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COMMISSION STAFF WORKING DOCUMENT

EVALUATION

to the Protocol to the Sustainable Fisheries Partnership Agreement between the European Union, of the one part, and the Government of Greenland and the Government of the Kingdom of Denmark, of the other part

Accompagnant le document

Recommendation for a Council Decision

authorising the opening of the negotiations on behalf of the European Union for the conclusion of an Implementing Protocol to the Sustainable Fisheries Partnership Agreement between the European Union, of the one part, and the Government of Greenland and the Government of the Kingdom of Denmark, of the other part

{COM(2024) 199 final} - {SWD(2024) 129 final}

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Glossary

<i>Term or acronym</i>	<i>Definition</i>
SFPAs	Sustainable Fisheries Partnership Agreements
EU	European Union
CFP	Common Fisheries Policy
IUU fishing	Illegal, Unreported and Unregulated fishing.
JSC	Joint Scientific Committees
JSM	Joint Scientific Meetings
VMS	Vessel Monitoring System
ERS	Electronic Reporting System
FMC	Fisheries Monitoring Centre
RFMOs	Regional Fisheries Management Organisations
MCS	Monitoring, Control and Surveillance
EEZ	Exclusive Economic Zone
NAFO	North Atlantic Fisheries Organisation
NEAFC	North East Atlantic Fisheries Commission
ICES	International Council for the Exploration of the Sea
FAO	Food and Agriculture Organisation
WB	World Bank
GNB	Gross National Benefit

1. INTRODUCTION

1.1. Purpose of the evaluation

In the framework of the external dimension of the EU's Common Fishery Policy (CFP)¹, the Commission negotiates and implements Sustainable Fisheries Partnership Agreements (SFPAs) with third countries. The SFPAs create a legal, environmental economic and social governance framework for fishing activities carried out by Union fishing vessels in third country waters. In exchange, the EU provides a partner country with financial compensation for access to its waters and financial assistance to implement a national strategy for fisheries and blue economy. The EU contribution is complemented by fees payable by EU vessel owners.

According to Article 3(1)(d) and (e) of the Treaty on the Functioning of the European Union, the EU has exclusive powers on the conservation of marine biological resources under the CFP and the common commercial policy. The European Commission is therefore responsible for the negotiation and implementation of the SFPAs.

According to Article 31(10) of the CFP Basic Regulation¹, the European Commission shall arrange for independent ex-ante and ex-post evaluations for each implementing protocol to a SFPA, before it submits to the Council of the EU a recommendation to authorise the opening of negotiations for a successor protocol.

This obligation is complemented by Article 34 of the Financial Regulation², according to which Commission Services have to undertake both ex-ante and ex-post evaluations for all programmes and activities which entail significant spending and – as stated in the Commission's Better Regulation Guidelines³ - in the form of a staff working document (SWD).

Importantly, under Article 31(5) of the CFP Basic Regulation¹, Union vessels cannot fish if there is no protocol implementing an SFPA between the EU and a third country. In order for Union vessels to continue fishing under an SFPA after an implementing protocol expires, a successor protocol must be negotiated.

1.2. Scope of the evaluation

This SWD makes an ex-ante and an ex-post evaluation covering the application of the current implementing Protocol (hereinafter, the implementing Protocol) of the

¹ Regulation (EU) 1380/2013 of 11 December 2013 on the Common Fisheries Policy ([OJ L354, 28.12.2013, p. 22](#))

² 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 ([OJ L 193, 30.7.2018, p. 1](#)).

³ SWD(2021) 305 final of 3 November 2021 - [Better regulation: guidelines and toolbox \(europa.eu\)](#)

Sustainable Fisheries Partnership Agreement concluded between the EU and Greenland (hereinafter, the Agreement). These evaluations are primarily informed by an evaluation study conducted by an independent consultant⁴.

The ex-post evaluation covers most of the period of application of the current implementing Protocol of the Agreement, starting from the April 2021 to December 2023. It provides an overall assessment of the implementing Protocol, drawing conclusions in terms of its effectiveness, efficiency, relevance, coherence, acceptance, EU added value of the intervention. The detailed evaluation questions corresponding to these evaluation criteria can be found in Annex III and further addressed in section 4.

The ex-ante evaluation analyses the relevant objectives for the Agreement and its implementing protocol, considering the current and future needs for this intervention. It considers the lessons learned from previous implementing protocols and the results of the ex-post evaluation of the current implementing Protocol.

Finally, the ex-ante evaluation considers and draws conclusions on the possible impacts of the following three policy scenarios:

- A renegotiation of the current implementing Protocol for the Agreement;
- No negotiation of a successor implementing protocol for the Agreement.
- A negotiation of an improved implementing protocol for the Agreement;

1.3. Methodology of the evaluation

The results of this SWD are mainly informed by an evaluation study conducted by an independent consultant. This evaluation study took place from January to March 2024 under the guidance of an inter-service group (ISG) established by the following services of the European Commission: EEAS, DG MARE, DG SANTE, DG TRADE, DG INTPA, DG ENV and SG and within the framework of the terms of reference of specific contract number 9 under the framework contract MARE/2021/OP/0001. The methodology of this evaluation study consisted of three main components: analysis of available information, consultations, and preparation of an evaluation report.

On the analysis of available information, DG MARE provided all relevant internal documents and databases to the independent consultant. Other external documentation was also used, such as regulatory texts and reports from relevant scientific working groups.

On the consultation, the independent consultant consulted stakeholders in the EU and Greenland. EU stakeholders were consulted in February 2024. Greenland stakeholders were consulted online as the consultant did not conduct a field mission due to time constraints and weather conditions at that time of the year in Greenland. Moreover, a

⁴ Evaluation pending publication.

‘call for evidence’ document was also published in the Commissions Have Your Say Portal for feedback for the period of 11 January 2024 - 08 February 2024⁵. The document attracted 3 feedbacks⁶. See more detailed information about the stakeholder consultations in Annex V. ‘Synopsis Report’.

The evaluation study was submitted to the European Commission in 2024 and the overall level and quality of findings gathered is robust. Nevertheless, the following general elements should be highlighted:

- This SWD, and the evaluation study on which it is based, considers all information available as of December 2023. It does not consider information beyond this date because the evaluation must be finalized at least a year before the expiry date of the implementing Protocol to obtain a mandate for negotiation and subsequently negotiate a successor protocol.
- Due to the tight deadline and weather conditions in Greenland at this time of the year, the consultant has not been able to visit Greenland and carry out an evaluation mission on the ground. All relevant consultations have been carried out telematically. Despite this, the level of engagement of all stakeholders has resulted in a high-quality evaluation.

Detailed information on the methodology, including how the supporting evaluation study was conducted can be found in Annex II.

⁵ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14014-EU-Greenland-fisheries-agreement-and-protocol-way-forward_en

⁶ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14014-EU-Greenland-fisheries-agreement-and-protocol-way-forward/feedback_en?p_id=32488597

2. WHAT WAS THE EXPECTED OUTCOME OF THE INTERVENTION?

2.1 Description of the intervention and its objectives

2.1.1 Sustainable Fisheries Partnership Agreements (SFPAs)

The CFP Basic Regulation covers the conservation of marine biological resources and the management of fisheries and fleets exploiting such resources within Union waters and by Union fishing vessels outside Union waters. The first fisheries agreements between the EU and third countries date back to the late 1980s and are enshrined in the CFP. In accordance with UN Sustainable Development Goal 14 (*life below water*), the SFPAs should contribute towards resource conservation and environmental sustainability of the exploitation of living marine resources of a coastal partner state. The SFPAs should also contribute to efficient data collection; monitoring, control and surveillance measures; and the respect for democratic principles and human rights.

The SFPAs establish a legal, environmental economic and social governance framework for fishing activities carried out by Union fishing vessels in third country waters. Under the framework of the SFPAs, Union vessels shall only catch surplus of the allowable catch, as referred to in Article 62(2) and (3) of the United Nations Convention on the Law of the Sea (UNCLOS)⁷. This surplus must be identified, in a clear and transparent manner, on the basis of the best available scientific advice. In addition, in order to ensure the sustainable exploitation of surpluses of marine biological resources, the EU must endeavour to ensure that the SFPAs are mutually beneficial to the Union and to the third country concerned, including its local population and fishing industry.

In terms of financial compensation, the EU provides a partner country with financial compensation for access to its waters and financial assistance to implement a national strategy for fisheries and the blue economy. The EU contribution is complemented by fees payable by EU vessel owners.

Importantly, SFPAs are exclusive and rendered operational only through their implementing Protocols. In order for Union vessels to continue fishing under an SFPA after an implementing protocol expires, a successor protocol must be negotiated (“exclusivity clause”).

The implementation of an SFPA and its implementing protocol is monitored by a Joint Committee composed of representatives from both parties, as well as a Joint Scientific Committee composed of scientists from both parties, though in the case of the SFPA between the EU and Greenland such Joint Scientific Committee does not exist as the scientific evaluation of the stocks is conducted in the framework of the Northwest

⁷ https://www.un.org/Depts/los/convention_agreements/convention_overview_convention.htm

Atlantic Fisheries Organisation (NAFO)⁸, the North East Atlantic Fisheries Commission (NEAFC)⁹ and the International Council for the Exploration of the Sea (ICES)¹⁰.

In July 2011, the Commission adopted a Communication on the external dimension of the CFP¹¹ and proposed several actions to reform FPAs. The Council adopted Conclusions regarding the External Dimension of the CFP on 19 March 2012¹² and the European Parliament expressed its views in a report adopted in November 2012¹³.

General and specific objectives of Sustainable Fisheries Partnership Agreements

The overarching objective of the external dimension of the CFP is to promote high standards in terms of fisheries management at the international and regional levels as well as under bilateral agreements, with the aim to ensure a level playing field. General and specific objectives of SFPAs are the following:

- 1) To contribute towards resource conservation and environmental sustainability through rational and sustainable exploitation of living marine resources of the coastal state, in particular by:**
 - a. directing fisheries exclusively at surplus resources and preventing the overfishing of stocks, on the basis of the best scientific advice and reinforced transparency on the global fishing efforts in third countries' waters;
 - b. following the same principle and promoting the same standards for fisheries management as applied in EU waters;
 - c. improving the scientific and technical evaluation of the fisheries concerned (notably by improving data collection and transparency on fishing efforts); and
 - d. ensuring compliance and combating IUU fishing.
- 2) To contribute to continuing the activity of the Union fleets and the employment linked to the fleets operating within SFPAs by:**
 - a. seeking appropriate share of the surplus resources, fully commensurate with the EU fleets interests;
 - b. ensuring that the level of fees payable by Union ship-owners for their fishing activities is fair, non-discriminatory and commensurate to the benefits provided through the access conditions while avoiding any discriminatory treatment towards EU vessels and promoting a level playing field among the different fleets;
 - c. ensuring supply for the EU and for the markets of certain developing countries;
 - d. encouraging the creation of a secure environment that is favourable to private investment and economic activities; and
 - e. taking into account the specific interests of the Union's outermost regions located in the vicinity¹⁴.

⁸ <https://www.nafo.int/>

⁹ <https://www.neafc.org/>

¹⁰ <https://www.ices.dk/>

¹¹ Communication from the Commission to the European parliament, the Council, the Economic and Social Committee and the Committee of the regions on the External Dimension of the Common Fisheries Policy, COM(2011)424 final, of 13.7.2011.

¹² Council conclusions on the external dimension of the CFP, 19.03.2012, 7086/12 (http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/agricult/129052.pdf)

¹³ European Parliament's report on the External Dimension of the Common Fisheries Policy, of 22.11.2012.

¹⁴ this specific objective is not applicable for this SFPA/protocol.

- 3) To support the development of a sustainable fisheries sector in partner countries by:**
- a. contributing to the capacity building in the third countries (notably by improving fisheries legal framework, control and surveillance and science);
 - b. defining annual and multiannual objectives to be achieved with the aim of developing sustainable fishing activities;
 - c. assessment of the results obtained in terms of impacts, and also on budgetary and financial requirements; and
 - d. promoting the employment of local seamen, improving infrastructures and encouraging landings, supporting the third country in developing local fisheries and processing industry.

2.1.2 Sustainable Fisheries Partnership Agreement between the EU and Greenland

The EU - Greenland fisheries relations are of special nature as they originate in the decision by Greenland to withdraw from the Community in 1985 and the need to maintain access to its waters for EU vessels following that withdrawal.

The Sustainable Fisheries Partnership Agreement between the EU and Greenland, and its current implementing Protocol, provide fishing opportunities to fish for Union fishing vessels in Greenland's waters and provides significant sectoral support for the sustainable development of the Greenlandic national fisheries sector. The SFPA is also a key component of the fishing quotas exchange network in the North Atlantic region, which enables the EU to swap fishing opportunities in Greenlandic waters for quotas in the waters of Northern Agreement partners, such as Norway or Faroe Islands.

It establishes the principles on the economic, financial, technical and scientific cooperation in the fisheries sector with a view to promoting responsible fishing in Greenland's waters to ensure the conservation and sustainable exploitation of fisheries resources and contribute in the development of the Greenland fisheries sector.

The Agreement has a duration of 6 years (from 22 April 2021 to 21 April 2027), it can be tacitly extended for additional periods of 6 years. The current 4 years implementing Protocol will de facto expire on 31 December 2024 since the parties agreed the first year of application would run from the date of provisional application from 22 April 2021 to 31 December 2021 and, for subsequent years, from 1 January to 31 December. The duration of the Protocol could be extended for another two years if the parties would agree, however, the Greenlandic Government informed the EU of its decision not to extend the current implementing protocol for another two years, so the current protocol, which de facto expires on 31 December 2024, needs to be renegotiated in order to maintain fishing opportunities for the EU fleet after that date.

There are two main types of SFPAs: bilateral agreements for highly migratory species, (such as tunas and tuna-like species), and multi-species agreements. Unlike most SFPAs, the agreement with Greenland is a multi-species agreement; 10 stocks are covered under the current protocol:

cod, pelagic and demersal redfish, Greenland halibut East & West, prawn East & West, capelin, grenadier East & West. The SFPA between the EU and Greenland is the only SFPA under which quota allocation between EU Member States is included in the annual Council regulation fixing fishing opportunities for most fish stocks in EU and non-EU waters (TAC and Quota Regulation)¹⁵.

6 EU Member States are involved DE, DK, FR, LT, EE, and SE. PL and ES are interested in entering the Agreement as well.

The current Protocol includes an annual EU financial contribution for access – EUR 13 590 754 - and for sectoral support – EUR 2 931 000. The EU contribution is complemented by fees payable by EU vessel owners on licences and catches.

The following table sets out the main features of the Protocol implementing the EU-Greenland SFPA for the period 2021-2024.

Figure 1. Main elements of the current implementing Protocol of the Sustainable Fisheries Partnership Agreement between the EU and Greenland

Duration of the Agreement	Six years renewable		
Date of entry into force of the Agreement	22 April 2021		
Date of entry into force of the Protocol	22 April 2021		
Duration of the Protocol	4 years: 22 April 2021 – 21 April 2025 (tacitly, 31 December 2024)		
EU fishing opportunities	• Cod - 1,950 tonnes • Pelagic Redfish - 0 tonnes • Demersal Redfish - 1,840 tonnes • Greenland Halibut - West - 2,250 tonnes • Greenland Halibut – East - 4,950 tonnes • Northern Prawn – West - 2,600 tonnes • Northern Prawn – East - 4,850 tonnes • Capelin - 13,000 tonnes • Grenadier spp. - West - 100 tonnes • Grenadier spp. – East - 100 tonnes • Bycatch - 600 tonnes		
EU financial contribution	• 13 590 754 EUR per year for access • 2 931 000 EUR per year for sectoral support		
Licence fees paid by the EU operators	Stock	EUR per tonne (21-22) EUR per tonne (23-24)	
	Cod	160	200

¹⁵ https://oceans-and-fisheries.ec.europa.eu/fisheries/rules/fishing-quotas_en

Pelagic Redfish	93	131
Demersal Redfish	93	131
Greenland halibut	216	309
Northern Prawn - East	100	181
Northern Prawn - West	159	240
Capelin	14	22

The sectoral support component is used for programmed activities in the following areas: (1) administration; (2) control and enforcement; (3) support of scientific research and advice.

Figure 2 provides a visual description of the intervention logic. It seeks to connect the needs, objectives, actions and expected achievements. The latter is discussed in terms of the outputs, results and impacts of the implementing Protocol.

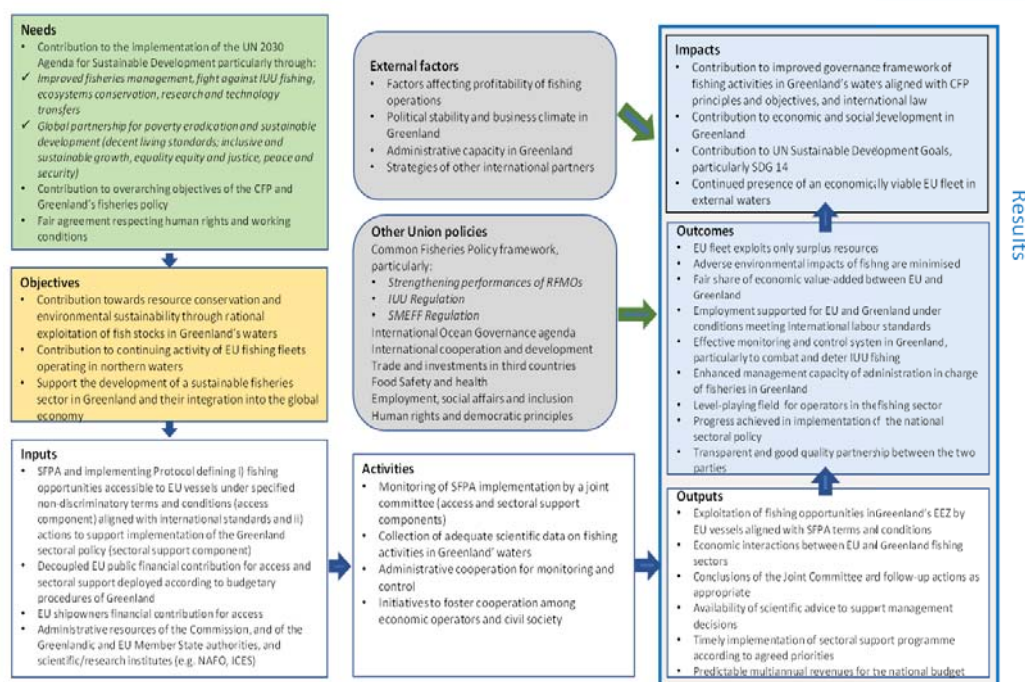


Figure 2. Intervention logic of the Fisheries Partnership Agreement between the EU and Greenland, and its current implementing Protocol

2.2 Point(s) of comparison

The EU - Greenland fisheries relations are of special nature as they originate in the decision by Greenland to withdraw from the Community in 1985 and the need to maintain access to its waters for EU vessels following that withdrawal. As mentioned above, the current Agreement was concluded on 21 April 2021, and it will be tacitly renewed for six-year periods.

The previous protocol with Greenland was applicable from 1 January 2016 and expired on 31 December 2020. Following 4 month of interruption of the implementing protocol, due to 5 rounds of negotiation during 2020 during the COVID pandemic and snap election in Greenland in early 2021 which delayed the signing of the current SFPA and protocol, the current implementing Protocol was signed and applied provisionally as of 21 April 2021.

During the four-month period where no implementing protocol was in force – the Union fleet was not allowed to operate in Greenland. Due to the exclusivity clause of the Agreement, EU vessel-owners were not allowed to enter private agreements with Greenland to access their waters and fisheries resources. In addition, Greenland did not receive any EU financial compensation for access nor sectoral support.

Based on the findings of the evaluation of the former implementing protocol to the Agreement¹⁶ include proper reference– applicable from 1 January 2016 to 31 December 2020 – the negotiation of the current implementing Protocol was the preferred option for the EU and Greenland. The evaluation provided an overall assessment of the first 36-months of the former implementing protocol, concluding that it was effective in achieving its objectives and economically relevant, with some areas for improvement regarding efficiency and coherence, such as increasing sectoral support funding with additional emphasis on issues of blue growth, helping to ensure that scientific research capacity was strengthened and to updating the underlying framework to the Protocol, such that it be changed from the former FPA to an SFPA to fully reflect CFP prescriptions. The protocol was considered an added value for both Parties and largely accepted by stakeholders.

Importantly, the conclusions and recommendations contained in the evaluation of the former implementing protocol, formed the basis for the negotiation mandate of the negotiation for the current implementing Protocol.

In this context, the points of comparison considered for the ex-post and ex-ante evaluation of the current implementing Protocol are the following:

- a) The prior implementing protocol (1 January 2016 to 31 December 2020), including the conclusions and recommendations of its ex-post and ex-ante evaluation and the negotiating mandate; and
- b) The reference situation at the start of the current implementing Protocol (21 April 2021).

