

West Med subsidies (Spain)

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Introduction.

Subsidies are defined by Eurostat as current payments by the general government or European Union institutions to resident producers that are not required to be reimbursed. The overriding goal is to influence levels of production or prices, or to compensate producers for production costs. From an economic perspective, the main purpose of subsidies is to reallocate resources, that is, to alter economic activity and behaviour to achieve an outcome that is 'more desirable' from what would occur otherwise. But even when subsidies generate a more desirable outcome, it does not mean that the entire value of the subsidy is corrective in nature, or that the particular type of subsidy used for a given purpose is best among the available policy alternatives (Schwartz and Clements, 1999). Subsidies can have positive or negative effects (Martini and Innes, 2018), contribute to more desirable effects or not, so that, data collection and evaluation of policies is indispensable for an efficient use of the public budget.

The long journey of the EU's Common Fisheries Policy (CFP) and the associated financial instruments have already covered more than twenty years, three key periods and four support instruments (Skerritt et al., 2020): the second iteration of the Financial Instrument for Fisheries Guidance (FIFG, 2000–2006) (Council of the EU, 1993), through the European Fisheries Fund (EFF, 2007–2013) (Council of the EU, 2006), the EMFF (European Maritime and Fisheries Fund) (2014–2020) (European Parliament and Council of the EU, 2014) (European Parliament and Council of the EU, 2014). and ending with the current iteration of the European Maritime, Fisheries and Aquaculture Fund (EMFAF) established for the period 2021–2027 (European Parliament and the Council of the EU 2021, 2021).

Over the last five years to major events have impacted the world economy and, of course, the economic balance of the European fishing fleet: the Covid-19 and the Ukraine invasion. The magnitude and unpredictability of those crisis requested for additional support measures that, in the case of the fishing sector, were implemented through the EMFF. The Regulations (EU) No 508/2014 on the European Maritime and Fisheries Fund was amended in 2020 (Regulation (EU) 2020/560 as regards specific measures to mitigate the impact of the COVID-19 outbreak) and in 2022 (Regulation (EU) 2022/as regards specific measures to alleviate the consequences of Russia's war of aggression against Ukraine on fishing activities).

In the case of the fishing sector responses to COVID-19 consisted in compensation for the temporary cessation of fishing activity; the reactivation of the storage aid (art. 67), granted to producer organizations or associations of producer organizations and the modification of existing measures, specifically, art. 66 of EMFF is amended to increase the ceiling for support to production and marketing plans from 3 % to 12 % of the average annual value of the production placed on the market and allow Member States to grant advances up to 100% of the financial support. This last one also can be granted to producer organizations only. Finally, temporary cessation caused by the COVID-19 outbreak was explicitly excluded from this financial capping previously established for temporary cessation, permanent cessation and engine replacement.

Following the line of events, on 23 March 2022, the Commission adopted the State aid Temporary Crisis Framework to enable Member States to use the flexibility foreseen under State aid rules to support the economy in the context of Russia's invasion of

Ukraine. Based on this framework the main measure established by the Spanish government was the compensation of additional costs stemming from the increase in production costs. Other measures included the deferral of social security contributions and the exemption from fresh fish tax in ports for six months. In 2023 cost support was materialized in direct fuel subsidies for fishing vessels and tunny fisheries (*almadravas*). All in all, the set of measures adopted is relevant enough for deserving data compilation and analysis, considering the different financial instruments, fleet segments and fishing grounds and for further evaluation of the impact on fisheries management.

Objectives

The TORs for this ad hoc contract are as follows:

- TOR 1: Provide an overview on the implementation of the EU Ukraine crisis mechanism in Spain and provide an overview on all operating subsidies implemented in Spain for the years 2019-2024. This should include the legal framework at European and national levels.
- TOR 2: Develop and populate a database with the available data on paid subsidies in Spain regarding the fleet segments used in the bio-economic models of the West Med Multiannual Management Plan evaluations (e.g., economic fleet segments, specific fleet segments in Spain) for the years 2019-2024. For the database use the same structure as developed for the results of the Italy case (see Excel template).
- TOR 3: Provide an overview on the measures of temporal and permanent cessations in Spain. This should include an overview on payments already issued and planned funding in the future.
- TOR 4: Analyze the STECF Annual Economic Report data regarding operational subsidies for the time period 2012- 2022 in Spain. This information should reveal how the last years may have been different from the years before the COVID-19 crisis. This provided data overview should be specified by fleet segment.

Overview.

Under EUMAP guidelines containing the definition of variables¹, subsidies are categorized as:

1. Operating subsidies: They are defined as direct payments which general government or the institutions of the European Union make to resident producers.

They refer to direct payments/transfers related to the vessel activity, except for: Fuel tax refunds; Subsidies for permanent cessation of fishing activities and Investment subsidies (fleet modernization)

2. Subsidies on Investment: They are defined as Direct payments which general governments, or the institutions of the European Union make to resident producers to finance all or part of the costs of their acquiring assets related to the vessel.

Following these definitions, social security funds and welfare contributions are not included in the analysis. These support measures are part of the wider context of welfare policies and are paid directly to workers.

Operating subsidies.

In the period 2019-2024, the Spanish fleet segments operating in the West Mediterranean Sea received the following operating subsidies:

1. Mandatory temporary cessation of fishing activities funds (MTC)
2. Temporary Cessation of fishing activities funds to mitigate the impact of the COVID-19 outbreak (TC_Covid_19)
3. Compensation costs stemming from the increase in production costs provoked by Russia's invasion of Ukraine (Fund_ EU Ukraine crisis)

Mandatory temporary cessation of fishing activities

Regulation (EU) No 508/2014 of the European Parliament and of the Council of 15 May 2014 on the European Maritime and Fisheries Fund (EMFF) and repealing Council Regulations (EC) 2328/2003, (EC) 861/2006, (EC) 1198/2006 and (EC) 791/2007 and Regulation (EU) 1255/2011 of the European Parliament and of the Council provides in Article 33 for the possibility of granting aid for the temporary cessation of fishing activities to owners and fishermen of fishing vessels in three cases, including where a temporary cessation is provided for in a management plan adopted in accordance with Council Regulation (EC) 1967/2006 on management measures for the sustainable exploitation of fishery resources in the Mediterranean Sea, or in a multiannual plan adopted in accordance with Articles 9 and 10 of Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013, if, on the basis of scientific recommendations, a reduction in fishing effort is necessary to achieve the objectives referred to in Article 2.2 and 5.a) of that Regulation.

The Operational Programme for Spain of the EMFF, for the programming period 2014-2020, approved by decision of the European Commission on 13 November 2015, includes the possibility of granting these aids to the Spanish fishing sector.

This support responds to priority 1 "Promote environmentally sustainable, resource-efficient, innovative, competitive and knowledge-based fisheries," established in Article 6 of Regulation (EU) No. 508/2014.

