implement the **Paris Agreement**. The EMFAF also aligns with the **Farm to Fork Strategy** by, supporting sustainable (environmental, economic and social) fishing and aquaculture activities, biodiversity protection and restoration, carbon emissions reduction and improvement of products quality. Finally, **the EMFAF plays a role in preserving and restoring ecosystems and biodiversity by supporting environmental legislation**, including the Habitat and Birds Directives and the MSFD, and actions within the Natura 2000 network.

With the CFP being an exclusive competence, the role of the EU in implementation and funding is indispensable and the general notion of the common policy, the mobile nature of fisheries, and the duty to manage the resources responsibly, means that **without adequate oversight Member States would not be incentivised to manage the common resources. Thanks to the investments made by fishers and national administrations, and through the support of the EMFF and in continuation of the EMFAF, fishing has become more sustainable and far fewer stocks are now overfished in the EU.** In the Mediterranean and Black Seas, the situation has improved but the rate of overfishing is still too high, and more efforts are needed to restore stocks to healthy levels, also with the help of the Fund.

In the context of the evaluation study, the managing authorities pointed out that overall, the EMFAF promotes a level playing field for all EU stakeholders operating in the blue economy sectors, and provides the incentives to support research, data collection, fisheries control and facilitate the adoption of sustainable fishing practices. The Fund can also enhance coordinated efforts and shared benefits across Member States, making interventions more effective and efficient compared with what Member States could achieve through national-level actions alone.

RELEVANCE

The EMFAF's overall intervention logic and refinement through Member States' SWOT analyses ensured that resources were well targeted to the most pressing sectoral needs—sustainable resource use, aquaculture competitiveness, and blue economy resilience. The intervention logic represents a clear improvement over the EMFF, where overly prescriptive measures reduced flexibility.

The EMFAF remains a central strategic instrument for bridging EU policy priorities and national realities. Its design grants Member States greater flexibility in programming resources according to their specific circumstances and to adjust them as priorities evolve. Evaluation findings confirm that Managing Authorities value this adaptability: national

programmes now reflect local and regional specificities, ensuring that interventions are tailored to each Member State's environmental, economic, and social context.

Notably, **20 Member States have included mechanisms to reprogramme funds** during the period, allowing adjustments in response to changing market conditions, crises, or policy shifts. This demonstrates a shift toward a more responsive, adaptive Fund capable of addressing on-the-ground challenges effectively.

Under the **two-year work programme framework for direct and indirect management, the EMFAF is also able to respond to emerging needs** at the EU level more dynamically. This approach complements national programmes by funding transnational and cross-border initiatives—such as marine knowledge, maritime surveillance, and international ocean governance—that cannot be managed effectively at national scale.

Nevertheless, some gaps persist. **The social dimension of the blue economy—including employment attractiveness, labour conditions, gender equality, and generational renewal—remains underdeveloped** within both national and EU-level implementation. As these challenges are expected to intensify with demographic shifts and the ongoing energy transition, greater attention must be directed toward strengthening the social sustainability of fisheries and aquaculture.

The EMFAF continues to be a **strategic instrument to address the EU policy priorities and national needs**, by providing flexibility to Member States to programme EMFAF in line with the changing policy context and priorities. The evaluation findings show that managing authorities appreciated that their programmes considered regional specificities, which ensured they were tailored to the unique conditions and needs of local communities. The review of the national EMFAF programmes confirmed that 20 Member States have specifically built-in flexibility to allow for changes in needs and uncertainty over the course of the programming period, which shows that the Fund is now more flexible in dealing with the reality on the ground.

The two-year work programme delivered under (in)direct management is also able to adapt to emerging needs on a more regular basis and serves as a complement to the national EMFAF programmes in addressing needs that transcend national boundaries.

There is however room for improvement and more efforts are needed in addressing the social aspects and challenges of the sector which are expected to increase.

5.2. LESSONS LEARNT

A key lesson emerging from this mid-term evaluation is that **legislative deadlines should allow greater flexibility for conducting mid-term evaluations** once implementation is sufficiently advanced. Fixed timelines did not reflect the severe delay in launching national programmes (most adopted only at the end of 2022). As a result, analysis across the Better Regulation criteria could not be fully completed. Future legislative frameworks should therefore provide adaptable timelines, triggered either by implementation progress or by the availability of intermediate data (e.g., Infosys outputs), rather than fixed years in the regulation.

EFFECTIVENESS

Member States explain that the main reasons for the slow implementation of the EMFAF are due to the lack of capacity, staff turnover affecting institutional memory, the institutional structure in the Member States, as well as the strict eligibility conditions of the fleet measures under the EMFAF. These issues indicate that further efforts are needed to ensure that the EMFAF delivery system builds on the necessary skills, capacities, and resources at the national level. Member States identify administrative capacity and staff turnover as the principal drivers of delays. The EMFAF delivery system must continue to invest in the skills, stability, and institutional memory of Managing Authorities.

Continuous stakeholder dialogue—particularly with small scale fishers, aquaculture producers, and environmental groups—should be formalised during implementation, not only at programming stage. Broad consultations during the Fund’s design were decisive for relevance, yet there remains room to align stakeholder expectations with legal and operational realities.

Ongoing exchanges between the Commission and Member States are encouraged to clarify flexibility within the current legal framework. Rigid eligibility conditions limit the take up of fleet modernisation and renewal actions.

EFFICIENCY

The evaluation finds that the use of SCOs, and in some cases of financial instruments have the potential to increase simplification and efficiency in the implementation of the Fund. Nevertheless, **SCOs are still being set up in different Member States, while the use of financial instruments is still very limited**, making it difficult at this stage to state whether they are working and to what extent they have improved the efficiency of the Fund. The same applies for the MEF, where Member States find its implementation challenging due to its newness, and raise concerns on the setting of indicators and targets.

As a lesson learnt, **the Commission will continue encouraging knowledge-sharing among Member States and between the EU and Member States** in the early stage of implementation of these tools and to investigate systematically what has worked, to what extent and the possible undesired effects. The Commission will also continue supporting the Member States in the setting-up and functioning of the MEF.

COHERENCE

Support to the fisheries sector is crucial to help them restructure, innovate, modernize, help them to become resilient, ensure generational renewal, contribute to food security and sustainable management of marine environment. Research and innovation in the maritime, fisheries, aquaculture and blue economy domain rely on the strong links established with Horizon Europe, including via Mission Ocean and EMFAF, with its dedicated support provided under Blue Invest and through InvestEU. Despite this, there is so far limited take-up of projects on research and innovation under the EMFAF.

While there are strong synergies with ERD and ESF+ and good synergies with the CAP and Horizon Europe, **more efforts should be made in order to get fishers and aquaculture farmers to work directly with science organisations, to build partnerships and participate in field work**, e.g. to help bring the work financed under

Horizon Europe to real life applications and testing. This is why it is of great importance to find and develop further synergies with the relevant funding streams and instruments, in order to respond to these challenges and to support further the fisheries sector.

Stronger operational links with Mission Ocean, Blue Invest, and Blue Innovation Hubs could ensure that scientific insights are more rapidly transferred into practice.

The Commission and Member States should aim to streamline governance structures to reduce duplication and clarify accountability between EU-level initiatives and national maritime strategies. The proliferation of overlapping blue economy strategies and frameworks has made policy coordination increasingly complex.

RELEVANCE

Overall, the evaluation finds that the EMFAF is highly relevant and effective funding vehicle, especially given the explicit contribution to the CFP as well as on horizontal EU priorities such as the European Green Deal. In view of the sectoral needs served by the EMFAF, the assessment is that these will continue and likely grow over time.

The EMFAF can also make a difference in developing new business opportunities in rural and coastal areas, enabling blue and circular economies, by supporting CLLD and helping coastal regions and communities adapt and mitigate the impacts of climate change. The recent FAMENET study demonstrates that EMFF-funded CLLD was by far the most effective intervention for job creation, a key concern in many coastal communities.

The enhanced flexibility of the programme is positively assessed as contributing to the relevance, and Member States have taken steps to build flexibility into their programmes based on lessons from the past. This implies a **need to continue to ensure this flexibility** also in view of the future funding instrument.

The support for CLLD should remain a priority under the EMFAF and its achievements should be given more visibility. The CLLD has the ability to build connections and foster cooperation between stakeholders at local level, including with the small-scale fisheries sector which has benefited from almost a quarter of such projects under the EMFF.

EU ADDED VALUE

To maximize EU added value, the EMFAF implementation needs further strengthening of policy coordination and integration with complementary EU instruments. This should include proactive cooperation to address emerging priorities, enhance competitiveness, and ensure smooth implementation. Targeted measures to accelerate implementation timelines and overcome administrative delays will help EMFAF effectively respond to both EU and national needs, thereby reinforcing its strategic relevance.

6. ANNEX I. PROCEDURAL INFORMATION

The European Commission conducted the mid-term evaluation of the European Maritime, Fisheries and Aquaculture Fund (EMFAF) in the programming period 2021-2027 by the end of 2024, in line with Article 45 of the Common Provision Regulation (CPR) 2021/1060.⁵⁷

The Decide planning entry for the mid-term evaluation is PLAN/2024/30. The Call for evidence and the Public Consultation were published on ‘Have your say’ on 12 June 2024 and 21 June 2024 respectively for a 12-week period (until 6 and 13 September 2024) for stakeholders and the general public to provide feedback.⁵⁸

The evaluation was led by the European Commission's Directorate-General for Maritime Affairs and Fisheries (DG MARE). An Interservice Steering Group (ISSG) was set up comprising the following Commission services: DG EMPL, DG ENV, DG HOME, DG REGIO, SG. Several DG MARE colleagues also formed part of the ISSG. The ISSG helped ensure the representativity of the evidence considered, the validity of the analysis and the reliability of the conclusions. In particular, the ISSG was consulted as follows:

- In September 2023 on the technical specifications of the external study;
- In December 2023 on the kick-off meeting with the external contractor;
- In January 2024 on the Inception Report of the external study;
- In May 2024 on the Call for evidence and the Public Consultation questionnaire;
- In May 2024 on the Draft Final Report;
- In June 2024 on the Validation workshop;
- In July 2024 on the Final Report;
- In November 2024 on the draft SWD; and
- In XX⁵⁹ 2025 on the SWD and all its annexes.

In line with the requirements set out in the Commission Better Regulation Guidelines,⁶⁰ the mid-term evaluation examined the effectiveness, efficiency, relevance, coherence and Union added value of EMFAF. The evaluation relied on the following component:

- I. An external independent supporting study (i.e. the supporting study) awarded to a consortium consisting of Tetra Tech, AND International, Poseidon Aquatic Resource Management Europe Limited and F&S SARL. The service contract started on 11 December 2023 and ended in October 2024. The analysis relied on desk research, data analysis,

⁵⁷ Regulation (EU) 2021/1060. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021R1060>.

⁵⁸ Call for Evidence and Public Consultation on the mid-term evaluation of the European Maritime, Fisheries and Aquaculture Fund (EMFAF) for 2021-2027. Available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14119-EU-Maritime-Fisheries-and-Aquaculture-Fund-EMFAF-2021-2027-midterm-evaluation_en

⁵⁹ To be updated after the formal ISC.

⁶⁰ Better Regulation: guidelines and toolbox https://commission.europa.eu/law/law-making-process/planning-and-proposing-law/better-regulation/better-regulation-guidelines-and-toolbox_en.

extensive stakeholder consultation activities (interviews, survey and validation workshop) and case studies.

For a full discussion on the evidence considered, including limitations faced and mitigations adopted, see Annex II. Annex V provides a full report of all consultation activities conducted.

7. ANNEX II. METHODOLOGY AND ANALYTICAL MODELS USED

OVERALL APPROACH TO THE EVALUATION

The mid term evaluation of EMFAF is largely based on an external supporting study. Additional sources of information included JRC and FAMENET. DG MARE relied on the work of the contractor to (i) collect and analyse the relevant evidence (including consultation work); (ii) provide initial answers to all evaluation questions; and (iii) present evidence-based conclusions and lessons learnt. The study followed an approach based on mixed-method data collection approaches, combining qualitative and quantitative research methods. The overall methodological approach was guided by an Intervention Logic presented in the main body of this SWD and an evaluation matrix/framework presented in Annex III.

In accordance with the terms of reference and the tasks described in there, an inception phase of the study was dedicated to fine-tuning and operationalising the methodology and preparing the data collection tools for the following phases.

The main objective of Task 2 was to provide an overview of the 26 national EMFAF programmes. The exercise provided key information on the delivery system and specificities of each programme. Task 2 also provided additional information to refine the intervention logic. This task was primarily based on the analysis of the national EMFAF programmes, in addition to available monitoring data and FAMENET documents. The survey and interviews with managing authorities (Task 3) then complemented and validated this.

INTERVIEWS WITH KEY STAKEHOLDERS AT THE EUROPEAN LEVEL

These interviews allowed for gathering of feedback from different types of stakeholders concerned by the shared and (in)direct management components of the EMFAF. 15 interviews with 27 key stakeholders were conducted at the European level. The list of selected (based on DG MARE and ISG feedback) stakeholder categories and subcategories is provided below:

- DG MARE: five interviews with seven stakeholders + four scoping interviews with 14 desk officers
- CINEA: two interviews
- DG ENV: one interview, with two representatives
- ETF: one interview with two representatives
- Europeche: one interview
- WWF: one interview

Each online interview lasted 45 minutes to 1 hour. The interviewee was informed in advance on the main topics and information sought to allow them to prepare. Interview guides for the three main stakeholder categories consulted were developed and disseminated. The interviewer tailored the corresponding guide to each organisation's intervention area.

ADVISORY COUNCILS

In addition, the contractor offered the 11 Advisory Councils the opportunity to provide written feedback, with a dedicated questionnaire, translated into French, Portuguese and Spanish upon their request. Nevertheless, only two Advisory Councils provided a contribution: the Aquaculture Advisory Council (AAC) and the Mediterranean Advisory Council (MEDAC).

SURVEY OF THE EMFAF MANAGING AUTHORITIES IN THE MEMBER STATES

The objective of this survey was to build on the data and information already assessed as part of the review of the national programmes, Infosys and the MEF. The survey questionnaire was provided and approved with the inception report.

26 responses from managing authorities were received, though the last ones were sent a month after the deadline.

SURVEY OF EMFAF TARGET GROUPS

A second survey of a wider group of stakeholders was used by the contractor, which was disseminated broadly and in a tailored way at the national level, based on closed monitoring of responses. The target groups were the following:

- Direct beneficiaries: stakeholders who benefitted from EMFAF funding (including those whose applications are still in progress) could include economic operators (e.g., fishers, aquaculture producers and processors of fisheries and aquaculture products), representative organisations of fisheries and aquaculture producers (e.g., producer organisations), institutional stakeholders with different legal status (e.g., ports managing authorities, Natura 2000 sites managers, public administrations, research institutes, Community-Led Local Development NGOs). At this stage, we expected the number of beneficiaries to be low, especially economic operators, as the national EMFAF programmes were approved in the second half of 2022.
- Indirect beneficiaries: stakeholders who have not applied but have benefited from EMFAF funding (e.g., projects in ports or in auctions benefit indirectly all the users).
- Non-beneficiaries: stakeholders who have not asked for EMFAF support or unsuccessful applicants.

The main objective of this survey was to collect complementary feedback on specific aspects.

SPECIFIC METHODOLOGICAL TOOLS USED IN THE ANSWERS TO THE EVALUATION QUESTIONS - ASSESSMENT OF THE DURABILITY OF EMFAF INTERVENTIONS

Interventions durability is understood as the ability of interventions to provide long-term beneficial impacts (i.e. after the end of the funding), either at individual level (e.g. private investments) or at institutional and policy level (e.g. improve the general implementation of the CFP beyond the project supported).

To categorise EMFAF interventions according to their level of ‘durability’, the study relied on the two classifications described below.

The classification developed by Sumaila et al. in 2010⁶¹, which classifies subsidies to the fisheries sector in three categories, based on their long term impact on the fishery resources:

⁶¹ Sumaila, U.R., A.S. Khan, A.J. Dyck, R. Watson, G. Munro, P. Tydemers, and D. Pauly, ‘A Bottom-up Re-Estimation of Global Fisheries Subsidies’, *Journal of Bioeconomics*, Vol. 12, No. 3, October 1, 2010, pp. 201–225

- Beneficial subsidies, which produce the “maximum long-term sustainable net benefits”: investments in natural capital assets (e.g. fisheries management program and services, R&D, MPAs);
- Capacity-enhancing or harmful subsidies which contribute to overexploitation of the fishery resource: all form of capital inputs and infrastructure investments from public sources that reduce cost or enhance revenue for fishers (e.g. fuel subsidies, vessels modernisation and construction, fishing port construction and renovation, price and marketing support, fishery development projects, foreign access agreements);
- Ambiguous subsidies, which may lead to long-term sustainability or to overexploitation depending on the objectives and implementation (e.g. vessel temporary and permanent cessation programs, CLLD).

The Sumaila et al. classification has the advantage to provide a simple analytical tool to classify interventions based on their potential long-term impacts. It is also widely used in the literature. For instance, a recent article published in the ICES Journal of Marine Science (Skerritt et al., 2020)⁶² used this classification to assess the sustainability of the EU fisheries funds from the Financial Instrument for Fisheries Guidance (FIFG, 2000–2006) to the EMFF (2014-2020), with a preliminary assessment for the EMFAF.

This classification has two main limits:

- its scope, both in terms of impacts, as it only considers impacts on fisheries resources, and in terms of sectoral coverage, as it cannot be applied to the support to aquaculture and processing activities;
- the fact that it does not take into account the quality of the management system in place.

As regards the second limitation, the OECD argued in its 2017 report on levels and impacts of support to fisheries⁶³ that the effect of support is “conditioned on, but not entirely mitigated by, the quality of the management system in place” and that whereas an effective management system could prevent overfishing, it did not completely prevent the incentive for excess capacity. In other words, the Sumaila et al. classification remains relevant for fisheries but could be nuanced in countries where catch controls and effort controls are in place, which is the case for the EU.