¹⁶ [Ex ante and ex post evaluation study of the Fisheries Partnership Agreement between the European Union and Greenland - Publications Office of the EU \(europa.eu\)](#)

These points of comparison were used, alongside the general and specific objectives of SFPAs (see figure 2), to identify certain indicators when assessing the implementation of the current implementing Protocol. Importantly, given the nature of these objectives, it is not always possible to provide a quantitative indicator for this analysis.

In terms of the **access component**, and based on the relevant specific objectives under general objectives (1) and (2), the following success criteria and indicators will be used for evaluating the implementation of this Protocol, vis-à-vis the points of comparison:

Figure 3. Objectives related to the access component and their corresponding success criteria and indicators

Specific objectives	Success criteria	Indicators
1.a To what extent fisheries activities addressed exclusively at surplus resources and prevent the overfishing of stocks, on the basis of the best scientific advice and improved transparency on the global fishing efforts in the waters included in the current Protocol.	The EU fishing opportunities are within the limits established or recommended by the relevant RFMO/RFO. The implementation of the Protocol takes into account the management strategies and recommendations proposed by the relevant RFMO/RFO, and Greenland.	State of the stocks targeted under the Protocol and their monitoring/management (scientific advice analysis by the joint scientific committee meetings, RFMO/RFO and national scientific institutes). Utilisation rate of fishing opportunities , including the evolution of EU vessels, licences and catches under the Protocol.
1.b To what extent the implementation has followed the same principles and promoted the same standards for fisheries management as applied in EU waters.	The EU fleet operating under the implementing Protocol follow the same principles and standards as vessels operating in EU waters, according to the CFP, and any additional standards required by Greenland.	Compliance of fisheries management measures applicable in the framework of the Protocol, in the EU and in Greenland.
2.a To seek appropriate share of the surplus resources, fully commensurate with the EU fleets interests and their regional and sub-regional fishing strategy.	Fishing opportunities covered by the Protocol correspond to the needs of the EU fleet and are acceptable considering the activities of fleets active in the same waters at national, sub regional and regional level.	Utilisation rate of fishing opportunities , including the evolution of EU vessels, licences and catches under the Protocol. Level of contribution to the supply of the EU market (volume and value).
2.b To ensure that the level of fees payable by Union ship-owners for their fishing activities is fair and proportional considering the revenues and costs, non-discriminatory and promotes a level playing field among the different fleets.	The Protocol offers similar conditions to other foreign fleets operating in the fishing zones and management areas of the Agreement. The cost benefit ratio is acceptable and reasonable for the EU ship owners and for Greenland.	Level of fees and technical conditions applied to third countries fleets in the fishing areas of Greenland Proportion between fees, costs and benefits for the EU ship owners and for Greenland.

In terms of assessing the implementation of the **technical conditions** established under the current Protocol, and based on the relevant specific objectives under these general objectives, the following success criteria and indicators will be used for evaluating the implementation of this Protocol, vis-à-vis the points of comparison:

Figure 4. Objectives related to the technical conditions and their corresponding success criteria and indicators

Specific objectives	Success criteria	Indicators
1.c To what extent the scientific and technical evaluation of the fisheries concerned have improved?	EU fishing activities follow a scientific data collection framework. This information is transmitted to the relevant RFMO/RFO and national research institutes. EU scientists and scientists from Greenland actively participate in RFMO/RFO scientific committees.	Compliance with scientific data collection obligations (e.g. logbook and scientific observers) under the Protocol. Regular collection and analysis of relevant data in relevant RFMO/RFO, and implementation of their recommendations.
1.d Ensuring compliance and combating IUU fishing	The activity of the EU fleet is properly monitored (VMS, AIS, etc.), in accordance with the Protocol.	Compliance with reporting obligations (e.g. logbook, VMS, observers) under the Protocol. Level of implementation of the monitoring, surveillance and control (MCS) provisions under the Protocol.
2.c To ensure supply for the EU and for the markets of Greenland and third countries.	The Protocol offers a framework to foster landings to supply local markets. The Agreement fosters trade on fisheries cooperation between the EU and Greenland and/or third countries.	Level of contribution to the supply of the EU market (volume and value), including for the processing sector. Compliance with landing obligation in local market, and level of landing in local market versus neighbouring countries markets .
3.d Improving infrastructures and encouraging landings, supporting the third country in developing local fisheries and processing industry. *Landings are treated under 2.c. and improvement of infrastructure is treated under the sectoral support component.	EU vessels land part of their catches in Greenland.	Compliance with obligation to land catches in Greenland to supply local processing factories.

In terms of the **sectoral support component**, and based on the relevant specific objectives under general objective (3), the following success criteria and indicators will be used for evaluating the implementation of this Protocol, vis-à-vis the points of comparison:

Figure 5. Objectives related to the sectoral support component and their corresponding success criteria and indicators

Specific objectives	Success criteria	Indicators
3.a To contribute to capacity building and social, environmental and economic development in Greenland.	The sectoral support contributes to capacity building and social, environmental and economic development in Greenland. In particular, the sectoral support contributes to adequate training, equipment and	Improvement of level of capacity (social, environmental, and economic) through sectoral support of the implementing Protocol

	infrastructures namely in the areas of science and control, monitoring and surveillance.	
3.b defining annual and multiannual objectives to be achieved with the aim of developing sustainable fishing activities	Utilisation of the sectoral support has been duly reported in accordance with the Protocol. Multiannual programming has been jointly established in accordance with the national fisheries and aquaculture and with the Protocol.	Percentage of the EU contribution to the different policy areas in Greenland, in accordance with the national fisheries strategy. Comprehensiveness and level of detail of the sectoral support reporting .
3.c assessment of the results obtained in terms of impacts, and also on budgetary and financial requirements	Effective and timely execution of sectoral support funds by Greenland and corresponding timely payments by the EU.	Execution rate of sectoral support by Greenland and corresponding timely payment by the EU.

The indicators mentioned to assess the access, sectoral support and technical components of the current implementing Protocol will be referenced throughout the next section, and often vis-à-vis the points of comparison.

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

Current state of play

3.1 Joint Committee

The Joint Committee, established under Article 12 of the Agreement, is the body responsible for monitoring the implementation of the Agreement and its implementing protocols. It is composed of delegations from the EU and Greenland and should meet on annual basis. At the time of this evaluation, and like in the 2016-2020 Protocol, the Joint Committee met on annual basis (three times) throughout the current implementing Protocol:

- June 2021 by videoconference
- May 2022 in Nuuk
- May 2023 by videoconference

3.2 Access component

As described in Figure 1, the current implementing Protocol provides fishing opportunities for the EU fleet to target demersal and small pelagic species. The fishing opportunities obtained were allocated by the Council to seven EU Member States: DE, Denmark, France, Lithuania, Estonia and Sweden.

The number of vessels with authorisations in the years 2021 to 2023 was 4-5 for Germany, 1 for Denmark, 3 for Estonia, 0-1 for Sweden, and 0-1 for Lithuania. Typically each year Germany has 4 vessels fishing, Denmark and Lithuania 1, and Estonia 2. All vessels are large pelagic or demersal trawlers, between 60 and 90 metres in length.

As described in Figure 3, several indicators have been used to assess the current implementing Protocol's access component, in relation to the objectives of the intervention logic. These indicators will be outlined in this section.

State of the stocks targeted under the current implementing Protocol

The latest scientific advice for stocks targeted under the Protocol suggests that there are only five of 15 species stock components which can be said with some certainty not to be over-exploited. This compares to six during the previous Protocol. Nine of the species stock components are either data limited with a precautionary approach to assessment and resulting advice or are assessed as having either stock status lower than maximum sustainable yield (MSY) or stocks being subject to overfishing. Northern prawn stocks in East Greenland are of special concern with biomass below Bmsy and fishing mortality above Fmsy. During the previous Protocol there were three species stock components of special concern.

The management of fisheries relevant to the Protocol frequently involves shared stocks and the need for joint management. Greenland is a party to multilateral or bilateral agreements for the following stocks and shares data on the activities of its vessels where relevant: pelagic redfish, with the EU, Faroe Islands, Iceland and Norway; West Greenland halibut, with Canada; East Greenland halibut, with Iceland; capelin, with Iceland and Norway. Additionally, Greenland has joint management of East Greenland cod with Iceland as part of the cod management plan. Greenland is party to all agreements currently in place for joint management of shared stocks relevant to the Protocol. Because Greenland is not a party to a Coastal States Agreement (CSA) on mackerel, no quota for mackerel has been provided to the EU under the current Protocol.

The Protocol text and technical provisions are aligned well with the management strategies of NAFO, NEAFC, and Greenland. Greenland sets quota for fish stocks which are included in the Protocol. Advice is provided by ICES or the NAFO scientific committees based on a mix of full analytical assessments, or a precautionary approach.

Mechanisms are in place through the Joint Committee to discuss and agree the part of Greenland's quota to be allocated to the EU, based on the scientific advice. Apart from Northern prawn in East Greenland, Greenland quota and the part of it allocated to the EU through the Protocol is lower than the TAC advice. Northern prawns in East Greenland have an inshore component and managers justify TACs above advice, with the need to maintain coastal communities, but EU quota in offshore areas is itself above TAC advice.

Mitigating this situation however is that the EU quota represents a relatively small proportion of total Greenland quota for most species, apart from demersal redfish, Greenland halibut and Northern prawn in East Greenland.

Utilisation rate of fishing opportunities

Before explaining the rate of utilisation of fishing opportunities we will focus on explaining the complex mechanism of quota allocation in each Joint Committee, the transfers of quotas to Norway and between Member States.

The quota allocated to the EU through the Protocol is agreed by Greenland and the EU at meetings of the Joint Committee. Greenland offers the EU a volume of quota for fishing opportunities in Greenlandic waters, and the EU then either accepts the quota, accepts a proportion of the quota, or declines the quota (for example over concerns over stock status or management arrangements). The resulting quotas agreed each year by the Joint Committee can vary, and in practice have varied, from the indicative fishing opportunities as outlined in the Protocol.

For capelin, the preliminary advice from ICES forms the basis of capelin quota offered to the EU, which is then revised following the Icelandic survey for capelin, taking place once capelin fishing in Greenlandic waters has ended. The in-season revision may be upwards or downwards.

Figure 1: Indicative fishing opportunities defined in the Protocol and agreed quotas (tonnes), by species and area, for the last Protocol (indicative quota) and current Protocol (agreed quota for 2021, 2022, and 2023)

Species	Area	Indicative annual last Protocol	Indicative annual current Protocol	Agreed 2021	Agreed 2022	Agreed 2023
Cod	ICES V, XII, XIV & NAFO 1F	1 800	1 950	1 950	1 950	1 950
Pelagic redfish ¹	ICES V, XII, XIV & NAFO IF	2 200	0	0	0	0
Demersal redfish	ICES V, XIV & NAFO Subarea 1F	2 000	1 840	1 840	1 530	1 530
Greenland halibut	NAFO 1	2 500	2 250	2 250	2 250	2 025
Greenland halibut	ICES V, XII, XIV	5 200	4 950	4 950	4 950	5 150
Northern prawn	NAFO Subarea 1	2 600	2 600	2 600	2 600	2 600
Northern prawn	ICES V, XIV	5 100	4 850	4 850	4 850	5 000
Capelin ³	ICES V, XIV	20 000	13 000	13 053	66 959	16 356
Mackerel ²	ICES subareas II, V, XII, XIV	-	0	0	0	0
Grenadier	ICES V, XIV	100	100	100	90	30.6
Grenadier	NAFO Subarea 1	100	100	100	90	30.6
Bycatch		1 126	600	600	600	237.3
Total		42 726	32 240	32 293	85 869	34 910
% of indicative annual quota				100%	266%	108%
% of indicative quota excluding capelin				100%	98%	98%

After the Joint Committee has agreed quotas to be allocated to the EU through the Protocol, the EU exchanges parts of the quotas for some species with Norway, in return for fishing opportunities for the EU fleet in Norway. The EU swapped quota for Greenlandic fishing opportunities with Norway in 2021, 2022, and 2023. The Greenlandic fishing opportunities transferred from the EU to Norway are presented below.

Figure 2: EU agreed quota in Greenland, and quota transferred to Norway for relevant species (2021 - 2023)

Species	Area	2021			2022			2023		
		EU/ GRL agreed	NOR	%	EU/ GRL agreed	NOR	%	EU/ GRL agreed	NOR	%
Demersal redfish	ICES V, XIV & NAFO Subarea 1F	1 840	0	0	1 530	300	20	1 530	556	36
Greenland halibut	NAFO 1	2 250	550	24	2 250	550	24	2 025	325	16
Greenland halibut	ICES V, XII XIV	4 950	650	13	4 950	650	13	5 150	850	17
Northern prawn	ICES V, XIV	4 850	1 000	21	4 850	1 701	35	5 000	2 123	43
Capelin *	ICES V, XIV	13 053	10 000	77	66 959	69 623	100	16 356	10 000	61
Total			12 200			72 824			13 854	

Quotas transferred to Norway represented relatively low proportions (13-24%) in the case of Greenland halibut, but 100% of the EU's capelin quota in 2022, and an increasing proportion of Northern prawns over 2021-2023 (up to 43% in 2023). In total the transfers to Norway represented 38% of the total EU agreed quota in Greenland in 2021, 97% in 2022, and 46% in 2023.

Following the transfers of quota to Norway, the remaining EU quota is distributed amongst the EU Member States using relative stability keys¹⁷, resulting in the quota allocations shown in the following three tables (for 2021, 2022, and 2023). The volumes of quota that each Member State initially receives are thus dependent on both the overall quota agreed at the Joint Committee meeting and the volume that is transferred with Norway.

Germany receives the highest volume of quotas and receives the majority of quotas for cod, Greenland halibut, and redfish (both pelagic and demersal). France also receives small quantities of redfish, with Denmark and France each receiving 50% of the total EU quota for Northern prawn.

After the initial allocation of quotas to Member States, quota can then be transferred between them to match available quotas to the needs of the fishing industry. Estonia, and Lithuania acceded to the EU in 2004 and receive no Greenlandic quota through relative stability, so these Member States rely on intra-EU transfers of quota to obtain fishing opportunities in Greenland.

Intra-EU Member State transfers were around 4 000 – 5 000 tonnes a year over 2021 to 2023, and almost all relate to Northern prawn. These transfers equated to 24% of the EU's total quota remaining after transfers to Norway in 2021 and 2022, and 17% in 2023.

¹⁷ Introduced in 1983 based on the historical practices during the period 1973-1978 by Member States of the EU at that time.

The general stability in intra-EU transfers between years is expected as the quota swaps are often a product of joint ventures and/or long-standing arrangements for cooperation between Member States. Northern prawn quota is transferred from France to Denmark as the Danish fishing vessel is co-owned by French and Danish companies. Similarly, Northern prawn quotas are transferred in some years between Denmark and Estonia as the Estonian fishing companies are in a joint venture with Danish companies.

Following these transfers, Germany and Denmark remain the largest quota holders as shown in the tables below, but the transfers allow for quota to be provided to Estonia and Lithuania.

In all three years, authorisations for target species as a proportion of total EU agreed quota (after transfers to Norway) were very high at 93% in 2021, 100% in 2022, and 100% in 2023, with only Northern prawn in East Greenland showing less than optimal uptake of 63% in 2021. The proportion of the total agreed quota for targeted species that was then caught was also extremely high at 90%, 96% and 98% in 2021, 2022 and 2023 respectively, with almost full utilisation for all species.

Figure 9: Quota (tonnes), quota after flexibility (tonnes), quota authorised in vessel authorisations (tonnes), proportion of quota authorised (%), catch (tonnes) and % of quota caught, for fishing opportunities under the EU–Greenland Fisheries Partnership Agreement, 2021 (after transfers to Norway)

Species	Area	Quota	Quota after flexibility and transfer	Authorised	% of indicative authorised	Catch	% of EU agreed quota caught
Cod	ICES V, XII, XIV & NAFO 1F	1 950	1 950	1 950	100%	1 950	100%
Pelagic redfish	ICES V, XII, XIV & NAFO IF	0	0	0	n/a	0	n/a
Demersal redfish	ICES V, XIV & NAFO Subarea 1F	1 840	1 840	1 831	100%	1 827	99%
Greenland halibut	NAFO 1	1 700	1 700	1 700	100%	1 690	99%
Greenland halibut	ICES V, XII XIV	4 300	4 050	4 300	106%	4 050	100%
Northern prawn	NAFO Subarea 1	2 600	2 521	2 581	102%	2 521	100%
Northern prawn	ICES V, XIV	3 850	3 653	2 305	63%	2 032	56%
Capelin	ICES V, XIV	0	0	0	n/a	0	n/a
Mackerel	ICES subareas II, V, XII, XIV	0	0	0	n/a	0	n/a
Grenadier	ICES V, XIV	75	75	n/a	n/a	41	55%
Grenadier	NAFO Subarea 1	60	60	n/a	n/a	7	12%
Bycatch		600	600	n/a	n/a	225	38%
Total (excluding Grenadier and bycatch)		16 240	15 714	14 667	93%	14 070	90%
Total		16 975	16 449	14 667		14 343	87%

Figure 10: Quota (tonnes), quota after flexibility (tonnes), quota authorised in vessel authorisations (tonnes), proportion of quota authorised (%), catch (tonnes) and % of quota caught, for fishing opportunities under the EU–Greenland Fisheries Partnership Agreement, 2022 (after transfers to Norway)

Species	Area	Quota	Quota after flexibility and transfer	Authorised	% of indicative authorised	Catch	% of EU agreed quota caught
Cod	ICES V, XII, XIV & NAFO 1F	1 950	1 950	1 950	100%	1 949	100%
Pelagic redfish	ICES V, XII, XIV & NAFO IF	0	0	0	n/a	0	n/a
Demersal redfish	ICES V, XIV & NAFO Subarea 1F	1 230	1 224	1 224	100%	1 197	98%
Greenland halibut	NAFO 1	1 700	1 700	1 700	100%	1 660	98%
Greenland halibut	ICES V, XII XIV	4 300	4 550	4 550	100%	4 440	98%
Northern prawn	NAFO Subarea 1	2 600	2 471	2 581	104%	2 142	87%
Northern prawn	ICES V, XIV	3 148	3 346	3 345	100%	3 265	98%
Capelin	ICES V, XIV	0	0	0	n/a	0	n/a
Mackerel	ICES subareas II, V, XII, XIV	0	0	0	n/a	0	n/a
Grenadier	ICES V, XIV	50	50	n/a	n/a	30.8	62%
Grenadier	NAFO Subarea 1	35	35	n/a	n/a	2.8	8%
Bycatch		600	600	n/a	n/a	225	38%
Total (excluding Grenadier and bycatch)		14 928	15 241	15 350	101%	14 653	96%
Total		15 613	15 926	15 350		14 912	94%

Figure 11: Quota (tonnes), quota after flexibility (tonnes), quota authorised in vessel authorisations (tonnes), proportion of quota authorised (%), catch (tonnes) and % of quota caught, for fishing opportunities under the EU–Greenland Fisheries Partnership Agreement, 2023 (after transfers to Norway)

Species	Area	Quota	Quota after flexibility and transfer	Authorised	% of indicative authorised	Catch	% of EU agreed quota caught
Cod	ICES V, XII, XIV & NAFO 1F	1 950	1 950	1 950	100%	1 949.5	100%
Pelagic redfish	ICES V, XII, XIV & NAFO IF	0	0	0	n/a	0	n/a
Demersal redfish	ICES V, XIV & NAFO Subarea 1F	974	974	969	99%	944	98%
Greenland halibut	NAFO 1	1 700	1 700	1 700	100%	1 690	98%
Greenland halibut	ICES V, XII XIV	4 300	4 300	4 300	100%	4 286	98%
Northern prawn	NAFO Subarea 1	2 600	2 729	2 729	100%	2 651	87%
Northern prawn	ICES V, XIV	2 877	2 809	2 809	100%	2 719	98%
Capelin	ICES V, XIV	0	0	0	n/a	0	0%
Mackerel	ICES subareas II, V, XII, XIV	0	0	0	n/a	0	n/a
Grenadier	ICES V, XIV	60	60	n/a	n/a	0	51%
Grenadier	NAFO Subarea 1	45	45	n/a	n/a	4	6%
Bycatch		600	600	n/a	n/a	53	38%
Total (excluding Grenadier and bycatch)		14 401	14 462	14 457	100%	14 240	98%
Total		15 106	15 167	14 457	95%	14 297	94%

Number of fishing licences

The three tables below present the number of vessels with authorisations for different species in 2021, 2022, and 2023. The total number of vessels authorised declined by one vessel each year. Germany had the most authorised vessels in each of the three years. All vessels are pelagic or demersal trawlers, with gross registered tonnage and length overall (LOA) ranging between 1 410 and 4 290 tonnes and 58 and 92 metres respectively.

