

**East of England Regional Response to the European Commission Green Paper
on the Reform of the Common Fisheries Policy**

East of England key messages in relation to a reformed CFP

In addition to responding to the consultation questions individually and specifically, The East of England would like to underline key policy recommendations and principles as below which we believe should form the backbone of the reformed Common Fisheries Policy.

Key principles upon which the reformed policy must be based

- Ecological sustainability has to be at the forefront of any long term plans in relation to a reformed and improved Common Fisheries Policy.
- The discarding of fish is justifiably a principle issue which gives the CFP a very bad reputation, addressing this must therefore be a priority for reform.
- Fisheries management should be achieved within the framework of the integrated maritime policy and delivered using an ICZM and ecosystem approach

Inclusive research and decision making

- Research and data collection must be appropriately developed and regularly updated with full involvement of all stakeholders to provide the basis for relevant and timely decisions.
- Policy decisions must be based on a full understanding of the reality of our environmental and ecological status.
- The fishing industry must be fully involved in decision making processes, implementation of appropriate technical measures, and subsequent monitoring

Regionalised approach to management

- A regionalised approach to fisheries management is necessary; whilst principles should be established at an EU level, delivery and implementation is more effectively delegated to the level of sea basins and the local areas within this macro region.
- In the East of England we believe the newly constituted Inshore Fisheries and Conservation Authorities (IFCAs - replacing the Sea Fisheries Committees) should be instrumental in delivering the CFP at a sub regional level particularly in relation to inshore non nomadic fishing fleets. This should be

- looked at as a good practice model for delivery across Europe.
- A newly constituted transparent and representative North Sea Regional Advisory Committee should have a role in delivering a North Sea Strategy in which ecological sustainability of fisheries is a key element.
 - A new Inshore Fisheries Regional Advisory Committee is required to work alongside a newly constituted North Sea RAC.

Differentiated approach for the inshore and large-scale fishing industry

- A differentiated approach and management structure is clearly required for the under 10 metre vessel non nomadic inshore fishing industry and the larger deep sea nomadic fishing fleets.
- 12 nautical miles from the coastline should be reserved for the inshore fishing fleet of the respective member state and national legislation should apply to all vessels within this area.
- Historic fishing rights and the principle of relative stability must be dismantled in the current policy context to adapt to changing conditions and needs.

Support for the economic restructuring of coastal communities

- A certain amount of economic restructuring is required in coastal communities which are currently heavily dependent on fishing and are moving to more diversified economic opportunities, this process of transition should be supported at least in the short term by the European Union.
- Opportunities for coastal populations undergoing economic change should be explored and this process should be supported by the European Commission, particularly in terms of renewable energy production where adapting to climate change could provide new industry opportunities and new jobs.

Increased education, communication and awareness

- Education, marketing and improved awareness are fundamental to driving consumer demand and providing added value for high quality sustainable fisheries.
- Ensuring the clear communication of scientific evidence and data carried out on our marine ecosystems to the industry is essential. This is necessary to ensure an understanding of the basis by which policy decisions affecting the fishing industry are made.

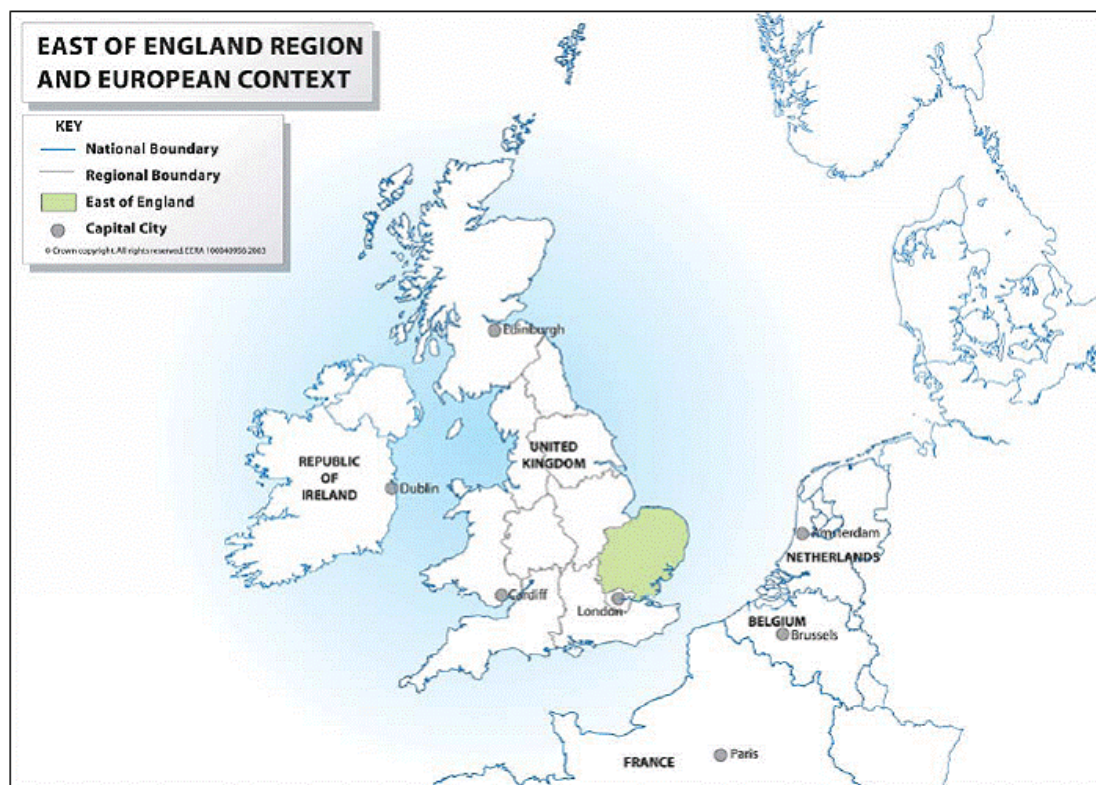
The East of England

The East of England is the second largest region in England covering 19,120 square kilometres with a population of 5,541,600 (ONS mid year population estimate) for 2005. There are around a dozen medium-sized towns and cities, although there is no major city acting as a regional focus. The six counties of Bedfordshire, Cambridgeshire, Essex, Hertfordshire, Norfolk and Suffolk and four Unitary Authorities of Luton, Peterborough, Southend-on-sea and Thurrock make up the East of England. There are 44 district or Borough councils.