Drawn up on the basis of the Council Regulation (EC) 1967/2006 the Spanish National Plan for the Mediterranean was established in the Order APA/423/2020, of May 18th, which establishes a management plan for demersal fishing resources in the West Med,

developing, in its article 5, the model for the allocation of fishing effort between the vessels of the Spanish bottom trawling fleet fishing in GSA areas 1,2, 5, 6 and 7.

For the first year of application of the plan, the maximum allowable fishing effort shall be reduced by 10 % compared to the reference value, except in geographical sub-areas where fishing effort has already been reduced by more than 20 % during the reference value period. For the period from the second to the fifth year of application of the plan, the maximum allowable fishing effort shall be reduced by no more than 30 %. The reduction in fishing effort may be supplemented by any other relevant technical or conservation measures adopted in accordance with Union legislation.

The Ministry of Fisheries will publish on the Department's website, before January 31 of each year, a provisional resolution with the list of fishing days assigned to each vessel or group of vessels, classified by length segments for both mixed coastal and deep-sea fisheries.

The maximum amount of aid granted to shipowners/owners of vessels subject to temporary suspension will be calculated by multiplying the scale detailed below by the gross tonnage (GT) of the vessel and the number of days established as the subsidy period in the corresponding call. The financial support is provided to the vessel owners through EMFF (until 2022) and EMFAF (from 2022 onward).

Table 1. Scale for the mandatory temporary cessation of fishing activities aid.

Gross tonnage	Maximum aid per vessel and day (euros)
1<GT<25	5,16xGT+36*
25<GT<50	3,84xGT+66
50<GT<100	3,00xGT+108
100<GT<250	2,40xGT+168
250<GT<500	1,80xGT+318
500<GT<1.500	1,32xGT+558
1.500<GT<2500	1,08xGT+918
≥2.500	0,80xGT+1608

*With a minimum of 100€/day

Temporary Cessation of fishing activities to mitigate the impact of the COVID-19 outbreak (TC_Covid_19)

The COVID-19 crisis has had consequences in every area of the Spanish economy. The fisheries and shellfishing sectors in Spain have been significantly affected due to the measures taken to curb the pandemic. In particular, the closure of the HORECA channel (Hotel and catering industry) and the confinement of the population have adversely affected the production of fresh fish and shellfish (Fernández-González et al., 2021). The flexibility mechanism adopted for the EMFF allowed for the adoption of a specific measure relating to the temporary cessation to compensate for unexpected loss of fishing opportunities as a consequence of Covid-19 crisis (Reg. (EU) 2020/460 as regards specific measures in response to the COVID-19 outbreak).

The beneficiaries of this instrument were, on the one hand, all active fishing vessels with a minimum of 120 fishing days during the two previous years and, on the other hand,

fishermen that had worked in ha fishing vessels for at least 120 days in the previous two years. In both cases when the temporary cessation takes places between March 16th and December 31st, 2020. This measure was managed at national level to guarantee fast tracking and ensure access by beneficiaries.

The subsidy will result from multiplying the number of eligible days by the corresponding maximum aid per vessel and day indicated in Table 1.

Regulation (EU) No 508/2014 of the European Parliament and of the Council of 15 May 2014 on the European Maritime and Fisheries Fund (EMFF) and repealing Council Regulations (EC) 2328/2003, (EC) 861/2006, (EC) 1198/2006 and (EC) 791/2007 and Regulation (EU) 1255/2011 of the European Parliament and of the Council provides in Article 33 for the possibility of granting aid for the temporary cessation of fishing activities to owners and fishermen of fishing vessels in three cases, including where a temporary cessation is provided for in a management plan adopted in accordance with Council Regulation (EC) 1967/2006 on management measures for the sustainable exploitation of fishery resources in the Mediterranean Sea, or in a multiannual plan adopted in accordance with Articles 9 and 10 of Regulation (EU) No 1380/2013 of the European Parliament and of the Council of 11 December 2013, if, on the basis of scientific recommendations, a reduction in fishing effort is necessary to achieve the objectives referred to in Article 2.2 and 5.a) of that Regulation.

Compensation of additional costs stemming from the increase in production costs provoked by Russia's invasion of Ukraine (Fund_ EU Ukraine crisis)

Energy prices increased globally during 2021 to levels similar to 2018 and 2019. However, in February 2022, energy prices increased sharply as a result of the Russian invasion of Ukraine and the resulting economic sanctions. Increased energy prices led to higher operating costs in many economic sectors, including the fishing sector. In 2022, the EU fishing sector paid on average about EUR 0.93 per liter of marine gasoil. At the peak of the crisis, in June 2022, the sector was paying EUR 1.2 per liter, which was more than three times early 2021 price (Guillen et al., 2023). Impacts of that magnitude are difficult to assume by the production function of different fishing fleets (Rodríguez-Rodríguez et al., 2024)

The Regulation (EU) 2022/1278 amending Regulation (EU) No 508/2014 provided specific measures to alleviate the consequences of Russia's war of aggression against Ukraine on fishing activities. In the case of Spain, Article 32 of Royal Decree-Law 6/2022, of March 29, which adopts urgent measures within the framework of the National Plan for response to the economic and social consequences of the war in Ukraine, represents the regulatory bases for State aid to companies that shipowners of fishing vessels. That article establishes that the Ministry of Agriculture, Fisheries and Food will be responsible for granting direct aid to companies that shipowners of fishing vessels in compensation for the increase in production costs caused by the increase in the price of electricity and fuels, derived from the situation created by the invasion of Ukraine, also establishing that said aid will have the nature of direct subsidies.

The subsidy will be granted based on the GT tiers, as presented in Table 2, being the maximum amount per company 35.000,00€:

Table 2. Compensation for the increase in production costs caused by the increase in the price of electricity and fuels, provoked by the Ukraine invasion.

GT tier	Maximum amount per vessel(€)
0<GT<25	1.550,52
25<GT<50	2.455,10
50<GT<100	4.414,61
100<GT<250	6.873,87
250<GT<500	8.387,57
500<GT<750	13.300,00
750<GT<1000	18.307,69
1000<GT<1250	21.291,67
1250<GT<1500	25.000,00
1500<GT<2500	27.794,12
GT> 2500	35.000,00

This cap was later extended to 75.000 adopting the character of complementary aid for those companies able to reach the new limit.

In 2023, Royal Decree-Law 20/2022, of December 27, on measures in response to the economic and social consequences of the War in Ukraine and in support of the reconstruction of the island of La Palma and other situations of vulnerability, established in art. 29 the new framework for state aid for diesel consumption of fishing vessels and *almadrabas*. This instrument was expanded through a complementary aid established in the art. 205 Royal Decree-Law 5/2023, of June 28. the criteria and corresponding amount of the subsidies, initial and complementary, are presented in Table 3:

Table 3. Aids por fuel consumption in fishing vessels 2023.