The classification used in the OECD Fisheries Support Estimate database, used in, which includes:

- Budgetary transfers to individual fishers, including:
 - payments based on variable inputs;
 - payments based on outputs;
 - payments based on fixed input use;
 - payments based on fishers’ income;

⁶² Skerritt DJ, Arthur R, Ebrahim N, Le Brenne V, Le Manach F, Schuhbauer A, et al. A 20-year retrospective on the provision of fisheries subsidies in the European Union. *ICES Journal of Marine Science*. 2020;77(7-8):2741-52

⁶³ OECD (2017), “Support to fisheries: Levels and impacts”, OECD Food, Agriculture and Fisheries Papers, No. 103, OECD Publishing, Paris. <http://dx.doi.org/10.1787/00287855-en>

- Budgetary transfers to support general services (e.g. fisheries management, enforcement, marketing and promotion, support to fishing communities, port investments...).
- Cost recovery, which consists in a transfer from fishers to the government to partially cover expenditures related to fisheries management.

The advantage of this classification is that it is also fairly simple to use. Compared to the Sumaila classification it can also be transposed to some extent to interventions targeting aquaculture and processing activities.

The main limit is that there is no direct link with sustainability or durability, but the OECD report concluded that Budgetary transfers to support general services is often categorised as providing long-term beneficial effects in terms of reducing fishing effort and improving sustainability, while budgetary transfers to individual fishers are more likely to result in long-term over capacity (with varying effects depending on the type of transfer).

The classification of types of intervention in the EMFAF regulation according to their expected contribution on the environment and climate issues:

- 100% contribution (beneficial): types of intervention with a clear focus on environment and climate;
- 40% contribution (ambiguous): types of intervention with an ‘ambiguous’ contribution, meaning they can have beneficial impacts on the environment, or not, depending on the actions implemented, i.e. interventions promoting fishery, aquaculture and the processing sector, as well as animal health and welfare, maritime surveillance and CLLD implementation;
- 0% contribution (neutral): no impact expected on reducing negative environmental impacts or mitigating/adapting climate change.

The advantage of this classification is that it is very simple, it is made for the EMFAF, and covers all possible interventions.

The limits are that:

- It relies on the assumption that 40% of the budget for what we call here ‘ambiguous’ types of intervention will effectively be allocated to actions with positive impacts on the environment and on the climate, which is not certain,
- It does not differentiate between short-term and long-term impacts;
- It does not take into account the potential negative long-term impacts on fishing capacity, described above. The risk is limited by the CFP rules and the EMFAF eligibility criteria, but, based on the scientific literature, in the long-run, impacts may still be negative.

To assess the durability of the EMFAF interventions, and not only the effects on the sustainability of fisheries resources and to encompass the full scope of the EMFAF, we mixed the different approaches above with an assessment of the potential duration of impacts after the end of funding, as follows:

- Long-term: support targeting primarily R&D, fisheries management and biodiversity conservation measures (SO 1.3 – permanent cessations, SO 1.4, SO 1.6 and SO 4.1);

- Medium term: support targeting primarily private investments, training, general services to promote the sustainable development of the sector, etc.. (SO 1.1, 1.2, 2.1, 2.2, 3.1 and 5.1)
- Short-term: mainly compensation measures (SO 1.3 – temporary cessations, SO 1.5)

The analysis was then carried out at the level of SO and type of intervention (cf. Infosys nomenclature) in several steps:

- We first applied the Sumaila classification for each SO : beneficial, capacity-enhancing, ambiguous, not applicable, based on Skerritt et al. article;
- We then applied the EMFAF classification by type of intervention;
- For the environmental classification, we combined the two classifications above with the following priority rules in case of contradictory classifications between the two approaches:
 - Capacity-enhancing > ambiguous, beneficial or not applicable;
 - Beneficial > ambiguous or not applicable;
 - Ambiguous > not applicable.
- We used the OECD classification of budgetary transfers as a basis to differentiate between impacts at individual level (corresponding to budgetary transfers to individual operators) and impacts at institutional level (corresponding to budgetary transfers to general services).
- We applied the long-term/medium-term/short-term classification above;

This classification resulted in the following matrix, which was crossed with the budget allocated by MS by type of intervention for each specific objective. We focused on planned expenditures rather than committed support considering that at this stage it would give a more comprehensive picture of potential impacts. To assess the durability of the EMFAF interventions, we calculated the share of EMFAF budget by category along the three dimensions (environmental sustainability, duration, individual vs institutional levels).

Table10 : Classification for the assessment of the durability of EMFAF interventions

SO	Type of intervention	Institutional/Individual	Sumalai classification	EMFAF classification	Assessment of environmental sustainability	Short-term/long-term	EMFAF allocated in national programmes
1.1.1	Environment and GES	Mixed	Ambiguous	Beneficial	Beneficial	Medium	138 946 428
1.1.1	Promoting fishery, aquaculture and processing sectors	Mixed	Ambiguous	Ambiguous	Ambiguous	Medium	462 939 534
1.1.1	Climate neutrality	Mixed	Ambiguous	Beneficial	Beneficial	Medium	31 763 250
1.1.1	Animal health and welfare	Mixed	Ambiguous	Ambiguous	Ambiguous	Medium	450 000
1.1.1	Data collection	Institutional	Ambiguous	Beneficial	Beneficial	Long-term	1 070 000
1.1.1	Technical assistance	Institutional	Ambiguous	Ambiguous	Ambiguous	Medium	20 005 939
1.1.2	Promoting fishery, aquaculture and processing sectors	Individual	Capacity-enhancing	Ambiguous	Capacity-enhancing	Medium	60 919 799
1.1.2	Technical assistance	Institutional	Capacity-enhancing	Ambiguous	Capacity-enhancing	Medium	2 088 101
1.2	Environment and GES	Individual	Capacity-enhancing	Beneficial	Capacity-enhancing	Medium	4 252 500
1.2	Climate neutrality	Individual	Capacity-enhancing	Beneficial	Capacity-enhancing	Medium	27 913 738
1.2	Technical assistance	Institutional	Capacity-enhancing	Ambiguous	Capacity-enhancing	Medium	1 008 184
1.3	Temporary cessation	Individual	Ambiguous	Beneficial	Beneficial	Short-term	142 087 591
1.3	Permanent cessation	Individual	Ambiguous	Beneficial	Beneficial	Long-term	144 782 147
1.3	Technical assistance	Institutional	Ambiguous	Ambiguous	Ambiguous	Short-term	7 988 155
1.3	Compensation unexpected events	Individual	Ambiguous	Ambiguous	Ambiguous	Short-term	7 988 155
1.4	Control and enforcement	Institutional	Beneficial	Beneficial	Beneficial	Long-term	479 304 370
1.4	Data collection	Institutional	Beneficial	Beneficial	Beneficial	Long-term	568 341 475
1.4	Maritime surveillance	Institutional	Beneficial	Beneficial	Beneficial	Long-term	29 400 000
1.4	Technical assistance	Institutional	Beneficial	Ambiguous	Beneficial	Long-term	36 462 717
1.5	Compensation outermost regions	Individual	Capacity-enhancing	Ambiguous	Capacity-enhancing	Short-term	187 225 130
1.6	MPA, Natura 2000	Institutional	Beneficial	Beneficial	Beneficial	Long-term	372 343 017
2.1	Environment and GES	Mixed	n/a	Beneficial	Beneficial	Medium	134 536 168
2.1	Promoting fishery, aquaculture and processing sectors	Mixed	n/a	Ambiguous	Ambiguous	Medium	776 978 285
2.1	Climate neutrality	Mixed	n/a	Beneficial	Beneficial	Medium	17 535 610
2.1	MPA, Natura 2000	Institutional	n/a	Beneficial	Beneficial	Long-term	9 844 163
2.1	Compensation unexpected events	Individual	n/a	Ambiguous	Ambiguous	Short-term	20 798 003
2.1	Animal health and welfare	Mixed	n/a	Ambiguous	Ambiguous	Medium	16 576 749
2.1	Technical assistance	Institutional	n/a	Ambiguous	Ambiguous	Medium	28 395 099
2.2	Environment and GES	Mixed	Ambiguous	Beneficial	Beneficial	Medium	40 875 330
2.2	Promoting fishery, aquaculture and processing sectors	Mixed	Ambiguous	Ambiguous	Ambiguous	Medium	749 556 582
2.2	Climate neutrality	Mixed	Ambiguous	Beneficial	Beneficial	Medium	25 285 085
2.2	Compensation unexpected events	Individual	Ambiguous	Ambiguous	Ambiguous	Short-term	20 759 002
2.2	Technical assistance	Institutional	Ambiguous	Ambiguous	Ambiguous	Medium	30 826 270
3.1	CLLD preparation actions	Institutional	Ambiguous	Ambiguous	Ambiguous	Medium	5 760 566
3.1	CLLD implementation	Mixed	Ambiguous	Ambiguous	Ambiguous	Medium	420 062 101
3.1	CLLD running costs and animation	Institutional	Ambiguous	Ambiguous	Ambiguous	Medium	87 904 287
3.1	Technical assistance	Institutional	Ambiguous	Ambiguous	Ambiguous	Medium	16 201 736
4.1	Environment and GES	Institutional	Beneficial	Beneficial	Beneficial	Long-term	7 096 100
4.1	MPA, Natura 2000	Institutional	Beneficial	Beneficial	Beneficial	Long-term	449 400
4.1	Data collection	Institutional	Beneficial	Beneficial	Beneficial	Long-term	60 172 239
4.1	Maritime surveillance	Institutional	Beneficial	Beneficial	Beneficial	Long-term	20 264 095
4.1	Technical assistance	Institutional	Beneficial	Ambiguous	Beneficial	Long-term	3 756 248
5.1	Technical assistance	Institutional	n/a	Ambiguous	Ambiguous	Medium	122 879 783

Source: Contractor's own elaboration

ESTIMATES OF MS ADMINISTRATIVE BURDEN RESULTING FROM THE EMFAF

The approach to estimate the administrative burden resulting from the EMFAF is in line with the approach used by the 2018 DG REGIO study on the administrative costs of ESIF⁶⁴, but not fully comparable as the scopes of the two studies and the level of detail of collected data are significantly different. While detailed data per task were task, as well as data on both FTEs (Full Time Equivalents) and costs were collected for the DG REGIO study, the data collection for the present study focused on the number of FTEs at national level for broad categories of activities. Labour costs were not provided by MS but derived from the information gathered on FTEs and Eurostat labour cost data as explained below.

Managing authorities were asked, in an email survey, a series of semi-quantitative, and qualitative questions (description, evolution compared to the EMFF, etc...) on their administrative costs related to the EMFAF (see **Error! Reference source not found..Error! Reference source not found.**, section 3), including:

- Approximate range for the number of FTEs dedicated to the design and drafting of the EMFAF programme;
- Approximate range for the number of FTEs dedicated to the management of the EMFAF programme;
- Approximate range for the number of FTEs dedicated to processing applications;
- Approximate range for the number of FTEs dedicated to payments and control;
- External costs.
- Evolution between the EMFF and the EMFAF;
- Open comments on the organisation and the allocated resources.

We assume here that the tasks included in those FTEs would not take place without the EMFAF, and therefore constitute the administrative burden resulting from the EMFAF and not business-as-usual administrative costs.

Information regarding resources used for the programming and drafting of the programme was fairly clear. All MS provided information on FTEs for 2020, 2021 and 2022 as well as detailed information on external costs.

FTEs were then converted into monetary costs using the following formula:

*Costs in Euros/ Member State = number of FTEs/ Member State * national annual labour cost/FTE.*, where:

national annual labour cost/FTE = annual labour cost, wages and salaries + overheads, where:

Annual labour costs are estimated using the 2020 Eurostat series for labour cost, wages and salaries for employees in the public administration and defence, and compulsory social

⁶⁴ European Commission, Directorate-General for Regional and Urban Policy, *New assessment of ESIF administrative costs and burden – Final report*, Publications Office, 2018, <https://data.europa.eu/doi/10.2776/36663>

security⁶⁵, adjusted with the 2023 labour cost index⁶⁶ and overheads are estimated at 25% of labour costs.

The following table presents the average estimates for the total FTEs mobilised for the programming and drafting of national programmes between 2020 and 2023, labour costs, external costs and total costs.

Table 11 : Estimated administrative burden for the programming and drafting of the national programmes (one-off costs)

MS	FTEs 2020	FTEs 2021	FTEs 2022	Average labour cost/ FTE (EUR)	External costs (EUR)	Euro spent/ Million euro of public cost
EU Average	3,6	3,4	3,3	52 023	110 500	2 060

Source: Contractor's own estimates based on MA survey

Regarding implementation and management, all MS provided some information, with varying levels of details. However, in processing the information, the following difficulties were encountered:

- MS reported that resources allocated generally include some full time staff, as well as a number of staff who only work partially on the EMFAF, which makes it difficult to estimate the resources in FTEs. It can be assumed that full-time are correctly reported, but other resources may be under or overestimated;
- In some MS, intermediate bodies play a major role in the EMFAF implementation and managing authorities do not always have visibility on the staff dedicated to the EMFAF;
- The breakdown of FTEs between management and implementation, applications processing and payments was not interpreted consistently by MS. In some cases the answers indicated that the FTEs indicated for the three categories were the same or that the FTEs indicated for management and implementation included the FTEs for the two other categories;
- To make it easier for MS to answer, questions were presented as closed questions with the following ranges of FTEs (<1; 1 to 2; 3 to 5; more than 5). Based on additional information provided in the open comments, the number of FTEs was often significantly greater than 5. This range in itself was therefore difficult to interpret.
- Information provided on external costs related to management and implementation turned out to be difficult to interpret in general and very partial and was not used.

In order to overcome these limitations, the study proceeded as follows:

- It estimated a minimum and a maximum number of FTEs for each MS to take into account the uncertainty
- It cross-checked the number of FTEs for application processing and payments with the number and types of operations committed and paid in Infosys for coherence checks
- It started to process data from MS, where the information was clear and easy to interpret (9 MS):
- MS which provided exact number of FTEs;

⁶⁵ Labour cost, wages and salaries (including apprentices) by NACE Rev. 2 activity [lc_ncostot_r2]

⁶⁶ Labour cost index by NACE Rev. 2 activity - nominal value, annual data [lc_lci_r2_a]

- Ranges of FTEs below 5 FTEs ;
- MS which clearly differentiated the FTEs under different categories of tasks (i.e. management, application processing and payment processing);
- MS which provided clear information commenting the figures.
- For MS where interpretation was more uncertain (13 MS), we made assumptions based on the answers on FTEs and other qualitative information provided (e.g. number of staff partially involved, number of intermediate bodies, feedback from complementary interviews with intermediate bodies, etc.)⁶⁷:
- For MS where the data seemed incoherent or too incomplete (4 MS), we applied the number of FTEs observed in similar MS, based on the size of EMFAF in the MS, the organisation (centralised, decentralised) and the number of intermediate bodies when we had the information.
- It only estimated the overall number of FTEs for the programming phase (one-off costs) and for the management and implementation as a whole (recurrent costs) as the breakdown between management, application processing and payment and control seemed reliable only from a small number of MS, with significant differences among MS.

An additional limitation for the estimate of management and implementation costs (i.e. recurrent costs), was that we could only rely on 2023, which was not a typical year, as MS were still transitioning between the EMFF and the EMFAF and some MS had not selected any project under the EMFAF yet. Some MS however who had no operation committed yet at the end of 2023 provided information on staff allocated to EMFF/EMFAF considering that the allocation of resources would remain stable. When no information was available, we estimated the number of FTEs as explained above.

For comparison purposes, we estimated the ratio of administrative burden/Total public contribution under the EMFAF, differentiating one-off costs (programming and drafting the programme) and recurrent costs (management and implementation).

To estimate total recurrent costs, we multiplied the 2023 management and implementation costs by 7 years. The result could be slightly underestimated based on the MAs feedback on the expected evolution of costs, but without a solid ground to estimate an evolution rate, it was assessed as the safest approach. On one hand, costs are expected to increase, as a result of full-speed implementation, inflation, increase in labour costs, additional external costs (studies, evaluations, etc.). On the other hand MS also report that they could decrease with the implementation of simplified cost options, and the new IT systems.

Finally, results were compared with the findings of a study carried out for DG REGIO in 2017-2018 to assess the administrative costs of the ESIF, including the EMFF⁶⁸, to cross-check the validity of the estimates. We found that our overall estimates are in the same order of magnitude as the ones found by the DG REGIO study, but higher, which is also coherent with MS feedback on the evolution of costs between the EMFF and the EMFAF.

⁶⁷ When MS answered more than 5 FTEs for a given category of costs, without further information, we counted between 5 and 10 FTEs as a conservative approach.

⁶⁸ European Commission, Directorate-General for Regional and Urban Policy, New assessment of ESIF administrative costs and burden – Final report, Publications Office, 2018, <https://data.europa.eu/doi/10.2776/36663>

The following table presents the estimates for the total FTEs (including in intermediate bodies) in 2023 (includes staff working on EMFF in some cases) for the implementation and management of national programmes, as well as total estimated labour costs for the period 2023-2029 by MS (anonymised and in a random order).

Table12 : Estimated administrative burden for the management and implementation of the national programmes (recurrent costs)

	Low hypothesis	High hypothesis
Average nb of FTEs / MS	42	49
Nb of FTE / million euros of public contribution	0.97	1.12
Average labour cost / MS (EUR)	58 351 178	68 323 218
Labour cost (EUR) / million euros of public contribution	51 386	60 168

Source: Contractor’s own elaboration, based on MA survey

LIMITATIONS AND ROBUSTNESS OF FINDINGS

The main limitations encountered in the research included the following:

Given the early stage of implementation and the budget allocated to the study, there were limitations to what it could achieve. The study focused on the early achievements but also greatly emphasised the programming, design of the national EMFAF programmes and the delivery system, and the perceived improvements compared with the previous programming period under EMFF. In addition, while the study covered shared and (in)direct management, based on the terms of reference, the methodology emphasises the former, proportionately to the EMFAF expenditure, and in line with Article 34 of Regulation (EU, Euratom) 2018/1046 (the 'Financial Regulation').