Figure 12: Number of vessels authorised by Member State and authorisation type in 2021

MS	Cod	GRL halibut – east	GRL halibut – west	North prawn – east	North prawn – west	Capelin	Demersal redfish	Total vessels
DE	4 *	5 *	4 *	-	-	-	3 *	5
DK	-	-	-	1	1	-	-	1
FR	-	-	-	-	-	-	-	0
EE	-	-	-	3 *	-	-	-	3

LT	-	-	-	1	-	-	-	1
SE	-	-	-	-	-	-	-	0
Total	4	5	4	5	1	0	3	10

Source: European Commission, DG Mare. Note: east = east Greenland, west = west Greenland. 'Total vessels' shows number of different vessels from each MS, not the number of authorisations. * = vessel authorisation(s) used collectively by more than one vessel.

Figure 13: Number of vessels authorised by Member State and authorisation type in 2022

MS	Cod	GRL halibut – east	GRL halibut – west	North prawn – east	North prawn – west	Capelin	Demersal redfish	Total vessels
DE	4*	4*	4*	-	-	-	3*	4
DK	-	-	-	1	1	-	-	1
FR	-	-	-	-	-	-	-	0
EE	-	-	-	3*	-	-	-	3
LT	-	-	-	-	-	-	-	0
SE	-	-	-	-	-	1	-	1
Total	4	4	4	4	1	1	3	9

Source: European Commission, DG Mare. Note: east = east Greenland, west = west Greenland. 'Total vessels' shows number of different vessels from each MS, not the number of authorisations. * = vessel authorisation(s) used collectively by more than one vessel.

Figure 14: Number of vessels authorised by Member State and authorisation type in 2023

MS	Cod	GRL halibut – east	GRL halibut – west	North prawn – east	North prawn – west	Capelin	Demersal redfish	Total vessels
DE	4*	4*	4*	-	-	-	3*	4
DK	-	-	-	1	1	-	-	1
FR	-	-	-	-	-	-	-	0
EE	-	-	-	3*	-	-	-	3
LT	-	-	-	-	-	-	-	0
Total	4	4	4	4	1	0	3	8

In comparison with the previous Protocol, in 2016, 2017 and 2018 the total number of vessels authorised was stable at 12 EU vessels each year. Germany had four authorised vessels in each of the three years, all of which fished under the agreement. Germany (2 vessels), the UK (1 vessel) and Estonia (1 vessel) introduced new vessels to their fleets fishing in Greenland over the 2016-2018 period, replacing older vessels. All vessels were pelagic or demersal trawlers, with gross registered tonnage and length overall (LOA) ranging between 1 410 and 4 290 tonnes and 58 and 92 metres respectively.

Number of catches

The table below shows the total catches by species and area made in Greenland waters over the 2021 - 2023 period. Catches of 41 555 tonnes compare to catches of 42 579 tonnes over 2016 – 2018. Over 2021 – 2023 the value of German catches was 61.2% of total revenue, Danish revenues accounted for 28.8%, and Estonian and Lithuanian revenues combined for just under 10%. The average first sale price of catch declined from EUR 4 543/tonne over 2016 – 2018 to EUR 3 661/tonne over 2021 – 2023, driven by lower prices for Northern prawn and Greenland halibut (with higher prices for cod), explaining the lower catch revenues over 2021 – 2023 despite catch volumes remaining largely similar over the two 3-year periods.

Figure 15: Total catch (tonnes) and estimated revenue (EUR), by country and species, aggregated over 2021 - 2023

Member State	Species	Area	Catch	Revenue
Germany	Cod	ICES XIV & NAFO 1	6 067	35 920 659
	Greenland halibut	ICES V, XIV	13 140	38 563 698
	Greenland halibut	NAFO 1	5 076	14 802 753
	Demersal redfish	ICES V, XIV & NAFO 1	4 004	3 593 547
Denmark	Northern prawn	ICES V, XIV	4 104	15 416 936
	Northern prawn	NAFO 1	7 387	28 343 393
Estonia	Northern prawn	ICES V, XIV	997	12 339 297
Latvia	Northern prawn	ICES V, XIV	680	2 775 301
Total			41 455	151 755 586

Access fees for licences and catches

The fishing authorisation fees paid by EU vessels are shown in Figure 16 and rise during the Protocol every two years. Fees are not paid for bycatches. If authorised quantities are not fished, the fee corresponding to any such unused authorised quantity is not reimbursed (unless the Protocol is suspended or terminated).

Figure 16: Fishing authorisation fees by species (EUR/tonne)

Species	EUR per tonne 2021/2022	EUR per tonne 2023/2024	EUR per tonne 2025/2026
Cod	160	200	241
Redfish	93	131	169

Greenland halibut	216	309	402
Northern prawn – east	100	181	263
Northern prawn – west	159	240	322
Capelin	14	22	29

Figure 17 presents the access fees as a proportion of turnover, and the access fees as a proportion of direct Gross Value Added (GVA) in Greenlandic waters. These ratios provide a comparison between access fees paid and economic performance of the vessels. Access fees have an impact on the fleet profitability measured through the Gross Profit (GRP) indicator (discussed above).

Access fees paid by the EU vessels represented 5.6% of their income over the 2021 - 2023 period with variation between 4.4% and 7.2%, compared to 3.3% of their income over the 2016 – 2018 period during the last Protocol. Access fees as a percentage of value added were 8.8% over 2021 – 2023 (compared to 6.8% over 2016 – 2018).

Figure 17: Access costs as a percentage of turnover from catches in Greenland, and as a percentage of gross value added from catches in Greenland, for EU vessels benefiting from fishing opportunities in Greenland

	Access fees / turnover	Access fees / GVA
2021	5.5%	10.4%
2022	4.4%	6.6%
2023	7.2%	10.2%
All years	5.6%	8.8%

The EU's financial contribution to Greenland in 2021 - 2023 is shown in the table below, and averaged EUR 17.76 million over the three-year period, or 107.5% of the payments envisaged in the Protocol.

Figure 18: EU payments for financial compensation (adjusted taking account of agreed fishing opportunities) 2021 to 2023 (EUR)

EU budget payments	2021	2022	2023
Financial compensation	14 024 766	17 089 034	13 383 921

Taking account of authorisation fees paid by EU fishing vessel operators, which were a yearly average of EUR 2.86 million over 2021 – 2023 (as compared to EUR 2.09 million over 2016 – 2018 during the last Protocol), total payments from the EU budget and from EU private sector operators combined were EUR 61.86 million over 2021 – 2023 or a yearly average of EUR 20.62 million (see Table 29).

Thirty-eight percent of total EU fishing vessel operator payments over 2021 - 2023 related to authorisations for Greenland halibut in East Greenland, 15% for Greenland halibut in West Greenland, 26% for Northern prawns in East and West Greenland, 12% for cod, 5% for demersal redfish, 3% for pelagic redfish, and 0.5% for capelin.

Figure 19: Total EU contributions (access and sectoral support) and payments by EU fishing vessel operators, 2021 to 2023 (EUR)

Payments	2021	2022	2023
EU budget	16 955 766	20 020 034	16 314 921
EU vessel operators	2 492 162	2 528 196	3 546 636
Total	19 447 928	22 548 230	19 861 557

Overall, the EU financial contribution for access and sectoral support has increased steadily, alongside the increase in fishing opportunities and categories over the past implementing Protocols. This increase is also reflected in the EU financial contribution for sectoral support, which has also augmented.

Level of fees and technical conditions applied to EU vessels

The principal of non-discrimination in the current implementing Protocol prohibits the granting of more favourable technical conditions to other fleets than those granted to EU operators in Greenland. It has been mostly respected.

Fishing by other foreign countries is therefore subject to similar conditions, with legislation applying to fishing vessels irrespective of flag. This applies certainly to Greenlandic technical conditions/regulations. In line with the SFPA text (Article 3.3 and 3.4) Greenland makes available information about the overall TAC and fishing opportunities to foreign fleets. It is expected that foreign fishing vessels would not pay for fishing opportunities originating from Greenland's other agreements as these agreements operate on the basis of a mutual exchange of fishing opportunities, rather than financial compensation for access to fishing opportunities in the case of the EU–Greenland SFPA

Compliance of fisheries management measures by EU vessels

The SFPA and Protocol place obligations on the parties. These obligations cover: the timing of financial contributions from the EU to Greenland; management of the sectoral support through a multi-annual framework and annual reporting; frequency of Joint Committee meetings and the topics they should cover; reporting by Greenland on use of sectoral support funds; scientific cooperation; the timing/speed for the issuing of authorisations; sharing of information by Greenland with the EU on technical conservation measures; recording and reporting of catch and bycatch; transmission of information about vessels entering and leaving the Greenlandic fishing zone, and about landings in Greenland and any transshipment; satellite-based monitoring of vessels; inspections of EU vessels at sea or in port; an observer scheme; handling of any infringements by EU vessels; experimental fisheries.

Consultations with stakeholders in both the EU and Greenland provided evidence that by-and-large, all requirements of the SFPA and Protocol have been complied with, and that the parties do not face difficulties in complying with the legal texts. However, it was noted that:

- An electronic licensing/authorisation system is a stated intention (not a legal requirement) but has not been introduced.

- An electronic reporting system (ERS), which is also a stated intention of both the current and previous Protocol (not a legal requirement) is still to be put in place by Greenland Fisheries License Control Authority (GFLK). The lack of harmonisation with e-logbooks used by EU vessels, and the fact that Greenland does not use the Fisheries Language Universal eXchange (FLUX) system of data exchange, means that records of catches retained by the EU and by Greenland differ by small amounts, because EU catches are recorded based on landings data/sales notes, while Greenland uses logbook data for its records of catches by EU vessels.
- There are several stocks for which fishing opportunities agreed by the Joint Committee are based on TACs that are not in line with the scientific advice, even though the EU allocation is generally a small proportion of the overall TAC.
- Greenland does not deploy observers on EU vessels at all times (although EU observers are present). The Protocol requires EU vessels to take onboard Greenlandic observers if they can be present in time at ports from which EU vessels depart, and EU vessels have been willing to do so. However, the fact that many EU vessels land into Iceland or more often EU ports mean that it is difficult for Greenland to deploy observers.
- There has been no mutually reciprocated interest in establishing joint enterprises/ventures (an intention, but not a legal requirement) due to the priorities of the private sector in Greenland and in EU MS, coupled with regionally uncompetitive economics for Greenlandic-based operations. This was also the case under the previous Protocol.
- Quota allocated to EU vessels that is subsequently transferred to non-EU fishing nations results in Greenland receiving no private sector payments for that quota.

Economic benefits for the EU and Greenland

The cost-benefit ratios in relation to value of access payments for quota not transferred to Norway, and the catches made only in Greenland, are shown in Table 40. In total, Greenland is estimated to have received an average of 945 EUR / tonne from the EU and EU shipowners for fish caught by EU operators in its fishing zone (compared to 750 EUR/tonne during the last Protocol over 2016 – 2018), with 21.6% borne by EU shipowners (compared to 19.7% over 2016 – 2018). The monies received by Greenland represent 25.8% of the first sales price of the catch (up from 16.5% during the last Protocol).

Figure 20: Cost benefit indicators in relation to average price paid for each tonne caught by EU vessels aggregated over the 2021 - 2023 period

Compensation element	2016 - 2018	2021 - 2023
EU payments for access (quota not transferred, EUR)	25 663 071	30 722 596
Access fees paid by EU shipowners in Greenland (EUR)	6 276 206	8 456 849
Total EU payments (EUR)	31 939 277	39 179 445
Average access cost per tonne caught in Greenland (EUR/tonne)	750	945
Access cost paid by the EU for catches in Greenland (EUR/tonne)	603	741
Access cost paid EU shipowners for catches in Greenland (EUR/tonne)	147	204
Average proportion borne by EU shipowners	19.7%	21.6%

Average first sales price of catch in Greenland (EUR/tonne)	4 543	3 661
Average proportion of market value received by Greenland	16.5%	25.8%

Source: consultant analysis based on earlier tables

Concerning cost-benefit ratios in relation to GVA, the main finding is that every EUR 1 invested from the EU budget in the compensation payment for access, supports the creation of EUR 6.88 of value added (compared to EUR 7.61 during the last Protocol). This is shared between the EU, Greenland and third country entities. For the EU, most economic benefits are from direct GVA, with fewer benefits from activities of ancillary activities both upstream and downstream. For Greenland, the Protocol has only minimal multiplier effects through indirect GVA, and a large proportion of benefits are the direct added value in the form of the compensation payments from the EU. For each EUR 1 invested from the EU budget, when considering the compensation payments, EU authorisation fees paid by EU private sector vessels, and value added generated in up- and down-stream activities, the Protocol generates value-added for Greenland of EUR 2.13 (compared to EUR 1.92 during the last Protocol).

Figure 21: Value-added indicators generated by EU vessels benefiting from fishing opportunities, for the aggregated period 2021 - 2023

	GVA	Catches	Compensation	Shipowner's fees	Total payments
		(EUR / t)	(EUR* / EUR)	(EUR / EUR)	(EUR / EUR)
All entities	Direct GVA	2 369	5.21	11.61	2.51
	Indirect GVA	1 240	1.67	6.08	1.31
	Total GVA	3 609	6.88	17.69	3.82
EU	Direct GVA	2 331	3.14	11.42	2.47
	Indirect GVA	807	1.09	3.96	0.85
	Total GVA	3 138	4.23	15.38	3.32
Greenland	Direct GVA	32	2.05	0.16	0.03
	Indirect GVA	55	0.07	0.27	0.06
	Total GVA	87	2.13	0.43	0.09
Other entities	Direct GVA	7	0.01	0.03	0.01
	Indirect GVA	378	0.51	1.85	0.40
	Total GVA	385	0.52	1.89	0.41

Source: consultant analysis. Note *: EU and private sector payments to GRL considered as direct GVA.

Costs of the Protocol

The EU's annual financial contribution to Greenland is outlined in the Protocol, with the financial compensation based on payment for quotas at 17.5% of the reference price for the agreed fishing opportunities for different species.

An overview of the timing of events affecting the EU's financial contributions is presented in the table below.

Figure 22: Timing of events affecting the EU's financial contributions

Date	Action
February 2021	Fishing opportunities for 2021 were agreed through exchange of letters and were the indicative fishing opportunities listed in the Protocol.
April 2021	Agreed through an extraordinary JC meeting that financial contribution for access for 2021 would be EUR 13 590 754, and EUR 2 931 000 for sectoral support. Due to the late start of agreements during the year, consideration given to transferring any unfished quota at the end of the year to 2022.
June 2021	Greenland presented the annual implementation report for sectoral support for 2020. JC meeting notes that despite Covid-19, funds available through the sectoral support for 2020 had been fully utilised. Agreement reached to pay EUR 2.931 million for the 2021 sectoral support.
23 June 2021	Sectoral support for 2021 paid.
30 June 2021	Deadline for payment of EU contribution for 2021 (compensation for access and sectoral support).
November 2021	Agreement reached over the fishing opportunities allocated for 2022, with an associated financial contribution of EUR 12 654 049 .
1 March 2022	Deadline for payment of EU contribution for 2022 for access.
May 2022	Greenland presented the annual implementation report for sectoral support for 2021 and JC approved the 2021 annual status matrix. Agreement reached to pay EUR 2.931 million for the 2022 sectoral support.
15 May	Sectoral support for 2022 paid.
1 June 2022	Deadline for payment of EU contribution to sectoral support for 2022.
November 2022	Agreement reached over the fishing opportunities allocated for 2023, with an associated financial contribution of EUR 12 746 921 .
1 March 2023	Deadline for payment of EU contribution for 2023 for access.
May 2023	Greenland presented the annual implementation report for sectoral support for 2022 and JC approved the 2022 annual status matrix. Agreement reached to pay EUR 2.931 million for the 2023 sectoral support.
1 June 2023	Deadline for payment of EU contribution to sectoral support for 2023.
6 June 2023	Sectoral support for 2023 paid.
November 2023	Agreement reached over the fishing opportunities allocated for 2024, with an associated financial contribution of EUR 12 479 154 .

The EU's financial contribution to Greenland in 2021 - 2023 is shown in the table below, and averaged EUR 17.76 million over the three-year period, or 107.5% of the payments envisaged in the Protocol.

Figure 23: EU payments for financial compensation (adjusted taking account of agreed fishing opportunities) and sectoral support, 2021 to 2023 (EUR)

EU budget payments	2021	2022	2023
Financial compensation	14 024 766	17 089 034	13 383 921
Sectoral support	2 931 000	2 931 000	2 931 000
Total EU contribution	16 955 766	20 020 034	16 314 921

Taking account of authorisation fees paid by EU fishing vessel operators, which were a yearly average of EUR 2.86 million over 2021 – 2023 (as compared to EUR 2.09 million over 2016 – 2018 during the last Protocol), total payments from the EU budget and from EU private sector operators combined were EUR 61.86 million over 2021 – 2023 or a yearly average of EUR 20.62 million.

Thirty-eight percent of total EU fishing vessel operator payments over 2021 - 2023 related to authorisations for Greenland halibut in East Greenland, 15% for Greenland halibut in West Greenland, 26% for Northern prawns in East and West Greenland, 12% for cod, 5% for demersal redfish, 3% for pelagic redfish, and 0.5% for capelin.

Figure 24: Total EU contributions (access and sectoral support) and payments by EU fishing vessel operators, 2021 to 2023 (EUR)

Payments	2021	2022	2023
EU budget	16 955 766	20 020 034	16 314 921
EU vessel operators	2 492 162	2 528 196	3 546 636
Total	19 447 928	22 548 230	19 861 557

When examining reference prices compared to first sale landed prices in the EU (calculated using EUMOFA volume and value landings data), apart from cod for which the reference price is lower than first sale landed price, reference prices for all other species are considerably higher than landed prices in the EU MS catching different species under the Protocol (see following table).

Figure 26: Reference price, Member State landed prices, and reference price as percentage by species, average 2022-2023 (EUR/tonne)

Species	Reference price	EU Member State landed price	Reference price as % of MS landed price
Cod	2 203	6 213	35%
Pelagic redfish	1 890	861	220%
Demersal redfish	1 890	3 690	220%
Greenland halibut	4 640	3 549	126%
Northern prawn	4 080	3 549	115%
Capelin	364	n/a	n/a

Grenadier spp.	1 735	634	257 %
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Figure 27 below shows that authorisation fees paid by EU private sector operators to fish in Greenland ranged from 4.4% to 9.1% of reference prices (compared to 2.4 – 7.6% during 2016 – 2018 of the last Protocol, with an average of 6.6% (compared to 4.5% during the last Protocol over 2016 - 2018). Authorisation fees as a percentage of EU landed prices ranged from 3.2% to 15.2% for different species with an average of 7.7% (compared to 0.9% - 5.4% of EU MS first sale prices with an average of 2.8% during the last Protocol). (Norwegian and vessels fishing in Greenland using EU quota transferred to Norway are not required to pay authorisation fees).

Figure 27: Authorisation fees as a percentage of the reference price, and average 2022-2023 EU Member State landed prices

Species	Authorisation fee	As % of reference price	As % of Member State landed price
Cod	200	9.1 %	3.2 %
Pelagic redfish	131	6.9 %	15.2 %
Demersal redfish	131	6.7 %	15.2 %
Greenland halibut	309	4.4 %	8.4 %
Northern prawn – west	240	5.9 %	5.1 %
Northern prawn – east	181	6.9 %	5.1 %
Capelin	25	9.1 %	n/a
Average	181	6.6 %	7.7 %

Reporting obligations

A reporting requirement/obligation (RO) is a ‘requirement stemming from EU legislation that obliges Member States authorities, private organisations and/or public organisations to provide (in principle periodically) structured or unstructured data (qualitative or quantitative) to competent authorities at EU or national level’¹⁸.

In this report the administrative burden from reporting requirements was noted as a point of comparison. The figure below provides an assessment of the ROs which stem from the SFPA/Protocol, noting whether they are additional either to the previous FPA/Protocol or to other reporting obligations stemming from legislation, such as: Regulation on the sustainable management of external fishing fleets (SMEFF Regulation)¹⁹; fisheries control regulation²⁰; Greenlandic legislation; RFMO requirements. As evident from the table, the

¹⁸ Call for evidence - Rationalisation of reporting requirements: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13990-Administrative-burden-rationalisation-of-reporting-requirements_en

¹⁹ Regulation (EU) 2017/2403 of the European Parliament and of the Council of 12 December 2017 on the sustainable management of external fishing fleets, and repealing Council Regulation (EC) No 1006/2008, (OJ L 347, 28.12.2017, p. 81–104) - <http://data.europa.eu/eli/reg/2017/2403/oj>

²⁰ Council Regulation (EC) No 1224/2009 of 20 November 2009 establishing a Union control system for ensuring compliance with the rules of the common fisheries policy, amending Regulations (EC) No

current SFPA/Protocol does not entail any reporting obligations over and above those which would otherwise be required, or which were required under the previous Protocol.