The region is diverse, stretching from the edge of London in the south to remote coastal and rural areas in the north and east. High quality river, wetland and coastal areas are key environment features of the region but some are potentially at risk from rising sea levels and other aspects of climate change. There are a considerable

number of habitats of international and national importance, including nearly 600 sites of Special Scientific Interest. The East of England region is strategically placed for access to the rest of Europe. Felixstowe and Tilbury are the most dominant of the seven major seaports in the region, Felixstowe being the largest container port in the UK and the fifth largest in Northern Europe.

The East of England in Europe



Introduction

The East of England welcomes the real sense of opportunity and urgency expressed through the European Commission Green Paper to radically change the way our fisheries are managed through a reformed Common Fisheries Policy. We welcome a new approach to fisheries which takes full account of the reality with which we are faced today and welcome the opportunity to respond to the questions put to us by the European Commission.

The East of England Europe and International Affairs Panel

This response has been prepared by the East of England Europe and International Affairs Panel (EIAP). EIAP is a constituted Panel of the East of England Regional Assembly (EERA) and comprises nominated members of EERA and of the East of England Development Agency (EEDA). EERA and EEDA jointly chair EIAP. In preparing the response, EIAP has benefited from the contributions of many partners at both the regional and sub-regional levels. The partnership has included representatives from the fishing industry, Joint Sea Fisheries Committees, Local Authorities, The Government Office for the East of England, The Regional Development Agency, maritime clusters, marine research organisations and ICZM spatial planning officers representing coastal authorities of the region.

Reform of the Common Fisheries Policy Consultation Questions

4.1 Addressing the deep rooted problem of fleet overcapacity

- **Should capacity be limited through legislation? If so how?**

Even whilst fishing fleets are reducing in size this gradual reduction in vessels is offset by technological progress in the industry. The size of European fishing fleets must be adapted and remain proportionate to available, sustainable fish stocks. We believe the best way of achieving this is through framework legislation limiting days at sea alongside technical measures; this should allow a reasonable level of flexibility for regional adaptation.

- **Is the solution a one off scrapping fund?**

Fishing fleets that are too large and economically unviable will naturally adapt to market conditions. A one off scrapping fund is clearly more effective than on going scrapping schemes which has in the past been the source of perverse effects; however the need for a scrapping fund at all would need to be looked at closely. We would want to avoid a situation where inshore fisherman were incentivised to scrap their under 10 metre vessels given the fact that this would affect the economic, social and cultural character of maritime communities in Europe which is commonly felt should be safeguarded.

- **Could transferable rights (individual or collective) be used more to support capacity reduction for large scale fleets and, if so, how could this transition be brought about? Which safeguard clauses should be introduced if such a system is to be implemented? Could other measures be put in place to the same effect?**

In order to create a level playing field, hours or days per year at sea alongside technical measures on net size, length of gear and particularly engine size are felt to be the most appropriate measures for capacity reduction. These technical measures would need to be managed regionally in order to be adapted to local conditions. We believe the UK quota should be allocated on a regional basis to IFCA's who should be given a mandate to manage this allocation. This collective fishing right delegated to an IFCA for a local area would then be managed according to fishing effort in the most appropriate way with full engagement of stakeholders in that area.

Transferable rights must be approached with caution, whilst individual and collective rights should be maintained, the ability to trade such rights outside a given locality, between Member States and between individuals could lead to many perverse and unintended damaging effects for the local industry. We therefore feel that trading transferable rights outside a locality should not be possible. The ability to buy, sell or rent quotas would turn the transfer of quotas into a commercial activity, this we feel should not be encouraged and is counter-productive to the over all aims of the policy.

Collective transferable rights may be of value, where species availability has changed over time and where quotas for particular fish are exhausted in one area and not another, it could be argued however that if this is the case perhaps it is the rights or quota allocations themselves which need to change.

Systems of Individual Transferable Quotas (ITQs) have been successfully used in other countries such as Iceland and New Zealand for a number of years. The attached link <http://www.unuftp.is/static/fellows/document/liu3.pdf> is to a paper analysing the Icelandic system. Whilst there are proven merits in the systems which are outlined in this paper, and this best practice must be explored as a potential model, it is very important to note that safeguard clauses need to be put in place so that the system does not create a private property right over the fish stock. This evaluation of the practice also allows us to learn from and address the flaws in the current system applied in Iceland. We believe great caution is necessary in approaching any transferability of rights measure given the potential for unintended negative consequences.

- **Should the choice be left entirely to Member States or is there a need for common standards at the level of the marine regions or at EU level?**

There must be a level playing field across Europe in an industry which relies on a natural resource which does not respect national boundaries; common standards therefore must be set at an EU level, which are considered fair to all.

4.2 Focusing the policy objectives

- **How can the objectives regarding ecological, economic and social sustainability be defined in a clear, prioritised manner which gives guidance in the short term and ensures the long-term sustainability and viability of fisheries?**

Ecological sustainability has to be at the forefront of any long term plans in relation to a reformed and improved Common Fisheries Policy. It is only using an ecological and ecosystem approach as the basis of reform that will ensure the economic and social sustainability of fisheries and fishing communities in the future. Whilst this may entail difficult political decisions for Member States, it is now essential that a clear policy is agreed and implemented appropriately.

- **Should the future CFP aim to sustain jobs in the fishing industry or should the aim be to create alternative jobs in coastal communities through the IMP and other EU policies?**

With the local fishing industry and associated businesses, a very unique culture and quality of life is established. The future CFP should aim to help small scale inshore fisheries to respond to external economic pressures and avoid extinction. Inshore and small scale fishing is essential to the character and stability of Europe's coastal communities and this is valued immensely by local populations as well as by those visiting as tourists.