In addition, as the data collection included mainly desk-based research and online consultations, the information on the measures programmed and implemented at the national and regional level relies primarily on the national EMFAF programmes, which provide varying levels of detail, especially as regards the types of actions under broad specific objectives, such as SO 1.1 (sustainable fishing activities), 1.6 (biodiversity and ecosystems), 2.1 (sustainable aquaculture) and 2.2 (processing and marketing). The full descriptions of the measures, their scope and selection criteria were defined in national documents that were outside the scope of the study. To address this shortcoming, descriptions in the national EMFAF programmes were triangulated with the feedback gathered from the managing authorities, the EU desk officers and the complementary interviews in a set of purposively selected Member States. This provides an overall understanding of what has been planned in the Member States and how different it is from the EU measures implemented under the EMFF.

Feedback gathered during the complementary interviews also highlighted that the impacts of the changes in the delivery system are still difficult to assess as managing authorities and intermediate bodies are still finalising some of the procedures (e.g., risk-based analyses, SCOs, etc.), which are expected to have the most impact on simplification.

The monitoring data (Infosys) provide valuable information on EMFAF commitments and spending as of 31 January 2024 at the project level, which allowed to look at achievements by specific objective, type of operations, type of interventions and several other characteristics related to the beneficiaries or the nature of the operations. Nevertheless, these preliminary data do not reflect the future potential impacts of the EMFAF. Result indicators are also presented but are difficult to interpret given the varying levels of execution, and commitment by Member States is often a driving factor and not necessarily representative of the expected results.

The feedback gathered through the survey of target groups provides valuable information on stakeholders' perceptions of the programme and the application process. However, the lack of access to a database of beneficiaries meant it was disseminated by sending the link to intermediaries at the national level. The results, therefore, can hardly be considered as statistically representative. In addition, following significant difficulties encountered with the application process in one of the French outermost regions, the local professional organisation campaigned for their members to answer the survey. As a result, the French outermost regions tend to provide particularly negative feedback and to be overrepresented among the respondents (8.5% of the total sample). We have, therefore, separated answers from those respondents from the rest of the sample where relevant.

Finally, as the managing authorities' responses to the survey were critical to carrying out the analyses, and some of them, including Member States with a significant share of the EMFAF budget, could not provide it within the initial timeframe, so the data collection period was extended. Feedback was eventually received from the 26 managing authorities a month after the initial deadline. This delayed the selection of the Member States and the implementation of the complementary interviews, which were sequential to the survey. While these were eventually conducted, the latest one took place on 27 May, two days before the study report's submission. This created significant time constraints when triangulating the data for the analysis. Data from the last interview(s) was ready to validate the findings, in case of any remaining gaps after the validation workshop.

8. ANNEX III. EVALUATION MATRIX AND, WHERE RELEVANT, DETAILS ON ANSWERS TO THE EVALUATION QUESTIONS (BY CRITERION)

Question	Judgment criteria	Indicators	Data sources
EFFECTIVENESS			
<p>KEQ 1: To what extent is support under the EMFAF able to achieve the specific objectives of the EMFAF Regulation, namely:</p> <ul style="list-style-type: none"> • Strengthen economically, socially, and environmentally sustainable fishing activities (P1 SO (a)) • Contribute to the adjustment of fishing capacity to fishing opportunities in cases of permanent cessation of fishing activities and to a fair standard of living in cases of temporary cessation of fishing activities (P1 SO (c)) • Foster efficient fisheries control and enforcement, including fighting against Illegal, Unreported and Unregulated fishing, as well as reliable data for knowledge-based decision-making (P1 SO (d)) 	<p>(JC 1.1) The EMFAF support is effectively addressing each specific objective activated in the programme, including in relation to the implementation of the CFP.</p>	<ul style="list-style-type: none"> • Number of Member State who have activated each SO • Total budget allocation, types of actions per SO • Number of operations already carried out at Member State/SO • Amounts and % of EMFAF funding by type of operation and type of intervention, progress towards funding targets. • Progress on milestones in the national EMFAF programmes and result indicators at SO level (i.e. Infosys) in shared management, is in-line with expectations. • Monitoring data on achievements regarding landing obligation, climate emergency, non-discrimination (gender equality and rights of people with disabilities) and additional tonnage of vessels. • Feedback from MA's/European Commission staff on: 	<ul style="list-style-type: none"> • Desk research <ul style="list-style-type: none"> • Regulatory framework: EMFAF Regulation • Core performance indicators of the EMFAF (EMFAF Regulation Annex I) • Monitoring data: "Infosys", Data transmitted under Art.42 CPR via SFC, Open Data Platform • Field research <ul style="list-style-type: none"> • Survey of managing authorities • Interviews with key stakeholders at EU level (interest groups) • Complementary interviews with key stakeholders at national level • Survey of target groups

<ul style="list-style-type: none"> • Contribute to a level-playing field for fishery and aquaculture products from the outermost regions (P1 SO (e)) • Contribute to the protection and restoration of aquatic biodiversity and ecosystems (P1 SO (f)) • Contribute to sustainable aquaculture activities, especially strengthening the competitiveness of aquaculture production, while ensuring that the activities are environmentally sustainable in the long term (P2 SO (a)) • Contribute to marketing, quality and added value of fishery and aquaculture products, as well as the processing of those products (P2 SO (b)) • Contribute to enabling a sustainable blue economy in coastal, island and inland areas, and to fostering the sustainable development of fishing and aquaculture communities (P3 SO) • Contribute to strengthening sustainable sea and ocean management through the promotion of marine knowledge, maritime surveillance, or coast guard cooperation (P4 SO). 		<ul style="list-style-type: none"> • planned delays • enabling and limiting factors which impact the capacity to achieve the objectives • mitigation strategies and their application • Feedback from beneficiaries on expected results 	
	<p>(JC 1.2) The EMFAF support has benefited from lessons learned/recommendations from the previous period.</p>	<ul style="list-style-type: none"> • Main lessons and recommendations from previous period, including mid-term evaluation of the direct and indirect management part of the EMFF. • National programme documents include main lessons learned / recommendations from mid-term evaluations. • European Commission stakeholders confirm integration of lessons within the regulatory framework. • MAs confirm integration of main lessons, factors limiting or enhancing uptake of key lessons, and early identified benefits. • EU and national stakeholder feedback confirms that the EMFAF is benefiting from lessons learned from the previous period. 	<ul style="list-style-type: none"> • Desk research <ul style="list-style-type: none"> • Regulatory framework: EMFAF Regulation, EMFF Regulation • EMFAF documents: national EMFAF programmes • Additional literature: previous studies and evaluations • Field research <ul style="list-style-type: none"> • Survey of managing authorities • Interviews with key stakeholders at EU level • Complementary interviews with key stakeholders at national level
	<p>(JC 1.3) The EMFAF support addresses different target groups adequately.</p>	<ul style="list-style-type: none"> • Target groups listed in NPs (incl. direct and indirect beneficiaries), and types of beneficiaries in Infosys • Application success rates per Member State / per target group (if available) 	<ul style="list-style-type: none"> • Desk research <ul style="list-style-type: none"> • EMFAF documents: Target groups per UP • Monitoring data: "Infosys", Data transmitted under Art.42 CPR via SFC, Open Data Platform

		<ul style="list-style-type: none"> • MA feedback on target groups with low success rates and explanations. • Amount of EMFAF per beneficiary type, including producer organisations • Selection criteria, progress made on under-represented groups. • Implications of the end of pre-defined measures at EU level • EU and national stakeholders, applicants and beneficiaries report: <ul style="list-style-type: none"> • possible challenges faced by some specific target groups to access EMFAF support • adequacy of EMFAF support on the application and contract process. 	<ul style="list-style-type: none"> • Field research • Survey of target groups • Interviews with key stakeholders at EU level • Complementary interviews with key stakeholders at national level (interest groups)
	<p>(JC 1.4) EMFAF support addresses the durability of interventions after the end of the funding, both at individual, institutional and policy levels.</p>	<ul style="list-style-type: none"> • Typology of types of operations funded at this stage based on their potential to be durable, for example e.g. compensation has a low durability potential, training, control, capacity building, etc. have a high durability potential) • Levels of funding allocated to most and least durable types of operation. according to their likely durability 	<ul style="list-style-type: none"> • Desk research <ul style="list-style-type: none"> • EMFAF national EMFAF programme documents • Field research <ul style="list-style-type: none"> • Survey of managing authorities • Complementary interviews with key stakeholders at national level
	<p>(JC1.5) The EMFAF support addresses visibility of the EMFAF interventions to the public (in general and per Member State / region / stakeholder group in particular).</p>	<ul style="list-style-type: none"> • Managing authorities have a communication strategy in place, with specific objectives/targets, target groups, and monitoring arrangements. • The European Commission and all managing authorities confirm activities to support the visibility of the EMFAF 	<ul style="list-style-type: none"> • Desk research • Review of European Commission and MA websites / social media • EMFAF documents: Communication and dissemination material and analytics, national EMFAF programmes

		<p>funding opportunities/calls and results among (there is evidence on-line):</p> <ul style="list-style-type: none"> • Have an EMFAF website/webpages up and running • Communicate about the EMFAF on their website, via information sessions, social media • Provide information about policy objectives, calls for proposals, criteria for selection, FAQs, and results • Have developed tools for the public: infographics, videoclips, etc. • Beneficiaries, applicants, and national stakeholder confirm expectations met re. the ease access, clarity of information and ease of application process, availability of support. • Beneficiaries confirm understanding of visibility activities undertaken in compliance with Article 60. • Data and feedback on number and quality of applications for funding from different target groups, met targets set. 	<ul style="list-style-type: none"> • Field research • Survey of managing authorities • Survey of target groups • Interviews with key stakeholders at EU level (DG MARE, FAMENET, interest groups)
	<p>(JC1.6) The EMFAF financial instruments are effectively addressing the objectives?</p>	<ul style="list-style-type: none"> • Documentary evidence on: • Number of Member States using financial instruments • Number and types of financial instruments most used per SO • Number of projects supported through financial instruments per Member State, per SO • Feedback from managing authorities on: 	<ul style="list-style-type: none"> • Desk research • Regulatory framework: EMFAF Regulation • EMFAF documents: national EMFAF programmes • Data from Infosys • Field research • Survey of managing authorities

		<ul style="list-style-type: none"> • Appetite/interest in financial instruments (loans/guarantees) in the Member State • Reasons for (not) using the financial instruments • Availability of private investment in the Member States 	<ul style="list-style-type: none"> • Complementary interviews with key stakeholders at EU and national level
<p>KEQ 2: To what extent is the EMFAF programme delivery system effective?</p>	<p>(JC2.1) The EMFAF delivery system supported structural improvements to allow Member States to tailor their national systems to better support their needs.</p>	<ul style="list-style-type: none"> • Evidence of changes to systems described in national programme documents. • Feedback from managing authorities on: <ul style="list-style-type: none"> • Types of structural changes since the introduction of the EMFAF • The impact/benefits of any structural changes • The take-up/effectiveness of an online data exchange platform/system. • Reasons why structural changes were not implemented and/or required. • Potential sustainability of structural changes and their resilience to future challenges • Impact of end of pre-defined measures at EU level. 	<ul style="list-style-type: none"> • Desk research • EMFAF documents: national programmes, • Additional literature: previous studies and evaluations • Field research • Survey of managing authorities • Interviews with key stakeholders at EU level • Complementary interviews with key stakeholders at national level
	<p>(JC2.2) The EMFAF delivery system builds on appropriate structures and processes.</p>	<ul style="list-style-type: none"> • Documentary evidence confirms governance structures in place, with clarity on roles and responsibilities, appropriate and timely decision-making chains, lack of bottlenecks. • European Commission and managing authority assessments of the effectiveness of the: 	<ul style="list-style-type: none"> • Desk research • EMFAF documents: national programmes, • Additional literature: previous studies and evaluations

		<ul style="list-style-type: none"> • Governance structure (scale: high, medium, low) • Procedures implemented (scale: high, medium, low) • System for "collection, management and use of data" (scale: high, medium, low) • Procedures for the evaluation of projects (scale: high, medium, low) • Usefulness of comprehensive action plans for outermost regions. • Feedback on national administrative approaches, which enhance or hinder EMFAF processes. 	
	<p>(JC2.3) The EMFAF delivery system is adequately adjusted to the content of the performance framework methodology paper submitted by the national authorities together with their EMFAF programme (<i>shared management</i>).</p>	<ul style="list-style-type: none"> • Review of performance framework methodology papers confirms adjustments made. • Degree to which the EMFAF delivery system aligns with and effectively implements the content and requirements specified in the national performance framework methodology papers. 	<ul style="list-style-type: none"> • Desk research • Regulatory framework: CPR, EMFAF Regulation • EMFAF documents: National programmes, Performance framework methodology paper
	<p>(JC2.4) The EMFAF delivery system benefits from lessons learned from the previous period.</p>	<ul style="list-style-type: none"> • Identification of the good practices and lessons learned in the delivery system. • Feedback from European Commission staff/ managing authorities on: • Main adjustments to the delivery system. • Main benefits identified. 	<ul style="list-style-type: none"> • Desk research • Regulatory framework: CPR, EMFAF Regulation, EMFF Regulation • EMFAF documents: national EMFAF programmes

		<ul style="list-style-type: none"> • Other consequences of integrating lessons learned and differences in experiences by Member State. 	<ul style="list-style-type: none"> • Additional literature: previous studies and evaluations • Field research
	(JC 2.5) The involvement of stakeholders was effective in the preparation of the EMFAF programmes.	<ul style="list-style-type: none"> • Documentary evidence that relevant partners were identified in line with CPR Article 8 / consistency in the performance framework methodologies. • MA feedback that relevant stakeholders supported the identification of priorities. • MA feedback that target values for the performance framework were based on reliable data or evidence and supported effective implementation. • Stakeholders' feedback their involvement in the preparation of the EMFAF programmes. 	<ul style="list-style-type: none"> • Survey of managing authorities • Interviews with key stakeholders at EU level • Complementary interviews with key stakeholders at national level
	(JC2.6) The EMFAF delivery system builds on the necessary organisational capacity and resources (i.e. consistency in the allocation of budgetary resources to the objectives of the programme) to effectively manage the programme.	<ul style="list-style-type: none"> • Data on share of EMFAF allocated by SO, consideration ratio EUR/project and comparisons across Member State. • European Commission and MA staff perceptions of: • Capacity and functioning of each step of the delivery system at national level; • aspects of the delivery system that work less well / due to inconsistent or insufficient staff capacity. 	<ul style="list-style-type: none"> • Desk research • Regulatory framework: CPR, EMFAF Regulation • EMFAF documents: national EMFAF programmes • Field research • Survey of managing authorities • Interviews with European Commission staff • Complementary interviews with key stakeholders at national level
	(JC2.7) The EMFAF delivery system builds on staff with the necessary skills, capacities, and time resources to	<ul style="list-style-type: none"> • Data on FTEs and comparison between levels of staff capacity at European 	<ul style="list-style-type: none"> • Desk research

	effectively manage the programme and implement simplification measures.	<p>Commission and Member State level (FTEs) and volume of funds allocated</p> <ul style="list-style-type: none"> • Data on external costs and comparison with volume of funds per Member State. • Managing authority feedback on: <ul style="list-style-type: none"> • Adequacy of HR allocations/capacity. • Presence of dedicated teams or units responsible for EMFAF implementation • Specific qualifications / level of expertise of staff in charge of EMFAF implementation • Appropriate training and capacity building for the staff in charge of EMFAF implementation 	<ul style="list-style-type: none"> • Regulatory framework: CPR, EMFAF Regulation • EMFAF documents: national EMFAF programmes • Field research • Survey of managing authorities • Interviews with European Commission staff • Complementary interviews with key stakeholders at national level
	(JC2.8) The EMFAF delivery system builds on improved communication with potential beneficiaries compared with the previous period.	<ul style="list-style-type: none"> • Managing authorities confirm improvements to measures implemented to improve the communication of information among relevant parties involved in EMFAF implementation, including between national and regional authorities and potential beneficiaries, which might include: <ul style="list-style-type: none"> • Speed of response to queries • Use of FAQs • Availability of helplines • Infodays and workshops 	<ul style="list-style-type: none"> • Desk research • EMFAF documents: national programmes and performance framework methodologies. • Field research • Interviews with European Commission staff • Survey of managing authorities • Complementary interviews with key stakeholders at the national level • Survey of target groups
	(JC 2.9) The EMFAF delivery system has appropriate quality assurance installed.	<ul style="list-style-type: none"> • Managing authorities confirm that they have procedures in place to ensure that selected projects meet the eligibility 	<ul style="list-style-type: none"> • Field research • Survey of managing authorities • Feedback from desk officers

		<p>criteria of the Common Provision Regulation and of the EMFAF Regulation</p> <ul style="list-style-type: none"> • Evidence of improvements made to reduce the number errors during audit procedures 	
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Question	Judgment criteria	Indicators	Data sources
EFFICIENCY			
<p>KEQ 3: To what extent is the EMFAF implementation system efficient?</p>	<p>(JC 3.1) EMFAF interventions are implemented at a reasonable cost to the administration and beneficiaries.</p>	<p>Estimated implementation costs (human resources and external costs) at national and EU level/Total EMFAF budget and comparison with previous programming periods and other EU Funds.</p> <p>EMFAF support/job created or maintained, EMFAF support/business created, EMFAF support/person trained and comparison with other EU funds</p> <ul style="list-style-type: none"> • Managing authorities report: • The level of administrative burden involved in programme management is appropriate compared with EMFF / other programmes, considered by Member State. 	<ul style="list-style-type: none"> • Desk research • EMFAF documents: national programmes (information on governance) • Infosys data • EMFF evaluations • Field research • Survey of managing authorities • Survey of target groups • Interviews with EU and national stakeholders (direct management) • Interviews with selected managing authorities