Figure 38: Reporting obligations from SFPA/Protocol

Reporting obligation	Additional to other EU, Greenlandic, or RFMO legislation and requirements?
Monitoring and reporting by the Joint Committee - SFPA Article 12 - and results of the annual and multiannual programming by Greenlandic authorities to the Joint Committee (not explicit, but implicit)	No (requirements included in, and the same as the last Protocol)
Reporting by shipowners (by species and gear) of catch, bycatch and discards - Protocol Article 2.4.(b), and Annex Chapter IV, Section 1 (through the electronic reporting system when established)	No (requirements included in, and the same as the last Protocol, and required by REGULATION (EU) 2023/2842 and Greenlandic legislation)
Transmission of landings data by masters of vessels required by the Agreement through the ERS to the competent Greenlandic authority - Annex Chapter IV, Section 1	No (requirements included in, and the same as the last Protocol, and required by REGULATION (EU) 2023/2842 and Greenlandic legislation)
Reporting of vessel position by vessels to the FMC of their flag state and by the flag state to the Greenlandic authorities - Annex Chapter IV, Section 2	No (requirements included in, and the same as the last Protocol, and required by REGULATION (EU) 2023/2842 and Greenlandic legislation)
Observer report by the observer to the master of the vessels (in electronic form), and by the Greenlandic competent authority to the Union of flag Member State (if requested) - Annex Chapter IV, Section 4	No (requirements included in, and the same as the last Protocol, and required by NAFO/ICES)
Infringements included in an inspection report to be sent by Greenlandic authorities to vessel owners, the Union competent authority and the flag State - Annex Chapter IV, Section 5	No (requirements included in, and the same as the last Protocol, and required by REGULATION (EU) 2023/2842)
A weekly report on catches per day and by haul, and an evaluation report by the Union vessels to EU and Greenlandic parties no later than 30 days after the conclusion of an experimental fishery - Annex Chapter VI	No (requirements included in, and the same as the last Protocol)
EU flag State reports to the Union authorities on catches of pelagic redfish taken under the Greenlandic quota in Greenlandic waters and in the NEAFC regulatory area under the flexibility scheme, and flag State FMCs to report to the Greenlandic authorities catch statistics- Appendix 5	No (requirements included in, and the same as the last Protocol)

3.3 Technical conditions

As described in Figure 4, several indicators have been used to assess the current implementing Protocol's technical conditions, in relation to the relevant specific

847/96, (EC) No 2371/2002, (EC) No 811/2004, (EC) No 768/2005, (EC) No 2115/2005, (EC) No 2166/2005, (EC) No 388/2006, (EC) No 509/2007, (EC) No 676/2007, (EC) No 1098/2007, (EC) No 1300/2008, (EC) No 1342/2008 and repealing Regulations (EEC) No 2847/93, (EC) No 1627/94 and (EC) No 1966/2006, latest consolidated version: <http://data.europa.eu/eli/reg/2009/1224/2024-01-09>

objectives. These indicators will be outlined in this section. Importantly, EU vessels generally complied with the technical conditions of the current implementing Protocol, as they had done in the 2015-2019 Protocol.

On scientific data collection, EU fishing activities are subject to an appropriate reporting obligation framework (logbook, VMS, observers etc.) in the Agreement and a scientific data collection framework (size composition of the catches, biological parameters etc.). This information is transmitted to the relevant RFMO and national research institutes. EU scientists and Greenland scientists actively participate in scientific meetings and RFMO/RFO scientific committees.

On monitoring, control and surveillance, the activity of the EU fleet is properly monitored (VMS, AIS, observers aboard, etc.); reporting, monitoring and control takes place as stipulated in the Protocol and as legislation requires. Moreover, there is adequate monitoring, reporting and control of all catches and catch composition, possible infractions are sanctioned; sectoral support is used to reinforce monitoring, control and surveillance (MCS).

On provisions regarding the boarding of observers, Greenland does not deploy observers on EU vessels at all times (although EU observers are present). The Protocol requires EU vessels to take onboard Greenlandic observers if they can be present in time at ports from which EU vessels depart, and EU vessels have been willing to do so. However, the fact that many EU vessels land into Iceland or more often EU ports mean that it is difficult for Greenland to deploy observers.

On employment, The Protocol was important for the EU fleet in terms of employment creation, supporting around 177 jobs onboard vessels, with 168 of those being for EU nationals. Additionally, around 600 jobs in the processing sector in the EU are estimated to be dependent, to some extent, on the catches made in Greenlandic waters and processed in the EU.

On social clauses applicable to seamen on board EU vessels, there are no indications of possible non-compliance by EU vessels.

On food security, in the current implementing Protocol, vessel's activity support port-related businesses in the EU and provides raw material for the EU processing sector.

3.4 Sectoral support component

The EU's total annual sectoral support contribution as outlined in the Protocol is EUR 2 931 000. This must be spent by Greenland in accordance with Article 4 of the Protocol. Specifically, the Protocol states that the Joint Committee should agree on a multiannual sectoral programme and implementing rules. The Joint Committee assumes the responsibility for programming the sectoral policy support payment from the EU for the duration of the Protocol.

As described in Figure 5, several indicators have been used to assess the current implementing Protocol's sectoral support component, in relation to the relevant specific objectives. These indicators will be outlined in this section.

Monitoring of sectoral support

The Joint Committee is responsible for adopting annual and multi-annual programming and monitoring sectoral support. Any changes to programming must be approved by the Joint Committee.

The annual sectoral matrices provided by Greenland were comprehensive in terms of the indicators and targets included, and the annual reports prepared by the Greenland authorities were comprehensive and informative in their presentation of budgets, expenditure, and achievements. Annexes to the annual reports provided additional detail.

Greenland has submitted reports on activities implemented with sectoral support funds. At the time of this evaluation, the following reports have been submitted:

- Implementation report for the first tranche (May 2021)
- Implementation report for tranche 2 (May 2022)
- Implementation report for tranche 3 (June 2023)

Payment of sectoral support

The current implementing Protocol has earmarked an EU financial contribution of EUR 2.93 million per year (2021-2024) towards sectoral support. The current implementing Protocol provides for the EU to suspend payments in whole or in part if the Joint Committee considers that results are not in line with programming. The Protocol stipulates that sectoral support payments may not be made beyond 6 months after the Protocol expires (December 2024).

Figure 39. EU sectoral support payments in the 2021-2024 Protocol²¹

EU payment	Date	Amount (EUR)
Tranche 1	23/06/2021	2 930 000
Tranche 2	17/05/2022	2 930 000
Tranche 3	06/06/2023	2 930 000
Total		8 790 000
Maximum EU financial contribution to sectoral support by December 2024		11 720 000

Programming of sectoral support

A summary description of the content and focus of the sectoral support, along with budget over the five-year Protocol, is provided below. The policy priority areas and budget allocated to different objectives are largely unchanged from the previous Protocol.

1. Policy priority 1.: administration and management (Ministry of Fisheries Hunting and Agriculture/APNN - - Aalisarnermut, Piniarnermut, Nunalerinermullu Naalakkersuisoqarfik):

²¹ For more information on the payment of sectoral support, please see Section 6.4.1 of the evaluation study (pending publication).

- 1.1 Enhancement of the legal framework for sustainable fisheries (EUR 80 000)
- 1.2 Enhancement and implementation of the Framework of Management, Development and Administration of the Fisheries (EUR 20 000)
- 1.3 International cooperation, obligations and management (EUR 75 000)
- 1.4 Capacity building of fisheries officials (EUR 5 000)
- 1.5. Financial support fund for the inshore fisheries component (EUR 470 000)
- 2. Policy priority 2.: control and enforcement (Greenland Fisheries License Control Authority - GFLK):**
 - 2.1. Inspection and control of fisheries (EUR 940 000)
 - 2.2. Education and training of inspectors and GFLK staff (EUR 30 000)
 - 2.3. Enhancement of international cooperation for fisheries control (EUR 10 000)
 - 2.4. Digitalization projects, database expansion and improvement (EUR 60 000)
 - 2.5. Procurement and maintenance of equipment (EUR 10 000)

3. Policy priority 3.: support of scientific research and advice on stock status (Greenland Institute of Natural Resources - GINR):

- 3.1. Drafting and presenting advice on stock status (EUR 240 200)
- 3.2. Conducting research and surveys in Greenlandic EEZ (EUR 840 700)
- 3.3. Drafting and publishing scientific publications in relation to research (EUR 120 100)

The administration and management policy area accounts for 23% of the planned sectoral support budget of EUR 2.931 million each year, control and enforcement for 36%, and support for scientific research and advice on stock status for 41%.

Implementation of sectoral support

The sectoral support provided through the agreement was outlined earlier. A comparison of the proposed budget for 2021 - 2023 for Greenland's policy programme and the actual expenditure (in 2021 and 2022 as 2023 actual expenditure is not yet known), along with the EU share of expenditure provided by the sectoral support, can be gleaned from the annual matrices and reports prepared by the Greenlandic authorities and is presented below. As shown in the table, scientific research and advice on stock status accounts for the largest share of the budget with EU funding as a proportion of actual expenditure being greatest for administration by the Ministry. Overall, the EU funding provided just over 26% of the total Greenlandic expenditure. There was full utilisation of the EU sectoral support budget in both 2021 and 2022 (and this is expected to be the case also in 2023).

Figure 40: The budget, expenditure, and EU share of expenditure provided by the sectoral support (EUR, totals over 2021 - 2023)

Activity	Budget (2021-2023)	Actual expenditure (2021-2022)	EU funding (2021-2022)	EU funds as share of expe nditu re (202 1- 2022)
Administration by the Ministry	5 675 880	2 946 758	1 360 000	46 %
Control and enforcement by GFLK	8 820 000	8 696 257	2 100 000	24 %
Scientific research and advice on stock status by GINR	16 361 180	11 140 000	2 402 000	22 %
Total	30 857 060	22 783 016	5 862 000	26 %

Source: 2021 - 2023 annual sectoral matrices. Actual expenditure for 2023 not available at time of writing.

The main achievements under the priority policy areas, were as follows, with the specific targets for related indicators set in the annual matrices generally being achieved, and in some cases exceeded.

Policy priority 1, administration (Ministry of Fisheries Hunting and Agriculture/APNN):

- Seven Fisheries Commission meetings in 2021 with a report of recommendations for a new fisheries Act and work progressed on the Act in 2022.
- The introduction of 3 species-specific executive orders in 2021 (snow crab, lumpfish, salmon) and 3 in 2022 (salmon, inshore Greenland halibut, and scallops)
- Finalizing, adopting, and implementing lumpfish, salmon and snow crab management plans (2021), and plans for offshore Greenland halibut in East Greenland 2. inshore Greenland halibut in West Greenland (2022).
- Numerous Consultations/negotiations with bilateral partners and RFMOs.
- Completion of a series of trainings for staff in the Ministry that is responsible for fisheries administration and management (important given staff turnover).
- financial support for inshore fisheries through two separate funds, one for vessels (> 6 meters) and one for dinghies (< 6 meters).

Policy priority 2, control and enforcement (GFLK):

- Development and testing of ERS and the vCatch system.
- 158 port State controls (2021) and 173 (2022).
- 2 control expeditions of the inshore fishery in 2021 and 17 full landing inspections in 2022
- 70 vessels less the 6 meters long, and 64 fishing vessels above 6 meters long were controlled (2021), and 65 vessels less than 6 meters and 50 fishing vessels above 6 meter were controlled (2022). 11 hygiene checks were also carried out in 2022.
- Several campaigning trips and meetings were conducted.

- The observer coverage in the offshore fisheries of 18.7% for the demersal fisheries in 2021 and 15% in 2022, and 4.2% in 2021 and 2.3% in 2022 for the pelagic fisheries and experimental fisheries. The observer coverage for the entire Greenland Economic Exclusive zone was 16.4% in 2021 and 13% in 2022.
- Training of staff.
- Participation by staff in meetings to support International Cooperation for Fisheries Control.
- Work on the adoption of the fisheries database systems to be compatible with the NEAFC FLUX standard.
- Purchasing of 3 new 7.7-meter patrol boats in 2022 and purchasing of 3 drones to be used by the fisheries and wildlife officers in 2021, and repair and purchase of other equipment.
- New executive order on control of fisheries was adopted in 2021 and updated in 2022.
- Report prepared and presented on a risk-based approach to control (2022).

Policy priority 3, support of scientific research and advice (GN):

- 14 stocks assessed, 37 advisory documents, and participation in 80 international meetings (in 2021), with corresponding figures for 2022 of 24, 36 and 50.
- 13 research cruises and 95 survey days completed (in 2021), and 15 cruises and 232 survey days in 2022.
- 17 reviewed publications produced in 2021, and 14 in 2022.

4. EVALUATION FINDINGS

4.1 To what extent was the intervention successful and why?

Following the intervention logic in Figure 2, this section considers to what extent the current implementing Protocol was successful in reaching the general and specific objectives it set out to achieve through a lens of effectiveness, efficiency and coherence.

Effectiveness: To what extent was the intervention successful and why?

The current implementing Protocol is effective on achieving the following objectives, with some specific areas for improvement:

Objective 1: To contribute towards resource conservation and environmental sustainability through rational and sustainable exploitation of living marine resources of Greenland.

1.a Fisheries activities are addressed exclusively at surplus resources and prevent the overfishing of stocks, based on the best scientific advice and improved transparency on the global fishing efforts in the waters included in the current Protocol.

As described in the previous section, the latest scientific advice for stocks targeted under the Protocol suggests that there are only five of 15 species stock components which can be said with some certainty not to be over-exploited. This compares to six during the previous Protocol. Nine of the species stock components of the supporting evaluation study (compared to 6 during the previous Protocol) are either data limited with a precautionary approach to assessment and resulting advice or are assessed as having

either stock status lower than maximum sustainable yield (MSY) or stocks being subject to overfishing. Northern prawn stocks in East Greenland are of special concern with biomass below B_{msy} and fishing mortality above F_{msy}. During the previous Protocol there were three species stock components of special concern.

The main weakness under this specific objective is that The Protocol provides mechanisms which are only partially adhered to, to ensure that quota offered to, and accepted by the EU relates to surplus resources and prevents the overfishing of stocks. Stock status has not improved overall since the last Protocol. However, one stock is now of major concern, the Northern prawn stock in East Greenland ICES XIV and V being over-fished and subject to overfishing, while three were of major concern in the previous Protocol. There is a lack of up to date and robust assessments for several stocks, and some are over-fished or subject to overfishing. Mitigating this however is that the EU quota represents a relatively small proportion of Greenland quota for most species (**except for** Northern prawn stock in East Greenland ICES XIV and V) .

1.b Implementation of principles and standards for fisheries management as those applied in EU waters

Bycatches by EU and Greenland vessels in Greenland's offshore fisheries are low. Management measures have been introduced in Greenlandic legislation to both reduce bycatches and reduce possible impacts on the ecosystem. These also apply to EU fishing vessels and include: the mandatory use of sorting grids in Northern prawn shrimp trawl fisheries to reduce bycatch of finfish species; a landing obligation, with derogations for species and fisheries where release mortality is low and prawn trawlers; and maximum bycatch rates.

As stated in the Protocol, bycatches by EU fishing vessels count against SFPA quotas for species where the EU has fishing opportunities, ensuring that bycatches are taken into account for management of the fisheries.

Given the low bycatch rates of EU fishing vessels and the landing obligation effective in Greenlandic waters, bycatches by EU fishing vessels are likely to have no adverse impact on stocks that are also the subject of targeted fisheries. The presence of specific bycatch quota in the Protocol for grenadier (introduced during the last Protocol) serves to support bycatch management. The latest scientific advice for grenadier (ICES, 2023 and NAFO, 2014) is provided on a precautionary basis.

Greenland has implemented measures to protect the corals and the benthic environment, which apply to all vessels in Greenland whether domestic or foreign. These include closed areas to protect concentrations of coral and sponge communities, move-on rules for bycatches of corals and sponges and technical conservation measures to mitigate the impact of bottom contact gears on benthic communities.

Greenland has implemented mandatory reporting of seabird bycatches, although interactions relate primarily to coastal gillnet fisheries in West Greenland not to EU vessels. Interactions between endangered, threatened and protected (ETP) species and EU vessels are minimal, with only limited potential interactions between Northern prawn trawl fisheries and the Greenland halibut fishery with Greenland shark.

1.c Improvement of technical and scientific assessment of the fisheries

As described in Section 3.2 of this evaluation, the EU fishing activities in Greenland under the Protocol are subject to a robust data collection framework in terms of catches, bycatches, etc. There are requirements for EU fishing vessels to comply with: obligations for catch reporting through logbook data submission; vessel monitoring system (VMS) requirements; and Greenland's observer scheme. These obligations are complied with, with EU vessels providing the required data to the Greenlandic authorities.

Scientists from the EU (i.e. EU MS and EU joint research institutes), and GINR attend relevant meetings of working groups in ICES and NAFO to contribute towards management advice, as well as meetings in the context of bilateral and multilateral agreements for joint management. EU sectoral support funding is used to support participation by Greenlandic officials in these and other relevant meetings, as documented in the Annual Status Reports which present information about the implementation of fisheries sectoral policy in Greenland and the EU's contribution to it. For example, in 2022, 28 international meetings were attended by Ministry staff.

The annual sectoral support status matrices for 2021 to 2023, indicate significant levels of funding available for the collection of scientific data to support management advice, including surveys and biological data. Greenland undertakes research surveys for economically important species targeted by EU vessels (as well as other species) in West Greenland.

There has been longstanding cooperation and collaboration between scientific institutes of Greenland and EU Member States in relevant ICES and NAFO working group meetings, as well as outside of them with scientists from EU MS supporting and working with GINR.

1.d Ensuring control and compliance with EU fleet rules

As detailed in Section 3.2 and 3.3 of this evaluation, monitoring of EU fleet activity through the catch reporting framework provided for by the Protocol is robust and adhered to, as is monitoring through VMS. However, implementation of an electronic catch reporting system (ERS) which is the intention of both the EU and Greenlandic authorities, has been several years 'in the making' and is still not operational – this despite sectoral support funds having been used to support its development and testing over recent years.

Greenland can effectively control fishing activities within its EEZ, given staffing levels and enforcement assets. The GFLK administers the registration and control of Greenlandic and foreign catches and landings, as well as international agreements on control and enforcement. Data are exchanged with countries that Greenland has fisheries agreements with on a daily basis. Control is based on a risk analysis built on historical control data and current information from the ports. Actual offshore inspection of vessels at sea is performed by the Royal Danish Navy's Arctic Command (AKO), and most foreign flagged offshore vessels do not call into port in Greenland. Compliance observers onboard vessels, vessel monitoring system (VMS) and data reporting are the main means of monitoring compliance.

Joint Committee meeting minutes and Greenlandic MCS reports do not raise any specific issues with regards to non-compliance by the EU fleet, and there were no instances which gave rise to a need to sanction EU operators for infringements of fishing regulations.

The annual sectoral support status matrices for 2021 to 2023, indicate significant levels of funding available for MCS, with good achievement of targets as assessed against the relevant indicators. The substantial contribution of sectoral support to control activities strongly suggests that it is allowing a more comprehensive level of control than would otherwise be possible.

Objective 2: to contribute to the continuity of fishing activities by the EU distant water fleet and employment linked to fleets.

2.a To seek appropriate share of the surplus resources, fully commensurate with the EU fleets interests and their regional and sub-regional fishing strategy.

As outlined in Section 3.2 of this evaluation, the current implementing Protocol provides fishing opportunities that are very important to a small part of the EU fleet, as evidenced by high rates of authorisations for EU quota (>95% - see Table 20), and high rates of utilisation/catches of authorisations at over 90%. The high rates of utilisation suggest that the Protocol fishing opportunities match the fishing patterns of the EU fleet. The Protocol quotas were also used in quota transfers with Norway through the EU-Norway agreement to access fishing opportunities in Norwegian waters. The Protocol therefore provided access to important fishing opportunities not only in Greenland, but elsewhere. Fishing opportunities through the SFPAs in Greenlandic and Norwegian waters form an important component of total fishing opportunities in northern areas required for EU fishing vessels to secure sufficient fishing opportunities for their fishing strategy.

While recognising the needs of Greenland to meet the needs of its own fleet and other countries allocated quota in Greenlandic waters, of concern with regards to meeting the objective of fulfilling EU fleet needs is that indicative fishing opportunities specified in the Protocol are lower than during the previous Protocol for all species (except for cod which had a small increase, and Northern prawns in West Greenland which remained the same). These declines are not just based on stock status and therefore lower overall quota, but also on a declining share of TACs in some cases, e.g. for Northern prawn in West Greenland, and for cod which has showed recent improvements in stock status, which have not been matched by corresponding increase in cod quota to the EU). Further reductions could compromise the ability of the Protocol to be effective in supporting viability for a number of vessels, especially given the high (and increased since Brexit) reliance by the EU vessels concerned on fishing opportunities in Greenland (and Norway through EU quota in Greenland swapped with Norway in exchange for fishing opportunities for EU vessels in Norway).