For the large scale fishing industry however a different approach is required. It is inevitable with increased capacity in terms of equipment and power in the fishing fleet, compounded with the fact that there are less fish available within our seas to be fished due to decades of overfishing, that there will need to be a reduction in the numbers of people employed by the fishing industry Europe-wide. Profitability must, for large scale and deep sea fishing fleets, come from increased productivity not national or European subsidies.

Alternative jobs must be created within coastal communities due to changes in the marine ecosystem as well as the fishing industry. The European Union has a

responsibility to help Member States preserve the unique character of maritime and coastal areas whilst also supporting the economic restructuring which is necessary for the future viability of such communities as well as the fishing industry. Supporting alternative jobs is of course possible and issues such as climate change and the need for low carbon economic growth should be the basis for such new industries and job creation. This could be in fields such as sustainable eco-tourism, offshore renewables, health and well being etc.

Coastal areas mostly have great potential in terms of the availability of natural resources for the production of renewable energy, whether it be wind, wave etc. In support of the European Union key high level strategies, namely Lisbon and Gothenburg, this economic and environmental potential should be both recognised and sustainably exploited. Skills should be developed within such new industries which could engender a whole host of new job opportunities for coastal populations and help to maintain a young and active population. Further opportunities such as aquaculture should be explored especially in so far as it could complement coastal realignment for example in the UK.

Any evolution should of course be supported within the framework of the Integrated Maritime Policy achieving the appropriate balance between locally interdependent policy areas. Local and regional stakeholders from the various sectors which come together within coastal areas must be fully involved in the decision making process in order to ensure that decisions are made based on the maximum availability of knowledge and sector intelligence. The establishment of such stakeholder groups should be further supported and enabled by the Member States and the European Union in order to effectively deliver the Integrated Maritime Policy within which the reformed Common Fisheries Policy has a vital place.

- **How can indicators and targets for implementation be defined to provide proper guidance for decision making and accountability? How should timeframes be identified for achieving targets?**

Different areas of Europe will of course have different needs and abilities in terms of change and support required. Indicators and targets for implementation must be defined based on framework principles which are established and agreed at the European level by Member States with appropriate funding mechanisms attached.

Local areas at the level of the IFCA's should then have the responsibility and decision making power to address such targets in the most appropriate way for the local circumstances by for example diversifying the economy and supporting restructuring according to possibilities and local opportunities.

Clear decisions at a European level must be translated clearly into national legislation avoiding any national gold plating and any confused practices at the national level.

4.3 Decision making Framework

- **How can we clarify the current division of responsibilities between decision making and implementation to encourage a long-term focus and a more effective achievement of objectives? What should be delegated to the Commission (in consultation with Member States), to Member States and to the industry?**

The East of England strongly agrees that the industry must become more involved in the decision making process and also take consequent responsibility for implementation of such decisions with regard to fisheries. The industry needs to take responsibility for the resource upon which it relies not only because the burden upon public authorities is too great but even more so because of the expertise and knowledge they have within their own sector. Principles for action must be set at a European level for implementation and some level of monitoring must be carried out and evaluated at this level. Any decision making is of course reliant on the appropriate data and research being carried out and made accessible, this must be supported by the European Commission.

We believe the Commission needs to be clear about the issues for EU fisheries and the information required on which to base decision making. Such research and data collection should be carried out and regularly updated Europe-wide reflecting the specificities of each regional sea.

For some areas, environmental issues need to be addressed urgently and polluting risks to the waters for a number of reasons may be much greater. In other areas the uses of the seas in terms of transport corridors might be a pressing issue with its own associated challenges. At a high level this data needs to be gathered and established into a body of information on which to base appropriate strategies for implementation on a regional sea basis, such as the Baltic Sea Strategy, the Mediterranean Strategy and most importantly for the East of England the North Sea Strategy which is currently under development.

The Commission must be responsible for coordinating regional sea strategies with the close participation of stakeholders from the Member States concerned. We very much welcome the Commission initiative which led to the development of the Baltic Sea Strategy and as a region are actively participating in the development of the North Sea Strategy. Member States which have an interest and responsibility for being actively involved in the strategy development process should ensure high level buy in and consequent resource commitment and implementation.

- **Do you think decentralised decisions on technical matters would be a good idea? What would be the best option to decentralise the adoption of technical or implementing decisions? Would it be possible to devolve implementing decisions to national or regional authorities within Community legislation on principles? What are the risks implied for the control and enforcement of the policy and how could they be remedied?**

Yes, we believe decisions on technical and implementing decisions must be decentralised to reflect regional and local specificities. These decisions should be decentralised to national and regional authorities within Community legislation and principles and where the EU continues to have a role is in ensuring that that the enforcement is even handed across Member States and punitive measures are applied equally. This is essential in creating a level playing field and avoiding discontent between fleets where different levels of application may be enforced. Regional seas may be the best level in the first instance for the decentralisation of technical decisions followed by regional and local decision making to address disparities in terms of species and capabilities within the framework of the larger regional sea area.

Shifting the burden to the Industry in terms of self regulation would be appropriate to ensure ownership and that regulations are respected. At the moment there is not perceived to be a level playing field as the application of rules and regulations is

believed to vary across Member States. Consistent application of rules is paramount to achieve buy in, compliance and to avoid perverse unintended effects. The industry must be subject to the same levels of regulation and enforcement procedures across Member States. Clear and transparent translation of European legislation into national legislation has a vital role to play in the success of the policy. Consistent enforcement of rules and regulations must be a priority for the Commission.

- **How could the advisory role of stakeholders be enhanced in relation to decision making?**

The East of England believes there is a need to establish an additional Regional Advisory Committee for the inshore fishing industry for boats under 10 metres and that this should work in close cooperation with a newly established North Sea Region RAC (Regional Advisory Committee).