		<ul style="list-style-type: none"> • Applicants and beneficiaries report that time spent on applications, and reporting / cost of external support is appropriate considering the funding made available. • Potential unnecessary costs have been or are being addressed 	
	<p>(JC3.2) Inefficiencies and obstacles have been identified and solutions put in place to overcome them.</p> <p>(We have moved two JCs on lessons learned, including from EMFF, from KEQ 4 and included them as an indicator to support this JC).</p>	<p>MAs and European Commission staff report that they have identified solutions to inefficiencies and obstacles at EU and national levels and solutions put in place since the launch of the programme.</p> <p>Insights from the previous programme and lessons learned have supported simplification measures / ways to address obstacles.</p> <ul style="list-style-type: none"> • List of process improvements by Member State / at EU level as reported in interviews/ via the surveys 	<ul style="list-style-type: none"> • Field research • Survey of managing authorities <ul style="list-style-type: none"> • Interviews with European Commission staff
<p>KEQ 4: To what extent are simplification measures efficiently installed?</p> <p>(We have not included the JC on simplification measures to address different target group needs as this is addressed under relevance.)</p>	<p>(JC4.1) EMFAF implementation has been simplified compared with the previous programme and simplification measures benefit from lessons learnt.</p> <p>(JC4.2) The EMFAF delivery system assures an efficient implementation of simplification measures.</p>	<p>Managing authorities confirm:</p> <ul style="list-style-type: none"> • Use of simplification measures • Use of the electronic data collection system has reduced admin burden. <p>Indicators of increased programme efficiency</p> <p>Reduced admin burden compared with the past (EMFF)</p> <p>Legal requirements, rules of procedures or practices that create disproportionate administrative burden at the EU or Member State level</p>	<ul style="list-style-type: none"> • Answer to KEQ 2 • Desk research • Regulatory framework: CPR, EMFAF Regulation • EMFAF documents: National programmes, Performance framework methodology paper • Descriptions/documentation on administrative processes and steps required for project application, selection, implementation and reporting compared with the previous programming period under shared/direct management

	<p>(JC4.3) There were improvements to governance and implementation resulting from the simplification of administrative processes (application requirements, selection procedures, implementation and reporting obligation) and of the monitoring system, which can be observed by strand (shared/direct).</p> <p>(JC4.4) There are no (other) areas where simplification could be pursued further, <i>without impacting the quality of results?</i> (We have slightly amended this JC.)</p>	<p>Evidence of external effects</p> <p>Positive stakeholder feedback</p> <p>Answer to KEQ 2</p> <p>European Commission staff and managing authority quantitative data on staff time / external costs, etc.</p> <p>European Commission staff and managing authority qualitative assessments of:</p> <ul style="list-style-type: none"> • feedback on reduced number of steps • staff/decision-making, • paperwork • increased automation • maintenance to quality standards • identification of gaps, challenges and unexpected benefits that may have arisen, as a result of streamlining • other possible options for simplification <p>Satisfaction of applicants and beneficiaries, feedback on improved experience (faster, easier, processes, etc.).</p>	<ul style="list-style-type: none"> • Additional literature: previous studies, including on the impact of externalities on the seafood sector, FAME SU Working paper EMFAF simplified cost options • Field research • Survey of managing authorities • Survey of target groups • Interviews with key stakeholders at the EU level (DG MARE, DG ENV, FAMENET, interest groups) • Complementary interviews with key stakeholders at the national level (managing authorities, intermediate bodies)
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Question	Judgement criteria	Indicators	Data sources
RELEVANCE			
<p>KEQ 6: To what extent is the delivery system able to respond to changing needs?</p>	<p>(JC6.1) The EMFAF responds adequately to changing needs of different target groups (new types of expectations of next generation, new skills and capacities, new customer requirements)</p> <p>(To avoid repetition, we have not included Green Deal and policy changes as these will be discussed under coherence and external challenges: war and climate change are discussed under efficiency (simplification and flexibility of financial instruments.)</p>	<ul style="list-style-type: none"> • Managing authorities confirm: • mechanisms exist to regularly update (or whenever there are relevant contextual changes) the needs assessment, • Programmes have been drafted to leave room for uncertainty. • Documentary evidence on • the implementation measures included in the legal framework addresses emerging needs. • Stakeholders at EU and national level confirm: • the relevance of EMFAF SOs to current and emerging EU/national priorities, • that their feedback was considered in a timely way to support the needs assessment and its updates • The different target groups confirm that: • The programme addresses the overall needs of the sector (including economic, social and environmental needs) • implementation measures meet expectations and are suitable for evolving needs among potential/actual beneficiaries, including supporting the development of new skill sets, the needs of new types of beneficiaries, including relation to particular crises COVID, economic crisis, energy crisis. • Perceptions of the implications of the end of mandatory funding of POs 	<ul style="list-style-type: none"> • Desk research • EMFAF documents: programme intervention logic, national EMFAF programmes • Additional literature: Studies on identified trends and needs, Commission's Megatrends Hub • Field research • Survey of managing authorities • Survey of target groups • Interviews with key stakeholders at EU and national levels
	<p>(JC6.2) The EMFAF delivery system is flexible enough to support the EMFAF in responding to the international dimension</p>	<ul style="list-style-type: none"> • There is data to confirm capacity to respond to the international dimension (voluntary contributions to RFMOs). • MAs provide examples to approach to managing voluntary contributions/enabling and limiting factors. 	<p>Survey of managing authorities</p>

	(voluntary contributions to RFMOs).		Interviews with key stakeholders at EU/national level
	<p>(JC6.3) Under the EMFAF, the shape and scope of the strand (direct/indirect/shared) achieved more relevance and greater budgetary flexibility in the management of procedures/processes (related to application, selection, reporting) to respond to policy priorities and stakeholders' needs?</p> <p>(We slightly reworded this JC to enhance clarity.)</p> <p>The strands identified and involved relevant stakeholders in its governance and implementation?</p>	<ul style="list-style-type: none"> • Documentary evidence/data on main types of changes to application process, selection criteria, and reporting, as well as budgetary flexibility to respond to changing stakeholder needs / policy priorities. • Data to confirm Member States' use of selective criteria, when choosing aquaculture and fisheries projects. • Managing authorities, EU staff confirm: • types of adjustments made to address changing beneficiary needs, changing policy environments, challenges in the external environment, the international dimension. • adequate use of the Fund to achieve the objectives of EU aquaculture policy and the multiannual national plans for aquaculture. • which changes were adopted by strand with what result; and • enabling and limiting factors determining the flexibility of the EMFAF delivery system. • Desk research and assessment of the: • diversity of representation of different groups of stakeholders involved in supporting governance; and • frequency of consultation processes to gather input from stakeholders on governance and implementation. • European Commission staff, managing authority, EU and national stakeholder feedback on: • pros and cons and areas for improvement in the stakeholder input process • extent to which stakeholders' input has influenced the strand's decision-making, resource allocation, relevance, and capacity to identify and respond to change. 	<ul style="list-style-type: none"> • Desk research • EMFAF documents: national EMFAF programmes • Field research • Survey of managing authorities • Interviews with key stakeholders at EU/national level • Complementary interviews at Member State level

Question	Judgement criteria	Indicators	Data sources and methods
COHERENCE			
<p>KEQ 7: To what extent is the EMFAF internally and externally coherent?</p> <p>7.1 To what extent is the EMFAF internally coherent?</p>	<p>(JC7.1.1)The different EMFAF interventions are complementary and coherent with the objectives of the CFP.</p> <p>(JC7.1.2)The different EMFAF interventions generate synergies and/or compensate trade-offs between them.</p>	<ul style="list-style-type: none"> • Documentary evidence and data confirms internal coherence between the objectives and priorities of the CFP and the objectives and priorities of the EMFAF programmes, as well the allocation of resources to inputs. • • EU stakeholders' feedback on the coherence of the EMFAF direct management and with the CFP objectives and priorities. • Managing authorities', and national stakeholder feedback on synergies and/or trade-offs between EMFAF interventions 	<ul style="list-style-type: none"> • Desk research • Intervention logic • EMFAF documents: national EMFAF programmes • CFP Regulation Field research • Survey of managing authorities • Interviews with key stakeholders at EU and national levels
<p>7.2 To what extent is the EMFAF externally coherent?</p>	<p>(JC 7.2.1) EMFAF interventions are coherent with:</p> <p>the national and regional objectives</p> <p>the objectives of the European Green Deal (including all policy initiatives/areas)</p> <p>Other relevant EU policies (Common Agriculture Policy strategy plan, ERDF, ESF, EU environmental legislation (MSFD, WFD, Habitats and Birds Directives), and funds (Horizon Europe and LIFE, etc.)</p> <p>the international dimension (voluntary contributions of Regional fisheries management organisations (RFMOs))</p>	<ul style="list-style-type: none"> • MAs and national stakeholders confirm that EMFAF interventions support national and regional objectives/may generate synergies/there are no overlaps or contradictions. • Documentary evidence confirms that the EMFAF design is aligned with other EU policies and programmes. • EU stakeholders and staff in DG ENV confirm that the design of the EMFAF complements other relevant EU policies (external coherence) and funds. • MAs and European Commission staff confirm the assessment of coherence was included in the EMFAF monitoring and evaluation system 	<ul style="list-style-type: none"> • Desk research • Intervention logic • EMFAF documents: national EMFAF programmes • Policy and programming documents relating to other relevant EU policies and funds. • Field research • Survey of managing authorities • Interviews with key stakeholders at EU level, DG ENV. • Complementary interviews at Member State level

Question	Judgement criteria	Indicators	Data sources and methods
EU ADDED VALUE			
KEQ 8: To what extent would outputs and results be achieved without EMFAF support/EU intervention?	(JC 8.1) Policy-related outputs and objectives would not be achieved without EMFAF interventions.	<ul style="list-style-type: none"> • Documentary evidence on how the EMFAF adds value at national and regional level. • Feedback from managing authorities, national stakeholders, and beneficiaries: • on the availability of other equivalent funding sources • that the EMFAF extends the coverage of EU policy objectives at national level, in relation to number and type of priorities/SOs that are funded at national level. 	<ul style="list-style-type: none"> • Desk research • Additional literature: impact assessment accompanying the proposal for a regulation on the EMFAF • Infosys • Evidence from answers to effectiveness and efficiency. • Field research • Survey of national authorities • Interviews with key stakeholders at EU level • Complementary interviews at Member State level
	(JC8.2) EMFAF is generating additional, earlier, and higher quality outputs and results than individual Member States acting on their own at the national or regional level.	<ul style="list-style-type: none"> • Monitoring data confirms that results are being achieved. • Managing authorities confirm: • that the overarching, homogenous approach provided by the EMFAF is starting to generate outputs and results, which could not otherwise be achieved • programme synergies, and lessons learning is enhancing national and regional approaches; • the speed, quality and types of results being generated through the EMFAF could not otherwise be achieved • the consequences of stopping or withdrawing EU intervention 	

9. ANNEX IV. OVERVIEW OF BENEFITS AND COSTS AND TABLE ON SIMPLIFICATION AND BURDEN REDUCTION

Table 13: Overview of costs and benefits identified in the evaluation⁶⁹

		Citizens/Consumers		Businesses		Administrations		Other	
		Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment
Cost or Benefit description:									
Direct compliance costs (adjustment costs, administrative costs, regulator charges)	One-off					Marginal compared with the overall EMFAF budget	Resources allocated at the EU level (DG MARE staff)		
Direct compliance costs (adjustment costs, administrative costs, regulator charges)	Recurrent				Administrative costs for beneficiaries: 63% of survey respondents spent more than 3 days on the application process, plus external costs for 31%.	58-68 million	Estimated resources allocated to managing and implementing the programme/year at the national level. (Partially funded through EMFAF)		Administrative costs for beneficiaries other than businesses. Application processes more time-consuming

⁶⁹ Where there is a prior impact assessment, the table should contain as a minimum the costs/benefits identified in the IA with the information gathered on the actual cost/benefit. As available, the table should include the monetisation (€) of the costs/benefits based on any quantitative translation of the data (time taken, person days, number of records/equipment/staff etc. affected or involved represented in monetary value – see Standard cost model, for example). For all information presented, it should be included in the comments section whether it relates to all Member States or is drawn from a subset. An indication of the robustness of the data should be provided in Annex II on Methodology and analytical models used.

		Citizens/Consumers		Businesses		Administrations		Other	
		Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment
					67% considered the total cost reasonable compared with the amount of support received (compared with 10% who disagreed).		technical assistance)		for beneficiaries other than businesses (producer organisations (POs), research, local action groups setting up). Only 50% of respondents other than private enterprises agreed that the application costs were reasonable, and 28% disagreed. The most negative assessments came from Research

		Citizens/Consumers		Businesses		Administrations		Other	
		Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment
									centres and POs.
	Recurrent					Marginal compared with the overall EMFAF budget	Resources allocated at the EU level (DG MARE staff)		
Enforcement costs (costs associated with activities linked to the implementation of an initiative such as monitoring, inspections, and adjudication/litigation)	Recurrent						It could not be isolated from the administrative costs.		
Indirect costs (compliance costs or other indirect costs such as transaction costs)	n/a								
Direct benefits					Direct support through investments and compensation measures		Direct support through funding of data collection, control and enforcement		Direct support through funding research projects, community-led local

		Citizens/Consumers		Businesses		Administrations		Other	
		Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment
							measures, technical assistance		development, POs Production and Marketing Plans, etc
Indirect benefits			Actions aimed at protecting the environment and mitigating climate change benefit access to quality food from fisheries and aquaculture products.		Support through transfers to general services promoting the development of fisheries and aquaculture sectors		Support for the implementation of the Common Fisheries Policy (CFP) and integrated maritime policy (IMP)		Support for the implementation of the CFP and IMP

Table14: Simplification and burden reduction (savings already achieved)

	Citizens/Consumers/Workers		Businesses		Administrations	Other	
	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative
Due to early stage of implementation simplification and burden reduction (savings already achieved) of EMFAF operations could not be analysed.							
Type: One-off / recurrent (select)							

Table15: PART II: II Potential simplification and burden reduction (savings)⁷⁰.

	Citizens/Consumers/Workers		Businesses		Administrations	Other	
	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment	Quantitative
Due to early stage of implementation simplification and burden reduction (savings that could be achieved) of EMFAF operations could not be analysed							
Type: One-off / recurrent (select)							

⁷⁰ This can be revisited in the context of the retrospective EMFAF evaluation foreseen for end 2031.

10. ANNEX V. STAKEHOLDERS CONSULTATION - SYNOPSIS REPORT

This annex summarises all stakeholder input from the consultation through “Have your say” on the Call for Evidence as well as the Public Consultation questionnaire.⁷¹ In addition, it summarises all consultation activities undertaken by the external study conducted on behalf of DG MARE to support the evaluation.

Starting with the consultation through “Have your say”, in line with Article 45(1) of the Common Provisions Regulation (EU) No 2021/1060, the Commission is required to carry out a mid-term evaluation of the EMFAF. In accordance with this obligation and in compliance with the Better Regulation Guidelines, DG MARE launched a public consultation aiming to gather evidence and different perspectives on the management and use of the funding. The consultation started on the 6 June 2024 and ended on the 13 September 2024. This report should be regarded solely as a summary of the contributions made by stakeholders and citizens on the Call for evidence and also on the basis of an EU survey (questionnaire) in all official EU languages, both publicly available through the “Have your say” portal. It cannot in any circumstances be regarded as the official position of the Commission or its services. Responses to the consultation activities cannot be considered as a representative sample of the views of the EU population.

The feedback gathered by stakeholders is presented below following the 5 criteria under the Better Regulation Guidelines (on the effectiveness, efficiency, relevance, coherence and EU added value).

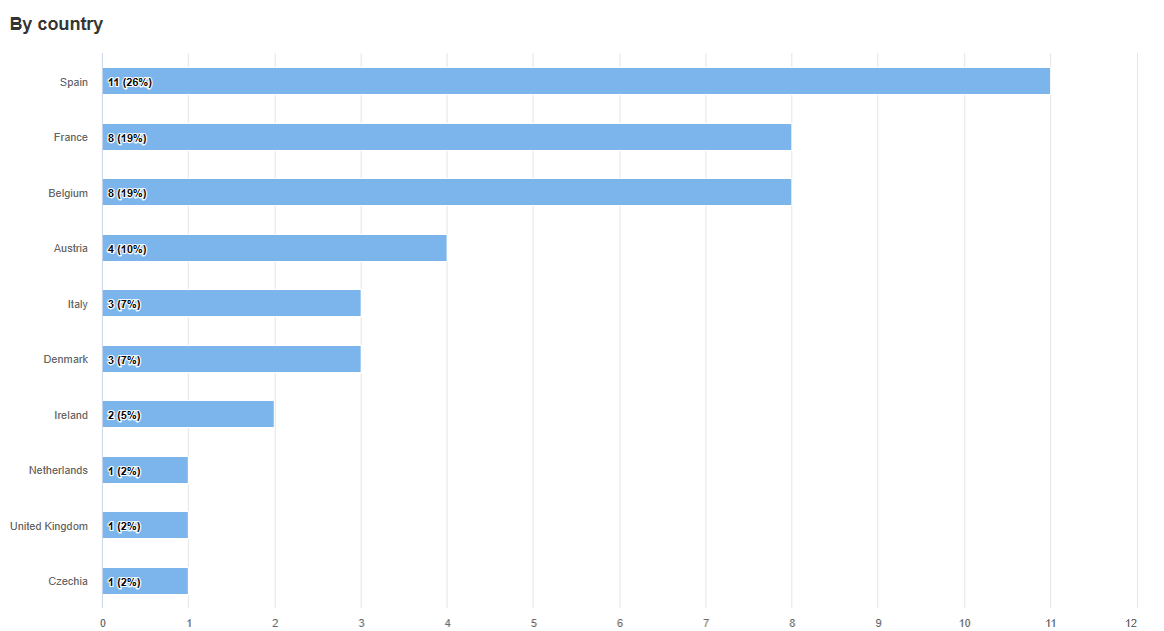
THE RESPONDENTS

Regarding the feedback received on the Call for evidence through “Have Your Say portal”, there were 42 comments from different organisations, ranging from public authorities to NGOs and businesses associations. The vast majority comes from Spain with a 26% of the total, followed by France and Belgium with a 19% each of the total.

