



NETWORK INSULAR CHAMBERS OF COMMERCE OF THE EUROPEAN UNION

Feedback on the Call for Evidence for the initiative "Training and certification standards for fishers on EU vessels"

- Formal Written Submission on Behalf of INSULEUR (Network of Insular Chambers of Commerce of the EU) -

To: European Commission – Directorate-General for Maritime Affairs and Fisheries (DG MARE)

Date: October 16th, 2026

1. Introduction and General Position

The Insular Chambers of Commerce and Industry of the EU (**INSULEUR**) represent the interests of businesses and local economies across European islands, where fishing constitutes a historical, economic, and social pillar.

We welcome the European Commission's objective to improve safety at sea, enhance the attractiveness of the sector, and facilitate worker mobility. Fishing remains one of the most hazardous occupations in the EU, and the need for adequate training is indisputable.

However, we express our **deep concern** regarding the way the proposed regulations, particularly the blanket incorporation of the International Maritime Organization's STCW-F Convention—may disproportionately affect fishers on islands, especially in remote and outermost regions.

2. The Insular Particularities of the Fishing Sector

Fishing on European islands is characterized almost exclusively by **small-scale coastal fisheries (SSCF)**, utilizing vessels under 12 or 24 meters in length. Insular fishers face permanent geographical and structural disadvantages:

- **Lack of local training infrastructure:** Most islands lack specialized maritime or fisheries academies. Mandatory attendance of courses requires traveling to the mainland.
- **High costs and lost income:** Transport and accommodation expenses, combined with days away from work (lost revenue), render traditional training economically unviable for small-scale fishers.
- **Demographic pressure and lack of generational renewal:** The sector is already suffering from an aging population. Imposing disproportionate bureaucratic and educational burdens will act as a deterrent for young entrants, accelerating the depopulation of island communities.

3. Assessment of Policy Options

INSULEUR **categorically rejects Policy Option 4** (a wider scope of application with mandatory basic training for all vessel sizes and extensions to skippers of vessels under 24 meters). This option would cause economic suffocation to the insular small-scale fleet and lead to a mass abandonment of the profession.

INSULEUR **supports Policy Option 3** (strict incorporation of the STCW-F Convention while maintaining the possibility for Member States to exempt vessels under 24 meters from basic training standards), provided that **specific insular clauses** are added. Mandatory requirements must strictly focus on the large-scale and distant-water fleets. For vessels under 24 meters, the implementation of standards should remain voluntary or be radically adapted.

4. Key Demands and Proposals by INSULEUR

To ensure a just transition that "leaves no island fisher behind", we request the inclusion of the following measures in the upcoming Directive:

- **Flexible and decentralized training methods:** Institutionalize remote learning (e-learning) options for the theoretical parts of the training. For practical modules (e.g., firefighting, first aid), we propose funding mobile training units to visit the islands periodically.
- **Full financial support:** The cost of training, travel, and compensation for lost income for insular fishers must be covered at 100% through the European Maritime, Fisheries and Aquaculture Fund (EMFAF).
- **Recognition of prior experience (Grandfathering clauses):** For currently active fishers and skippers of small vessels on islands, multi-year professional experience should be automatically recognized as equivalent to basic training, avoiding the burden of retraining from scratch.
- **Simplified standards for coastal fisheries:** Training modules for small-scale fishers must be short, practical, and tailored to the actual risks of the coastal zone, free from the administrative demands of ocean-going vessels.

5. Conclusion

The harmonization of standards must not lead to a uniformity that ignores geographical realities. Insular fishing is not just an economic activity; it is the social fabric of Europe's remote areas. We call on the European Commission to integrate an **"island proofing" approach** into the impact assessment and protect the small-scale fleet, ensuring that safety at sea will not be achieved at the expense of the survival of insular fishers.