For German and Danish fleets, the agreement is critically important in terms of the fishing opportunities it provides in Greenlandic waters. For the German fleet, catches in Greenland accounted for an average of 62% of the total value of landings from the 4-5 vessels concerned over 2021 to 2023 (compared to 59% during the last Protocol), while for the Danish vessel targeting Northern prawn, the agreement provided for 89% of the value of its catches over the same period (compared to 66% during the last Protocol). These vessels combined accounted for more than 90% of the aggregated volume of catches in Greenland over 2021 – 2023 by EU vessels. Given the concentration of access, for other EU MS the agreement is of less importance given either initial quota allocations that are low based on relative stability, or the small amounts of final quota available after transfers between EU MS and catches by Estonian and Lithuanian vessels. However, fishing opportunities for EU vessels in Norway enabled through the Protocol are

important for a number of EU MS (notably Germany, Spain, France, and Portugal), even though (with the exception of Germany) they do not end up fishing EU quota in Greenland.

The Protocol was important for the EU fleet in terms of employment creation, supporting around 177 jobs onboard vessels, with 168 of those being for EU nationals. Additionally, around 600 jobs in the processing sector in the EU are estimated to be dependent, to some extent, on the catches made in Greenlandic waters and processed in the EU.

The number of vessels taking up authorisations in Greenlandic waters declined slightly from 10 to 8 over 2021 to 2023, but with 8 vessels typically actually fishing each year, and investments in German vessels in recent years underscores the importance of the agreement and the opportunities it provided.

Catches by EU vessels of cod, redfish, Greenland halibut, grenadier, and Northern prawns in Greenlandic waters in 2021 accounted for around 50% of the total EU catches for those species. The agreement also allowed for (unquantifiable) additional EU catches in Norway and the Faroe Islands.

2.b Level of fees paid by EU vessel owners for their fishing activities is fair and proportionate to costs and revenues, and non-discriminatory

As outlined in Section 3.2 and 3.3 of this evaluation, fishing by other foreign countries is generally subject to similar conditions, with legislation applying to fishing vessels irrespective of flag. This applies certainly to Greenlandic technical conditions/regulations. In line with the SFPA text (Article 3.3 and 3.4) Greenland makes available information about the overall TAC and fishing opportunities to foreign fleets. It is expected that foreign fishing vessels would not pay for fishing opportunities originating from Greenland's other agreements as these agreements operate on the basis of a mutual exchange of fishing opportunities, rather than financial compensation for access to fishing opportunities in the case of the EU–Greenland SFPA.

Shipowners pay authorisation fees which range for different species between 3.2% and 15.2% of landed prices in the EU.

2.c. Ensure supply for the EU market.

EU catches of 14 000 – 15 000 tonnes per year in Greenlandic waters during 2021 to 2023 made only small (0.14%) contributions to EU market supplies, when considering total supplies to the EU market and apparent consumption of around 10.6 million tonnes of fish in 2021. However, cod landed and processed in Iceland is typically destined for the EU market, redfish and Greenland halibut is mainly destined for the EU market with some sold to Asia, and around 10% of prawns caught in Greenland and processed in Europe (e.g. Denmark) are for the EU market (with the balance sold to a wide variety of international markets). Supplies made available to the EU market through EU opportunities in Norway are an additional benefit of the agreement.

2.d Encourage the creation of a favourable environment for private investment and economic activities that contribute to the sustainable development of the partner country and strengthen its cooperation with the EU.

On encouraging cooperation between economic operators, investment by EU shipowners in the types of vessels required to take up fishing authorisations to fish in Greenlandic waters is very considerable, and having certainty over access to quota is thus critical. The current Protocol only lasts for four years (with the potential to extend it by a further two years, which has not been agreed) and will tacitly expire less than four years after it started. This is not creating the secure business environment required by EU shipowners.

EU vessels support economic activity in the EU ports in which they are based or visit, through the purchase of goods and services, and through the supply of some catches for processing in the EU. EU catches in Greenlandic waters made important contributions as raw material inputs to the EU processing sector - only cod caught in Greenlandic waters was processed in Iceland, and around 30% of Northern prawns caught in Greenlandic waters was processed outside of Europe (mostly in Greenland), with other EU catches processed in Europe.

There have been no temporary joint ventures in Greenland for Protocol species, even though the Protocol allows for them. The notion of joint ventures may be more applicable to SFPAs with developing countries and an objective to support the development of the third country sector, given that Greenland's domestic fishing sector is already relatively well developed. In addition, EU stakeholders suggest that the procedure for establishing a temporary joint venture (Chapter V, Section 1 of the Annex to the Protocol) would be unlikely to be fast enough to allow for such an initiative to catch uncaught Greenlandic quota in a specific year (which would be the focus of EU interest in such a venture).

Objective 3: To support the development of a sustainable fisheries sector in partner countries (through the governance framework that the Agreement creates and through the sectoral support; cooperation on blue economy, to the small scale and artisanal fisheries, to direct and indirect job creation, development of the local and national sectoral policies, etc.) and analysis of geographic, social, environmental, and economic impacts.

3.a Contribute to social, environmental, and economic development in Greenland. To what extent the SFPA and the activities implemented with the EU contribution for sectoral support, have generated significant positive / unintended / longer term / broader effects?

All of the EU catch of Northern prawns in West Greenland are landed and processed in Greenland even though there is no mandatory requirement for any EU catches to be landed in Greenland. No other EU catches are landed in Greenland or supply its domestic market. This is explained by the fact that apart from the Danish vessel fishing for prawns in West Greenland, other EU vessels generally do not visit Greenlandic ports, due to a lack of landing sites in East Greenland where most EU vessels fish.

Upstream benefits to Greenlandic enterprises take the form of purchases and services made by the Danish prawn vessel fishing out of Nuuk, which totalled around EUR 2.7 million in 2023. Other vessels fishing in East Greenland do not generally visit Greenlandic ports due to the lack of ports in the East of the country. Downstream activities in Greenland resulting from the agreement are relatively limited as most of the

fish caught under the framework of the SFPA/Protocol supplies the EU market and/or the EU processing industry. Nevertheless, the agreement is estimated to generate around EUR 3.6 million per year in combined upstream and downstream indirect value added for the Greenland economy (in addition to access fees and direct value added in the form of crew wages).

As noted above, there have been no temporary joint ventures in Greenland for Protocol species, even though the Protocol allows for them.

With regards to the sectoral support component, EU funding makes significant contributions to social, environmental, and economic development in Greenland. The support for inshore fisheries is notable (with a potential economic and social benefit), as is the role of sectoral support funding in improving governance and the functioning of the fisheries sector through scientific research and control of fishing activity in support of environmental sustainability.

3.b Contribute to strengthen capacities of Greenland to monitor and control fishing activities and to promote sustainable fishing practices in its waters.

As outlined in Section 3.4 of this evaluation, sectoral support funding provided by the agreement has achieved considerable results, across three main areas: administration and management (by the Ministry of Fisheries Hunting and Agriculture); control and enforcement (by GFLK); and scientific research and advice on stock status (by GINR). EU sectoral support funding as a share of total government expenditure on these three areas contributed 46%, 24% and 22% respectively over the period 2021 - 2022, or 26% of total government expenditure in the fisheries sector over the same period. The sectoral support contributes to training and equipment in support of both science and MCS.

The Greenlandic authorities prepare a detailed annual status report each year on the achievements in meeting pre-defined targets related to activities under each of the three main areas of funding. Specific targets for related indicators set in the annual matrices are generally achieved and if not, are explained by the authorities. Activities and purchases funded through the sectoral support are in line with the mandates and responsibilities of the three organisations concerned.

In some minutes of the Joint Committee, it has been noted that actual expenditure has slightly exceeded total budgets, but divergence is identified in the matrices, explanations have been provided by Greenland, and EU contributions were not increased. It is also noted that there is no fisheries attaché in Greenland to monitor sectoral support implementation, or any office of the EU.

3.c Assessment of results obtained in terms of impacts

Implementation of the impact of sectoral support is jointly monitored by the Joint Committee, on the basis of supporting documents supplied by the Ministry of Fisheries, and through technical missions of the EU dedicated to monitoring technical support.

Importantly, the reports and documentation provided by the Ministry of Fisheries generally identify the activities implemented and the main challenges encountered by the national authorities, but there is room for improvement in their analysis of economic and

social benefits. It should be noted, however, that the Protocol does not specifically address the need to address this dimension.

3.d Promote employment of local fishers and create direct and indirect employment in Greenland. To promote decent working conditions in the fisheries sector.

The Protocol was important for the EU fleet in terms of employment creation, supporting around 177 jobs onboard vessels, with 168 of those being for EU nationals. Additionally, around 600 jobs in the processing sector in the EU are estimated to be dependent, to some extent, on the catches made in Greenlandic waters and processed in the EU.

Employment of Greenlandic nationals on EU vessels is estimated to be around 5 people, working under decent working conditions. As noted above, all of the EU catch of Northern prawns in West Greenland are landed and processed in Greenland, which along with port visits generates onshore employment in Greenland.

Efficiency: to what extent were the expected effects achieved at reasonable costs?

In terms of the cost-benefit for the EU, Rates of utilisation of EU quota by the fleet are very high averaging 95% for all species over the period 2021 – 2023. The financial contribution to Greenland by the EU and EU shipowners in 2021 - 2023 averaged EUR 20.58 million a year (compared to EUR 15.3 million a year during the last Protocol), with slightly less than EUR 3 million per year being for sectoral support, and the balance financial compensation for access. These payments allowed for catches by the EU fleet in Greenland waters of EUR 152 million over the years 2021 - 2023 (compared to EUR 193 million over 2016 – 2018), plus additional catches in Norwegian and Faroese waters.

The average access cost per tonne of fish caught in Greenland was EUR 945, with EUR 741 paid by the EU (and the balance by private sector operators). EU payments of EUR 30.7 million over 2021 - 2023 related to catches made in Greenland waters by EU vessels (not additional payments for quota transferred to Norway) represented 18.1% of the catch revenue by EU vessels when fishing in Greenland. Concerning cost-benefit ratios in relation to GVA, every EUR 1 invested from the EU budget in the compensation payment for access, supports the creation of EUR 6.88 of value added. This is shared between the EU (EUR 4.23), Greenland (EUR 2.13) and third country entities (EUR 0.52).

In terms of the cost-benefit for EU operators, aggregated shipowner catches totalled 41 455 tonnes over 2021 – 2023 (compared to 42 579 tonnes during the last Protocol over 2016 – 2018), valued at EUR 152 million. Access fees paid by EU vessels represented 5.6% of their income from the aggregated catches over the 2021 - 2023 period (compared to 3.3% over 2016 – 2018). Access fees as a percentage of value added were 8.8% over 2021 – 2023 (compared to 6.8% over 2016 – 2018).

The costs of access were therefore a relatively small part of the overall cost structure for EU vessels, and the Protocol can be considered as efficient from the perspective of EU vessel operators, generating a gross profit from catches in Greenlandic waters of EUR 21.0 million per year on average over the 2021 - 2023 period.

In term of the cost-benefit of the actions of sectoral support, as already noted, and as discussed more fully in previous sections, specific targets for related indicators set in the annual matrices are generally achieved or exceeded, and where not, reasons are articulated in the annual reports prepared by the Greenlandic authorities. Data show that all EU budgeted sectoral support funds, were fully utilised in 2021 and 2022 and are expected to be fully utilised also in 2023.

In terms of financial compensation for fishing opportunities benefits the EU and Greenland, Greenland received compensation for access from the EU and shipowners equivalent to 25.8% of the average price at first sale of the fish caught in Greenland under the Protocol over 2021 – 2023. For catches made in Greenlandic waters, Greenland received 30.9% of the total value added. When also considering catches made by EU vessels in Norway following transfers enabled by the Protocol, this figure is 24.6%. Total GVA generated for Greenland in Greenland is calculated at slightly over EUR 65.3 million over the period 2021 - 2023 with 94% of that figure being from the access payments. Greenland also benefits to a small extent in terms of direct GVA from the activities of EU vessels, through small numbers of Greenlandic crew employed, and some limited indirect GVA in upstream and downstream activities related to the EU vessel fishing for Northern prawns in West Greenland which lands into Nuuk and is partly supplied by Greenlandic companies. The Greenlandic economy obtained EUR 1 576 of GVA per tonne of fish caught by EU vessels in its fishing zone over the period 2021 - 2023, equivalent to EUR 1.23 of GVA per EUR 1 paid by the EU in exchange for access (not accounting for sectoral support, and excluding quota transferred by the EU to Norway).

The financial compensation is absorbed with central government revenue/income, to be spent as part of the national budget benefitting all regions and social groups in the country.

Coherence

Overall, the current implementing Protocol is coherent and cooperates positively with other EU interventions and contributes to the priorities identified by both Parties.

On coherence with the CFP in general and with its external dimension and the regional fisheries policy, the SFPA and Protocol are coherent with the objective of the common fisheries policy (CFP), as set out the ‘Basic Regulation’¹, to ensure that fishing activities are environmentally, economically, and socially sustainable and are managed consistently with the objectives of achieving economic, social and employment benefits, and of restoring and maintaining fish stocks above levels which can produce maximum sustainable yield and that they are contributing to the availability of food supplies. The current Protocol is consistent with the CFP objectives since it safeguards the Union’s interests in terms of access rights and conditions, and it is coherent with CFP objectives of sustainability.

The Protocol is also fully coherent with both Regulation on the sustainable management of external fishing fleets (SMEFF)¹⁹, and Regulation (EU) 2023/2842 as regards fisheries control.

At regional level, the SFPA and Protocol contribute to the EU objectives of good regional management of shared stocks, through:

- the agreement of quotas for the EU within the context of overall regional agreement, and

- the engagement by Greenlandic authorities with NAFO and NEAFC (enhanced through the sectoral support).

And they contribute to the objective of providing a regional network of fishing opportunities for the EU fleet, not just in Greenlandic waters, but also in Norway through the quota transfers with those third countries.

As mandated by the CFP Regulation, SFPAs and their underlying texts reflect a stronger emphasis than older generation of FPAs on human rights, combatting IUU fishing, supporting development of Sustainable Development Goal 14 ‘Life below water’, and on SFPAs being limited to surplus catches. The introduction of the SFPA in 2021 to replace the previous FPA thus increased coherence of the agreement with EU policy.

On coherence with the other EU policies, the Protocol, with the emphasis on cooperation and sustainable exploitation of resources, is in line with the Joint Communication by the European Commission and high representative of the Union for foreign affairs and security policy on a stronger EU engagement for a peaceful, sustainable and prosperous Arctic, which focuses on: contributing to maintaining peaceful and constructive dialogue and cooperation; addressing the ecological, social, economic and political challenges arising as a consequence of climate change; and supporting the inclusive and sustainable development of the Arctic regions to the benefit of its inhabitants.

It is coherent with the Joint Declaration by the European Union and the Government of Greenland and the Government of Denmark, on relations between the European Union and Greenland, signed in Brussels on 19 March 2015, which committed to strengthening relations and cooperation based on broadly shared interests and to endow their mutual relations with a long-term perspective.

It is coherent with the Decision on the association of the Overseas Countries and Territories (OCTs) with the European Union²² to support sustainable development and diversification of Greenland’s economy. The decision has objectives to: foster and support cooperation with OCTs, including in addressing their major challenges and reaching the SDGs; and support and to cooperate with Greenland in addressing its major challenges such as the raising of education level and to contribute to the capacity of the administration of Greenland to formulate and implement national policies.

Under the Decision, Greenland has a wide-ranging political and policy dialogue with the EU, receives funding, and has preferential trade arrangements to access the EU market. Greenland is one of the largest recipients of EU support per capita in the OCTs (EUR 225 million foreseen between 2021 and 2027).

SFPA/Protocol objectives are consistent with the first common objective stated in the 2006 Joint Declaration by the EU and the Governments of Greenland and Denmark, namely cooperation in sustainably managing fish stocks and the environment and provision of fishing opportunities for EU fishing vessels. The Protocol has supported capacity building through contributing to the training of personnel in Greenlandic authorities responsible for fisheries policy, management, and control through the sectoral support programme.

On Greenlandic fisheries policy and other related national policies, the objectives of the SFPA/Protocol are fully coherent with the main objectives of Greenland’s fisheries

²² Council Decision (EU) 2021/1764 of 5 October 2021 on the association of the Overseas Countries and Territories with the European Union including relations between the European Union on the one hand, and Greenland and the Kingdom of Denmark on the other (Decision on the Overseas Association, including Greenland) (OJ L 355, 7.10.2021, p. 6–134) - <http://data.europa.eu/eli/dec/2021/1764/oj>

policy. These are to ensure the largest possible, long-term socio-economic benefits from fishing on a sustainable basis, and that fisheries legislation and other relevant initiatives create coherent, stable framework conditions that reduce uncertainty and hence create an attractive investment climate for the benefit of further development of the industry. The SFPA and Protocol are also coherent with Greenland's underlying policy principles of biologically sustainable exploitation of fishery resources to ensure reproduction and optimal utilization, and appropriate output limitation (TAC and quotas) and input limitation in the form of capacity regulation to create a stable and lasting balance between the fishing fleet's capacity and its fishing opportunities over a longer period.

The EU's sectoral support made substantial contributions to activities over 2021 - 2023 to ensure that Greenland can achieve the objectives and priorities of its fisheries policy, and to updating the Fisheries Act.

4.2 How did the EU intervention make a difference and to whom?

EU Added Value

The current implementing Protocol mostly responds to the needs of both Parties through the interventions provided for under the access and sectoral support components. The EU's added value lies mainly in the following three elements:

- The additional value resulting from the EU intervention under the Protocol, compared to the absence of Protocol. To what extent would Member States have had the ability or possibility to put in place appropriate alternative measures? To what extent have the overall benefits of the Agreement and Protocol had an added value for the EU?;

In the absence of a Protocol but with the SFPA in force, EU shipowners would have been prevented from negotiating direct access due to the exclusivity principle: Article 5.3 of the SPFA states that Union vessels can only engage in fishing activities in Greenland if they hold a fishing authorisation issued under the Agreement. However, even if the SFPA was not in place along with the absence of a Protocol it would be likely that EU shipowners would have found it difficult to negotiate access to Greenlandic waters with the Greenlandic authorities, given pressure from the Greenlandic private sector to fish for quota currently allocated to the EU.

Compared to both scenarios:

1. The Protocol therefore allows EU vessel access to Greenlandic (and Norwegian) waters that would otherwise not be the case, generating considerable and additional value to the EU fleet in terms of catches of species, which are important for the fleet as evidenced by high authorisation rates and catches compared to the quota offered to the EU by Greenland.
2. The EU intervention adds value in terms of the following features of the Agreement, which would have been difficult, if not impossible to generate otherwise:
 - dialogue and direct exchange between EU and Greenlandic authorities, in terms of scientific cooperation and a framework for joint monitoring and control of EU activities.
 - promotion of responsible fishing practices, including more transparent access conditions.

- coherence with EU policies.
- financing of actions aimed at achieving the objectives of the Greenlandic sectoral policy.

On the last point, the high additional value of EU involvement is demonstrated by the 100% absorption of the sectoral support funding and the amounts of funding involved (at just under EUR 3 million a year), and the significant proportion of national budget for fisheries that is provided for by the sectoral support (26% over 2021 - 2022).

- The additional value resulting from the EU intervention under the Agreement and the Protocol, compared to what could be achieved by the Union fleet outside the framework of the Agreement;

EU vessel operators that are provided with quota through relative stability keys express a preference for accessing Greenlandic waters through the mechanism of the Agreement and the Protocol. Those EU operators/MS that do not receive quota through relative stability keys might be expected to prefer private agreements as this might enable them to access quota.

An element of uncertainty remains for the EU operators given the way that the Protocol includes indicative quota that is mutually agreed between Greenland and the EU each year, and which may and often does vary from the indicative quota. Nevertheless, variations from indicative quota are not normally significant (apart from capelin). The Protocol thus provides a more stable environment and guaranteed lawful access to the Greenlandic fishing zone over a 4-year period than would be the case under private agreements.

The strong uptake of authorisations is reflective of vessel owner satisfaction with the Protocol, and while the costs of operating under private agreements cannot be known, data provided earlier have shown that the cost of access paid by vessel owners to Greenland, as negotiated by DG MARE and included in the Protocol as authorisation fees, are not prohibitive.

EU vessel owners recognise the benefits the Protocol has in supporting sustainability which ultimately benefits them, as well as the positive role that the EU plays in negotiating on behalf of EU MS and the benefits of a Protocol in protecting quota, given pressure within Greenland by its private sector for quota.

Acceptability²³

- To what extent are the EU shipowners satisfied with the Protocol?

EU shipowners fishing in Greenlandic waters under the Protocol, and consulted during this evaluation, expressed very strong support for renewal of the Protocol given its strategic importance in terms of their overall fishing strategy and the benefits it facilitates in terms of gross value added and employment.

No major concerns were expressed over the content of the technical and financial conditions of the Protocol.

²³ For a full report of the consultations conduction, see Annex 6 of the [evaluation study](#).