Most of the contributions come from business associations accounting for 38% of the total (16 comments), followed by non-governmental organisations accounting for 29% of the total (12 comments) and public authorities accounting for 19% of the total (8 comments).

⁷¹ Call for Evidence and Public Consultation on the mid-term evaluation of the European Maritime, Fisheries and Aquaculture Fund (EMFAF) for 2021-2027. Available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14119-EU-Maritime-Fisheries-and-Aquaculture-Fund-EMFAF-2021-2027-midterm-evaluation_en

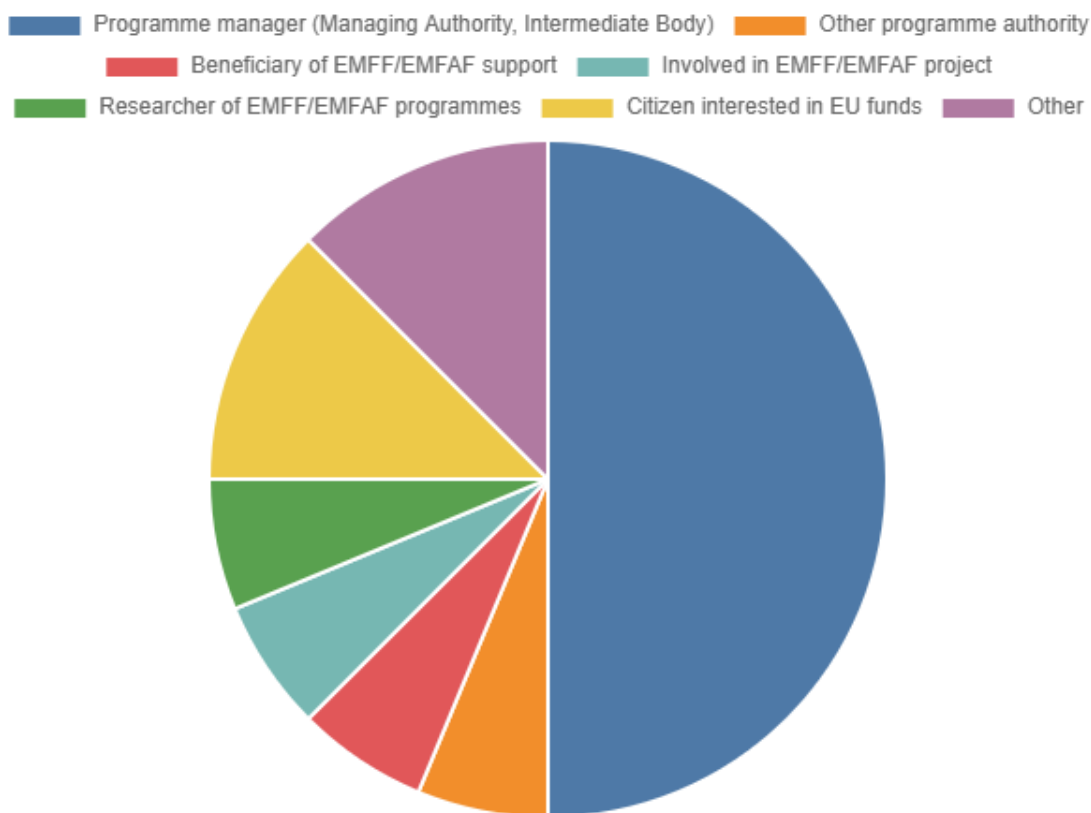
Figure 14: Response rate per country



Source: supporting study carried out by the consortium formed by Tetra tech, 2024

Regarding the feedback on the EU Survey, the Commission received 16 replies which half of them corresponded to programme managers (e.g. managing authorities or intermediate bodies).

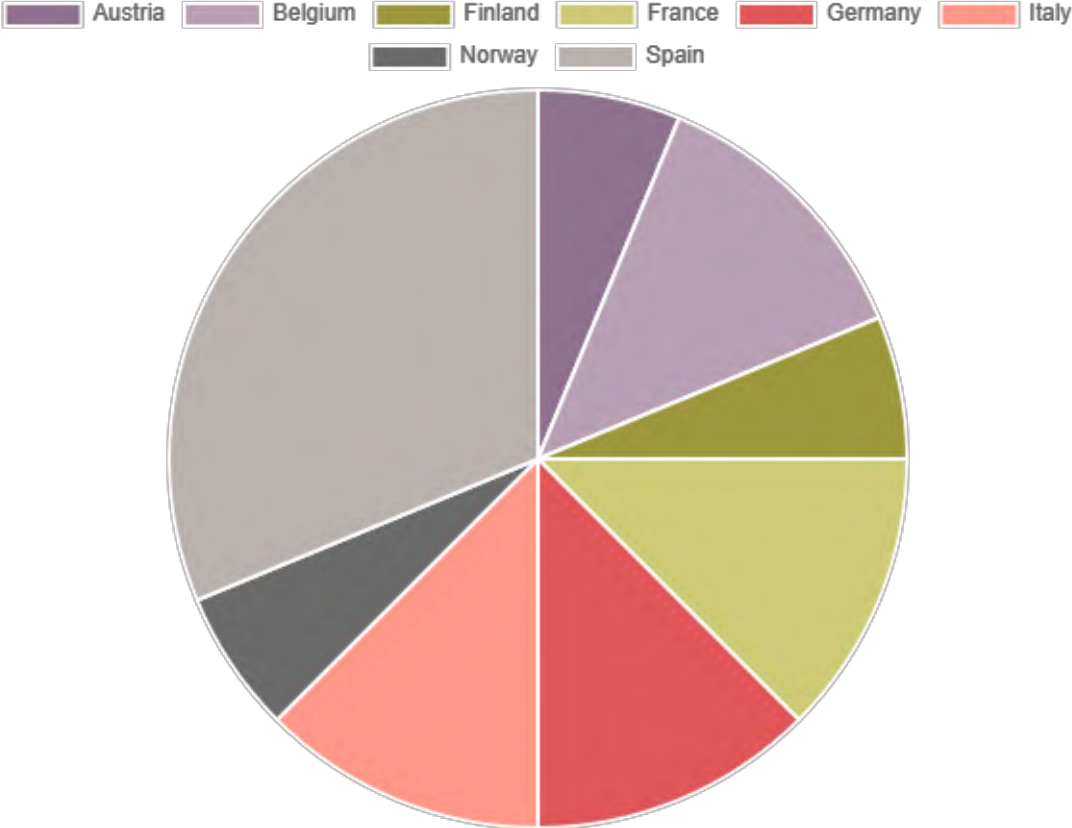
Figure 15: Type of participants in the survey and share of replies



Source: supporting study carried out by the consortium formed by Tetra tech, 2024

Most of the answers came from Spain, with up to 32% of the share.

Figure 16: Response rate per MS



Source: Supporting study carried out by the consortium formed by Tetra tech, 2024

EFFECTIVENESS

Respondents stress that the success of EU fisheries and aquaculture policies hinges on the development of clear and measurable sustainability and animal welfare indicators. These metrics are essential for tracking progress toward environmental and welfare objectives while ensuring that funding aligns with sustainable practices.

They also argue that the industry's transition to low-impact, climate-smart fisheries requires targeted investment in modernising vessels, adopting energy-efficient technologies, and improving infrastructure. Without such structural modernisation, the green transition's effectiveness will remain constrained.

Achieving equitable growth through funds like the EMFAF is closely tied to prioritising support for small-scale and coastal fisheries. These operations are often more sustainable but financially vulnerable and directing funds to them is seen as key to fostering meaningful, sector-wide impact.

To be effective across all EU regions, funding must also adapt to regional conditions, such as the unique needs of inland aquaculture or outermost regions. Tailoring policies in this way ensures they remain responsive and applicable to diverse environmental and economic contexts.

Participants of the public consultation stated that the effectiveness of both EMFF and EMFAF in achieving desired objectives was rated as reasonably effective. Specific areas like implementing the Common Fisheries Policy scored well (31.25% rated it 7 out of 10, 18.75% rated it 10 out of 10).

EFFICIENCY

Respondents across emphasise that the effectiveness of EU funding is hindered by a lack of transparency and insufficient monitoring. Strengthening tracking and auditing processes is seen as crucial to ensuring funds are allocated and utilised as intended, minimising waste and inefficiencies.

Improved efficiency could also be achieved by linking funding to sustainability benchmarks. Making funding conditional on meeting these standards would discourage support for unsustainable practices and prioritise resource allocation to operators who are sustainable and responsible.

Another challenge identified is the administrative burden associated with fund applications and compliance, particularly for small-scale and artisanal fishers. Simplifying these processes would make funding more accessible and efficient, enabling quicker and more impactful resource distribution.

Economic incentives play a vital role in enhancing efficiency as well. Focusing on low-cost, high-impact investments, such as offering low-interest loans for vessel upgrades, would accelerate the adoption of sustainable practices across the industry.

On cost-effectiveness and timely results, 50% of the respondents believed objectives were met to some extent, while 31.25% saw only minor success. Burdensome processes like reporting, audits, and project implementation were noted with many scoring these processes between 6 and 10 on a scale of burden intensity.

COHERENCE

Respondents stress that funding for fisheries and aquaculture must align with the EU Green Deal, Biodiversity Strategy, and Marine Action Plan. Achieving coherence is essential to ensure that investments and subsidies actively support climate and environmental objectives rather than undermining them by financing high-impact practices. In this regard, strong coherence was identified between the funds and other EU initiatives like the LIFE programme (50% reinforcement) and ERDF/CF (43.75% reinforcement).

There is widespread agreement that animal welfare should be integrated into the sustainability objectives for aquaculture. Failing to include welfare indicators creates a disconnect between welfare goals and the EU's broader sustainability ambitions, undermining the consistency of policy objectives.

Many participants argue that EU funds should prioritise small-scale, low-impact fisheries to better align with goals for environmental protection and resource efficiency. Supporting larger industrial operations is often viewed as contradictory to these aims, reducing the overall effectiveness of efforts to meet the sustainability targets of the Common Fisheries Policy.

To enhance coherence, respondents also advocate for harmonising how EMFAF funding is allocated and regulated across Member States. This would ensure a consistent application of environmental and social objectives, creating a more level playing field throughout the EU.

RELEVANCE

EU fisheries and aquaculture funding is recognised as crucial for addressing key challenges and supporting sustainable development. Funding like the EMFAF plays a central role in enabling modernisation, climate adaptation, and the continuation of rural and structurally weak areas' fishing activities. There is a strong call to increase allocations to meet the sector's needs, especially as rising costs from inflation and energy crises strain operations.

The alignment of funding with EU environmental objectives is highlighted as essential, with an emphasis on eliminating harmful subsidies that support unsustainable practices, such as those linked to fossil fuels. Redirecting funds toward transitioning the sector into a low-impact, climate-smart industry is considered vital to preserving marine ecosystems and ensuring long-term sustainability.

Additionally, respondents stated that addressing generational renewal is considered critical for the sector's future, requiring adjustments to funding regulations to remove barriers and improve operational safety and efficiency. These measures would help ensure that funding not only preserves existing activities but also supports innovation and sustainability in fisheries and aquaculture across the EU.

Up to 32% of the participants in the public consultation found the funds relevant in addressing regional and local economic needs, mostly regarding towns and villages.

EU ADDED VALUE

Respondents emphasise that EU funds deliver significant added value when they address gaps not covered by other funding sources. Supporting small-scale, coastal, and artisanal fisheries is one such area where EU intervention can make a substantial impact, helping to preserve local

communities and promote sustainable practices. A significant majority of the participants in the public consultation (43.75%) felt the funds enabled initiatives that would not have been possible without EU funding.

Another area of added value lies in fostering generational renewal within the fisheries sector. Many suggest that EU funding can support young fishers entering the industry, encouraging them to adopt sustainable methods. This approach helps rejuvenate the workforce, ensuring the continuity of local fishing traditions and sustainable practices.

EU funding also plays a critical role in advancing decarbonisation and climate adaptation within the fisheries sector. Financial support for transitioning to low-impact, climate-resilient operations is seen as essential, particularly as these changes would be difficult for operators to achieve without external assistance.

Investing in research and innovation further highlights the EU's value-added contribution. Funding initiatives like the development of selective fishing gear or alternative feed sources fosters sector-wide sustainability by reducing environmental impact and improving resource efficiency. These efforts are viewed as transformative in advancing sustainability within the industry.

As regards the consultation activities undertaken by the external study conducted on behalf of DG MARE to support the evaluation, a qualitative and quantitative analytical overview of the results is provided below. It explains how and to which extent the stakeholder views have been considered in the study and the number of removed contributions. Its aim is twofold:

- To inform policymaking on the outcome of all consultation activities while differentiating the views of the different categories of stakeholders,
- To inform stakeholders on how their input has been considered and to explain why specific suggestions could not be taken up.

OUTLINE OF THE CONSULTATION STRATEGY

The consultation objectives were two-fold:

- To gather primary evidence to address any data gaps identified following the desk review,
- To gather stakeholders' views regarding various evaluation criteria and compare and integrate the evidence collected through other data collection activities.

Notably, the survey of managing authorities aimed to enhance the understanding of existing data from the review of the national EMFAF programmes, Infosys, and the Common Monitoring and Evaluation System (CMES). Interviews at the European level allowed the study team to collect specific information from different types of stakeholders concerned by shared and (in)direct management components of the EMFAF.

The following **stakeholder groups were identified** as relevant for consultation:

- Key stakeholders at the European level, such as relevant Commission Directorate-Generals (DG MARE and the Directorate-General for Environment (DG ENV) for example), the European Climate, Environment and Infrastructure Executive Agency

(CINEA), the Fisheries and Aquaculture Monitoring, Evaluation and Local Support Network (FAMENET). the social partners, namely the Association of National Organisations of Fishing Enterprises (Europêche) and the European Transport Workers Federation (ETF), and other EU-level interest groups from fisheries and aquaculture representative organisations, such as European Association of Fish Producers Organisations (EAPO), the European Federation of Aquaculture Producers (FEAP), and the European Fish Processors Association-European Federation of National Organisations of Importers and Exporters of Fish (AIPCE-CEP), to non-governmental organisations (NGOs) such as the WorldWide Fund for Nature (WWF),

- Key stakeholders at the Member States level (EMFAF managing authorities, intermediary bodies, etc.),
- Potential direct and indirect beneficiaries, namely EU, national, regional and local target groups, including fishers, fish farmers, processors and their representative organisations, relevant public bodies, research centres, NGOs, etc.,
- Advisory Councils.

The stakeholder consultation in the context of the midterm evaluation of the EMFAF included the following **consultation methods and tools**:

- A survey of the EMFAF managing authorities based on a Word questionnaire disseminated by e-mail (5 March 2023 for them to provide one consolidated response per Member State within a month),
- An online survey of the EMFAF target groups administered (through Sphinx, launched on 5 March 2024 and open until 13 May 2024),
- A targeted consultation of the Advisory Councils, using a Word questionnaire disseminated by e-mail (5 March 2024, for them to provide one consolidated response per Advisory Council by 15 April 2024, translated into French, Portuguese and Spanish upon request),
- Semi-structured interviews with key stakeholders at the European level (including the scoping interviews carried out in the inception phase of the study),
- Complementary interviews at the national and local levels,
- A half-day validation workshop (on 17 June 2024).

Annex II documents each consultation activity tool, including the questionnaires and interview guides used by the study team.

As regards **participation**, the study team engaged with many stakeholders through these consultation activities, given its scope. While it is not possible to provide the exact number of stakeholders consulted, given that some participated in several activities, the study provided further details on the specific groups of stakeholders who provided data, views and experiences for the study below:

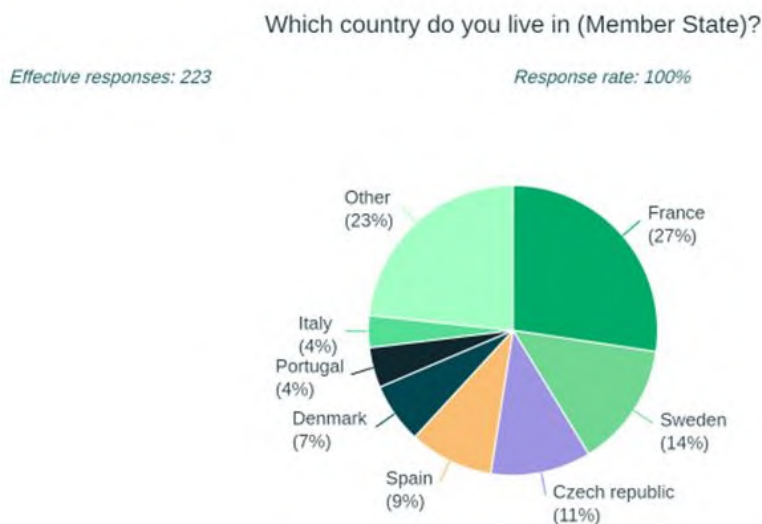
- The survey of managing authorities generated 26 responses from the 26 EMFAF Member States.
- The survey of target groups received 223 responses. Figure 1 below provides quantitative data on participants' country of origin.
- The targeted consultation of the Advisory Councils led to two contributions from the Aquaculture Advisory Council (AAC) and the Mediterranean Advisory Council (MEDAC).

- The study team carried out 14 interviews with 26 key stakeholders at the European level, including representatives from DG MARE, DG ENV, and FAMENET, as well as interest groups (social partners and one environmental NGO) and fisheries and aquaculture experts.
- CINEA (EU agency) participated in the study through two interviews. The table below provides information on the main views and concerns they addressed, which we took on board wherever relevant.
- The study team carried out nine complementary interviews with national stakeholders, including intermediary bodies and (potential) beneficiaries, in six selected Member States (Czech Republic, Denmark, France, Germany, Latvia, and Spain) on specific topics, such as innovation, synergies, etc., as well as written feedback from the Estonian stakeholder consulted.
- 48 stakeholders joined the half-day validation workshop on 17 June 2024, including 17 managing authorities (CZ, CY, IT, DE, DK, EE, FI, IT, LV, MT, NL, PL, PT, RO, SE, SI, SK), six Advisory Councils (AAC, BISAC, MAC, MEDAC, NWWAC, NSAC), and representatives from 4 DG MARE units.