We believe the Regional Advisory Committees set up by the 2002 CFP reform are a very positive idea in principle, however unfortunately the perception and experience of such Committees in the East of England is one of a closed shop dominated by the big players such as huge producer organisations and oil companies which is not necessarily representative of the sea region and its interest groups. Whilst it is clear such bodies have become influential as advisory bodies to the Commission, it is less clear how they are populated and what the available mechanisms are to influence them. However because in principle the operation of such stakeholder bodies at the level of the North Sea is required we feel such a body needs to exist but that this should be more representative, more transparent and provide some cross-over between the large scale fishing industry and oil companies and the inshore fishing industry.

- **How would ACFA and the RACs adapt to a regionalised approach?**

A newly formed North Sea RAC could be further adapted to a regionalised approach by playing a role in the delivery of aspects of the proposed North Sea Strategy.

We believe the newly established IFCA's (Inshore Fisheries and Conservation Authorities) with new planning powers established through the UK Marine Bill, should be responsible for the management of the inshore and small scale fishing fleet at a local and regional level in England. Part of the national quota could be allocated to the IFCA to manage within the geographical areas covered by the boundaries of the IFCA. This is because of their sensitivity and expertise regarding local and regional conditions within coastal communities which can be reflected within management practices. It is felt this is a model bringing local stakeholders together in coastal communities which has worked very well and should be strengthened. At a higher level there could be an association of such local fisheries committees which could come together at a higher level in the form of a RAC. If such local and regional structures do not already exist in other Member States we would advocate the usefulness of such a structure in an integrated Maritime Policy Framework.

4.4 Encouraging the Industry to take more responsibility

- **How can more responsibility be given to the industry so that it has greater flexibility while still contributing to the objectives of the CFP?**

Flexibility is important to the fishing industry and those in the industry are in a strong position to understand the impact of their fishing practices.

We believe the industry would be more appropriately managed through fishing effort in the form of limiting hours/days at sea, along with technical measures such as increasing mesh sizes and regulating engine capacity, net length and so on. An appropriate size of mesh should be established to allow immature fish to escape being caught and help the various species to replenish fully; these principles should be set at a European level. The fishermen understand when the fish are breeding and where the breeding grounds are, days at sea should be selected in order to ensure sustainability of the stocks upon which their livelihoods depend. The pooling of local quotas within a sub regional sea area within communities should also be explored. Where local quotas are pooled and managed at a local level, the industry will have more responsibility and flexibility for establishing the most appropriate and profitable approaches to their activities.

To avoid discards, it is necessary to allow landings of all catches where there are mixed fisheries. The mesh size should ensure against the catching of immature fish.

The industry needs to be able to plan in the long term, annual fishing quotas are not practical and lead to short term considerations and practices. As a region we advocate better long term planning, taking full account of the needs of the environment and ecosystem, as well as the industry which depends on this natural resource.

The industry needs to work hand in hand with all stakeholders in managing the use of the seas and its resources, particularly in terms of gathering information and data and understanding its implications. There seems to be a feeling amongst representatives of the industry that research in evaluating the stocks and impact of fishing is on occasions carried out at the inappropriate times of year or in inappropriate locations which may not result in appropriate sets of data on which to base decisions, this means decisions may be made which do not have the buy in of the industry. For effective policy decisions and consequent implementation, this issue needs to be addressed; more successful policy development and implementation can be achieved through stronger stakeholder and industry involvement in future decision making and implementation. Communicating the data and research which is carried out into meaningful messages and policy approaches for the fishing industry is vital in this process.

- **How could the catching sector be best structured to take responsibility for self management?**

We believe the IFCA provides the appropriate body for managing small scale non nomadic inshore fisheries. If the local quota was pooled within the IFCA geographical area this would lead to adapting approaches to local conditions in the most effective way. This approach would provide a framework within which the local fishing industry would be structured and brought together leading inevitably to an increased culture of cooperation and joint working. It may also lead to sharing of good practice, strengthening local producers, distribution and supply chains and more joint marketing which is felt would be beneficial.

The North Sea RAC could take more responsibility for the large scale /deep sea nomadic fishing fleets which clearly requires a different approach.

- **Should the POs be turned into bodies through which the industry takes on management responsibilities? How could the representativeness of PO's be ensured?**

It seems there are a number of examples where this is working well, this possibility therefore requires further exploration. PO's currently only seem to manage large scale fishing fleets and there seems to be limited access to PO's within some regions such as the East of England which is an issue. The possibility of setting up PO's for the inshore under 10 metre vessels should be explored also.

- **What safeguards and supervisory mechanisms are needed to ensure self management by the catching sector does not fail, and successfully implements the principles and objectives of the CFP?**

Regional and local implementation must operate within the framework of principles set at a European level and agreed in the context of a reformed CFP. Checks must be put in place by each Member State and enforced in an equal and consistent manner across the EU; punitive measures should also be applied with the same level of rigour across all Member States to ensure a level playing field.

To ensure self management by the catching sector does not fail, gold plating of European legislation and directives must be avoided within Member States across the EU. This is to avoid more complex administration and procedures being put in place at a local level which are difficult for the industry to comply with. The European Commission has a role to play in this regard given that at the Lisbon summit in the year 2000, EU governments committed themselves to a deregulation agenda and supporting maximum harmonisation. Simple and clear procedures need to be implemented at a local and regional level to enable effective and workable compliance. A member state quota should be reallocated to regional areas; it should then be within the management of regionalised structures such as IFCA's to allow the industry to operate in the most effective way working within the principles and parameters set.

- **Should the catching sector take more financial responsibility by paying for rights or sharing management costs, e.g. control? Should this only apply to large-scale fishing?**

Shared management costs should be paid for at least in part through the industry; apart from the fact that this is the case for all other industries, it provides an incentive to make the system work. Fishermen should pay the licensing authority an appropriate contribution to the management costs which is proportionate and does not affect economic viability.