However, shipowners identified a number of issues which if addressed would enhance their satisfaction with the Protocol even further. These included:

- sharing of bycatch information by Greenland (as required for EU vessels) which would advance research.
- a longer Protocol (6 years minimum), given the necessary investments made by EU vessels and the need for certainty.
- experimental fisheries for prawn in northern areas which are opening up due to less ice cover. Currently no experimental fisheries for Protocol species are possible, but consideration could be given to areas north of a certain latitude where such fisheries could be allowed.
- if quotas are not fully utilised by the year end, paid authorisation fees could be credited or transferred to the following year.
- increased flexibility regarding vessel entry and exit from the Greenland zone, especially concerning vessels carrying fresh catches.
- increasingly flexibility arrangements for Northern prawns to be better aligned with conditions applying to Greenlandic vessels in being able to roll over quota until the end of April in the following year.
- revision of reference prices specified in the Protocol during the Protocol to better align them with market prices.
- To what extent is the Protocol developed in consultation, coordination and supported by the civil society in the EU and nationally and locally?

There are few civil society organisations in Greenland involved in the fisheries sector. The Greenland Business Association noted in its response to consultation that it was not in favour of the SFPA/Protocol or its renewal, given that Greenlandic vessels could catch quota which is allocated to the EU. It did not however have specific concerns over the technical clauses in the Protocol aimed at supporting environmental sustainability, although commented on levels of EU bycatch quota suggesting these were high. The fishers and hunters' association (KNAPK) did not respond to consultation requests, but during the last evaluation expressed general satisfaction with the Protocol and supported its renewal. Inshore fisheries, and KNAPK specifically, receive direct funding through the sectoral support programme. They recognised at that time (2019) that the EU allocation is from offshore quotas and so not directly impacting their fishing opportunities. Also, the taxation of the offshore sector goes to central government, with no certainty that the EU quota share going to Greenlandic offshore vessels instead would result in increased support to the inshore sector. However, the organisation wished to see greater emphasis through the sectoral support on funding for the inshore fishery (not just for investment in inshore vessels/dinghies, but rather in education and in funds to increase the ability of inshore fishermen to access inshore quota, which are reported to be quite consolidated with/in larger companies).

Civil society organisations in the EU were approached for their views during this evaluation, but none responded. This may be suggestive of the fact that these organisations have no major concerns over the Protocol, or just that are more interested in Agreements with developing countries. EU civil society organisations are part of the Long-Distance Advisory Council (LDAC) working group on Bilateral Relations with Third Countries and are thus afforded the opportunity through working group meetings to engage with the European Commission about the Protocol, its implementation, and its possible renewal.

- To what extent is the Protocol supported by the sector (ship owners, traders, and processors) in Greenland

Greenlandic shipowners of larger vessels operating in the offshore fishery, are in direct competition for quota allocated to the EU. The Greenlandic offshore private sector recognises that a renewal of the Protocol is likely for political reasons but considers that Greenlandic companies have the capacity to catch EU quota themselves (i.e. they therefore do not consider there to be a surplus). They would wish however for the indicative quota specified in the Protocol to be reduced. The previous evaluation in 2019 also noted that they commented that EU quota transferred to Norway does not result in any authorisation fees to the Greenlandic Government when Norwegian vessels take up authorisations for that quota, and that the Government could make more money from taxing catches made by Greenlandic companies if they were allocated additional quota.

- To what extent are the Greenlandic and EU MS administrations, satisfied with the implementation of the Protocol?

The Greenlandic authorities are generally satisfied with the Protocol and its implementation, and with the good working relations with the EU which are important for successful implementation. They recognise the benefits of good geo-political relationships with the EU that are enabled by the SFP/Protocol and seek its renewal.

While recognising that the Greenlandic authorities and the Commission may have differing views when it comes to negotiating the Protocol, during implementation there appears a good spirit of partnership and collaboration between the two parties, good levels of communication, and the Joint Committee functions well.

Greenlandic authorities are satisfied with the sectoral support funding provided and its use on the three main priority areas and recognise the benefits of it. They are also satisfied with most the technical clauses of the Protocol and the respective obligations those place on the Government, on the EU, and on EU shipowners. However, they:

- do not support fixed reference prices and would prefer for implementation to include a mechanism to adjust the price levels at least once in the Protocol period to reflect market prices.
- commented that for some species when scientific advice results in reduced overall quota, quota reductions for the EU fleet are less than for Greenlandic vessels.
- observed that the process of accepting capelin offers means that when the EU does not accept Greenland's offer it is difficult for the Greenlandic fleet to fish any quota that they EU does not want to accept during the short season.
- commented that with regards to observers, reaching the required observer coverage rate requires sacrificing manhours that could be allocated on control of the coastal fleet. They would wish more dialogue and flexibility about observer coverage.
- suggested that the Joint Committee to discuss sectoral support could be conducted online.

EU Member States are satisfied with the implementation of the Protocol, and the benefits of the partnership, also being complementary about the role that the European Commission and Greenlandic authorities play. They seek its renewal.

4.3 Is the intervention still relevant?

- To what extent the original objectives of the SFPA/Protocol still correspond to the needs of the EU and Greenland?

For both the EU and the Greenlandic authorities, the objective of resource and environmental sustainability provided for by the SFPA and Protocol is highly relevant to the needs of both parties. There is a requirement of the legal texts to consider sustainability during the process to fix EU fishing opportunities. And the objective to improve scientific and technical knowledge in Greenland, enhanced through the sectoral support funding, further helps to ensure that the requirement for sustainability is supported.

For Greenlandic shipowners, providing access to the EU fleet to Greenlandic waters through the SFPA and the Protocol is becoming less relevant over time, as the Greenlandic fleet is increasingly capable of catching fish resources in Greenlandic waters given investments in new vessels. In this sense the needs of the EU and Greenlandic shipowners are potentially and increasingly opposed. However, the EU agreed quota represents only a small proportion of total Greenlandic quota for concerned species.

The SFPA and Protocol are relevant to the needs of EU shipowners in providing access to the Greenlandic fishery zone for a part of the EU fleet, and through the transfer of EU quota in Greenland to Norway which allows the EU fleet access to Norwegian waters in return. The SFPA and Protocol are most relevant to the needs of German and Danish fleet operating in Northern waters and are also relevant to Estonia and Lithuania who can access to quota through intra-EU MS quota swaps. The SFPA/Protocol are also relevant to the needs of Germany, Spain, France and Portugal who gain access to Norwegian waters through the quota transfers between the EU and Norway.

Supporting the development of a sustainable fisheries sector in Greenland remains relevant to needs in Greenland and is provided for in the SFPA/Protocol through the sectoral support funding and the potential for joint ventures. However, as noted above, Greenland's fisheries sector, especially its offshore sector which is now technologically advanced, efficient, and generating tax revenues for the government, has developed considerably over recent decades, and recent private sector investments in the sector and the existing status of the domestic fishery are evidence that the need to develop the domestic sector is declining, except in supporting an enabling environment provided by its government. In association, for the Government of Greenland the ability to extract resource rent through taxes from its own increasingly developed domestic sector when targeting the same stocks as EU vessels, means that in purely financial terms the needs of Government for the financial compensation for access has reduced. However, the Government of Greenland views the SFPA and Protocol not just in financial terms, and the agreement remains highly relevant to the Greenlandic government in terms of contributing to its objective to improve fisheries governance and to retain close cooperation and good relations with the EU.

- To what extent is the Agreement relevant to the policy objectives of RFMOs and to the EU's regional relations with other northern partners?

The Protocol includes a provision for mackerel quota to EU vessels, should Greenland be part of a CSA for mackerel and set quota based on agreement between all Coastal States (UK, Norway, the EU, the Faroe Islands, Iceland, and Greenland). There is currently and still no such agreement on quota distribution between the Coastal States, although they do jointly agree to TAC (which for 2024 is in line with scientific advice).

The SFPA/Protocol contributes to the objectives of the Arctic Council and to building relations between the EU and other parties to it, and it contributes to the sustainability objectives of NAFO and NEAFC, both RFMOs, through the sectoral support which allows Greenlandic scientists to engage with ICES, NEAFC and NAFO.

The SFPA and Protocol are relevant to the needs of both parties, with a strong emphasis on sustainability. However, there are tensions between the competing needs of the Greenlandic and EU private sector fishing fleets for access to resources, a reduced need to support development of the Greenlandic private sector (due to success in its development), and in purely financial terms, less relevance for the Greenlandic government on the financial compensation for access. However, the agreement remains relevant to the Greenlandic government in the broader sense in terms of contributing to a sustainable development of its fisheries sector and maintaining levels of cooperation with the EU.

The Protocol, contributes to the objectives of RFMOs and other regional organisations and helps to foster EU relations with them.

5. WHAT ARE THE CONCLUSIONS AND LESSONS LEARNED?

5.1 Conclusions

As for the conclusions, the intervention, in the form of the SFPA and associated Protocol, was **highly effective** in meeting the 3 general objectives and 11 specific objectives. Nine of the 11 specific objectives evaluated through relevant success criteria were satisfactorily achieved. Two others were generally achieved but with some issues of concern: noting that EU quota represents a relatively small proportion of Greenland quota (except for Northern prawn stock in East Greenland ICES XIV and V) for most species, stock status has not improved since the last Protocol, there is a lack of up to date and robust assessments for several stocks, and some are over-fished or subject to overfishing; additionally, the length of the Protocol does not provide a sufficiently secure business environment for EU shipowners.

The Protocol was **highly efficient**. Answers to all four evaluation questions suggest success in terms of value for money for the EU, value for money for EU shipowners, sectoral support being well implemented with positive economic, environmental, and social impacts at a reasonable cost, and the good benefits to Greenland in terms of the revenues and value added generated by allowing EU vessels access to its fisheries resources.

There was a **high level of economy**, with EU sectoral support matching well with Greenland's needs and being fully absorbed, and with EU disbursements of the sectoral support financial contributions made in a timely manner consistent with the Protocol.

The SFPA and Protocol were **highly coherent** in terms of alignment with the CFP in general and with its external dimension, and with the regional fisheries policy. It also

made an effective contribution to a wide range of EU policies for the region as well as to Greenland's policies, which include cooperation, collaboration, and sustainable exploitation of natural resources. The SFPFA and Protocol are also coherent with Greenland's policy priorities in terms of alignment of objectives and use of sectoral support funding.

The **EU added value of the intervention was high**. Compared to any other mechanism for gaining fisheries access for EU vessels to Greenlandic waters, the Agreement delivered a wide range of benefits to both EU and Greenlandic stakeholders in terms of sustainability contributions, transparency, equity, and national development. The Protocol, and the EU's role in negotiating it, generated considerable additional value to EU shipowners in terms of certainty over quota quantities provided.

The intervention was **moderately acceptable**. Globally speaking, the EU, EU shipowners, and the Greenlandic authorities all wish to see a new Protocol. However, many Greenlandic private sector interests would rather there was no Protocol, and both the EU and Greenland consider that some improvements to the content of the Protocol could be made.

The Protocol was **moderately relevant** to the needs of the EU and Greenland, with a strong emphasis on sustainability, contributing to good relations between the parties which are needed, and to the objectives of RFMOs (NAFO and NEAFC) and other regional organisations which helps to foster EU relations with them. However, there were tensions between the competing needs of the Greenlandic and EU private sector fishing fleets for access to resources.

5.2 Lessons learned

As for the lessons learned, the ex-post evaluation provides important lessons as follows:

- Implementation arrangements for the Protocol (access and sectoral support components) function well, having evolved over time and being based on good relations between the EU and Greenlandic authorities. Along with many of the technical clauses and requirements of the Protocol, they do not therefore need amendment.
- The SFPFA/Protocol is of very high importance to the EU given the benefits derived, as evidenced by the high rates of utilisation by the EU fleet and the fishing opportunities that are provided in both Greenland and Norway through quota swaps.
- Greenland also benefits considerably in financial terms from the financial compensation, and from the sectoral support funding. However, there is an increasing ability and willingness over recent years by Greenland's own offshore sector to catch Greenland quota, given the investments and technological advancements that have been made.
- Indicative fishing opportunities provided to the EU have been decreasing over successive Protocols, while costs for access paid by the EU (reference prices) and shipowners (authorisation fees) have been increasing.
- Not all species being caught under the Protocol are assessed as being sustainably exploited and/or are subject to full analytical assessments of stock status.
- Reference prices in the Protocol are fixed for its duration, meaning that they are unlikely to reflect market prices that change over time.

- The EU is typically unable to utilise indicative or offered fishing opportunities for capelin due to timing issues.
- The length of the current Protocol (four years) could be increased to provide greater certainty to all related parties.
- The shared nature of stocks in the region that change in size and distribution, and the wishes by several fleets from different countries to exploit them, makes joint agreement and management of stocks and fishing opportunities complex when considered in light of the different interests by countries fishing in northern waters.

6. EX-ANTE EVALUATION

The ex-ante evaluation of the current implementing Protocol provides a forward-looking perspective that is complementary to the ex-post evaluation. Expressly, it reflects on the lessons learned and outlines the possible ways forward, through a set of available policy options, for the implementation of the Sustainable Fisheries Partnership Agreement between the EU and Greenland.

6.1 Problem analysis and needs assessment

In the context of the intervention logic in Figure 2, this section outlines the possible current and future needs of both Parties to the current implementing Protocol and the Agreement.

Current and future needs of Greenland

Greenland needs to ensure that it can generate revenue from its fishery resources, supporting and developing its inshore and offshore sectors. Furthermore, the country would benefit from landings of fisheries in Greenland so that downstream economic and social benefits are created. These needs can be mutually met with allocation of quota to its offshore sector, taxation of the offshore sector, and use of resulting government revenues to support the inshore sector.

At the same time, the Greenlandic authorities are aware that the capacity of the country's fishing fleet has increased, and it is possible that they will seek to accommodate internal demands for increased quota of key resources to its own vessels, particularly in West Greenland. Nonetheless, the government appreciates alternative channels of revenue such as financial compensation provided for granting access to EU vessels which contributes to the diversification of Greenland's revenue base.

Regarding sectoral support, Greenland would prefer to continue receiving funds for the development of its fisheries sector, with priorities to be defined at a later stage.

In general, Greenland has expressed needs for aligning the Protocol to its national legislation, ensuring coherence. Moreover, it is rather essential that the country continue to benefit from tariff-free access to the EU market that could be lost in case of a “non-renewal” of the implementing Protocol.

Current and future needs of the EU

In the event of a new Protocol being concluded, the interests of the European Union would be served if the two following needs are met:

- Alignment of the financial contribution for access with the demand of EU vessels: the high utilisation rate of the fishing opportunities provided for in the Protocol is an indicator of the high demand of the EU fleet for access to the Greenlandic waters which is expected to be the case also in the future. Nevertheless, and pursuant to the requirements of the European Court of Auditors, it is essential for the EU to ensure that it avoids paying for fisheries access which is not utilised.
- With regard to sectoral support, the EU needs to ensure sound management of the funds, following the recommendations of the report of the European Court of Auditors in its 2015 report “Are the Fisheries Partnership Agreements well managed by the Commission”²⁴: i) clearly differentiated from overall funding from other sources with respect to specific activities supported; ii) used in areas with the greatest impact; iii) used as much as possible for activities rather than salaries; iv) assessed through a robust set of indicators; v) clearly reported on through detailed annual reports; and vi) guided by a multi-annual sectoral matrix and annual matrices.

Current and future needs of the EU fleet/processors/consumers

The EU shipowners have a clear interest in a new Protocol. Continued access to Greenland’s EEZ would serve to support a network of regional fishing opportunities, both through the fishing opportunities provided in Greenland, and through the opportunities that are provided to fish in Norway in exchange for those third countries being allowed to fish for EU quota provided under the EU/Greenland Protocol. Although the EU vessels fishing in Greenlandic waters are of a small number (typically 8 vessels per year), the fishing opportunities provided are very important. Danish and German vessels are highly dependent on fishing under the Protocol, while for others fishing in Greenland, for instance Lithuanian and Estonian vessels, that are not so dependent, the Protocol nevertheless offers fishing opportunities that are vital in contributing to catches made within northern waters more generally (e.g. NAFO, NEAFC, Norway, Iceland) and therefore allow for year-round activity. A failure to agree a new Protocol would have very serious consequences for the EU fleet in terms of the resulting impacts on fishing possibilities, fishing strategy, and reduced profitability. The EU shipowners would hence prefer to maintain or increase the amount of the allocated quota.

Furthermore, a longer Protocol (6 years minimum) would provide for a more secure investment climate for the EU operators as it would increase certainty. They would also prefer that authorisation fees do not increase in a new Protocol and that, in case of non-utilised quotas, authorisation fees to be credited or transferred to the following year.

Regarding level-playing field, the EU fleet needs to operate on a level playing field with other fishing nations active in Greenlandic waters. This is currently not the case as non-EU foreign vessels fishing in Greenland for EU quota provided under the EU/Greenland Protocol, or for quota provided under mutual exchanges of opportunities with Greenland, do not pay authorisation fees (even though there is reciprocal access and quota transfers).

²⁴ [Special Report No 11/2015: Are the Fisheries Partnership Agreements well managed by the Commission? | European Court of Auditors \(europa.eu\)](#)

As per the EU processing sector, it also has needs in raw material aquatic products which would be partially met with the maintenance or increase of fishing opportunities in the Protocol. Apart from cod, which is processed in Iceland, all other species provided for in the Protocol are processed in the EU with significant downstream effects, both in terms of economic (value added) and social (employment) benefits.

EU consumers' needs for the supply of fish are partly met by the Protocol, and there is a need for a continued supply of fish from Greenlandic (and Norwegian) waters by the EU fleet.

6.2 EU added value

The EU holds exclusive competence to negotiate the implementing protocols to the SFPAs, in accordance with Article 3 of the Treaty on the Functioning of the European Union. In addition to the added value outlined in Section 4.2, the EU's involvement in the negotiation of a new implementing protocol also brings the following benefits:

- i. a mandate from the EU that ensures that the Protocol and its implementation are aligned with international law and the CFP and consistent with other agreements concluded with partner countries in the region,
- ii. the possibility for the EU to have an instrument to strengthen sectoral policy at sub-regional level, which is facilitated by a network of agreements and EU interventions within NAFO and NEAFC, and
- iii. a specific instrument of bilateral cooperation with Greenland, and its interventions within NAFO and NEAFC.

6.3 Policy and management objectives

The objectives of SFPAs are guided by Articles 31 and 32 of the Basic Regulation on the CFP and the Council conclusions on the external dimension of the CFP. The objectives of a future intervention under the Fisheries Partnership Agreement concluded between the EU and Greenland must be based on the general and specific objectives (see Section 2.1.1) which guide the EU's intervention logic for all SFPAs. This intervention logic is outlined in Figure 2.

6.4 Policy options, including associated risks

Two options are available when the current implementing Protocol to the Agreement de facto expires on 31 December 2024:

- **Option A:** non negotiation of the Protocol implementing the Agreement when the current implementing Protocol expires.
- **Option B:** negotiation of a new protocol implementing the Agreement with two possible sub-options:
 - o **Sub-option B1:** negotiation of a new implementing protocol with the same conditions as the current Protocol (status quo)

- o **Sub-option B2:** negotiation of a new implementing protocol with adjusted conditions

6.4.1 Option A

The Agreement becomes dormant without an implementing protocol. The instruments provided for in Articles 31 and 32 of the CFP become non applicable, except for the provision on the exclusivity clause which prevents EU vessels from accessing the fishing areas in Greenland.

6.4.2 Option B

Under option B, the EU and Greenland agree on the conclusion of a new implementing protocol under the Agreement for a new multiannual period. The conclusion of a new protocol will make it possible to implement the tools provided for by the CFP to establish the framework under which EU vessels may operate in Greenlandic waters and to mobilise an EU financial contribution for access and sectoral support. The financial contribution in question will be the result of a negotiation and are not known at this stage.

Sub-option B1

Sub-option B1 consists of negotiating a new protocol without any adjustment to the conditions of the current implementing Protocol (same conditions for the implementation of the access component and sectoral support, same financial commitments – **status quo**)

Sub-option B2

The main conclusions of the ex-post evaluation and the lessons learned suggest that there are areas for improvement in the conditions of the current implementing Protocol. The proposed adjustments would many address the following issues:

- Agreement of a **6-years** implementing Protocol (minimum) to ensure a safe business environment for EU shipowners
- Improved quota **alignment with scientific advice and better stock assessment**
- The indicative **bycatch quota** offered to the EU would be reduced
- The **reference prices** included in the Protocol should better reflect the actual market prices and, if necessary, readjusted mid-Protocol
- The fishing authorisation fees should reflect a **fair contribution paid by the EU shipowners**
- If quotas are not fully utilised by the year end, **paid authorisation fees could be credited or transferred** to the following year

Ability to **roll over unutilised quota** until the end of April of the following year and up to 10%

- **Experimental fisheries** for Northern prawn above the agreed latitude could be envisaged, especially in West Greenland
- A slight **increase of sectoral support** funds could be considered

6.5 Results and impacts

As presented earlier, some of the expected results and impacts are shared, some are specific to the EU, and some are specific to Greenland.

6.5.1 Option A

Under option A, **EU vessels** would no longer have access to the Greenlandic fishing zone as a result of the application of the exclusivity clause. The result from not having a new Protocol between the EU and Greenland, i.e. Option A, would be the loss of these benefits to the EU. The benefits lost from not being able to fish in Greenlandic waters would be compounded from the associated impacts that would occur under Option A from the reduced possibility for the EU to exchange part of its quota in Greenland for quota in Norway. The implications of a failure to agree a new Protocol in terms of loss of access to Greenlandic waters, and potentially reduced access to Norwegian waters, would be very significant for the EU. It would cause significant disruption to the fishing activities of the Member State operators involved.