All the stakeholder groups and interests identified were given the opportunity to participate in the study.

As regards the quantitative data on participation in the survey of target groups, 223 stakeholders from 19 Member States responded to the survey of target groups. 27% of the respondents (61 out of 223) were from France, 14% from Sweden (31 out of 223), 11% from Czechia (25 out of 223), 9% from Spain (21 out of 223), 7% from Denmark (15 out of 223), 4% from Portugal (10 out of 223) and 4% from Italy (8 out of 223), and 23% from other countries (52 out of 223) – see Figure 1 below.

Figure 17: Distribution of contributions by Member States



Source: Survey of target groups, Source: Supporting study carried out by the consortium formed by Tetra tech, ^2024

Contributions came from a wide range of stakeholders, including 46% of private enterprises (103 out of 223), 17% of public bodies (37 out of 223), 13% of producer organisations, interbranch organisations and associations of producer organisations (29 out of 223), 8% of Local Action Groups (17 out of 223), 6% of individuals (14 out of 223), 5% of NGOs and association (12 out of 223) and research centres (4 out of 223). Among enterprises, 96% (99 out of 103) of the respondents were SMEs, and 64% (66 out of 103) were micro-enterprises (one to nine employees).

The respondents represented the different economic sectors, including fisheries for 48% (107 out of 223), 23% aquaculture (51 out of 223), 5% processing and marketing (12 out of 223), 3% other maritime activities (7 out of 223), as well as 6% integrated or multisectoral activities (13 out of 223). 6% of the respondents (14 out of 223) also work in activities related to the protection of the environment. Among respondents in the fisheries sector, 41% (44 out of 107) were vessel owners working on board.

Notably, the French outermost regions were over-represented in the sample (16% of the total sample) and negatively influenced some of the results (on the relevance and application process in particular). Feedback from complementary interviews indicated that one of the French outermost regions encountered significant difficulties in the application process, which probably explains this feedback. Therefore, when relevant, the study team separated responses from the French outermost regions from others' responses. In this case, the study team discarded 37 responses from the survey of target groups.

As regards the **methodology and tools used to process the data**, the study team conducted a quantitative and qualitative analysis of data gathered through the different consultation activities. The quantitative analysis included a descriptive statistical analysis of the results of the surveys of the EMFAF target group and managing authorities in the Member States.

The analysis of the input gathered in the context of the consultation work was conducted first at the individual data collection tools level. Then, the study team triangulated the data and contrasted it with data from the desk research to produce the study findings and develop overarching conclusions and recommendations. These were presented in the main study report.

RESULTS OF THE STUDY'S CONSULTATION ACTIVITIES

This section includes the results of each consultation activity, including qualitative and interpretative analysis, highlighting consistencies or contradictions in relation to contributions and main stakeholder categories where relevant. Namely, the input from Managing Authorities; Target Groups, Advisory Councils; Key stakeholders at the European level; complementary interviews at the national and local level; an *ad hoc* contribution; the Validation workshop.

All inputs were on the basis of the following 3 questions:

- To what extent has the EMFAF been successful and why?
- How has the EMFAF made a difference and to whom?
- Is the EMFAF still relevant?

Survey of the managing authorities: The results present below are based on the 26 responses to the survey of managing authorities.

To what extent has the EMFAF been successful and why?

Managing authorities expressed strong satisfaction with stakeholder contributions, highlighting the collaborative development process that included diverse stakeholders. In open comments, they also supported the performance framework's target values, believing them to be well-grounded in reliable historical data, which enhanced their credibility. Involving local authorities, fishers, and environmental organisations was emphasized to ensure the programme objectives were comprehensive, that they could effectively address local challenges, and that they had integrated sustainability goals. The programme was considered flexible to adapt to evolving needs and the ability to reallocate funds during crises like COVID-19 to support vulnerable sectors such as small-scale fisheries.

Lessons learned from the previous programming period (EMFF 2014-2020) were also implemented. Some specific examples of how earlier experiences had informed current practices included: streamlined application processes and enhanced communication channels between the authorities and stakeholders. Several managing authorities noted that these improvements had reduced bureaucratic delays and increased the efficiency of fund distribution, enabling quicker implementation of projects.

Managing authorities rated the governance structures and procedures as highly effective, underscoring the robustness of the administrative framework overseeing programme implementation. However, opinions varied on resource allocation compared to the previous EMFF, with the majority perceiving it as stable. This suggested that there was continuity in resource allocation, reflecting a similar level of investment in program execution and oversight. The programme's adaptability and the mechanisms for quick response to crises were also noted as efficient in the open comments. These mechanisms ensured the programme could handle unforeseen challenges, minimising disruptions and maintaining progress towards its objectives. The vast majority of managing authorities reported this adaptive capacity to be a critical component of efficiency, as it enabled the programme to remain functional and effective in dynamic and often unpredictable environments.

The results of the coherence assessment included positive feedback on synergies with other EU funds, reportedly facilitated through national coordination meetings, common IT platforms, and joint committees. Numerous managing authorities reported that these mechanisms enhanced the programme's coherence by ensuring that it worked in harmony with other initiatives and policies, avoiding duplication and maximizing resource utilisation.

Most managing authorities indicated that learning from other Member States through established networks and expert meetings also contributed to coherence. However, there was room for improvement in informal exchanges and direct interactions between managing authorities. Enhancing these interactions could have further improved coherence by facilitating the sharing of best practices and innovative solutions across different contexts. Generally speaking, this collaborative approach ensured that the programme was not operating in isolation but was integrated into a broader, cohesive framework of EU policies and initiatives, according to managing authorities.

How has the EMFAF made a difference and to whom?

Diverse perspectives on the influence of flexibility, budgetary allocations, and stakeholder input existed during the programming phase. These elements contributed significantly to the

enhanced effectiveness of the EMFAF by ensuring that it was responsive to a wide range of needs and priorities.

Drafting an Action Plan for Outermost Regions and allocating resources reflected the unique benefits of EU-level strategic planning. This strategic approach enabled the programme to address specific regional needs effectively, leveraging the collective resources and expertise of the EU. By operating at the EU level, the programme achieved outcomes that would have been difficult or impossible for individual Member States to accomplish alone. This added value was a testament to the programme's design and implementation, highlighting the benefits of a coordinated and strategic approach to addressing complex challenges across the EU.

Is the EMFAF still relevant?

The survey revealed a high level of perceived relevance and flexibility in the national programme to address future needs, indicating that the programme was designed with an understanding of emerging challenges and is capable of evolving to meet them effectively

Many managing authorities highlighted the programme's ability to address emerging issues effectively. For instance, respondents mentioned that the programme's objectives were aligned with the latest environmental and economic challenges, such as the increasing impact of climate change on fisheries and the need for sustainable practices. One managing authority noted that the programme's focus on sustainability and resilience is critical as severe environmental changes are more frequent.

The programme's responsiveness to local communities' needs was highlighted by managing authorities, who appreciated its tailored approach to regional specificities. This ensured that interventions were precisely targeted to address local challenges effectively. Additionally, the programme's continuity in specific objectives with minor adjustments allowed it to stay aligned with current and emerging priorities, maintaining stability while adapting to new challenges as needed.

Survey of target groups: The views expressed in the responses to the survey of target groups are provided below, which are not statistically representative.

To what extent has the EMFAF been successful and why?

The responses to the survey of target groups confirm the overall effectiveness of the delivery system.

Responses to the survey of target groups show a generally positive outlook among applicants on the communication and the application process, except in the case of the French Outermost region mentioned above. While, without the French outermost regions, the average scoring on the information provided, the communication with the administration, delays and the application process in general reached 3.3 out of 5, for the French Outermost regions, it only reached 2 out of 5. Except in this specific case, respondents praised, in particular, the good communication with their administration (72% of the respondents agreed, including 23% who strongly agreed and only 15% who disagreed) and were more critical of the level of complexity (only 42% agreed the application process was simple and 35% disagreed) and the timeliness of the application process (50% of respondents who agreed 21% who disagreed).

The answers to the target group survey also indicate the perceived relationship between the different types of EMFAF support and their results and impacts. The answers cannot be

considered as fully representative of the results achieved at this stage, but they provide some insights on the expected results from the perspective of the beneficiaries, in particular on investments, as 50% of the respondents applied for this type of support. Investments, as well as production and marketing plans, are related primarily related to increased production capacity and improved working conditions for both fisheries and aquaculture, and to a lesser extent to maintaining capacity and jobs, jobs creation, improved resource efficiency, innovations, and reduced environmental impacts. The survey also highlights the relationship between data collection and studies and biodiversity protection. Impacts on energy efficiency and reduced CO2 emissions tend to be more indirect but could be expected from a wide range of types of support.

Finally, the survey indicates that the fund effectively contributes to the visibility of EU action as the vast majority of beneficiaries (80%) confirmed having communicated about the EMFAF fund one way or another, mainly through their website or through the display of the European logo in their premises. Only 8% of the respondents were unaware of the communication requirements (especially people from private enterprises), and 12% have not communicated yet.

The survey also provided helpful information on administrative costs for applicants. It shows that costs vary significantly from a few hours to more than five days worth of work, but that a majority of respondents agreed that overall costs were reasonable compared to the amount of support received (65% of respondents, against only 14% who disagreed). Respondents among POs, LAGs, and research centres tend to disagree more, but the percentages may need to be more representative as there are only a small number of respondents.

How has the EMFAF made a difference and to whom?

The wide range of beneficiaries among the respondents, including micro-enterprises and individuals, the low rejection rate (4% among respondents) and the answers on reasons for not applying or not obtaining support indicate that the EMFAF successfully reaches out to all target groups. The eligibility criteria that respondents mention as a problem for applying or more related to the type of support (e.g. age limit for the first acquisition of a vessel) than to a specific group of stakeholders.

Is the EMFAF still relevant?

The responses to the survey of target groups also show that stakeholders' involvement in the preparation of the national EMFAF programme has resulted in a more positive perception of the programme's relevance.

Targeted consultation of the Advisory Councils: The findings below were based on the targeted consultation of the Advisory Councils, which led to two contributions from the Aquaculture Advisory Council (AAC) and the Mediterranean Advisory Council (MEDAC). As their membership is wide, their response is submitted on behalf of their members.

To what extent has the EMFAF been successful and why?

According to the Advisory Councils that provided feedback for this study, the EMFAF has shown some early signs of success but also faces significant challenges.

Both Advisory Councils highlighted significant bureaucratic challenges that hinder the timely implementation and accessibility of the EMFAF. Excessive control requirements and complicated administrative procedures often delay funding and project execution. The practical

effects of simplification measures have yet to be realised. The current administrative procedures remain complex and time-consuming, which affects the efficient use of the EMFAF.

In addition, the flexibility given to Member States (see 4.3.3 below) can lead to uneven implementation, with varying levels of administrative capacity and priority given to aquaculture development, for instance. Some regions and target groups, such as those involved with towed gears or operating in administratively weak regions, face difficulties accessing the Fund.

One Advisory Council also expressed concerns that the regulatory constraints at the national level may prevent achieving the objective of increased aquaculture production by 2030. Significant hurdles include ineffective spatial planning, complicated licensing procedures, and limited social acceptability.

With an emphasis on sustainability and competitiveness, the EMFAF aligns with broader EU strategic goals like the Green Deal and the Farm to Fork Strategy. The Fund's focus on environmentally friendly practices and market competitiveness is crucial for the long-term viability and resilience of the EU's fisheries and aquaculture sectors. Yet, the EMFAF's objectives are sometimes at odds with other EU policies. For instance, the EU trade policy does not always promote a level playing field for EU-produced seafood versus imports, and environmental regulations can conflict with food production goals.

Finally, there is a need for better monitoring and evaluation mechanisms to assess the impact of the EMFAF, including establishing sustainability and welfare indicators. For the Advisory Councils, this is crucial for ensuring that the Fund's objectives are met effectively.

How has the EMFAF made a difference and to whom?

For the two Advisory Councils, the EMFAF has made a difference to the EU's fisheries and aquaculture sectors in several key ways. It has made a notable difference by providing greater flexibility and responsiveness compared with previous funds, benefiting various stakeholders from managing authorities to small-scale operators. The EMFAF includes provisions for quickly mobilising funds to mitigate the impacts of crises, enhancing the sector's resilience. This has provided crucial support to businesses facing unexpected disruptions, helping them to maintain operations and livelihoods during difficult times. In addition, SMEs can benefit from measures to improve competitiveness and resilience. Yet, the practical impact is limited by administrative barriers and access issues in some regions. Addressing these issues is essential for the EMFAF to maximise its positive impact across the EU's fisheries and aquaculture sectors.

Is the EMFAF still relevant?

Based on the two Advisory Councils' feedback, the EMFAF remains relevant due to its increased flexibility, crisis response capabilities, and support for sustainable and competitive practices.

The EMFAF's structure allows Member States to design and activate measures that align with their specific needs, providing greater flexibility compared with the EMFF. This flexibility is intended to help Member States tailor their interventions more closely to local conditions and priorities, potentially leading to more effective and relevant use of the Fund. For example, regions with unique environmental or economic challenges can create bespoke solutions without being restricted to a predefined list of eligible measures. So, although progress is yet to be fully assessed, the intent is to address the needs of various target groups.

The EMFAF includes provisions for addressing crises, such as the impacts of COVID-19 and energy crises, by allowing for the mobilisation of funds to support the resilience of the fisheries sector. This ability to respond flexibly to crises represents a significant improvement over previous funding mechanisms.

While there are challenges, they highlight areas for improvement rather than detracting from the fund's overall relevance. By addressing these challenges, the EMFAF can continue to play a vital role in supporting the EU's fisheries and aquaculture sectors.

Interviews with key stakeholders at the European level: The results presented below are based on interviews with key EU-level stakeholders. As a reminder, the study team carried out 14 interviews with 26 key stakeholders at the European level, including representatives from DG MARE, DG ENV, and FAMENET, as well as interest groups (social partners and one environmental NGO) and fisheries and aquaculture experts.

To what extent has the EMFAF been successful and why?

There was consensus among the European-level interviewees that the EMFAF has benefited from lessons from the EMFF. The transition towards a more flexible funding architecture was viewed positively. The delivery system has also improved in terms of clarity of roles, coordination, and planning, particularly in direct management.

The governance structure of the EMFAF has had varying impacts on the actual use of the Fund across Member States. Some struggled more with implementation, possibly due to administrative burdens and differing Fund-use priorities. Factors that facilitated successful EMFAF use include increased levels of expertise, adherence to best practices, geopolitical developments, and dedicated administrative assistance provided by DG MARE/CINEA.

While in terms of working methods, direct expenditure under the EMFAF mirrors that of the EMFF, Member States increased flexibility in the delivery of their national programmes under shared management, reportedly supporting greater creativity. The EMFAF prioritises performance and results, allowing Member States the freedom to determine how to achieve specified goals, whereas the EMFF was more prescriptive. Interviewees considered that efforts were underway to facilitate collaboration and the expansion of successful initiatives, including collaboration with other EU funding, like the EIB Blue Invest platform. Successful collaborations included presentations at expert group meetings and collaboration with other EU programmes like Horizon and LIFE. Additionally, interviewees (in CINEA and DG MARE) acknowledged incorporating references to biodiversity and climate change within the EMFAF as a significant advancement, contributing to accomplishments in these areas and bolstering the EU's reputation.

In addition, interviewees considered EMFAF projects under direct management to be highly visible, which, in turn, significantly contributed to CINEA's visibility. Communication initiatives were reported to address citizen concerns and proactively communicate across social media platforms like Facebook, Instagram, LinkedIn, and YouTube. This digital-focused approach reflects the EMFAF's commitment to adaptability and reaching wider audiences effectively. Despite challenges like language barriers, efforts are underway to ensure effective communication and dissemination of EMFAF opportunities. Collaboration with other DGs offers further avenues to enhance the visibility and awareness of EMFAF initiatives.

Despite these positive aspects, there were areas for improvement. Notably, interviewees suggested greater transparency and stakeholder involvement in project selection processes are needed to ensure that sustainability criteria are adequately applied, particularly in the aquaculture sector. Challenges include difficulty obtaining information and implementation complexity, particularly regarding (in)direct management. Despite EMFAF's crucial adaptability following crises like COVID-19, the Fund also needs provisions to address specific challenges, such as terminated fishery agreements. According to interviewees, barriers to the EMFAF's success included external dynamics, technological limitations (e.g. for selectivity or decarbonisation), funding constraints, and conditionalities (e.g. capacity ceilings and license definitions (GT, kW)) preventing the construction of larger vessels and may disincentive fishing companies to seek EMFAF support.

Other areas for improvement mentioned by key stakeholders at the European level to enhance EMFAF's effectiveness were as follows:

- EMFAF should enhance transparency and consistency in addressing sustainability concerns. While the legal framework outlines sustainability goals, there is a need for more precise guidelines on how these goals are applied and projects selected, ensuring more active involvement of Member States in sustainability initiatives.
- Regarding control and enforcement, effective communication channels between managing authorities and control authorities were highlighted as crucial for appropriate Fund utilisation. According to EU stakeholders from the Commission and interest groups, increased simplification and more apparent roles and responsibilities could enhance the EMFAF's effectiveness in supporting fisheries control efforts.
- Emphasis on reshaping mindsets to prioritise SDG 14-related work and fortify the EU's credibility in international governance.
- Enhancing departmental collaboration, delegating measures regionally, addressing marine litter, navigating political dynamics, and maintaining focus on economic and social aspects.

Different viewpoints emerged regarding the proportionality of costs. To address concerns, a review of fund allocation was reported to be crucial to ensure effective resource utilisation, support for fishers, and improved access to funds for eligible categories. Additionally, consideration should be given to incorporating costs related to public awareness efforts, provided they align with programme objectives. programme

In the past, Member States were obligated to submit annual expenditure reports on data collection for validation before receiving final payments from the Commission. However, this requirement was eliminated under the EMFAF as a simplification measure. Nevertheless, some Member States continue to request Commission validation before payment. In contrast, others consider report submission satisfactory for payment processing, showing that there is a bit of a learning curve involved in adjusting and realising the benefits of simplification.