If increased financial responsibility means the price of the product increases slightly, this cost should be reflected in the price of fish for the consumer. The costs should be proportionate and therefore would apply predominantly for the large scale fleets given that small scale inshore fisheries management could largely be supported by the IFCA through local or regional authority and European funding. Given the wider economic importance of inshore fisheries to coastal communities and the benefits associated to this in terms of quality of life, unique selling points of coastal communities, character etc the industry should not be allowed to become unviable and consequently the inshore fishery sector needs a certain level of support from public funding.

- **When giving more responsibility to the industry, how can we implement the principles of better management and proportionality while at the same time contributing to the competitiveness of the sector?**

Giving more responsibility to the industry immediately incentivises good practice in order to get the most out of time at sea within the set fishing effort rules. This self-management would contribute to the competitiveness of the sector. The European Commission could helpfully support technical knowledge being better employed to help the industry; research and knowledge transfer should be increased and utilised to help the industry prosper.

Proportionality is achieved through the different management practices applied to small and large scale fisheries and the associated structures tasked with ensuring more effective management.

- **Are there examples of good practice in particular fisheries that should be promoted more widely? Should incentives be given for the application of good practices? If so, which?**

Yes, incentives should be given for good practice such as recognition through certification and financial incentives such as only allowing access to European funding when effective control and compliance is demonstrated. A similar approach is taken for example under the delivery of the CAP with environmental stewardship.

4.5 Developing a culture of compliance

- **How can data collection systems be improved in the short and medium term to ensure coherent information for enforcement purposes?**

A clear understanding needs to be set as to the data required in order to make effective policy decisions as well as how this is to be effectively acquired. Data has to be developed and constantly updated over time to enable long term planning and enable stakeholders to react and adjust to short term needs. Robust, long-term and ongoing scientific advice is essential to make long term planning work.

We are aware that this process for the development of coherent information has begun and that the International Council for the Exploration of the Sea (ICES), the marine research body for the North Atlantic, based in Copenhagen co-ordinates research at a European level. This body of scientific evidence effectively informs the Commission, Member States and fishermen about the state of fish stocks in our seas, and provides the starting point for the annual quota negotiations. Improving the communication of this scientific evidence for enforcement purposes is however required, understanding of high level decisions on the ground could be improved through the clear communication of evidence and data into meaningful policy advice for the fishing industry as it applies to their local area. This must be continuously updated and made relevant to local conditions.

Data collection systems need to be established more and more with the close involvement and intelligence of the industry, research specialists and public authorities. Whilst practice has improved over time in this direction particularly with regard to involving the industry this must be improved, standardised and extended. Data collection needs to capture seasonal changes, breeding patterns and geographical differences and should lead to the adaptation of technical enforcement measures etc. This is not perceived to have been achieved in the past, leading to inevitable rule breaking and an inability to create a culture of compliance.

It is worth emphasising that with annual quota negotiations this has become a highly politicised process which encourages short term policy making, the relevance of

science and use of scientific evidence is therefore taken away; this demonstrates the imperative to move towards longer term planning.

- **Which enforcement mechanisms would in your view best ensure a high level of compliance: centralised ones (e.g. direct Commission action, national or cross-national controls) or decentralised ones?**

Mesh size principles should be set at a European level eg at a larger size across the board which would allow immature fish to grow and reproduce thus replenishing the fish stocks more effectively throughout Europe. Closed breeding zones and seasons should be explored and set at a European level.

The industry should look at their timing of going out to sea according to the needs of fish stocks and reproduction patterns. If days at sea are set for the fishing industry per year for example, these days at sea could then be selected and demonstrated by the industry to be at a suitable time for the sustainable management of fish stocks.

National and decentralised controls and enforcement mechanisms which are varied according to the small/large scale fishing industry with European spot checks around regional sea basins would seem most appropriate.

- **Would you support creating a link between effective compliance with control responsibilities and access to Community funding?**

Yes. Compliance and control needs to be incentivised and such a link, similar to cross compliance under the CAP, may go some way to achieving this. Compliance with principles set following informed policy decisions should be incentivised and rewarded. Equally this approach should provide a disincentive to those who may not be inclined to comply.

- **Could increasing self-management by the industry contribute to this objective?**

Yes.

- **Can management at the level of geographical regions contribute to the same end?**

Yes, as described previously.

- **What mechanisms could ensure a high level of compliance?**

5.1 A differentiated fishing regime to protect small-scale coastal fleets?

This is absolutely essential as described previously. The approach to the industry must accommodate the very different needs and circumstances of these fishing industry groups. Vibrant fishing communities deliver wider social, cultural and economic benefits and therefore require and justify a more supportive approach.

- **How can overall fleet capacity be adapted while addressing the social concerns faced by coastal communities taking into account the particular situation of small- and medium-sized enterprises in this sector?**

This can be achieved by:

- reserving the 12 mile zone for inshore fishing fleets of the Member State concerned. This provides a straightforward, fair and enforceable approach to adapting fleet capacity as well as protecting coastal communities and their non nomadic fleets.
- abolishing historic fishing rights: these were agreed when engine capacities were much lower than now and such rights are no longer relevant to the current policy context. This of course goes a long way to addressing the concerns of coastal communities whose livelihoods would subsequently be more easily protected.
- ensuring national legislation of the Member State concerned applies to all vessels entering the 12 mile boundary zone.
- regulating mesh sizes across the board at a European level to reduce the catching of immature fish, stocks of which may never be able to reproduce and replenish without such rules.
- managing fleet capacity according to days at sea with technical measures to reflect specificities of local/regional seas.
- educating and informing consumers about the quality and benefits of fish caught and sold locally and encouraging local markets and marketing practices to enable the industry to become more profitable
- attaching a premium to sustainable, responsible fishing which reduces the carbon impact of fish miles and encourages fresh fish consumption.