Option A is not therefore considered a good option in any sense for the EU if benefits are to be maintained, as EU vessels would be prevented from fishing in Greenlandic waters, either because private agreements with Greenland are not a possibility if the SFPA were to remain in force given the exclusivity clause, or if the SFPA was denounced Greenland would be expected to allocate all quota to its domestic fleet.

As per **Greenland**, Option A would result in a lack of this sectoral support and a reduction in contributions to the financial capacity of Greenland to implement its national fisheries policy. Other results of Option A would include cessation of financial contributions by the EU (based on reference prices) and vessel owners (based on authorisation fees). While Greenland could conceivably use quota not provided to the EU under Option A in quota exchanges with other countries, the direct financial contributions from third countries (the EU in this case) would cease as other countries fishing in Greenlandic waters do so under quota exchanges rather than based on financial contributions, and vessels from other countries fishing under Greenland's agreements do not pay authorisation fees.

Changes to the overall financial benefits to the Greenland government from its catching sector would thus depend on any increases in taxes that could be generated from allocating a greater share of Greenland quota to the domestic fleet, or the taxation of benefits generated by its fleet from increased fishing opportunities in other third countries through greater quota exchanges with other non-EU countries. As this revenue is strongly reliant on export prices, over-reliance on this source represents a significant risk for Greenland should export prices reduce, and maintaining high taxation levels would impact on profitability of the domestic sector. With this uncertainty over future tax revenues, it is not possible to know whether in net terms, benefits to the Greenlandic government would be increased or decreased under Option A over the duration of a future Protocol.

Option A would provide increased benefits to the Greenlandic domestic offshore sector from increased fishing opportunities. This assumes that the Greenlandic offshore fleet takes up the fishing opportunities not exploited by the EU, rather than these being transferred to other fishing nations. It could also result in increased upstream and downstream benefits in Greenland, assuming that a proportion of the increased catches by Greenlandic vessels were landed in Greenland.

From a geo-political perspective however, Option A would reduce the level of engagement with the EU, thus generating potentially serious negative impacts on EU/Greenland relations of a non-financial nature. Perhaps most importantly, these would include lost/reduced collaboration on resource management and scientific collaboration. The failure to re-negotiate the agreement/Protocol could also have an impact on a) the future OCT Decision, and b) the exemption from customs duties of Greenlandic products exported to the EU; the Protocol of 1985 (No. 15) annexed to the EU Treaty on special arrangements for Greenland, states that these exemptions apply ‘if the possibilities for access to Greenland fishing zones granted to the Community pursuant to an agreement between the Community and the authority responsible for Greenland are satisfactory to the Community.

6.5.2 Option B

Having a new Protocol (either option B1 or B2) could be expected to result in the overall and specific objectives specified above being achieved, as without a new Protocol there would be neither the joint efforts by both parties aimed at sustainable exploitation, nor the considerable benefits that are derived from the Protocol.

The granting of access within a framework guided and managed jointly by the EU and Greenland and overseen by the Joint Committee, coupled with the sectoral support, represents a key difference between both Options B1 and B2, and Option A. In addition, the engagement and communication between the EU and Greenland fostered through having a new Protocol (options B1 and B2) serve to support regional coordination and cooperation between all parties interested in fishing for and managing shared stocks in northern waters (e.g. the EU, Greenland, and other northern countries through NAFO, NEAFC or other coastal state agreements).

Sub-option B.1

In case the status quo is maintained, the already identified needs stemming from the weaknesses of the current Protocol would remain unmet. Whereas good utilisation of the fishing opportunities, strong scientific cooperation, good functioning of the Joint Committees and good implementation of the sectoral support component will most likely remain the case, issues regarding acceptability of the Protocol by the entirety of the stakeholders, misalignment of reference prices with actual market prices and overexploitation of certain stocks (due only partially to EU vessels) would probably persist.

Sub-option B.2

The revised Protocol as defined in Option B2 would better meet the shared needs than the unchanged Protocol specified in option B1. For the shared need of sustainable exploitation, Option B2 is preferable because fishing opportunities offered by Greenland to the EU and accepted by the EU would be more closely aligned with scientific advice,

and with a potential increase in sectoral support the contribution to science and research would be enhanced. Option B2 would also ensure the most equitable sharing of benefits due to the modifications to the Protocol in terms of adaptation of reference prices during the Protocol.

Option B2 better addresses the EU needs and addresses a number of weaknesses in the current Protocol as identified in the ex-post evaluation, providing better results for the EU than option B1. Improvements would relate to the need for increased flexibility, which would benefit the EU fleet. The longer duration of the Protocol in option B2 compared to option B1 would also result in additional benefits to stakeholders in the EU (i.e. the private sector, and the Commission), in terms of a) the greater security of the benefits generated and b) the need to engage with negotiations for a new Protocol less frequently. However, it should also be noted that better alignment of quota with scientific advice under option B2 could potentially, but not necessarily, have a negative impact on the amount of quota offered to the EU, thereby reducing the benefits to the EU fleet (and upstream and downstream sectors in the EU). Whether this was the case or not would depend on whether amounts of quota allocated to the EU, generally being small proportions of total Greenland quota, would be ring-fenced/maintained even in the event that TACs for certain species might need to be reduced in order to be in line with scientific advice.

In comparing the results between options B1 and B2 (both of which would ensure continued benefits to Greenland in terms of financial contributions and sectoral support from the EU), the different financial benefits would only be revealed following negotiations over indicative and agreed quota, reference prices and authorisation fees, and possible increases in sectoral support, and would also be based on authorisations taken up by EU vessels. In addition, the longer duration of the Protocol under option B2 would benefit Greenland by increasing its security over the benefits resulting from the Protocol. The non-financial benefits of option B2 would also be greater than under option B1, in terms of enhanced collaboration on sustainability issues and scientific research.

6.6 Preferred option

A comparison of the options indicates that sub-option B2 (negotiation of a new implementing protocol with some adjustments) is the preferred option. Adjustments to ensure greater proportionality between the fishing opportunities negotiated and the effective use of these opportunities will improve the efficiency of the EU's investment in the financial contribution for access.

Compared with sub-option B2, sub-option B1, which considers a renegotiation of the current implementing Protocol, has as its main weaknesses (i) maintaining fishing opportunities in excess of needs and (ii) maintaining a category of small pelagic fisheries whose technical arrangements are not suitable for EU operators specialising in this type of fishery.

The sub-options B1 and B2 will allow the EU to mobilise specific EU funding for sectoral support, decoupled from the EU counterpart for access. The performance of sectoral support will depend on its implementation conditions (available budget, programming, technical and financial management of planned activities, monitoring and evaluation). By comparison, option A of non-renewal of the Protocol does not meet any of the needs of both parties.

6.7 Risks

Option 2 is high risk for the EU, given the benefits that would be lost to EU stakeholders both from fishing in Greenland, and in Norway. It would also pose risks to Greenland: any net change in benefits to Greenland from being able to allocate quota to its own fleet or to include such quota in exchanges with other third countries is unknown and would be highly dependent on export prices. Additional risks to Greenland could relate to impacts on the OCT Decision and exemption from customs duties. The key risk to both parties is therefore that a new Protocol is not agreed. A failure to agree a new Protocol would result in a cessation of all benefits currently being generated by the Protocol, while not necessarily increasing financial benefits in Greenland.

Given the exclusivity clause, an additional risk is that a new Protocol (under either option 1 or option 3) is not agreed before the existing one expires at the end of December 2024, i.e. a failure to have a new Protocol in force in time would result in a cessation of EU vessel activity. The mitigating measure is to ensure that negotiation mandates are provided to both negotiation teams in plenty of time to allow for negotiations to be concluded to the satisfaction of both parties, and a new Protocol formally approved by both sides in advance of the tacit expiry of the current Protocol on 31 December 2024.

As noted earlier, given the shared nature of stocks in northern waters and the extensive use of quota exchanges between different parties, it must also be recognised that other fisheries agreements and management arrangements in the region could impact on a future Protocol. Failure to agree quota at the regional level by all parties, or a failure of potential fisheries management plans to be agreed at the regional level, could result in the EU having to decline fishing opportunities offered to it by Greenland for sustainability reasons.

Under both options 1 and 3, there is a risk of a failure by EU vessels to utilise the fishing opportunities provided. However, based on recent utilisation rates and species currently included in the Protocol, this risk is considered as low.

A failure by parties to agree on the content of the sectoral support matrix, given different views about priority objectives and needs, as well as implementation, is also a risk. However, this risk is not considered a major one, especially as sectoral support needs may continue broadly in line with those under the current Protocol.

A failure by the Joint Committee to adequately monitor the implementation of the Protocol so as to achieve both its overall objectives as specified above, and the detailed arrangements and agreements contained within the Protocol and Annexes, is a risk that should be mitigated by ensuring that regular Joint Committee meetings are held as scheduled, are of sufficient duration to adequately consider all issues of relevance at the time, and by any future ex post evaluations carefully reviewing the functioning of the Joint Committee.

Both options 1 and 3 also have inherent risks with regard to uncertainty over fish prices, and the impact such price fluctuations might have on achieving fair and mutual benefits. Given that financial compensation for access is based on reference prices, divergence of these prices from actual values could benefit one party over the other. This risk is inherent in all SFPAs/Protocols but is mitigated in option 3 by the proposal to review reference prices mid-way through the Protocol.

Both options 1 and 3 also have risks in relation to the exploitation of fish stocks. As already noted, not all species have historically been exploited in line with scientific advice. However, option 3 provides for a closer alignment of catches with advice, thereby serving as the mitigating measure for this risk. In any case the process of annual confirmation/agreement of indicative fishing opportunities allows for scientific advice to be considered.

6.8 Monitoring of a future implementing Protocol

Once it enters into force, a new implementing protocol would continue to be monitored through the ongoing technical dialogue between the Greenlandic authorities and DG MARE. This technical dialogue should continue to encourage, as was the case under the current implementing Protocol, the preparation of the annual meetings of the Joint Committee, which has the power to make decisions on the implementation of the access and sectoral support components of the Agreement.

The monitoring framework should continue to incorporate indicators on the use of fishing opportunities. The monitoring framework should also add indicators for the periodic monitoring of the application of the provisions of the Protocol concerning the embarkation of national seamen and observers, and the contribution in kind to food security.

For the sectoral support component, the monitoring framework should continue to consider disbursement indicators to measure progress in implementation. Where possible, it would be appropriate for the monitoring include more systematically indicators on the number of direct beneficiaries of activities and, where appropriate, indicators on the economic benefits of activities.

In accordance with the requirements of the EU Financial Regulation and the CFP, the Protocol will have to be the subject of an independent ex-post evaluation, which it will be necessary to implement approximately 18 months with the date of expiry of the Protocol in order to give the European institutions time to prepare for a possible negotiation under the ordinary legislative procedure without interruption of access possibilities.

Directorate-General for Maritime Affairs and Ocean

PLAN/2023/2011 - EU-Greenland Sustainable Fisheries Partnership Agreement – negotiation mandate for a new protocol

1. Organisation and timing

The results of this SWD are mainly informed by an evaluation study conducted by an independent consultant. This evaluation study took place from January to March 2024 under the guidance of an interservice steering group established by different services of the European Commission and within the framework of the terms of reference of specific contract number 9 under the framework contract MARE/2021/OP/0001. The evidence base of this evaluation study consisted of two main components: analysis of available documentation and consultations with stakeholders.

2. Format of the Evaluation

This initiative does not require an impact assessment as it sets out a general policy approach and does not commit to any new action. This is in line with the standard flexible application of better regulation rules to Sustainable Fisheries Partnership Agreements that entail a tight schedule for proposing and adopting individual agreements and unavoidable legal requirements for the preparation of the renewal or revision of agreements. There was no choice of alternative policy options in this case a non-continuation of the agreement was not desired, which the findings of the evaluation also support. However, a retrospective and forward-looking evaluation was carried out instead of an impact assessment and presented with this staff working document. For the retrospective evaluation, the questions look at the effectiveness, efficiency, economy, relevance, coherence, EU added value and acceptance of the Protocol.

For the prospective evaluation, the questions focus on identifying problems and needs, the objectives to be achieved, the options available (conclusion or not of a new Protocol) and the associated risks, and lessons learned.

3. Evidence, sources and quality

The details on the stakeholders consulted and the feedback received can be found in the synopsis report in Annex VI.

ANNEX II. METHODOLOGY AND ANALYTICAL MODELS USED

For the evaluation as a whole, the following methodology was applied by the independent consultant, which was in line with the Terms of Reference:

- A phasing of the evaluation activities with: i) a short inception/planning period to develop an intervention logic, agree consultation tools, and collect relevant data and information; ii) a consultation phase involving extensive (remote) consultations with EU and Greenland stakeholders (those private sector operators directly affected, the EU MS and Greenlandic authorities responsible for implementing the Protocol, and civil society and (i)NGOs with an interest in the Protocol) – see Annex 6 for synopsis report; and iii) a data analysis and report writing phase.
- The construction of an economic model to assess value-added to EU and Greenlandic parties
- The use of an evaluation questions matrix, with relevant indicators, as the basis for answering questions related to the ex-post evaluation criteria.
- Monitoring and guidance of the evaluation by an Inter-service Steering Group (ISG) consisting of officials from Commission services and the EEAS, which assisted with identifying aspects to consider, discussing and approving the methodology documented in the inception report, commenting on the draft and final reports, and assessing the quality of the evaluation.
- Peer review and quality control by the staff of the contractors not engaged in the evaluation and analyses, to ensure reliability and robustness.
- The evaluation period (three months) did not allow for in-person consultations, but remote consultations were characterised by good engagement and feedback by stakeholders with the evaluators, ensuring that the robustness of the methodology was not compromised.
- Throughout the evaluation there was rapid and effective communication between the consultants and DG MARE, and the consultants and Greenlandic authorities to facilitate the work of the consultants, for example with the provision of data and answers to specific questions required and posed by the consultants.
- All major data requirements of the consultants to complete the evaluation were available from public available sources (e.g. EUMOFA, STECF, ICES, NAFO), or made available by relevant stakeholders (EU shipowners, DG MARE, Greenlandic authorities), and are assessed as being reliable.

Specific objectives	Success criteria	Indicators	Data sources
Objective 1: To contribute towards resource conservation and environmental sustainability through rational and sustainable exploitation of living marine resources of Greenland			
Fisheries activities are addressed exclusively at surplus resources and prevent the overfishing of stocks, based on the best scientific advice and improved transparency on the global fishing efforts in the waters included in the current Protocol.	Stocks targeted by the EU fleet are not overexploited at the regional level or at national level, and the EU fishing capacity is within the limits established or recommended by the relevant Coastal States Arrangements (CSA), RFMO or regional fisheries organisation (RFO). The Protocol considers the management strategies expressed by CSA, RFMOs, RFOs and Greenland. Greenland takes part in the relevant CSA/RFMO/RFOs and provides data on activities carried out by vessels flagging its flag and by other foreign fleets operating in its waters.	State of the stocks targeted under the Protocol (scientific advice analysis that Greenland conducted, meetings, regional scientific reports, and data, CSA/RFMO/RFO and national scientific institutes); All fleets catches and fishing effort in Greenland and in the region; possible impact on the environment of all the fleets operating in these waters.	ICES, NAFO, GINR Protocol text JC minutes CSAs

Implementation has followed the same principle and promote the same standards for fisheries management as applied in EU waters.	The EU and Greenland adopt management measures to reduce bycatches and discards and reduce the possible impacts on the ecosystem.	Management measures adopted at the regional, national or EU level or in the framework of the Protocol. Strategies aimed at bycatch and conservation measures for protected species.	Relevant management measures and strategies
Scientific and technical evaluation of the fisheries concerned has improved.	EU fishing activities are subject to an appropriate reporting obligation framework (logbook, VMS, observers etc.) in the Agreement and a scientific data collection framework (size composition of the catches, biological parameters etc.). This information is transmitted to the relevant RFMO and national research institutes. EU scientists and Greenland scientists actively participate in scientific meetings and RFMO/RFO scientific committees.	Inclusion of data collection provisions in the Agreement and timely availability of relevant data at the management and scientific operators; amount and quality of data collected; number of reports to RFMOs and scientific institutes; participation rate in RFMO/RFO scientific committees; results achieved with sectoral support; number of meetings between scientists and managers at country level.	JC minutes Sectoral support Annual Implementation Reports (AIRs)
Compliance and control of EU-fleet activities have been ensured.	The activity of the EU fleet is properly monitored (VMS, AIS, observers aboard, etc.); reporting, monitoring and control takes place as stipulated in the Protocol and as legislation requires. Moreover, there is adequate monitoring, reporting and control of	Level of implementation of the monitoring provisions in the Agreement and its Protocol; level of implementation of the monitoring, reporting and control provisions; results achieved with sectoral support in terms of MCS. Number of	JC minutes AIRs

	all catches and catch composition, possible infractions are sanctioned; sectoral support is used to reinforce monitoring, control and surveillance (MCS).	infringements by EU vessels.	
Objective 2: To contribute to continuing the fishing activity of the EU long distance fleet and the employment linked to the fleet operating within the Agreement and its Protocol			
To seek appropriate share of the surplus resources, fully commensurate with the EU fleets interests and their regional and sub-regional fishing strategy.	Species and quantities covered by the Protocol correspond to the fishing patterns of the EU fleet. The fishing opportunities allowed are acceptable considering the activities of all fleets active in the same waters at national, sub-regional and regional level.	Utilisation of fishing licences; catches in waters covered by the current Agreement and Protocol compared to overall catches at national, regional, and sub-regional level if appropriate; employment (direct and indirect jobs) for EU operators; evolution of the number of EU vessels in the region; contribution to the supply of the EU market and EU processing sector (volume and value) and to the local processing sector.	Data provided by DG MARE Consultations with stakeholders Trade data

To ensure that the level of fees payable by Union shipowners for their fishing activities is fair and proportional considering the revenues and costs, non-discriminatory and promotes a level playing field among the different fleets.	The Agreement and its Protocol offer similar conditions to all foreign fleets operating in the fishing zones and management areas in the current Protocol. Fishing authorisation fees paid by EU shipowners are reasonable.	Level of fees and technical conditions applied to third countries fleets in the fishing zones and management areas in the current Protocol. Fees paid by EU shipowners.	JC minutes GRL consultations Protocol
To ensure supply for the EU market.	The Agreement offers a reasonable framework to foster landings in the EU or trade of fish into the EU market.	Catches as proportion of EU consumption	DG MARE for catches EU shipowners for trade flows EUMOFA
To encourage the creation of a secure environment that is favourable to private investment and economic activities in the EU.	The length of the Protocol is sufficiently long for EU shipowners to have certainty about access when making investment and maintenance decisions about their vessels. Vessel activity support port-related businesses in the EU, and provides raw material for the EU processing sector.	Number of years of Protocol. Provision of raw material to EU fish processors Number of temporary joint ventures with Greenland	Stakeholder consultations Protocol
Objective 3: To support the development of a sustainable fisheries sector in partner countries (through the governance framework that the Agreement creates and through the sectoral support; cooperation on blue economy, to the small scale and artisanal fisheries, to job direct and indirect creation, development of the local and national sectoral policies, etc.) and analysis of geographic, social, environmental, and economic			

impacts.			
To contribute to social, environmental, and economic development in Greenland. To what extent the SFPA and the activities implemented with the EU contribution for sectoral support, have generated significant positive / unintended / longer term / broader effects?	The sectoral support and the economic activity that the implementation of the Agreement creates contributes to the functioning of the fisheries sector, better governance, transparency, inclusiveness, and social and economic development of the area covered by the current Protocol. Part of the fish caught in the framework of the Agreement supplies the Greenlandic market and processing industry; and the EU-fishing supports port- and ancillary activities and the economic and social development in Greenland. There are synergies between the implementation of the Agreement and the economic and social development of the country.	Results achieved with sectoral support and economic and social impact of the implementation of the current Protocol; EU contribution to budget of the national fisheries strategy; extent of economic (level of purchases in EUR) and social activity (employment) in Greenland due to EU vessel activity.	Sectoral support matrices AIRs GRL budgets GRL consultations
To contribute to strengthen capacities of Greenland to monitor and control fishing activities and to promote sustainable fishing	The sectoral support contributes to adequate training, equipment, and infrastructures namely in the areas of science and MCS.	Results achieved with sectoral support; comprehensiveness and level of detail of the sectoral support reporting and cooperation on Blue Economy, small scale	Sectoral support matrices AIRs GRL budgets

practices in its waters.	Utilisation of the sectoral support has been duly reported (detailed results on expected economic and social benefits in all geographic scope of the current Protocol).	and artisanal fisheries, aquaculture, data collection, MCS, food security and policy areas.	GRL consultations
To promote employment of local fishers and create direct and indirect employment in Greenland. To promote decent working conditions in the fisheries sector.	Greenlanders are employed on EU vessels. Part of the catch is landed and processed locally generating employment.	Employment created directly and indirectly in the EU and in Greenland or in the sub region/sub region. Landings by EU vessels for local processing	Protocol (for obligations) GRL (for landings and employment in GRL)