Fishing fleet	Length	Subsidy per vessel	
		Initial: Art. 29 RD 29/2022	Complementary: Art. 205, RD 5/2023
Small scale	00-10	1100	184
	10-12	274	464
	>12	6621	1.104
Trawlers Cantabrian Sea/Golf of Cadiz/Mediterranean Sea	<12	6404	1.067
	12-18	21624	3.604
	18-24	40725	6.788
	24-40	99119	16.519
Purse seiners Cantabrian Sea/Golf of Cadiz/Mediterranean Sea	<12	2697	450
	12-18	9263	1.543
	18-24	17876	2.979
	24-40	43071	7.179
Gillnets/Botton-set longlines/Pole-and-line tuna vessels	<12	1922	320
	12-18	6591	1.099
	>18	21354	3.599
<i>Almadrabas</i>		1098	183
Fixed gear in the ICES area and bottom longliners	>18	109086	18.181
Other fleets in EU and international waters	24-40	253929	46.071

	>40	300000	-
Surface-set longlines	10-12	10428	1.738
	12-18	14592	2.432
	18-24	38015	6.335
	24-40	133920	22.320
	>40	258650	41.350

The maximum amount granted per company was established in 300.000, so that complementary aid is only granted to those shipowners who have not reached the maximum amount in the first call.

The national plan for addressing the economic and social impacts of the Ukraine war also included measures for compensating the increased costs of fishing activity (and aquaculture), established in art. 34 of the Royal Decree-law 6/2022, of March 29. The call for this instrument was launched in the Order APA/986/2022, of October 17.

Additional costs arising from the increase in the production costs of each vessel that have been borne by the vessel owners during the period between 24 February 2022 and 30 June 2022 will be eligible for funding. Production costs shall be understood as those relating to bait, salt, ice, containers and packaging, supplies (food, non-alcoholic beverages, work clothes, gas and cleaning materials), maintenance and repair costs of gear, lubricants and costs of transporting fishery products from their place of landing to delivery of the goods to the first buyer, including the case where they are landed in a third country and sold in another third country. Irrespective of the place from which the sales note is issued, the country of landing shall be taken into account. Likewise, in the case of the fleet that operates in international fishing grounds outside of Community waters and the fleet that operates in Community waters and supplies itself in foreign ports, fuel costs will be considered eligible (with certain limits).

The amount of aid for the reference period will be calculated as follows:

- a) Bait, salt and ice: 8% of the actual cost presented by the purchase invoices.
- b) Packaging: 15% of the actual cost presented by the purchase invoices.
- c) Supplies: 8% of the actual cost presented by the purchase invoices for the concepts of food, non-alcoholic beverages, work clothes, cleaning elements and gas.
- d) Gears: 11% of the actual cost presented by the invoices for the maintenance and repair of said gears, understood as the set of elements or tools used in fishing activities.
- e) Lubricants: 27% of the actual cost presented by the purchase invoices.
- f) Transport: this will be the difference between the value in euros of the transport costs incurred in said reference period of 2022 and the average value in euros of the transport costs incurred in the reference period during 2019, 2020 and 2021.
- g) Fuel: this will be the difference between the value in euros of the costs of fuel consumed in the reference period of 2022 and the average value in euros of the costs of fuel consumed in the reference period during 2019, 2020 and 2021, with a maximum amount to be collected resulting from multiplying the litres consumed from 24 February to 30 June 2022 by 0.2 €/litre

This last instrument is considered compensation to fishing vessel owners for additional costs, in accordance with Article 26.2 of Regulation (EU) 2021/1139 of the European Parliament and of the Council, of July 7, 2021, that establishes the EMFAF.

Information on beneficiaries is currently being processed and is not available yet.

Subsidies on investment.

Following the EU Regulation 508/2014 the MAPA published the selection criteria for the granting of aid under the EMFF¹. Investment measures are summarized in Table

Table 4. Investment measures in EMFF Spanish operative program

Regulation (EU) 508/2014	Title	EMFF measure
Art. 26	Innovation	New products, equipment or process
Art. 30	Diversification and new forms of income	investments contributing to the diversification of the income of fishermen through the development of complementary activities, including investments on board, angling tourism, restaurants, environmental services related to fishing and educational activities concerning fishing
Art. 31	Start-up support for young fishermen	First acquisition of a fishing vessel
Art. 32	Health and safety	Investments on board or in individual equipment to improve hygiene, health, safety and working conditions for fishermen
Art. 34	Permanent cessation of fishing activities	
Art. 38	Limitation of the impact of fishing on the marine environment and adaptation of fishing to the protection of species	Equipment improving size selectivity or species selectivity of fishing gear; Investments on board or in equipment that eliminates discards Equipment that limits and, where possible, eliminates the physical and biological impacts of fishing on the ecosystem or the sea bed; Equipment that protects gear and catches from mammals and birds
Art. 39	Innovation linked to the conservation of marine biological resources	Reduce the impact of fishing on the marine environment and the impact of protected predators, support the gradual elimination of discards and by-catches and achieve sustainable exploitation of living marine biological resources that allows MSY to be achieved.
Art. 41	Energy efficiency and mitigation of climate change	Investments in equipment or on board aimed at reducing the emission of pollutants or greenhouse gases and increasing the energy efficiency of fishing vessels, replacement or modernization of main or ancillary engines
Art. 42	Added value, product quality and use of unwanted catches	Investments increasing the value of fishery products, particularly allowing fishermen/women to directly sale catches Innovative investments on board that improve the quality of the fishery products.
Art. 76	Control and enforcement	Installation of technology ensuring or facilitating monitoring and control

¹ https://www.mapa.gob.es/es/pesca/temas/fondos-europeos/criteriosdeseleccion_documentojulio2024_reintegroinfraccionesgraves_tcm30-690966.pdf

Database with the available data on paid subsidies regarding the fleet segments used in the bio-economic models of the west med map evaluations

Data and methodology

The database on the subsidies granted to the Spanish fishing fleet in the West Med was developed based on the available data and documentation in different official sites following the next steps:

- Compilation of the relevant regulation at European and national level.
- Compilation of the data sources of subsidies and fleet composition and activity at national level. In certain cases, as the subsidies to fuel, the total amount granted was presented at owner level needing to be recalculated at vessel level.
- Development of an excel database to match the official list of beneficiaries by the typology of subsidies, year of payments and GSA area of activity. ‘CFR number’ of funded vessels and CFR numbers in the fishing fleet register database were crossed to an in-depth look at what types of operations, types of beneficiaries and vessels received funding. Aggregated data of subsidies classified by fishing gear, length and year was crossed with the distribution of catches by GSA to allocate the subsidies.