- **How could a differentiated regime work in practice?**

IFCA's could be the appropriate mechanism for managing local fishing fleets and the ICZM zone within 12 nautical miles of the coast. Beyond that there would be a need for other structures such as the North Sea RAC and a forum within which Member States work together on issues affecting their regional seas. These bodies would of course need to work together given their obvious linkages and use of the same resource. The proposed North Sea Strategy could provide a framework for cooperation at a macro-regional sea basin level.

- **How should small-scale fisheries be defined in terms of their links to coastal communities?**

They should be defined as inshore non nomadic fleets with fishing vessels which are under 10 metres in size. The non nomadic under 10 metre vessels which define the inshore industry should be allowed to fish within 12 miles of their national coastline with an appropriate maximum engine size, mesh size and net length, and be managed within an integrated maritime policy context using the ICZM approach.

- **What level of guidance and level-playing field would be required at EU level?**

To ensure consistency as well as a level playing field, national legislation and regionalised management approaches within the 12 nautical miles from the coastline of a member state boundary should apply. Currently national legislation does not apply to foreign vessels in this area, this works against the need for a level playing field.

12 miles from the coastline should be reserved to the national inshore fishing fleet across Europe, thereby abolishing historic rights which may affect inshore fisheries. Historic fishing rights are no longer appropriate given the changes in the industry and the seas since the time when they were established. In a changed environment all

rights and policies need to be revisited. A 12 mile zone reserved for inshore low intensity fishing would effectively create a more protected breeding zone for fish species given vessels would be smaller and they would adhere to regionalised technical measures including mesh size and net length and limited days/hours at sea. This is a rule that could easily be applied across Europe; it helps in creating a level playing field for all Member States and takes account of the reality of our current policy context.

Radical and brave policy decisions such as this must be taken and this would go a long way to resolving a number of challenges associated with creating a more effective Common Fisheries Policy.

5.2 Making the most of our fisheries

- **How can long-term management plans for all European fisheries be developed under the future CFP? Should the future CFP move from management plans for stocks to fisheries management plans?**

There must be flexibility according to circumstances in terms of fishing opportunities so that fishermen's rights and opportunities match the catches available from the fishing grounds.

- **How could the MSY commitment be implemented in mixed fisheries while avoiding discards?**

Better ways of targeting the right fish and reducing discards should be found, good practice in relation to this aspect of fisheries management needs to be highlighted.

- **What should the main management system be for Community fisheries and to which fisheries should it apply? Catch limitations? Fishing effort management? A combination of the two? Are there any other options?**

Weight based management of catch should be maintained however the main management system should be fishing effort management through hours/days at sea in addition to technical measures in relation to mesh size, net length and power of the vessel. The potential of closed breeding grounds and limiting fishing during the reproductive season should also be explored where necessary in achieving a sustainable future for the stocks and industry. Satellite monitoring which is currently practiced in many areas has proven to enable these new approaches of catch limitation and fishery management to be effective as it records when and for how long vessels are at sea. Such management decisions must be based on research and ecological need which may be different in different regional seas.

- **What measures should be taken to further eliminate discards in EU fisheries?**

Norway is often quoted as a leader in Europe in this respect; the merits of the Norwegian model and practices should be examined and this model evaluated for potential transferability.

Increasing mesh sizes at a European level in order to allow immature fish to escape and go on to breed should also be established through legislation. This could also work towards the elimination of discards as well as the depleting fish stocks which formed the rationale for this policy when it was established.

Discarding of fish is the single issue that gives the CFP such a bad name and this should be one of the priority areas for reform.

- **Could management through transferable quotas be useful in this regard?**

Collective transferable quotas may be of value where species availability has changed over time and where quotas for particular fish are exhausted in one area and not another, and it could be suggested that this could work towards combating the discard issue. However it could be said that with regionalised management and quotas which are set according to the most up to date scientific knowledge this mismatch of quotas should not arise. Transferable rights are an area of concern given the potential that the sale of rights could become an economic opportunity and trade in their own right. This could of course have perverse effects and greatly affect the coastal communities which we seek to protect. Whilst quota allocations must be adjusted depending on the availability of fish species we believe that localised quota allocations should not be tradable given the potential impact on local communities over time.

5.3 Relative stability and access to coastal fisheries

- **How could relative stability be shaped to better contribute to the objectives of the CFP? Should it be dismantled or if not should it become more flexible and if so, how? How could such alternatives be set up?**

There are current discrepancies between quotas allocated to Member States and the actual needs and uses of their fleets which need to be eliminated. Relative stability is the principle that each Member State's share of the Community quota should remain constant over time. The relative stability principle should be abandoned as it is no longer fit for purpose since the circumstances within which this system was established no longer exist. Such principles need updating and can not be justified given the state of our seas and overfished stocks today. The size of the European fishing fleet must be adapted and remain proportionate to available fish stocks and the needs and capacities of coastal communities rather than short term political considerations.

That said the fishing industry does need the ability to plan more appropriately in the long term and the abilities and constraints within which the industry must operate need to be clear and perceived to be fair. Operators will adapt their fleets to their fishing rights in order to achieve economic efficiency.

- **Should access to the 12 nm zone be reserved for small-scale fishing vessels?**

Yes, we very keenly support this policy proposition given the importance of inshore fisheries to our coastal communities as well as the need for a differentiated approach between large and small scale fishing and the pressing need to conserve our resources more effectively. The fact that historic rights are also inappropriate to modern fishing practice (technical capabilities have changed, economic realities in communities have changed, fish availability has changed) and the fact that historic rights do not create a level playing field is sound grounds for abolishing such

practice. National legislation should apply to all vessels entering the 12 mile boundary of the member state to ensure effective regionalised management.

There should also be a presumption against gravel dredging within the 12 nautical mile limit.

5.4 Trade and markets – from catch to consumer

- **How could market mechanisms be used to encourage the development of fisheries that are market efficient as well as sustainably exploited?**

The market be developed through creating positive local conditions and strong demand for the sale of local and sustainably exploited fish stocks; this could be through local accreditation and certification. Certification of origin and clear labelling could assist in this process as well as more effective marketing and an increased focus on quality. Good practice for example of supermarket buying practices in this direction provides inspiration as an example of a market led mechanism for sustainable exploitation of marine resources as does the direct sale to the public by local fishermen of fresh caught fish.