The EMFAF efficiently prioritised climate adaptation and introduced flexibility to address climate-related challenges. The simplification from the EMFF was viewed as a major improvement, and its adaptable response to recent crises demonstrated its effectiveness. However, the focus on financing fisheries control could have been more extensive, with many

findings being incidental. Recommendations included periodic reviews to ensure efficient crisis responses and improved transparency in the allocation of fisheries control funding.

Multiannual work programmes and better coordination within DG MARE have reportedly enhanced implementation efficiency. Planning and monitoring were also said to have improved with the transition to an IT-based grant management system, and a centralised database facilitates information sharing and helps prevent fraud or double funding.

Interviewees confirmed that the EMFAF was able to support various EU policies and the European Green Deal to some extent. For instance, direct investments in community development initiatives promoted social cohesion and economic well-being in line with EU policy priorities. Digitalisation projects like marine observation and data collection were also said to support EU environmental goals. However, concerns arose about funding adequacy for new objectives and evolving policy obligations. While the EMFAF aligns on paper with policies such as decarbonisation and biodiversity, some stakeholders (DG ENV and WWF) highlighted that more scrutiny was needed for implementation and funding. For them, despite theoretical alignment with policies like the CFP, practical challenges still need to be addressed, especially in funding for research and data collection. Specific policies, such as those concerning decarbonisation and biodiversity, occasionally extend beyond the scope of the EMFAF objectives, leading to possible coordination and resource allocation challenges.

Interviewees confirmed that the EMFAF fully supports the CFP and strongly focuses on sustainability. Environmental concerns were well integrated into the design of the Fund, aiming to avoid harm to the environment. There has been a shift towards a sustainable economy narrative, moving away from purely growth-focused approaches.

How has the EMFAF made a difference and to whom?

According to those consulted. The EMFAF brings significant added value compared to national-level actions, particularly in facilitating cross-border cooperation on maritime spatial planning and addressing sector-specific needs like aquaculture. European funding has established permanent structures and platforms for collaboration among Member States, fostering networking and sharing of best practices. Initiatives like FLAGS and FAMENET have further diversified local tourism and support activities like seaweed cultivation. Additionally, the EMFAF promoted collaboration on aspects requiring common intervention or policy development at the EU level, ensuring a level playing field and addressing international aspects beyond the scope of individual Member States. Overall, interviewees explained that the EMFAF filled a niche by providing essential funding for initiatives that would otherwise see limited action at the national level, thereby promoting collaboration, innovation, and policy development on a European scale.

In particular, interviewees highlighted that the EMFAF's emphasis on cross-border cooperation and technology innovation enhances its European dimension, fostering impactful solutions at a European level.

Is the intervention still relevant?

According to interviewees, the objectives of EMFAF remain relevant.

More specifically, the EMFAF was seen to prioritise climate adaptation, which is crucial for tackling climate challenges. Its design reportedly allows flexible resource allocation for

adaptation needs. However, practical adaptability was reported to be key, especially during crises like COVID-19 or geopolitical events. While EMFAF showed flexibility in some cases, like responding to crises, in its present form, it needs to catch up in others, such as compensating fleets affected by terminated fishery agreements. This was viewed by specific stakeholders as problematic, even if it was a clear design choice.

The EMFAF's specific objectives appeared highly relevant to current EU priorities, particularly regarding international aspects like Regional Fisheries Management Organisations (RFMOs). The focus on sustainability, scientific research, and capacity building aligns with the EU's commitment to responsible global fisheries management. Examples such as the work of the North East Atlantic Fisheries Commission (NEAFC) and the Great Bluefin Year Programme demonstrated concrete efforts that contributed to achieving these objectives.

The interest groups consulted indicated that the current support provided by EMFAF may not adequately address the needs of all target groups. While the programmes target small fishers and vessels under 24m, barriers prevented certain groups, such as small fishers and women, from accessing the funds effectively. Capacity building, broadening the target group criteria, strengthening women's networks, and addressing training and gender issues were reported to be essential to ensure that EMFAF support effectively reaches all intended beneficiaries. Indeed, one interviewee representing an interest group expressed concerns that most of the funds are being allocated towards technical assistance for managing the funds instead of directly helping fishers with their applications.

COMPLEMENTARY INTERVIEWS AT THE NATIONAL AND LOCAL LEVEL:

To what extent has the EMFAF been successful and why?

The interviewed intermediate bodies agreed that there is an enhanced simplification of both the programme and the delivery system. This simplification resulted from the learning process of the managing authorities and the flexibility provided by the legal framework in some specific topics (eligibility criteria for small vessels or the simplification for projects involving different dimensions). Specific examples of structural changes within Member States were also mentioned during interviews, as these are expected to deliver positive impacts in the future. For instance, in France, the management of biodiversity-related operations was delegated to regional intermediate bodies, allowing the implementation of local projects.

Even though the current programming phase benefitted from lessons learned from previous periods, feedback gathered suggested that several lessons learned still need to be implemented. This is because they emerged towards the end of the previous programming period, leaving little time for their integration into the current programming period.

Even though there is a consensus on the simplification of the delivery system during the current programming period, interviewed intermediate bodies highlighted an increased administrative burden due to the multiplication of verification steps and the growing volume of administrative work. This burden has been particularly challenging for smaller beneficiaries, though without preventing them from applying for the funds.

Regarding the state of play and the programme's implementation, all the intermediate bodies interviewed mentioned delays in the instruction. The majority of the projects are still in the instruction phase; few have been committed, and some payments have been made.

Some beneficiaries interviewed highlighted the new programme's greater flexibility and, thus, adaptability. However, several beneficiaries highlighted important delays, posing potential challenges for smaller beneficiaries.

How has the EMFAF made a difference and to whom?

When asked about the potential impact of withdrawing the EMFAF, responses varied by region. Beneficiaries in the outermost regions indicated they would no longer be competitive, as the cost of complying with EU norms is significant. Research institutes stated that they would seek alternative funding sources, but some projects (e.g., those providing scientific advice) would stop, as the EMFAF is their primary source of support. Beneficiaries in the production sector mentioned that they would continue their activities but would need to increase production to maintain profitability without EMFAF support. This could lead to reduced quality, poorer working conditions, and decreased sustainability.

Some beneficiaries also expressed concerns that implementation delays might result in a lower committed budget than anticipated, potentially leading to reduced budget allocations for the next programming period.

Is the intervention still relevant?

Beneficiaries estimated that the EMFAF addressed the needs of the sector to a great extent. However, some concerns were raised concerning inflexible criteria, which have led to excluding some projects from the EMFAF support, such as investments for new fishing vessels and some research projects.

AD HOC CONTRIBUTIONS

An *ad hoc* contribution outside the formal consultation context was received by the study team. A Latvian fisher expressed his views by email to the study team. It was indicated that fishers' primary need is to buy new boats and equipment, but the regulations are different in all Member States. In some cases, receiving EMFAF funding requires profits to increase significantly, or fishers must give the money back, while in other Member States, they give them some years to grow. So, there is a need for local governments to listen to fishers more, as fishing is an uncertain sector.

VALIDATION WORKSHOP

The validation workshop brought together 54 participants, including the study team, representatives from DG MARE, Advisory Councils, and managing authorities.

The workshop's objective was to validate the initial key findings, complement consultation activities and address any remaining gaps in the analysis. Notably, the discussions during the workshop enabled the team to do precisely this: confirm with those present that there were no significant gaps, misunderstandings, or disagreements with the draft findings. The workshop allowed the team to develop the specific aspects in more detail, with specific examples or explanations of experiences with the Fund, for instance, elaborating the reasons for the delayed start (which were indeed linked to COVID-19 but also reflected experiences across other funding periods) and to hear priorities for the future. Based on a preparatory survey, the focus of the validation workshop was determined to be efficiency and efficiency.

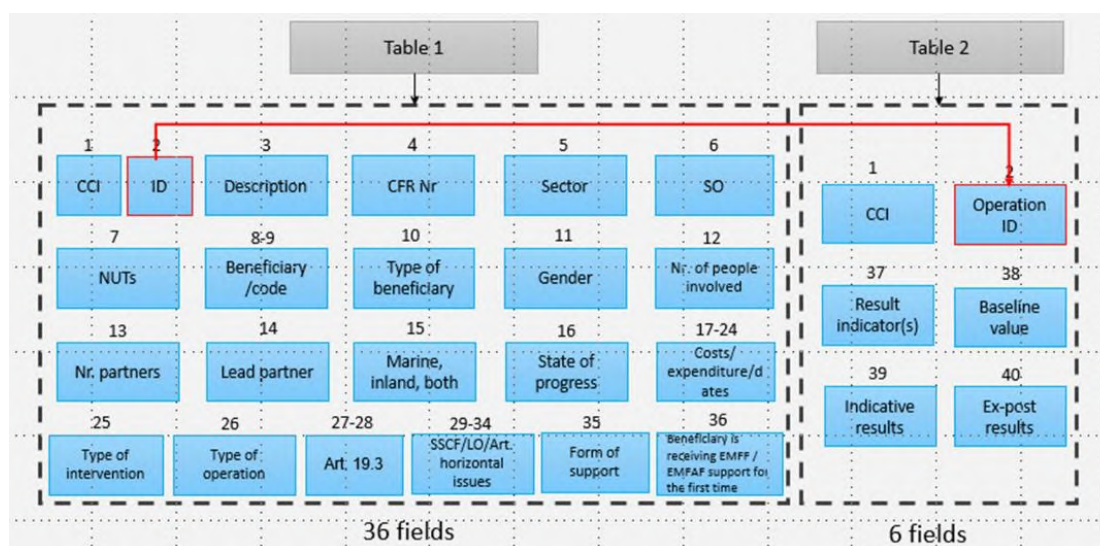
11. ANNEX VI. INFOSYS DATABASE

What is ‘Infosys’ and how does it work?

Infosys is a database of all operations selected and implemented under the EMFAF, in fulfilment of Article 46 of the EMFAF regulation. It covers all operations, both under Shared Management and Direct/Indirect Management (implemented by DG MARE and related agencies). **It is a powerful and valuable database with constantly quality-checked and readily-available data that can be used for information and evaluation purposes.**

The exact data to be gathered and reported for every operation in Infosys are defined in Commission Implementing Regulation 2022/79⁷² and include operation and beneficiary characteristics, financial data, contribution of an operation towards specific horizontal/policy goals (such as gender-equality), type of intervention and common result indicators capturing the effects of operations. Infosys data are generated by EMFAF beneficiaries and reported to national Managing Authorities, who then compile and formally submit their national EMFAF operation data to the European Commission twice per year.

Figure 18: Infosys data base system



- table 1 has 36 fields – focus on information about operations
- table 2 has six fields – focus on result indicators

Source: FAMENET 2024

⁷² Commission Implementing Regulation (EU) 2022/79 of 19 January 2022 laying down rules for the application of Regulation (EU) 2021/1139 of the European Parliament and of the Council as regards the recording, transmission and presentation of operation-level implementation data.

The Commission has developed an operational methodology in linking the EMFAF objectives to the CFP objectives, and when Member States are reporting on the EMFAF objectives, to show how they also contribute to the CFP objectives ⁷³. Table 4 illustrates how EMFAF support, expenditure and number of operations are distributed per CFP objectives.

Table16: EMFAF contribution to the CFP objectives– (in)direct and shared management

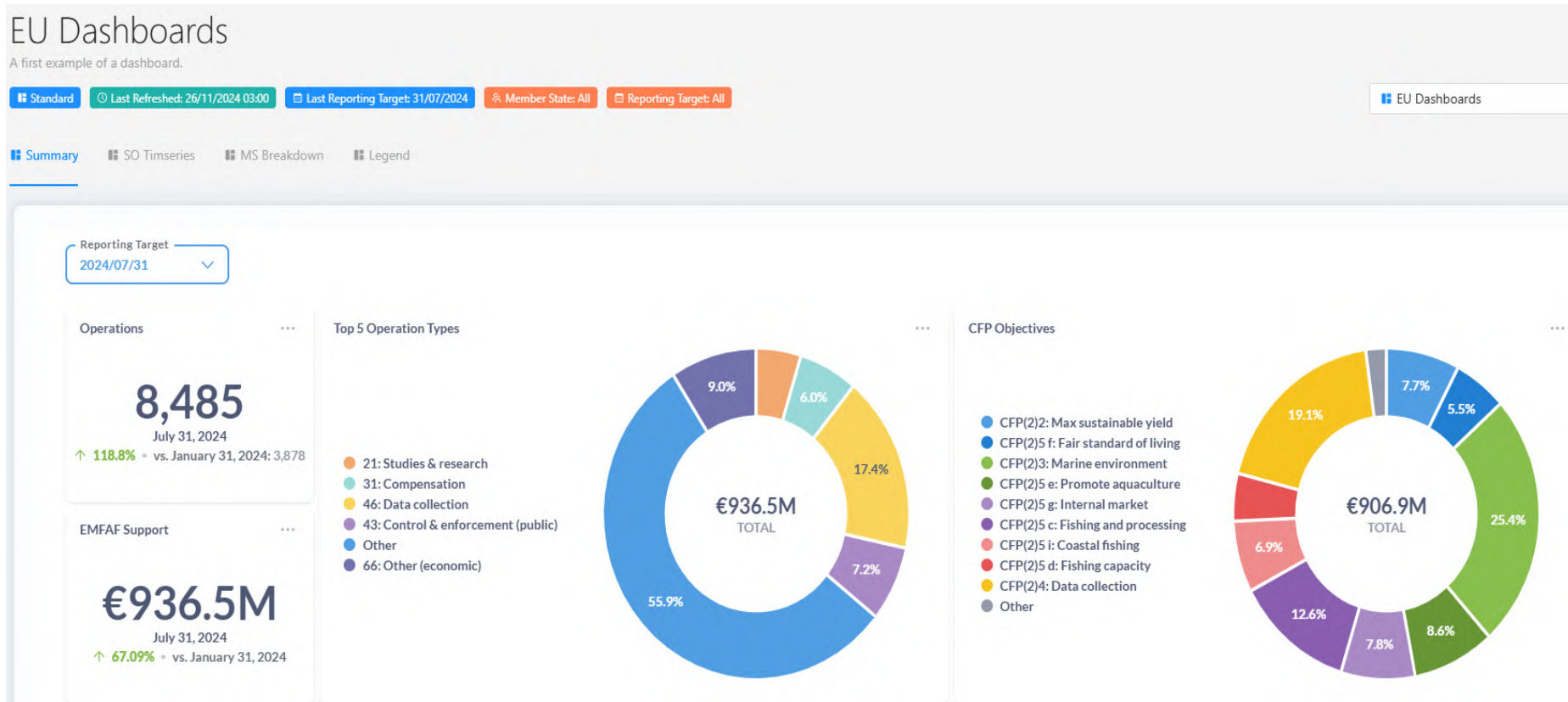
CFP objective	EMFAF support Infosys 31.12.2023 (EUR)	EMFAF expenditure Infosys 31.12.2023 (EUR)	Number of operations
Art. 2(2) CFP Reg. Ensure that exploitation of living marine biological resources restores and maintains populations of harvested species above levels which can produce the maximum sustainable yield	39 407 649	17 975 197	682
Art. 2(3) CFP Reg. Ensure that negative impacts of fishing activities on the marine ecosystem are minimised and ensure that aquaculture and fisheries activities avoid the degradation of the marine environment	164 826 932	59 691 684	949
Art. 2(4) CFP Reg. Collection of scientific data	126 806 424	11 663 111	30
Art. 2(5)(a,b) CFP Reg. Gradually eliminate discards, by avoiding and reducing unwanted catches, and by gradually ensuring that catches are landed; where necessary, make the best use of unwanted catches	180 244	32 922	10
Art. 2(5)(c) CFP Reg. Provide conditions for economically viable and competitive fishing capture and processing industry and land-based fishing-related activity	78 534 029	12 337 640	362
Art. 2(5)(d) CFP Reg. Adjust the fishing capacity of the fleets according to fishing opportunities			

⁷³ The methodology comprises a combination of:

- Specific Objective (Infosys field 06)
- Type of Intervention (Infosys field 25)
- In few cases - also Type of operation (Infosys field 26)
- All possible combinations of fields 06 and 25 are created
- In total 165 combination for shared management and 23 for direct management
- Each combination is linked to a CFP objective

CFP objective	EMFAF support Infosys 31.12.2023 (EUR)	EMFAF expenditure Infosys 31.12.2023 (EUR)	Number of operations
Art. 2(5)(e) CFP Reg. Promote the development of sustainable aquaculture activities to contribute to food supplies and security and employment	31 723 448	4 663 631	525
Art. 2(5)(f) CFP Reg. Contribute to a fair standard of living for those who depend on fishing activities	10 634 193	4 009 927	535
Art. 2(5)(g) CFP Reg. Contribute to an efficient and transparent internal market for fisheries and aquaculture	40 970 514	12 765 329	549
Art. 2(5)(h) CFP Reg. Take into account the interests of both consumers and producers	3 831 623	1 316 994	33
Art. 2(5)(i) CFP Reg. Promote coastal fishing activities, taking into account socioeconomic aspects	40 806 437	555 667	168
Total²³	537 721 494	125 012 102	3 843