Subsidies were allocated to the different GSAs following the formula:

$$S_{i,j}^{GSAn} = S_{i,j} * \frac{C}{C_{i,j}^{GSAn}}$$

Where S are de subsidies and C the catches, so that for a given year, subsidies in a given GSA and and given fleet (defined by fishing gear i and length j) are equal to total subsidies for the same fleet multiplied by the coefficient resulting from dividing the total catches (in GSAs 1, 2, 5, 6 and 7) by the catches in a given GSA by a given fleet.

At the time of writing this report, the EAR 2024 is not publicly accessible yet, so, catches for 2022 are not available. As a proxy, for the years 2022 and 2023, the average of the three previous years was used. Even though real data is always preferable the catches’ structure seems pretty stable and can provide a sound orientation for following years.

Certain subsidies, such as the storage aid (art. 67 of the EMFF) were granted to fisher organizations, nevertheless in this case there were no beneficiaries in the Mediterranean area.

Finally, not all the aids approved under the EMFAF have been fully processed and certified and there are no completed and systematic databases for them. This is the case of the subsidies for compensating the increased costs provoked by the Ukraine invasion (art. 34). As a matter of fact, available EMFAF records at vessel level are currently available only for the temporary cessation of activity aid.

Summary sheet by subsidy type

MTC	Mandatory temporary cessation of fishing activities
Description	The EMFF may support measures for the temporary cessation of fishing activities in the following cases: a) application of Commission measures or Member States' emergency measures referred to in Articles 12 and 13 respectively of Regulation (EU) No 1380/2013 or of conservation measures referred to in Article 7 of that Regulation, including biological rest periods b) non-renewal of sustainable fisheries partnership agreements or their protocols c) where the temporary cessation of fishing activities is provided for in a management plan adopted in accordance with Council Regulation (EC) No 1967/2006 or in a multiannual plan adopted in accordance with Articles 9 and 10 of Regulation (EU) No 1380/2013, if, on the basis of scientific advice, a reduction in fishing effort is necessary to achieve the objectives referred to in Article 2(2) and (5), letter a) of Regulation (EU) No 1380/2013
Data source	List of beneficiaries of EU financing, through the EMFF: https://www.mapa.gob.es/es/pesca/temas/fondos-europeos/transparencia-femp-30-06-2024_tcm30-585327.pdf
Payment year	Year of finalization of the activity
Calculation of the subsidy at vessel level	Table 1

TC_Covid_19	Temporary Cessation of fishing activities to mitigate the impact of the COVID-19 outbreak
Description	The EMFF may support measures for the temporary cessation of fishing activities when the temporary cessation of fishing activities takes place between 1 February and 31 December 2020 as a result of the COVID-19 outbreak, including vessels operating under a sustainable fisheries partnership agreement.
Data source	List of beneficiaries of EU financing, through the EMFF: https://www.mapa.gob.es/es/pesca/temas/fondos-europeos/transparencia-femp-30-06-2024_tcm30-585327.pdf
Payment year	2020
Calculation of the subsidy at vessel level	

Fund_ EU Ukraine crisis	Compensation costs stemming from the increase in production costs provoked by Russia's invasion of Ukraine (Fund_ EU Ukraine crisis)
Description	Direct aid to companies that shipowners of fishing vessels in compensation for the increase in production costs caused by the increase in the price of electricity and fuels, derived from the situation created by the invasion of Ukraine (art. 32 of Royal Decree-Law 6/2022, of March 29)

	Direct aid to companies for compensating the increased costs of fishing activity (and aquaculture), established in art. 34 of the Royal Decree-law 6/2022, of March 29 are not available yet.
Source	Concession orders available at the online notice board of the MAPA: https://sede.mapa.gob.es/portal/site/seMAPA/navTablonAnuncios 2022: 27-05-2022: Orden del ministro de agricultura, pesca y alimentación, sobre concesión de ayudas de estado a aquellos armadores que no han ejercido las facultades de rechazo, oposición a la consulta de datos, alegado error, omisión u otra circunstancia, o bien no han solicitado modificar o añadir cuenta corriente, en el marco del artículo 32 del real decreto-ley 6/2022, de 29 de marzo. Ayudas de Estado a empresas armadoras de buques pesqueros (electricidad y combustible) 17-06-2022: Segunda orden de concesión de ayuda a electricidad y combustible. Ayudas de Estado a empresas armadoras de buques pesqueros (electricidad y combustible) 20-07-2022: Tercera orden de concesión de ayudas de Estado a armadores de buques pesqueros, para compensar la subida de precios de electricidad y combustible. Ayudas de Estado a empresas armadoras de buques pesqueros (electricidad y combustible) 16-08-2022: Ayudas complementarias electricidad y combustible. Resolución listado armadores ayuda complementaria electricidad y combustible. Ayudas de Estado a empresas armadoras de buques pesqueros (electricidad y combustible) 26-09-2022: Orden de concesión de ayudas de estado complementaria a armadores de buques pesqueros, para compensar la subida de precios de electricidad y combustible. Ayudas de Estado a empresas armadoras de buques pesqueros (electricidad y combustible) 11-10-2022: Cuarto, quinta y séptima órdenes de concesión. Ayudas de Estado a empresas armadoras de buques pesqueros (electricidad y combustible) 23-05-2023: Orden por la que se concede a una ayuda a un grupo de empresas armadoras que presentaron recursos en el marco del procedimiento contenido en el artículo 32 del Real Decreto-ley 6/2022, de 29 de marzo. Ayudas de Estado a empresas armadoras de buques pesqueros (electricidad y combustible) 23-11-2023: Orden por la que se concede una ayuda a un grupo de empresas armadoras que presentaron recursos en el marco del procedimiento contenido en el artículo 32 del Real Decreto-ley 6/2022, de 29 de marzo. Ayudas de Estado a empresas armadoras de buques pesqueros (electricidad y combustible) 2023: 12-06-2023: Órdenes concesión ayuda art 29 real decreto-ley 20/2022 (gasóleo empresas armadoras y almadrabas) grupos: 1, 2, 3, 5, 6, 7, 8, 9 y 10. Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 12-06-2023: Propuesta de resolución provisional, requisito art. 13.3 bis lgs, para ayuda art. 29 rd-ley 20/2022. Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 5-06-2023: Órdenes de concesión de ayudas gasóleo 2023, art 29 RD-ley 20/2022. Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 04-07-2023: Orden concesión ayudas grupo 12. Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 14-07-2023: Segunda propuesta de resolución provisional, requisito art. 13.3 bis lgs, para ayuda art. 29 rd-ley 20/2022 y art. 205 RD-ley 5/2023 Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 20-07-2023: Órdenes de concesión de ayudas gasóleo 2023, art 29 RD-ley 20/2022. Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas

	07-08-2023: Orden concesión grupo 16 Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 29-08-2023: Orden concesión grupo 17: Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 07-09-2023: Orden concesión grupo 18: Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 25-09-2023: Propuesta de resolución provisional de concesión. Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 30-10-2023: Cuarta propuesta de resolución provisional, requisito art. 13.3 bis lgs, para ayuda art. 29 rd-ley 20/2022 y art. 205 rd-ley 5/2023. Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 31-10-2023: Orden concesión grupo 19. Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 31-10-2023: Orden concesión grupo 20. Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 29-11-2023: Grupo 21 de combustible y complementarias 1, 2, 3 y 4 de combustible. Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 01-12-2023: orden de concesión grupo 22 y complementarias del 5 al 8. Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 04-12-2023: ordenes complementarias grupos 9 y 12. Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 11-12-2023: Grupo 10, 11 y 15 de complementarias gasoleo grupo 23 del art 29 de gasoleo. Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 15-12-2023: Grupo 24 y complementarias grupos 13, 14 y 16. Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 11-07-2024: Quinta propuesta de resolución provisional, requisito art. 13.3 bis lgs, para ayuda art. 29 rd-ley 20/2022 y art. 205 rd-ley 5/2023. Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 09-09-2024: Grupo 17, 18 y 19 de complementarias gasoleo 2023. Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas 29-10-2024: Grupo 25 y complementaria grupo 20 combustible 2023. Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas Ayuda de estado por consumo de gasóleo a empresas armadoras de buques pesqueros y almadrabas
Payment year	2022, 2023
Calculation of the subsidy at vessel level	2022: Table 2 2023: Table 3

Available data on paid subsidies by fleet segments in West Med area and type of subsidies

Subsidies for the Spanish fleet in the West Med are classified in the database by *Type of subsidies*, *GSA*, *Fishing technique*, *Vessel class*, *Payment year*, and quantity in euros

(*Subsidies (€)*). For the sake of brevity in this section data by vessel class is only displayed in TC Covid19 subsidies, granted for 2020 only.

Table 5. MTC

	2019	2020	2021	2022	2023	Total
GSA1	29.531,86	67.364,25	81.433,50	87.410,72	42.863,67	308.603,99
DFN	0,00	0,69	6,32	5,83	14,86	27,70
DRB	56,39	48,13	54,75	370,84	337,81	867,93
DTS	13.951,89	29.297,62	33.516,59	30.349,79	5.399,28	112.515,16
FPO	0,00	0,00	13,52	53,12	92,67	159,31
HOK	107,07	309,04	560,52	548,92	392,01	1.917,56
PMP	77,65	712,69	3.826,18	5.978,67	13.189,38	23.784,56
PS	15.338,86	36.996,09	43.455,62	50.103,55	23.437,65	169.331,77
GSA2	521,54	793,82	1.817,47	1.301,78	271,85	4.706,46
DFN	0,00	0,00	0,53	0,25	0,00	0,78
DRB	0,00	0,00	0,00	0,00	0,00	0,00
DTS	388,77	757,00	1.572,69	1.038,25	154,66	3.911,38
FPO	0,00	0,00	0,00	0,09	0,00	0,09
HOK	0,00	6,83	14,67	14,94	8,92	45,36
PMP	0,00	0,00	0,00	0,00	0,00	0,00
PS	132,77	29,98	229,58	248,25	108,27	748,86
GSA5	8.715,46	19.090,55	23.503,31	21.328,81	7.627,13	80.265,27
DFN	0,00	0,14	1,72	1,70	6,35	9,92
DRB	0,00	0,00	0,00	0,00	0,00	0,00
DTS	7.734,35	16.100,31	20.218,92	17.141,16	2.832,57	64.027,32
FPO	0,00	0,00	0,00	0,06	0,00	0,06
HOK	185,10	594,60	548,25	593,88	543,55	2.465,37
PMP	32,28	147,23	1.089,25	1.669,81	3.686,88	6.625,45
PS	763,73	2.248,27	1.645,17	1.922,20	557,78	7.137,15
GSA6	90.422,50	193.696,30	222.540,64	234.961,79	75.477,92	817.099,15
DFN	0,00	10,18	37,17	49,13	145,52	241,99
DRB	4,45	0,00	0,00	16,47	15,03	35,96
DTS	59.945,00	125.098,37	145.919,90	137.708,81	20.265,79	488.937,87
FPO	0,00	0,00	5,76	29,08	47,77	82,60
HOK	276,19	726,47	888,85	1.020,74	810,71	3.722,95
PMP	172,37	986,93	5.326,50	9.409,90	20.751,24	36.646,94
PS	30.024,49	66.874,36	70.362,47	86.727,66	33.441,86	287.430,83
GSA7	1.232,67	3.707,73	3.594,84	3.943,93	453,05	12.932,22
DFN	0,00	0,01	0,03	0,02	0,08	0,14
DRB	0,00	0,00	0,00	0,00	0,00	0,00
DTS	1.208,00	3.629,93	3.553,39	3.839,40	357,77	12.588,50
FPO	0,00	0,00	0,00	0,00	0,00	0,00
HOK	4,59	10,60	26,54	27,26	17,34	86,33
PMP	0,00	4,31	11,66	22,48	49,66	88,10
PS	20,08	62,88	3,22	54,76	28,20	169,14
Total	130.424,02	284.652,66	332.889,77	348.947,02	126.693,62	1.223.607,09

Table 6.Fund EU_Ukraine crisis

	2022	2023	Total
GSA1	97.207,32	704.616,53	801.823,85
DFN	185,34	641,85	827,19
DRB	173,75	153,58	327,33
DTS	39.605,48	513.059,79	552.665,27
FPO	66,34	151,64	217,98
HOK	416,72	2.799,71	3.216,43
PMP	26.964,08	18.200,55	45.164,63
PS	29.795,61	169.609,42	199.405,02
GSA2	1.534,33	20.864,39	22.398,72
DFN	14,39	66,03	80,43
DRB	0,00	0,00	0,00
DTS	1.360,29	19.828,60	21.188,89
FPO	1,51	6,51	8,02
HOK	9,31	63,70	73,01
PMP	0,00	0,00	0,00
PS	148,82	899,55	1.048,38
GSA5	34.849,69	358.045,18	392.894,87
DFN	33,26	63,50	96,76
DRB	0,00	0,00	0,00
DTS	22.908,98	315.491,10	338.400,08
FPO	14,57	19,85	34,42
HOK	562,62	3.893,97	4.456,59
PMP	7.504,17	5.064,39	12.568,55
PS	3.826,09	33.512,38	37.338,47
GSA6	273.007,01	2.931.112,06	3.204.119,06
DFN	1.353,93	4.170,66	5.524,60
DRB	19,99	68,01	88,00
DTS	174.298,43	2.535.941,91	2.710.240,34
FPO	67,00	210,43	277,43
HOK	874,37	5.874,58	6.748,94
PMP	42.679,84	28.970,24	71.650,08
PS	53.713,45	355.876,24	409.589,68
GSA7	4.626,12	78.957,83	83.583,95
DFN	0,41	0,79	1,20
DRB	0,00	0,00	0,00
DTS	4.471,31	78.588,15	83.059,46
FPO	0,01	0,05	0,06
HOK	20,19	121,38	141,57
PMP	100,88	68,08	168,95
PS	33,32	179,39	212,71
Total	411.224,46	4.093.595,99	4.504.820,45