A Europe-wide publicity campaign could increase public and consumer awareness of the need for sustainable exploitation of natural resources thus moving towards demand driven through education and awareness for high quality produce. Quality is often assured by local fishing fleets as opposed to the huge vessels; a move in consumer demand in this direction could therefore help in sustaining these fishing communities.

There are a whole set of issues around marketing and awareness, a key one being the fundamental need for fishermen themselves to gain a better understanding of market conditions and consumer preferences as well as more consumer education about sustainable fisheries. Effective use of scientific evidence and data collection is very important in the regard. This knowledge transfer from research establishments to industry and the learning associated should be encouraged, facilitated and financially supported at a European level to enable cooperative marketing, the development of market demand and effective supply chains and accreditation schemes at a local level.

- **How can the future CFP best support initiatives for certification and labelling?**

For management and control purposes this type of information is required and logged by the industry anyway, and making this available for certification and labelling should therefore not be too much more of a burden. The initiation of this process might require financial support in the short term. Local accreditation schemes would be extremely valuable in supporting locally produced fish consumption, this would allow local fisherman access to key markets where the volume may not be very high but profit margins on such sought after produce would make it viable.

Eco - labelling could be explored as a legislative requirement for all in the industry.

- **How can traceability and transparency in the production chain be best supported?**

Traceability and transparency in the production chain should be incentivised through public awareness which should result in increased demand for such products. Increased consumer demand for sustainable fishing practice should mean those practicing such values should command a better price.

There should be a premium attached to transparency in the production chain supported and driven by the public sector and consumer. Large producer organisations should also be encouraged to ensure traceability and transparency in the production chain.

- **How could the EU promote that fisheries products come from sustainably managed fisheries, providing a level playing field for all?**

Eco - labelling could be explored as a legislative requirement for all in the industry.

- **How can the POs better work to match production with market needs?**

The EU should seek to improve consumer information as well as the match between supply and demand, developments in this direction are welcome.

- **Which new market based policy instruments could be implemented through POs? How can fishermen improve their position towards processing and distribution?**

Local accreditation schemes would be extremely valuable in supporting locally produced fish consumption; these would allow local fishermen access to key markets where the volume may not be very high but profit margins on such sought after premium products would make it viable. Cooperative marketing schemes at a local level would be valuable as well as increased understanding of market demand.

The development of appropriate supply chains for distribution is very important and relies on a good understanding of market conditions, opportunities and demand. Locally processed fish should also be supported as a way of maintaining jobs and economic opportunity in coastal communities as well as a way of reducing the carbon footprint which is engendered by food miles. Improving the direct sale opportunities of locally produced fish should be encouraged.

5.5 Integrating the Common Fisheries Policy in the broader maritime policy context

- **In which areas does the fishing industry interact closely with other sectors?**

Sectors which interact closely with the fishing industry include renewable energy production (especially off-shore wind), aquaculture, spatial planning, recreational uses of the sea, use of ports and facilities, tourism, eco-tourism, local food production and sale, the oil industry, dredging and safety at sea services.

The link between the fishing industry and the recreational fishing sector of angling also needs to be recognised and addressed with an integrated approach. Within the East of England this sport is recognised to represent significant economic opportunity as well as potential value for coastal communities. There is however also a need to manage this recreational use of our natural resource given high numbers of anglers could also impact significantly on particular stocks and quota in a local area. A bag

(take home) limit should be set at an appropriate level to avoid the problem of unregistered fishing for profit; this number limit would have to be established following appropriate research and analysis.

- **Where specifically is integration within the IMP required?**

Maintaining an ecosystem approach within an integrated coastal zone management framework, is essential to the IMP and the CFP, combining environmental interests with social and economic concerns.

Integration of fisheries into the IMP is essential; particularly given that the Maritime policy provides a holistic approach to maritime affairs and fisheries is a key part in this. Given the need for a certain level of restructuring of economies in coastal area is recognised, using the IMP, local areas can look at providing economic opportunities within the wider coastal economy against local opportunities. Understanding the coastal environment and economy as a whole is fundamental to any reform and all aspects of the CFP should be integrated in so far as it has an impact on the environment, the economy and social concerns within maritime areas.

- **How can the future CFP contribute to the continued access of fisheries, including both fishing fleets and aquaculture, to marine space, within an integrated spatial planning framework?**

The CFP can contribute through the establishment of certain principles and processes. Continued access to maritime space can best be achieved through involving the industry (small and large scale fishing fleets as well as aquaculture representatives) within regional and local advisory and decision making authorities. Decisions on the uses of our seas and maritime spaces must be made collectively taking into account the views and needs of all stakeholder groups and reconciling diverse interests through an ecosystem approach.

Reconciling diverse economic interests and managing with an integrated coastal zone management and ecosystem approach is the only way to ensure a sustainable future for our environment and fishing industry communities.

- **How can the future CFP best ensure consistency with the Marine Strategy?**

In England, this consistency could be ensured through the management structure of the IFCA's for the inshore fisheries sector, and equivalent structures in other countries beyond England and Wales. At a macro-regional level this should be ensured through the regional sea strategies e.g. the North Sea Strategy.

- **How can the future CFP support adaptations to climate change and ensure that fisheries do not undermine the resilience of marine ecosystems?**

Using an ecosystem approach, ensuring that overfishing stops preventing fish stocks from replenishing, ensuring that discards and all their consequences ceases to be an issue, ensuring new opportunities are explored for coastal communities in the renewable energy/adaptation to climate change/sustainable tourism sector and that the CFP and IMP is managed using an integrated policy approach.