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

Effectiveness – The extent to which the objectives of the Implementing Protocol to the Agreement were achieved

Efficiency – The extent to which the desired effects are achieved at a reasonable cost

Questions	Success criteria	Possible indicators	Data sources
To what extent does the Protocol offer value-for-money to the EU?	The EU financial contribution for access is commensurate to all fishing opportunities offered by the current Protocol and per category.	Utilisation of the fishing opportunities and positive cost-benefit ratios.	DG MARE data Economic model

To what extent has sectoral support and cooperation on blue economy actions, policy area, small scale and artisanal fisheries, food security, etc. agreed in the initial programming, been achieved at reasonable cost	All activities included in the sectoral support have been properly implemented and benefited Greenland in environmental, social, and economic terms.	Degree of completion of the initial programming; % of sectoral support activities and projects compared to overall EU contribution, to the national budget for fisheries, marine and maritime issues and to other donor contributions. Contribution to the sustainable development of the country.	Sectoral support matrices JC minutes AIRs
To what extent has the Protocol offered value-for-money to the EU shipowners?	The EU shipowners' contribution is commensurate to effective catches and profits compared to total costs and benefits.	Volume and value of catches. Gross profit from catches Access fees as % of income from catches	DG MARE data Economic model STECD fleet performance data Consultations
To what extent is the financial compensation for the fishing possibilities under the Agreement advantageous for the EU and for Greenland?	Greenland benefits from a fair part of the added value of the catches and all financial compensation. This financial compensation is distributed geographically and socially fairly in Greenland.	Financial compensation received by Greenland GVA to Greenland	Economic model

Economy – the extent to which resources are available in due time, in appropriate quantity and quality at the best price

Questions	Success criteria	Possible indicators	Data sources
To what extent is all the EU contribution and specifically its sectoral support commensurate to the needs of Greenland and absorption capacity?	The total EU contribution is in line with national and local needs and absorption capacity. The total amount of sectoral support is used according to the foreseen calendar and adapted to the needs of the country. In case of modifications of the initial programming of the sectoral support, these have helped to better use of the financial support and contributed successfully to the sustainable development of the country.	Consumption of the EU contribution for sectoral support and geographical distribution compared to the local and national needs in the related policy area. Geographical and social distribution impacts and benefits of all financial compensation. Absorption capacity of the sectoral support; success stories; % of sectoral support compared to the national and local budget for fisheries and to other donor contributions.	AIRs Sectoral support matrices Consultations
To what extent have the sectoral support payments been made yearly in time and according to the programming defined in the Protocol?	Contributions have been paid consistently with the Protocol provisions, and so that they could be allocated to the national or local budget in compliance with the engagements of the Protocol. Achievement of the criteria reports and procedures, budget, financial indicators and methods of control and audit.	Calendar of payments and considered allocations. Results of the budget and financial indicators and methods of control and audit.	JC minutes

Relevance – the extent to which the objectives of the Protocol match current needs and problems

Questions	Success criteria	Possible indicators	Data sources
Extent to which the original objectives of the SFPA/Protocol still correspond to the needs of the EU and Greenland?	The SFPA and Protocol are in line with SFPA objectives (resource and environmental sustainability; support the development of a sustainable fisheries sector in Greenland; improve scientific and technical knowledge, and address correctly the needs of Greenland and of the EU shipowners.	Comparison between original Agreement's objectives and national and local needs and those of the EU and its fleet improved with the implementation of the Agreement and the Protocol.	Agreement and Protocol Consultations
To what extent is the Agreement relevant to the policy objectives of RFMOs and to the EU's regional relations with other northern partners?	The Protocol contributes to achieving objectives set at RFMOs and Coastal State Arrangements (CSA) and by the Arctic Council, and support relation-building with other regional partners of the EU.	Comparison between SFPA and these organisations objectives and how the implementation of the Protocol contributes to their objectives; consistency, coherence, and cooperation with objectives of other fisheries Agreements in the region and the EU's interest and objectives in such regional organisations.	Council Regulations on quota swaps ICES/NAFO CSAs

Coherence – The extent to which the Agreement and its Protocol do not contradict and is coherent other interventions with similar objectives

Questions	Success criteria	Possible indicators	Data sources
How coherent is the SFPA and Protocol with the CFP in general and with its external dimension and the regional	The Protocol is in line with the CFP in general, contribute to achieving EU objectives at regional level, is	Consistency with the CFP and its external dimension and the main strategies policy orientations at regional and sub regional	Protocol EU regulations

fisheries policy?	consistent with RFMOs/RFOs and other relevant organisations' objectives.	level.	
To what extent is the Protocol and its implementation consistent and coherent and complements with the other EU policies?	The Protocol makes a substantial contribution to other EU policies. The Protocol and its implementation is complementary, ensures coherence for sustainable development including its social dimension and cooperates positively with other EU interventions.	Consistency with the main EU strategies / policy orientations. Implementation of social clauses. And contribution to sustainable food security. Coherence of the Agreement with EU policies in the region and the country.	Protocol EU Consultations Other EU policy documents
In what ways are the Agreement and Protocol consistent with Greenlandic fisheries policy and other related national policies?	The SFPA and Protocol contribute to achieving the priorities identified nationally and is in line with regulations to implement national policy.	Consistency with the national and regional Fisheries, marine and maritime policies, and sectoral policies in the country. Benefits to the governance of the country and to the protection and sustainable management of natural resources and to the society.	Protocol GRL consultations National policies and strategy documents

The **EU added value** – The extent to which the intervention brings EU added value

Questions	Success criteria	Possible indicators	Data sources
What is the additional value resulting from the EU intervention under the Protocol, compared to the absence of Protocol? To what extent would Member	Financial contribution, in particular sectoral support, successfully used to support and develop the national and local fisheries sector. Evidence of the need and usefulness of the	Data on the implementation within the current Protocol in economic, social, and environmental terms compared to other agreements or with no agreement.	Consultations AIRs Sectoral support matrices

States have had the ability or possibility to put in place appropriate alternative measures? To what extent have the overall benefits of the Agreement and Protocol had an added value for the EU?	benefits arising from the Agreement, in terms of good governance, natural resources conservation, sound implementation of sectoral policies, infrastructure, social services, the setting-up of businesses, vocational training, and of programmes aimed at developing and modernising the fisheries sector, to ensure that this distribution benefits the country, its natural resources and the population. The fishing species included in the agreement are the ones of interest for the EU fleet considering the species available and fishing possibilities for all fleets operating in the same area.		
What is the additional value resulting from the EU intervention under the Agreement and the Protocol, compared to what could be achieved by the Union fleet outside the framework of the Agreement?	The Agreement and its implementing Protocol provide substantial benefits to the EU fleet compared to private agreements.	Uptake of licences, comparison of all costs and benefits of operating under this Agreement, other SFPAs and private agreements, degree of legal certainty provided by the Agreement and its legal framework.	Data from DG MARE Consultations

ANNEX IV. OVERVIEW OF BENEFITS AND COSTS

Tables show cost and benefits compared to no Protocol. In most cases EU fleets and EU MS would have the same obligations/costs associated with control and enforcement of vessel activity either in Greenland waters or elsewhere, and Greenland authorities would have similar control and enforcement costs if they allowed EU vessels access their waters. Recurrent costs are annual.

		EU citizens/ consumers	GRL citizens/ consumers	EU businesses	GRL businesses	MS adminis- trations	GRL administration	EU commission services
Costs	one-off / recurrent	Monetary value, ranges and/or qualitative comment						
Direct compliance costs								
Negotiation of Protocol	one-off	n/a	n/a	n/a	n/a	n/a	Some staff time, but not quantifiable	3 person months FTE estimated (DG MARE)
Design of sectoral support component	one-off	n/a	n/a	n/a	n/a	n/a	Some staff time, but not quantifiable	n/a
Catch (value) not available as caught by EU	recurrent	n/a	Not quantifiable/proportionate within scope of evaluation as not certain if GRL vessels caught fish instead of EU how much exported and sold locally	n/a	€ 43 210 510	n/a	n/a	n/a
Gross value added from catches not available to GRL fleet	recurrent	n/a	n/a	n/a	Not easily quantifiable/ proportionate within scope of evaluation but could be around EUR 32 million if GVA of GRL vessels same as EU ones from catches	n/a	n/a	n/a
Tax revenue on catches if made by GRL fishing companies instead	recurrent	n/a	n/a	n/a	n/a	n/a	Not easily quantifiable as depends on export values, tax rates, and utilisation which aren't known. But if same profits as EU	n/a

		EU citizens/ consumers	GRL citizens/ consumers	EU businesses	GRL businesses	MS adminis- trations	GRL administration	EU commission services
Costs	one-off / recurrent	Monetary value, ranges and/or qualitative comment						
							vessels and assuming 20% tax on vessel profits c.a. EUR million	
Enforcement costs								
Sectoral support oversight	recurrent	n/a	n/a	n/a	n/a	n/a	1 FTE/year estimated (consultants)	1/2 FTE/year estimated (DG MARE)
Data management and vessel oversight as 'super-flag state'	recurrent	n/a	n/a	n/a	n/a	n/a	n/a	1/2 FTE/year estimated (DG MARE)
Indirect costs								
Upstream and downstream value added if catches made by GRL fishing companies instead	recurrent	n/a	n/a	n/a	Not quantifiable/ proportionate within scope of evaluation	n/a	n/a	n/a
		EU citizens/ consumers	GRL citizens/ consumers	EU businesses	GRL businesses	MS adminis- trations	GRL administration	EU commission services
Benefits	one-off / recurrent	Monetary value, ranges and/or qualitative comment						
Direct								
financial compensation for access (EU and shipowners)	recurrent	n/a	n/a	n/a	n/a	n/a	€ 17 651 523	n/a
sectoral support for admin/management, MCS, and research/science	recurrent	n/a	n/a	n/a	n/a	n/a	€ 2 931 000	n/a
German catch value from GRL available as input to EU processors	recurrent	n/a	n/a	€ 27 267 357 (economic model)	n/a	n/a	n/a	n/a

		EU citizens/ consumers	GRL citizens/ consumers	EU businesses	GRL businesses	MS adminis- trations	GRL administration	EU commission services
Costs	one-off / recurrent	Monetary value, ranges and/or qualitative comment						
EU catches in GRL and Norway available to consumers (after processing)	recurrent	Not quantifiable/ proportionate within scope of evaluation as not all EU catch destined for EU market and value of catches in Norway not modelled	n/a	n/a	n/a	n/a	n/a	n/a
Direct value added to EU fleet	recurrent	n/a	n/a	€ 43 979 753 (crew wages and profits from economic model)	€ 438 816 (crew wages from economic model)	n/a	n/a	n/a
Crewing/employment (FTE)	recurrent	112 (employment analysis)	5 (employment analysis)	n/a	n/a	n/a	n/a	n/a
Indirect								
Indirect value added	recurrent	n/a	n/a	€ 17 229 939 (economic model)	€ 759 801 (economic model)	n/a	n/a	n/a
Upstream/downstream employment (FTE)	recurrent	559 (employment analysis)	Not quantifiable/ proportionate within scope of evaluation	n/a	n/a	n/a	n/a	n/a

ANNEX V. SIMPLIFICATION AND BURDEN REDUCTION

<i>Simplification and burden reduction (savings already achieved)</i>				
	Citizens/Consumers/Workers	Businesses	Administrations	[Other...] _ specify
A list of reporting obligations (ROs) related to the Protocol is provided in Figure 38 on page 28 and shows that there are a several obligations on EU MS, EU shipowners, and Greenlandic authorities which relate primarily to: i) reporting on the sectoral support provided by the EU; ii) control of EU fishing vessel activity and reporting by them of catches and landings. The ROs stemming from the intervention are the same as those in the previous Protocol and are considered the minimum ROs necessary to ensure sustainable exploitation of resources, effective monitoring of the use of sectoral support funding, and compliance with Greenlandic legislation and legislation in the EU such as Council Regulation (EC) No 1224/2009 of 20 November 2009 establishing a Union control system for ensuring compliance with the rules of the common fisheries policy, as amended mostly recently by Regulation (EU) 2023/2842 (the Control regulation²⁵). There is no administrative burden on EU citizens/consumers/workers stemming from the intervention/Protocol.				
<i>Potential simplification and burden reduction (savings)</i>				
	Citizens/Consumers/Workers	Businesses	Administrations	[Other...] _ specify
As noted above, the ROs stemming from the Protocol are the same as those in the previous Protocol and are considered the minimum ROs necessary to ensure sustainable exploitation of resources, effective monitoring of the use of sectoral support funding, and compliance with Greenlandic legislation and legislation in the EU such as the Control regulation¹⁴. Additionally, as indicated in Figure 38 on page 28, none of the ROs are additional to those in previous Protocols or to the requirements contained in other legislation. No potential additional				

²⁵ https://oceans-and-fisheries.ec.europa.eu/fisheries/rules/enforcing-rules/control-regulation_en latest access: 11.3.24

simplification and savings in terms of ROs are there identified to make the Protocol more effective or efficient without prejudicing its objectives, for example of fish stock sustainability and supporting sustainable development of the Greenlandic fisheries sector.

This short synopsis report covers all consultation activities. It provides a summary of both the consultations completed by the contractors, as well as contributions made by stakeholders through Have your say.

The consultations completed by the contractor involved remote emailed questionnaires, with an initial period of two weeks to provide responses. For those stakeholders which did not provide responses within two weeks, a reminder email was sent providing for an additional one week to provide responses. In the tables below, ‘*’ indicates that a stakeholder provided a completed or partially completed questionnaire.

Through the Have Your Say Portal, 3 submissions were made, one from Denmark (private sector fishing organisation), one from Estonia (public authority), and one from Germany (EU citizen).

Summary of EU stakeholder views

Government and private sector EU stakeholder views²⁶ about the current and potential future Protocol were largely consistent and/or covered the following points.

There is strong support for the current SFPA/Protocol. EU vessels that fish in Greenlandic waters rely on the Agreement for high percentages of total catches and profitability, and utilisation rates are always very high. Some MS that are not allocated quota through the TAC and quota regulation (based on relative stability) or which do not obtain it through swaps (e.g. Latvia, Poland²⁷) would like to fish in Greenlandic waters (for example for cod, Greenland halibut and Northern prawn).

The list of species covered by the Protocol is acceptable and appropriate and is considered sustainable. There are concerns over declining fishing (indicative and actual) opportunities provided over successive Protocols for a number of species, which in some cases (e.g. West Greenland Northern prawn) represent declining percentages of the TAC.

Stakeholders widely recognise the importance of the EU/Greenland SFPA/Protocol in providing fishing opportunities in Norwegian waters (e.g. for the Norwegian arctic cod stock) through swaps of EU quota in Greenland with Norway. Access to Norwegian waters, and to Greenlandic waters through the Greenland Protocol, is more important than ever following Brexit. Consistency in swaps with Norway between years is also important.

²⁶ EU civil society organisations did not provide responses to consultation requests.

²⁷ Poland had track record of catches in Greenlandic waters until 2012 and has track record in Norway, but is not allocated quota in Greenlandic or Norwegian waters.

Regarding a level playing field and the technical clauses in the Protocol, there are concerns by EU stakeholders about the amounts of quota allocated to Greenland vessels (e.g. for Northern prawn in West and East Greenland) which they claim are not caught but which are not allocated to EU vessels. Likewise, different arrangements for inter-year flexibility over the use of quota for Greenlandic and EU vessels do not represent a level playing field. EU vessels would also like to see more transparency (and therefore a more level playing field) in the sharing of information by Greenland about bycatches by its vessels in line with requirements for EU vessels to provide such data. A move towards implementation of the electronic reporting system is favoured.

In terms of Protocol implementation, EU stakeholders report that the Joint Committee meetings generally work well, although more time could be provided for them, documents could usefully be circulated in advance, and it could be useful to organize the Joint Committee meeting on fishing opportunities more in advance of EU Norway bilateral consultations. EU Member State and private sector are appreciative of the good work the Commission services do in acting on behalf of EU Member States and the EU private sector in negotiations, Protocol implementation, and issuing of vessel authorisations (in association with the Greenlandic authorities). A specific timing issue with regards to implementation of the Protocol is the need for early/earlier notification of capelin fishing opportunities which can be critical given sea ice in allowing fishing trips to Greenland waters to be planned and for quota to be utilised.

Thinking towards a possible future Protocol, EU stakeholders are unanimous in emphasizing the need for a new one – failure to re-negotiate the Protocol would have profound impacts on the EU fleet operating in both Greenlandic and Norwegian waters, and result in some vessels likely becoming inoperative. Stakeholders do not feel the need for a change in the species for which fishing opportunities are provided, although if Greenland were to become part of an international coastal state agreement involving any of the Union's shared pelagic species, some quota for those species could be included.

However, important for EU stakeholders is that: i) fishing authorisation fees do not continue to rise as they have done over recent years, and ii) the quota allocated to EU vessels should remain at current or increased levels for operations to be economically viable, and EU vessels would like more quota. The new management plan for East Greenland cod and increased biomass in the area could/should provide for more cod quota to the EU.

A future Protocol could consider a longer Protocol period to provide greater certainty, which is important given the high levels of investments made in vessels. In this context the potential re-negotiation of the Protocol in 2024 is regrettable. Other views about possible changes/improvements in a future Protocol are to address the concerns over technical clauses listed above, and if quotas are not fully utilized by the year end that paid authorisation fees can be credited or transferred to the following year. Additional flexibility could also usefully be provided to allow part of the capelin quota to be fished in Icelandic waters. Again, and related to flexibility, there could be increased flexibility regarding vessel entry and exit from the Greenland zone, especially concerning vessels carrying fresh catches as the current rules appear more suited to frozen-at-sea catches and do not fully accommodate the dynamics of fresh catch operations. Finally, EU stakeholders would like to see a requirement for authorisation documents including

annexes issued by Greenland to be accessible electronically (rather than transmission by e-mail).

EU stakeholders consulted

Name of organisation	Type of stakeholder
Denmark: Danish Ministry of Food, Agriculture and Fisheries	Government *
Germany: Management and Control of Sea Fisheries, IWC, Federal Ministry of Food and Agriculture	Government *
Estonia: Permanent Representation of Estonia to the EU	Government *
Lithuania: Ministry of Agriculture	Government *
Latvia: Fisheries Department, Ministry of Agriculture	Government *
Spain: Ministry of Agriculture, Fisheries and Food	Government *
Poland: Ministry of Foreign Affairs	Government *
Sweden: Ministry of Rural Affairs and Infrastructure Department for Rural Affairs	Government *
France: Direction Générale Des Affaires Maritimes, De La Pêche Et De L'Aquaculture	Government *
Denmark/France: Ocean Prawns	Private sector *
Denmark: Danish Pelagic Producers Organisation	Private sector
Estonia: Estonia Long Distance Fishing Association	Private sector *
Germany: Deutsche Fischfang-Union GmbH & Co. KG	Private sector *
Germany: Nordbank Hochseefischerei GmbH	Private sector *
Spain: Cooperativa de Armadores del Puerto de Vigo / ARVI ANAMER ANAVAR.	Private sector
Poland: High Seas Fish Producers Organization	Private sector *
Lithuania and Latvia: Marlinas	Private sector
Sweden: BC Pelagic	Private sector *
Sweden: Swedish Pelagic Federation Organisation	Private sector *
President of the LDAC and representative of cod/haddock and pelagic vessels	Private sector
Netherlands: Pelagic Freezer Trawler Association	Private sector
Europeche	Civil society
Coalition for Fair Fisheries Agreements (CFFA)	Civil society
Oceana	Civil society
WWF Belgium	Civil society
Environmental Justice Foundation	Civil society
The Danish Society for a Living Sea	Civil society
Pew Europe	Civil society
Long Distance Fleet Advisory Council (LDAC)	Civil society

Greenlandic stakeholders consulted

Name of organisation	Type of stakeholder
Ministry of Fisheries and Hunting,	Government*
Ministry of Agriculture, self-sufficiency, Energy and Environment	Government*
Greenland Institute of Natural Resources	Government
Ministry of Independence and Foreign Affairs	Government*
Ministry of Finance and Taxes	Government*
Greenland Representation to the EU, Brussels	Government*
Statistics Greenland	Government
Greenland Fisheries License Control Authority (GFLK)	Government*
Joint Arctic Command	Government
Arctic Prime	Private sector
Polar Seafoods	Private sector
Royal Greenland	Private sector*
Oceans North Kalaallit Nunaat	Civil society
Greenland Business Association	Civil society*
Greenland Fishers and Hunters Association (KNAPK)	Civil society
Sulinermik Inuussutissariuteqartut Kattuffiat (SIK), Greenland's labour union	Civil society
Qalerualinniat Aalisargarniallu Kattuffiat (QAK)	Civil society