	VL0006	VL0612	VL1218	VL1824	VL2440	Total 2020
GSA1	30,53	12.645,73	15.548,34	44.725,86	1.933,52	74.883,98
DFN	0,00	38,56	89,55	0,00	0,00	128,11
DRB	0,00	24,18	4,61	0,00	0,00	28,79
DTS	0,00	15,14	2.563,89	20.454,83	1.719,02	24.752,87
FPO	0,00	13,52	4,19	0,00	0,01	17,73
HOK	0,00	12,82	202,85	38,44	0,00	254,11
PMP	30,53	12.505,09	0,24	0,00	0,00	12.535,86
PS	0,00	36,42	12.683,01	24.232,59	214,49	37.166,51
GSA2	0,00	0,00	41,18	523,37	140,97	705,53
DFN	0,00	0,00	15,71	0,00	0,00	15,71
DRB	0,00	0,00	0,00	0,00	0,00	0,00
DTS	0,00	0,00	1,52	509,85	140,97	652,34
FPO	0,00	0,00	0,81	0,00	0,00	0,81
HOK	0,00	0,00	6,09	0,00	0,00	6,09
PMP	0,00	0,00	0,00	0,00	0,00	0,00
PS	0,00	0,00	17,05	13,52	0,00	30,57
GSA5	1,73	2.636,25	998,03	11.722,49	4.745,05	20.103,56
DFN	0,00	7,82	0,00	0,00	0,00	7,82
DRB	0,00	0,00	0,00	0,00	0,00	0,00
DTS	0,00	0,00	416,61	11.350,33	2.010,79	13.777,72
FPO	0,00	0,00	1,08	0,00	15,69	16,78
HOK	0,00	32,20	143,72	208,65	0,00	384,57
PMP	1,73	2.590,58	0,00	0,00	0,00	2.592,32
PS	0,00	5,65	436,62	163,52	2.718,57	3.324,36
GSA6	76,54	17.917,24	16.688,25	129.478,79	30.348,82	194.509,63
DFN	0,00	570,16	455,05	0,00	0,00	1.025,21
DRB	0,00	0,00	0,31	0,00	0,00	0,31
DTS	0,00	21,54	6.320,06	75.866,85	24.886,71	107.095,16
FPO	0,00	9,20	15,44	0,00	3,35	27,99
HOK	0,00	41,66	370,73	147,35	0,00	559,73
PMP	76,54	17.263,08	11,43	0,00	0,00	17.351,05
PS	0,00	11,60	9.515,23	53.464,59	5.458,75	68.450,17
GSA7	0,00	78,59	57,29	1.476,57	1.712,66	3.325,11
DFN	0,00	0,57	0,00	0,00	0,00	0,57
DRB	0,00	0,00	0,00	0,00	0,00	0,00
DTS	0,00	0,00	25,37	1.436,24	1.712,66	3.174,27
FPO	0,00	0,00	0,01	0,00	0,00	0,01
HOK	0,00	2,16	8,99	0,00	0,00	11,14
PMP	0,00	75,86	0,00	0,00	0,00	75,86
PS	0,00	0,00	22,92	40,32	0,00	63,25
Total	108,80	33.277,81	33.333,09	187.927,08	38.881,02	293.527,81

Table 7. Subsidies on investment(€).

	2016	2017	2018	2019	2020	2021	2022	2023	Total
1.1.2. Limitation of the impact of fishing on the marine environment and adaptation of fishing to the protection of species (Art.38 (+ Art.44.1.c))	17.803,9	85.683,9	297.760,4	63.186,3	100.316,5	215.078,3	92.524,8	148.621,6	1.020.975,6
1.4.2. Diversification and new forms of income (Art.30 (+ Art.44.4))					3.857,4	1.261,5	3.393,0		8.511,9
1.4.3. Start-up support for young fishermen (Art.31 (+ Art.44.2))				8.437,5	0,0	16.087,5		28.125,0	52.650,0
1.4.4. Health and safety (Art.32 (+ Art.44.1.b))	27.750,0	13.132,0	68.882,2	53.445,5	104.640,1	83.423,5	43.181,2	54.619,1	449.073,6
1.4.8. Added value, product quality and use of unwanted catches (Art.42 (+ Art.44.1.e))			11.812,5	9.369,4	6.622,5	10.566,0	82.836,1		121.206,5
1.5.3. Energy efficiency and mitigation of climate change. Onboard investments (Art.41.1.a (+ Art.44.1.d))			11.812,5	9.369,4	6.622,5	10.566,0	82.836,1		121.206,5
1.5.4. Support for the replacement or modernisation of main or ancillary engines (Art.41.2 (+ Art.44.1.d))					5.028,1	26.910,5			31.938,6
3.2.1. Control and enforcement (Art.76.2 a-d y f-l)			5.427,1			9.354,7			14.781,8
Total	45.553,9	98.815,9	395.694,8	143.808,0	227.087,0	373.248,0	304.771,2	231.365,7	1.820.344,5

Summary of the collected data on operating subsidies

Regulation (EU) 2019/1022 of the European Parliament and of the Council of 20 June 2019 establishing a multiannual plan for the fisheries exploiting demersal stocks in the western Mediterranean Sea applies to the demersal fisheries (in particular, trawl nets, bottom-set nets, traps and longlines). Subsidies to the fleets under the West Med show an increasing path with an appreciable leap in 2023.

Table 8. Total operating subsidies for the Spanish fleets under the West Med (GSA1, 2, 5, 6, 7) by year.

	2019	2020	2021	2022	2023	Total
DFN	0,00	1.188,45	45,77	1.644,27	5.109,65	7.988,13
VL0612	0,00	628,13	33,14	917,59	1.832,55	3.411,42
VL1218	0,00	560,32	12,63	726,67	3.277,10	4.576,71
DTS	83.228,01	324.335,61	204.781,49	432.721,91	3.491.919,62	4.536.986,64
VL0612	12,00	54,06	46,39	165,02	278,08	555,55
VL1218	5.124,23	21.690,10	17.029,50	32.689,04	173.766,54	250.299,41
VL1824	59.883,19	238.085,12	152.272,54	297.321,58	2.206.400,88	2.953.963,32
VL2440	18.208,58	64.506,33	35.433,06	102.546,26	1.111.474,11	1.332.168,35
HOK	572,94	2.863,19	2.038,83	4.088,94	14.525,86	24.089,76
VL0612	0,00	110,47	24,77	241,65	385,87	762,76