5.6 The knowledge base for the policy

- **How can conditions be put in place to produce high-quality scientific research regarding fisheries in the future, including in regions where it is currently lacking? How can we best ensure that research programmes are well coordinated within the EU? How can we ensure that the resources are available and that young researchers are educated in this area?**

This should be supported by the European Union Framework programmes and specific levels of knowledge need to be achieved across Europe in connection with our maritime environment to enable the most effective policy decision making.

An analysis of information availability, adequacy and needs should be carried out and gaps subsequently filled through research and development. The right criteria for research needs and research approaches also needs close attention to ensure the research is then fit for purpose and can result in effective implementation. In order to take into account potential shortfalls and inadequacies, all those affected by the research, particularly the industry should have a role in advising on past issues and problems and areas for improvement and change in research and data collection.

Increased awareness of young people through education campaigns to the needs of our marine ecosystem should stimulate an increased interest. Resources should be made available to encourage research in such areas of increasingly recognised importance.

- **How can the resources available best be secured and utilised to provide relevant and timely advice?**

Through agreement on principal research and resource needs across the European Union, and by agreeing on the considerations which need to be addressed including the identification of gaps in knowledge.

Procuring research in a harmonised manner across the Union, possibly through a coherent team working at a European level with very well established criteria to ensure the most useful information is acquired and made available to allow for effective decision making, policy implementation and subsequent monitoring within European seas.

- **How can we better promote stakeholder involvement in research projects, and incorporate stakeholder knowledge in research-based advice?**

Fund their involvement (for example their participation in consultations) and facilitate their involvement through thoughtful locations of public consultations. Public authorities responsible for research projects should set aside funds to go out and engage with the sector listening to their needs and concerns and then going on to reflect these in the projects where appropriate. Thought could be given to incentivising engagement by demonstrating benefits of the process to stakeholders concerned.

Use of the forums currently in existence is important and creating systems for seeking advice and reporting back on outcomes should be emphasised as part of the projects.

5.7 Structural policy and public financial support

- **What should be the top priorities for future public financial support and why?**
 - Ensuring availability of the appropriate research for policy decisions and implementation across Europe is crucial.
 - Inshore and small scale fishing in coastal communities must be a priority in order to preserve a unique character and quality of life which is very much valued and has wider economic value in relation to tourism and healthy consumption of fishing products.
 - Creating the framework for integrated and consultative policy making which involves the industry and other stakeholders in the process. The policy needs to be carried and delivered by the industry as a major driver.
 - Developing new industries and jobs within coastal communities taking into account social and economic pressures and adapting to structural change whilst allowing the fishing industry to become more competitive. This will need public financial support at least in the short term.
- **What changes can the sector not manage to bring about on its own and therefore require public financial support?**

The sector can not bring about the development of new economic opportunities and skills very easily; this can be facilitated by public support which identifies how existent skills can be adapted to new areas of work, facilitating this process of consequent transition.

The sector would need support in the education of consumers so that they understand the importance of sustainable fisheries and purchasing and encouragement of the sale of local produce. Within this policy framework there is a value in changing mind sets, attitudes and understanding in relation to the environment and food quality.

- **How can we change the focus of EU financial resources to promote innovation and adaptation to new policies and circumstances? Does any new policy area require funding? Should public financial support be focused on specific transitions such as eliminating discards in the fishing industry?**

Adaptation and mitigation to climate change and the new economic opportunities this may provide should be supported in so far as it functions effectively within the IMP.

Aquaculture opportunities should be explored and if viable supported.

Eliminating discards in the fishing industry is essential and should be a priority of the reformed CFP.

- **How can synergy and coherence of possible CFP funds with other EU and national instruments be ensured?**

The various national authorities working with CFP funds should be responsible for identifying synergies/complementarities/overlap and gaps in relation to their national funding mechanisms.

- **How can a synergy between the pillars of a future CFP be achieved? Should public assistance be conditional on Member States' achieving policy objectives?**

Yes.

- **Should public financial support apply equally to all sectors (small and large scale)? Should the European Fisheries Fund continue to distinguish between convergence and non-convergence regions?**

No, there needs to be a differentiated approach to small and large scale fisheries, small scale is most likely to need public financial support whilst large scale should not rely on subsidies in order to be competitive and sustainable. It should also be recognised that the quality of fish caught by small scale fisheries is much higher than that of the large scale deep sea fishing industry where the fish inevitably are more damaged and less fresh. Non nomadic fleets are also in many areas the lifeblood of their communities.

The EFF fund should not distinguish between convergence and non convergence regions but rather the composition of the fleets within the industry and structural deficiencies.

- **Should indirect support such as services related to fisheries management (access, research, control) continue to be provided free to all sectors of the industry?**

Research should be carried out and made available to the industry free of charge where it is in the public interest.

A certain amount of management costs has to lie with the sector itself in order to remain sustainable and secure buy in and ownership of responsibility; this cost could be incorporated in to the licensing fee. This should also lead to more efficient and cost effective methods and compliance.

- **Should permanent fisheries subsidies be phased out, maintaining, on a temporary basis, only those aimed at alleviating the social impacts of the restructuring of the sector?**

Yes, for the large scale fishing industry. Europe should not artificially maintain overcapacity. Profitability must, for large scale and deep sea fishing fleets, come from increased productivity not national or European subsidies. As previously outlined however, the circumstances and considerations for large and small inshore fleets are different and therefore require a differentiated approach. In contrast to the large scale fleets, the small scale inshore fishing industry needs continued support in the form of public subsidies to protect the social, cultural and economic benefits which surround it.

5.9 Aquaculture

- **What role should aquaculture have in the future CFP: should it be integrated as a fundamental pillar of the CFP, with specific objectives and instruments, or should it be left for Member States to develop on a national basis? What instruments are necessary to integrate aquaculture into the CFP?**

The potential role and any risks associated to further developing aquaculture should be explored. Unsustainable practices such as the feeding of fishmeal products in aquaculture should not be supported. As a region we do feel there is strong potential to develop certain areas of aquaculture sustainably especially in the context of managed retreat. Research on aquaculture and what is required to address the bottlenecks preventing this sector from developing would be helpful.

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