Figure 19: EU dashboard



Source: European Commission 2024

12. ANNEX VII. EMFAM INTERVENTION LOGIC AND THE MEF

Figure 20: Intervention Logic EMFAF

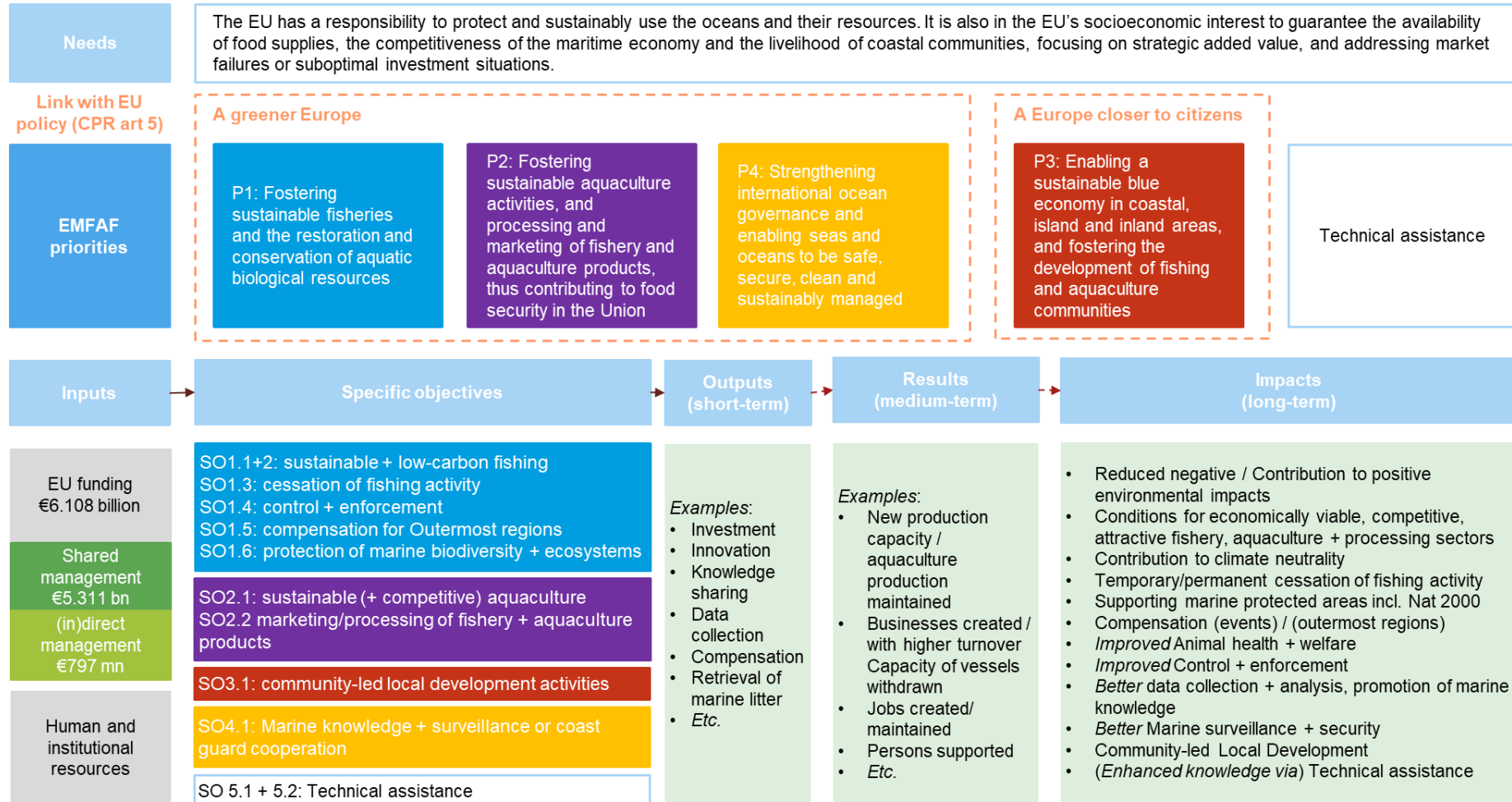


Figure 21: Intervention Logic for Priority 1

Specific objectives	Areas of support	Outputs	Results	Impacts
SO1.1: strengthening economically, socially and environmentally sustainable fishing activities	<ul style="list-style-type: none"> All eligible actions contributing to SO (Art 13) 1st acquisition fishing vessel (Art 17) Investments in vessels to imp safety working conditions / energy efficiency (Art 19) 	<ul style="list-style-type: none"> Investments to support business development (strategy, admin, equipment) Investments in working conditions Knowledge sharing 1st acquisition of fishing vessel 	<ul style="list-style-type: none"> New production capacity Contribution to a GES Persons (workers) supported + jobs created Businesses grow 	<p><i>Contribution to GES + conditions for economically viable, competitive, attractive fishery, aquaculture + processing sectors</i></p>
SO1.2: increasing energy efficiency + reducing CO ₂ emissions	<ul style="list-style-type: none"> Replacement / modernisation of a main / ancillary engine (Art 18) 	<ul style="list-style-type: none"> Investment in reduction of energy use and energy efficiency 	<ul style="list-style-type: none"> Reduced CO₂ emissions 	<p><i>Contribution to climate neutrality</i></p>
SO1.3: promoting the adjustment of fishing capacity to fishing opportunities in cases of permanent cessation of fishing activities	<ul style="list-style-type: none"> Permanent cessation of fishing activities (Art 20) Temporary cessation of fishing activities (Art 21) 	<ul style="list-style-type: none"> Permanent cessation of fishing activities Temporary cessation of fishing activities 	<ul style="list-style-type: none"> Vessels (+capacity) withdrawn Persons impacted compensated 	<p><i>Contribution to adjustment of fishing capacity to fishing opportunities</i></p>
SO1.4: fostering efficient fisheries control + enforcement, incl. fighting IUU + reliable data for knowledge-based decision-making	<ul style="list-style-type: none"> Control + enforcement (Art 22) Collection, management, use + processing of fisheries sector data + R+I programmes (Art 23) 	<ul style="list-style-type: none"> Investments in control + enforcement (public authorities +private business) Data collection enabled Investments in IT development + maintainance 	<ul style="list-style-type: none"> Improved control (control means installed / improved + the improvement of governance capacity) Knowledge creation (more effective collection + management + use of data, datasets + advice made available) 	<p><i>Fostering of efficient fisheries control + enforcement as well as knowledge-based decision making</i></p>
SO1.5: contributing to a level playing field for fishery + aquaculture products (outermost regions)	<ul style="list-style-type: none"> Promoting level playing field in outermost regions (Art 24) 	<ul style="list-style-type: none"> Compensation of additional costs delivered 	<ul style="list-style-type: none"> Additional costs borne by the sector due to natural and structural handicaps of outermost regions offset 	<p><i>Contribution to a level playing field in outermost regions</i></p>
SO1.6: contributing to the protection of marine biodiversity + ecosystems	<ul style="list-style-type: none"> Protection, restoration of aquatic biodiversity + ecosystems (Art 25), incl. marine litter + Nat 2000 	<ul style="list-style-type: none"> Retrieval / disposal of marine litter Support rivers' ecological continuity Gear selectivity to reduce unwanted catches 	<ul style="list-style-type: none"> More actions / areas contributing to GES, protecting, conserving + restoring biodiversity + ecosystems 	<p><i>Contribution to the protection of marine biodiversity + ecosystems</i></p>

Figure 22: Intervention Logic for Priorities 2, 3 and 4

Specific objectives	Areas of support	Outputs	Results	Impacts
SO2.1: Promoting sustainable aquaculture activities, especially strengthening the competitiveness of aquaculture production, while ensuring that the activities are environmentally sustainable in the long term	Aquaculture activities (in line with multiannual strategic plans) (Art. 27)	<ul style="list-style-type: none"> • Productive investments for sustainable aquaculture • Investments to support business development (i.e. improve the image / competitiveness of farmed products) • Compensation (critical land + nature management services) • Investment in renewable energy systems • Knowledge sharing 	<ul style="list-style-type: none"> • New production capacity • Persons working in sector benefit + jobs created • Contribution to good environmental status (actions) • Entities improving resource efficiency 	<i>Contribution to sustainable + competitive aquaculture sector</i>
SO2.2: Promoting marketing, quality and added value of fishery and aquaculture products, as well as processing of those products	Fishery and aquaculture sector (production, processing, marketing, retail) (Art. 28)	<ul style="list-style-type: none"> • Structuring of the market – for example, SSCF creating/integrating POs, aqua farmers setting up POs • Preparation + implementation of production + marketing plans by POs • Food quality + hygiene safety • Investments to support business development • Compensation (in case the crisis mechanism is triggered) 	<ul style="list-style-type: none"> • More Member States with POs • More concentrated and profitable aquaculture sector • Improved channelling of the production to the market • Entities benefit • Persons working in sector benefit + jobs created 	<p><i>Increase in the share of production placed on the market by PO members</i></p> <p><i>Crisis effects absorbed</i></p>
SO3: Enabling a sustainable blue economy in coastal, island and inland areas, and fostering the sustainable development of fishing and aquaculture communities	CLLD activities (cf. CPR Art.31)	<ul style="list-style-type: none"> • Events • Restoring ecological continuity of rivers • Studies and research • Preparatory actions 	<ul style="list-style-type: none"> • Persons (in local communities) benefit • Governance capacity strengthened • Stakeholder cooperation stimulated and strengthened 	<i>A more sustainable blue economy + fishing + aquaculture community</i>
SO4: Strengthening sustainable sea and ocean management through the promotion of marine knowledge, maritime surveillance or coast guard cooperation	<ul style="list-style-type: none"> • Marine knowledge (including EMODnet) • Maritime surveillance (CISE) • Coast guard cooperation 	<ul style="list-style-type: none"> • Data collection and scientific studies on marine ecosystems • Resources for improving maritime surveillance and sharing of information 	<ul style="list-style-type: none"> • Improved knowledge supporting implementation of EU legislation relevant for protecting the marine environment • Enhanced tools + mechanisms for maritime surveillance 	<i>Knowledge-based management of the marine environment</i>

Source: Supporting study carried out by the consortium formed by Tetra tech, 2024

REPORTING FRAMEWORK ON THE IMPLEMENTATION OF THE PROGRAMMES

The Monitoring and Evaluation Framework (MEF) 2021-2027 has three types of common indicators: output indicators, result and core performance indicators.

The EMFAF has only one type of **output indicator**: “number of operations”. Output indicators aim to measure output produced with EMFAF support. Member States define the target value for the number of operations for each specific objective in the EMFAF programme. That is the sum of all operations to be implemented for that specific objective (reported at MS level).

There can be no specific objective in a programme without at least one common result indicator (CR) out of the 22. Each operation has to be linked to a minimum of one suitable indicator with a defined baseline and target value. The indicators aim to demonstrate the gross effect⁷⁴ of the EMFAF programme and are common to all Member States (reported at MS level). For each operation receiving EMFAF support Member States report via Infosys a value for at least one CR that succinctly captures the intended effects of the operation. Only CRs relevant to the specific operation are reported, while Member States are encouraged to select as many CRs as necessary to ensure that the various results of the operation are adequately captured.

The MEF also includes predefined 12 core performance indicators for EMFAF reporting which are used in compliance with the Commission’s reporting requirement pursuant to Article 41(3)(h)(iii) of Regulation (EU) No 2018/1046 (Financial Regulation)⁷⁵ (reported at Commission level).

Member States report each operation via Infosys twice a year. The Infosys report contains structured data as defined in the EMFAF implementing regulation 2022/79⁷⁶. This regulation provides for consistent and comparable data at the level of the single operation. For example, the indicator “jobs created” can be expanded to be for example “jobs created in aquaculture through energy efficiency investments in SMEs in remote areas” as needed. This is done in a fully consistent and comparable way through all Member States and allows for the extraction of conclusions.

⁷⁴ Gross means that the indicator captures for example the number of jobs created at a company receiving a grant, without considering external influences. However, jobs created might not be entirely thanks to the grant, other factors (for example market growth) can contribute too.

⁷⁵ Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012.

⁷⁶ Commission Implementing Regulation (EU) 2022/79 of 19 January 2022 laying down rules for the application of Regulation (EU) 2021/1139 of the European Parliament and of the Council as regards the recording, transmission and presentation of operation-level implementation data.

Table 17: EMFAF common result indicators

Code	Description	Measurement unit
CR01	New production capacity	tonnes/annum
CR02	Aquaculture production maintained	tonnes/annum
CR03	Businesses created	number of entities
CR04	Businesses with higher turnover	number of entities
CR05.1	Capacity of vessels withdrawn	GT
CR05.2	Capacity of vessels withdrawn	kW
CR06	Jobs created	number of persons
CR07	Jobs maintained	number of persons
CR08	Persons benefitting	number of persons
CR09.1	Area addressed by operations contributing to a good environmental status, protecting, conserving, and restoring biodiversity and ecosystems	km ²
CR09.2	Area addressed by operations contributing to a good environmental status, protecting, conserving, and restoring biodiversity and ecosystems	km
CR10	Actions contributing to a good environmental status, including nature restoration, conservation, protection of ecosystems, biodiversity, animal health and welfare	number of actions
CR11	Entities increasing social sustainability	number of entities
CR12	Effectiveness of the system for "collection, management and use of data"	scale: high, medium, low
CR13	Cooperation activities between stakeholders	number of actions
CR14	Innovations enabled	number of new products, services, processes, business models or methods
CR15	Control means installed or improved	number of means
CR16	Entities benefitting from promotion and information activities	number of entities
CR17	Entities improving resource efficiency in production and/or processing	number of entities
CR18.1	Energy consumption leading to CO ₂ emissions reduction	kWh/tonne
CR18.2	Energy consumption leading to CO ₂ emissions reduction	litres/h
CR19	Actions to improve governance capacity	number of actions
CR20	Investment induced	EUR
CR21	Datasets and advice made available	number
CR22	Usage of data and information platforms	number of page views

Source: The Commission publishes data on the implementation of Member States' programmes using the data reported by the Member States.

13. ANNEX VIII. RESPONSE TO THE REGULATORY SCRUTINY BOARD

RSB	Common result indicators/Infosys
1) Policy context	
<p>The European Maritime, Fisheries and Aquaculture Fund (EMFAF) is a successor to long-standing fisheries support programmes in previous programming periods, to enable a sustainable blue economy, the conservation of marine resources and the supply of aquatic food products.</p> <p>Under the multiannual financial framework 2021-2027, EMFAF is implemented mainly (EUR 5.31 billion) under shared management in partnership between the Commission and Member States, and to a lesser extent (EUR 0.79 billion) under direct or indirect management by the Commission.</p> <p>The mid-term evaluation covers the period from 2021 until early 2024 and is a legal requirement of the Common Provisions Regulation (EU) 2021/1060 and of the EMFAF Regulation (EU) 2021/1139. The purpose of the evaluation is to inform the design of future EU instruments in this policy area, as well as to identify lessons learned to improve implementation in the current period.</p>	No action needed
2) Key issues	
<p>The objectives are not operationalised and measurable to assess expected achievements. The methodological approach does not demonstrate the causal links between inputs and the achievement of objectives.</p>	Section 2.1
<p>On effectiveness, the definition and presentation of outputs is not comprehensive, in particular in terms of activities supported</p>	
<p>In the assessment of efficiency, the report does not sufficiently demonstrate how the increase of administrative costs is consistent with the simplification objective.</p>	Included in p. 36
<p>The analysis on relevance does not consider emerging needs and current political priorities, especially on competitiveness.</p>	Included throughout the document
(C) What to improve	
<p>(1) The objectives should be clearly defined and operationalised in SMART terms to enable an informed assessment and measurement of the expected outcomes and achievements.</p>	Answered with the section: Approach to overcome the current limitations on section 2.2

<p>The report needs to clearly define points of comparison and what would be considered a successful outcome of the intervention. If objectives are further specified through decisions made on the national level the report needs to compile and analyse evidence demonstrating how the objectives have been operationalised through such national decisions, and what the expected outcomes could be /said to be/ on aggregate level.</p>	<p>Revision of the section 2.2. Summary of the impact assessment and reference to the Performance indicators in Annex I of the EMFAF regulation.</p>
<p>A similar analysis should be provided regarding the societal needs that are to be identified through a SWOT analysis.</p>	<p>Description in section 2.1 of how the EMFAF was developed by MS using SWOT.</p>
<p>The report should present a comprehensive narrative of how the intervention was expected to work, what it was planned to achieve and the causal links between problems, needs, inputs, outputs, results and impacts. There should be a clear link from the baseline to the achievement of the objectives through the EMFAF.</p>	<p>The intervention logic is described in section 2.1</p>
<p>The report should identify any data gaps, including data needed for counterfactual analyses, and where relevant draw lessons for monitoring and evaluation arrangements in order to allow for causal attribution of impacts in the final evaluation</p>	<p>Described under 2.2</p>
<p>(2) To better assess effectiveness and efficiency the report needs to provide additional information beyond budget deployment, and views of stakeholders, as indicators of achievements.</p>	<p>Stakeholder involvement is described in the methodology section 1.3 and throughout the report.</p>
<p>When operations are used as output indicators they need to be defined in specific and measurable terms.</p>	<p>The little information available has been provided in quantitative tables in section 3.1 and 4.1.</p>
<p>Thereafter, the number, frequency and relative importance of such operations need to be stated in the report, for example, in the form of quantitative tables or diagrams. In addition to reporting operations, it should be clear if and what kind of other activities or outputs have possibly been generated.</p>	<p>Due to the lack of data the number and frequency and relative importance cannot be determined at the state of the MTE.</p>
<p>The report should assess whether and why it can be assumed that the funds have been allocated to the highest value activities.</p>	<p>To be addressed in the retrospective evaluation</p>
<p>3) The report should present a more thorough analysis of the simplification objective and the seemingly contrasting increase of administrative costs, explaining why the latter is deemed reasonable. This analysis should go beyond restating the opinions reported from stakeholders and take into account Commission policies regarding reduction of administrative costs.</p> <p>The analysis also needs to demonstrate how such costs will be distributed among different categories of stakeholders</p>	<p>Section 4.1 Section 5.1</p>

<p>(4) The report should include an improved analysis of relevance. It should better cover competitiveness both as part of the objectives stated in the underlying regulation and emerging needs and priorities. The analysis should also reflect on the relative allocation of resources and the effects of the funding on competitiveness.</p>	<p>Section 4.3</p>
<p>(5) The report should present the views of different stakeholder groups, including beneficiaries, unsuccessful applicants, businesses, civil society and other stakeholders external to the Fund governance.</p>	<p>Stakeholder views have been covered throughout the SWD</p>
<p>(6) Any conclusions or lessons learned in the report need to be fully supported by evidence and analysis, or else omitted.</p>	<p>Revision of the conclusions based on the changes made throughout the report.</p>