VL1218	308,46	1.553,77	1.213,88	2.762,50	8.270,39	14.108,99
VL1824	263,35	1.198,94	800,18	1.062,07	5.592,67	8.917,22
VL2440	1,13	0,00	0,00	22,72	276,93	300,79
PMP	282,29	34.406,24	10.253,59	94.329,82	89.980,40	229.252,35
VL0006	4,79	118,54	91,51	851,30	549,90	1.616,04
VL0612	277,51	34.276,03	10.162,08	93.417,81	89.157,44	227.290,87
PS	46.279,93	215.246,43	115.696,06	226.573,71	617.650,74	1.221.446,88
VL0612	67,11	227,38	115,12	298,07	359,72	1.067,41
VL1218	8.796,81	44.224,32	25.939,19	51.763,09	115.483,86	246.207,27
VL1824	35.959,64	157.314,57	86.894,51	161.847,07	406.113,59	848.129,38
VL2440	1.456,37	13.480,16	2.747,25	12.455,77	95.693,57	125.833,11
Subsidies West Med	130.363,18	578.039,91	332.815,74	759.358,65	4.219.186,27	6.019.763,75
Total Subsidies	130.424,02	578.180,46	332.889,77	760.171,48	4.220.289,62	6.021.955,35

Table 9. Total operating subsidies (2019-2023) for the Spanish fleets under the West Med (GSA1, 2, 5, 6, 7) by fund.

	Fund_ EU Ukraine crisis	MTC	TC_Covid_19	Total
DFN	6.530,17	280,53	1.177,43	7.988,13
VL0612	2.538,74	255,56	617,11	3.411,42
VL1218	3.991,43	24,97	560,32	4.576,71
DTS	3.705.554,04	681.980,23	149.452,37	4.536.986,64
VL0006	0,00	0,00	0,00	0,00
VL0612	374,78	144,10	36,68	555,55
VL1218	185.565,29	55.406,68	9.327,45	250.299,41
VL1824	2.358.239,77	486.105,45	109.618,10	2.953.963,32
VL2440	1.161.374,20	140.324,01	30.470,14	1.332.168,35
HOK	14.636,54	8.237,57	1.215,65	24.089,76
VL0612	523,41	150,51	88,84	762,76
VL1218	8.315,25	5.061,37	732,37	14.108,99
VL1824	5.498,23	3.024,55	394,44	8.917,22
VL2440	299,66	1,13	0,00	300,79
PMP	129.552,21	67.145,05	32.555,08	229.252,35
VL0006	1.293,47	213,76	108,80	1.616,04
VL0612	127.945,85	66.910,41	32.434,61	227.290,87
VL1218	312,89	20,88	11,67	345,44
PS	647.594,27	464.817,76	109.034,85	1.221.446,88
VL0612	423,86	589,88	53,67	1.067,41
VL1218	115.683,23	107.849,21	22.674,83	246.207,27
VL1824	426.150,78	344.064,06	77.914,54	848.129,38
VL2440	105.126,69	12.314,61	8.391,81	125.833,11
VL40XX	209,71	0,00	0,00	209,71
Subsidies West Med	4.503.867,22	1.222.461,14	293.435,39	6.019.763,75
Total	4.504.820,45	1.223.607,09	293.527,81	6.021.955,35

Figure 1. Distribution of subsidies for the Spanish fleets under the West Med (GSA1, 2, 5, 6, 7) by year and fund.

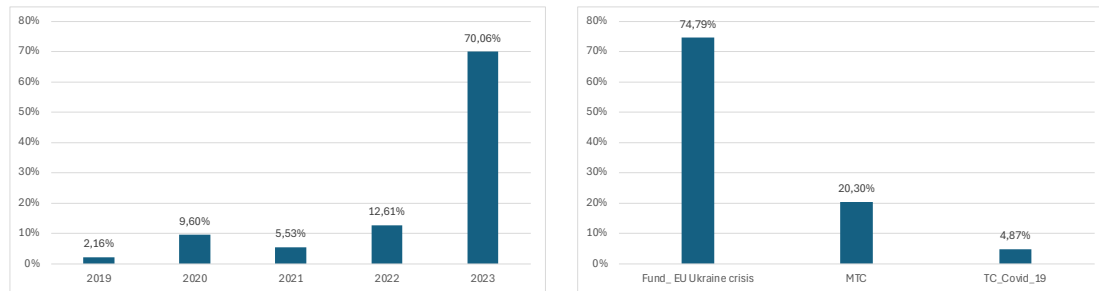
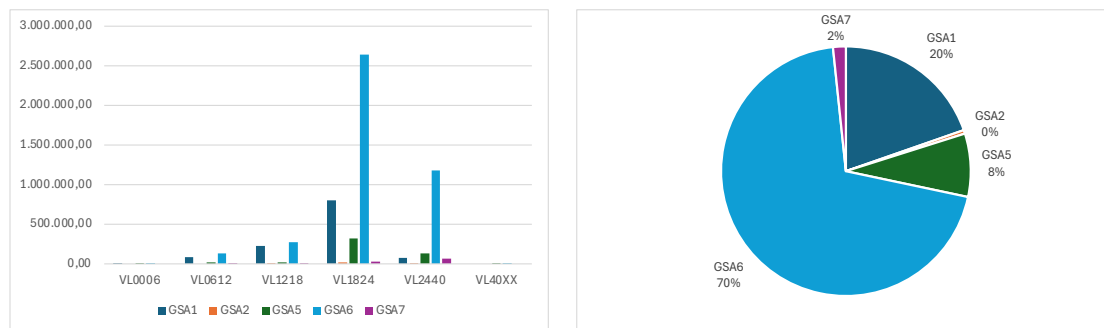


Figure 2. Distribution of subsidies for the Spanish fleets under the West Med by GSA.



Analyses of AER data regarding operating subsidies for the time period 2012- 2022 in Spain.

The DCF requires MS to provide data on “operating subsidies” and “subsidies on investments”. The definition and the methodology are described in the “guidance document for the fishing fleet”⁴

Data are disseminated through the STECF website and are available until 2021. The fleet economic data call requires economic data at the supra-region level which for Spain includes the North Atlantic (NAO), Mediterranean and Black Sea (MBS) and Other fishing regions (OFR) allowing to focus the analysis to the Spanish fleet in the West Med.

Table 10. Subsidies to the Spanish fleet operating in the Mediterranean Sea. Euros.

	2017	2018	2019	2020	2021
Operating subsidies	986.536,33	919.604,54	2.030.217,48	2.366.251,96	3.709.113,77
Operating subsidies/vessel	384,91	368,14	845,57	997,16	1.581,71
Operating subsidies/Total income	0,31%	0,27%	0,67%	0,81%	1,22%

Source: AER, 2024.

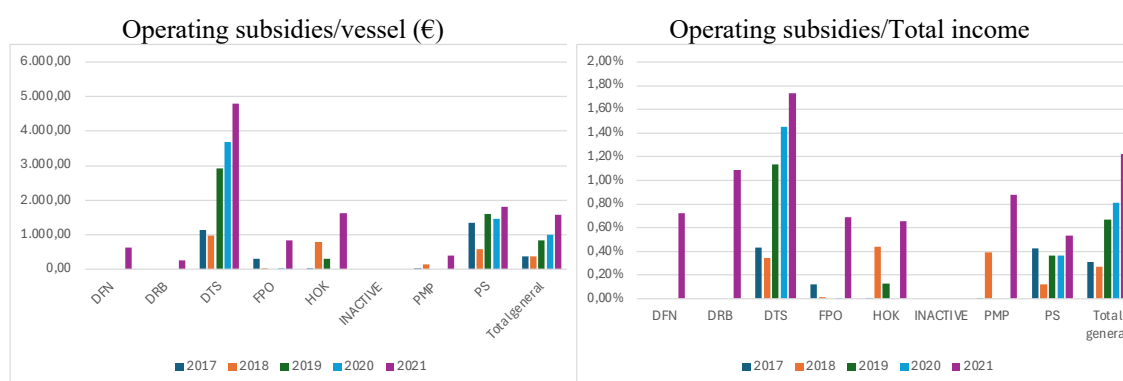
Table 11. Subsidies in the MBS subregion by length and fishing gear (2017-2021). Euros.

	VL0006	VL0612	VL1218	VL1824	VL2440	Total
DFN		0,00	58.277,70			58.277,70
DRB		8.250,00	0,00			8.250,00
DTS		46.915,62	990.117,84	4.303.044,28	2.409.891,55	7.749.969,28
FPO		26.000,00	11.035,43			37.035,43
HOK		0,00	129.200,82	168.834,06		298.034,88
PMP	0,00	336.088,90	196.807,13			532.896,04
PS		38.845,00	183.573,67	802.018,84	302.823,24	1.327.260,75
Total	0,00	456.099,52	1.569.012,59	5.273.897,18	2.712.714,79	10.011.724,08

For the last five years, subsidies for the Spanish fleet in the West Med have been kept at low levels (less than 1 million for the whole fleet and about 0,3% of the income) until 2019, when subsidies doubled. The beneficiaries of this additional support were mainly trawlers and purse seiners as compensation for the 30 days of mandatory cessation of the fishing activities based on the Management Plan for the conservation of fishery resources in the Mediterranean².

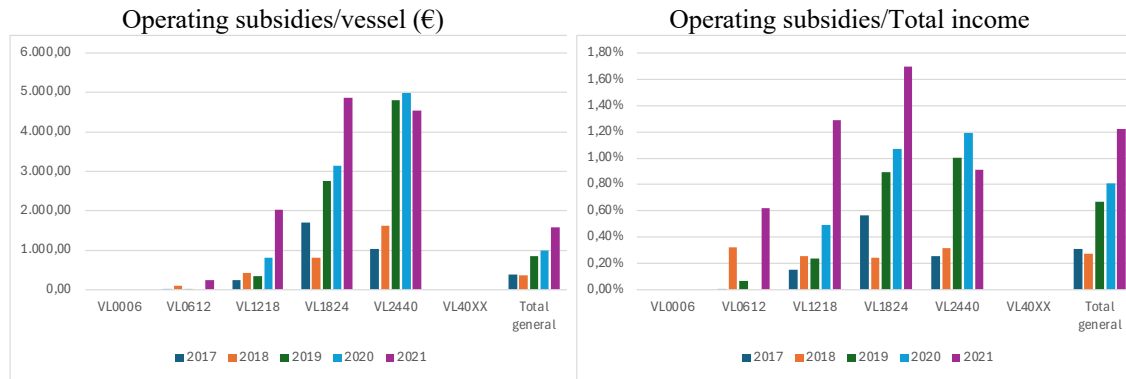
The increasing trend continued in subsequent years following the consequences of the major events that impacted the world economy: COVID19 and the Ukraine invasion. Data based on the Data Call indicates that in 2020 total operating subsidies reached 2.366.251,96 euros, nevertheless, this figure is likely to be underestimated, since COVID subsidies (Art. 33.1.d) for temporary cessation of the fishing activities accounted for 2.448.482,01 euros. The mismatch between surveying time in the Data Call and the effective time of payment of the subsidies can eventually explain, at least partially, the gap between AER database and EMFF database for Spain

Figure 3. Operating subsidies by fishing gear.



² Order AAA/2808/2012, of December 21, establishing an Integrated Management Plan for the conservation of fishery resources in the Mediterranean affected by fisheries carried out with purse seine nets, trawl nets and fixed and minor gear, for the period 2013-2017, extended by Order APA/1206/2018, of November 14

Figure 4. Operating subsidies by vessel lenght



In 2021, subsidies increased up to 3.709.113,77 euros, 1.581,71 euros per vessel, and 1,22% of the income. Even though the growth rate is noticeable, the overall level is still low. On the other hand, if in 2019 and 2020 the additional support concentrated mainly on trawlers and purse seines, in 2021 the was more distributed reaching also dredges, longliners and vessels using active and passive gears.

along the period analysed trawling was the most supported sector both in absolute and relative terms, receiving 77,4% of the funds during the five years, getting to 1,74% of the total income in 2021. On the other hand, for 2021 the effort reduction set for the Spanish trawling fleet in the West Med was 8,3%. Even though it has no direct link to the subsidies, other measures that concur on this segment fleet includes a seasonal bottom trawling ban within 6 nautical miles from the coast except in areas deeper than 100 m for 3 months each year (Sánchez Lizaso et al., 2020).

Final remarks.

Subsidies to the Spanish fleet in the West Med had kept at a low level until 2021. It does not matter if we consider only the fleet in the western Mediterranean or the entire fleet, the difference is negligible. The increase in subsidies has follow the path of major events hitting the world economy and, of course, the fishing sector: COVID-19 and Ukraine invasion. The increase in subsidies has followed the path of major events hitting the world economy and, of course, the fishing sector: COVID-19 and the Ukraine invasion. The effect of these shocks is likely to be accumulative, eroding the resilience of the fishing sector. The countervailing measures have led to an appreciable increase in 2023. The allocation of the funds shows, also, a pre-eminence of the Ukraine fund, the trawling fleet and the segment between 18 and 24 m and GSA6.

Not all the funds could be included in this report. Subsidies under EMFAF are not yet fully processed and certified and only temporary cessation of the fishing activity aids are publicly available between operating subsidies records. Not all the funds could be included in this report. Subsidies under EMFAF are not yet fully processed and certified and only temporary cessation of the fishing activity aids are publicly available between operating subsidies. This means that subsidies to compensate for the increase in productive cost provoked by the Ukraine invasion (art. 34 of the Royal Decree-law 6/2022, of March 29) are not currently included.

The gap between subsidy concession, effective payment and DFC surveying can eventually provoke certain mismatches between the different series that should be taken into account for fisheries analysis

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