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## **Comments by Iceland regarding the Green Paper on the Reform of the EU Common Fisheries Policy**

The European Union is an important cooperation partner of Iceland in the field of fisheries, both at the regional level in the management of shared straddling stocks in the Northeast Atlantic and at the global level in fisheries deliberations in such fora as the United Nations and the FAO. Iceland therefore appreciates the opportunity offered by the Commission to provide a few comments regarding its Green Paper on the Reform of the EU Common Fisheries Policy.

### General

The Green Paper gives a comprehensive and honest assessment of the current situation and the challenges facing the fisheries sector in the EU. The Paper recognizes that the Common Fisheries Policy has failed to prevent the current problems of overfishing, fleet overcapacity, heavy subsidies, low economic resilience and decline in the volume of fish caught by European fishermen. Iceland shares the conclusion of the Green Paper that a fundamental reform of the Common Fisheries Policy is required to bring about the dramatic change needed to reverse the current situation.

### Sustainable fisheries

A fundamental requirement is to ensure that fisheries under the reformed Common Fisheries Policy will be sustainable and the current overfishing put to an end. Long-term interests must prevail over short-term interests. Iceland shares the view expressed in the Green Paper that while ecological, economic and social factors should remain as core objectives of the Common Fisheries Policy, the ecological factor should be given the highest priority as the other two depend on ecological health in the long term.

A key issue in this context is to make sure that fisheries management decisions are taken on a scientific basis. Strengthening the scientific basis of the Common Fisheries Policy includes, in particular, improving knowledge on the status of the relevant fish stocks.

There are strong arguments for abolishing the current system of landing quotas and replacing it with a system of catch quotas, since, from an ecological point of view, what is essential is how much fish is caught and not how much fish is landed.

Iceland shares the vision of the Green Paper that the future Common Fisheries Policy should ensure that discarding, which not only has been authorized but mandatory, will no longer take place. To address the problem of discards, the system should provide for some flexibility, for example by including transfers of catch quotas between years, between vessels and between species.

### Economically self-reliant fisheries sector

It is imperative that fisheries be treated like any other economic sector within the EU and measures taken to make the fisheries sector economically self-reliant.

An obvious prerequisite for an economically self-reliant fisheries sector is the elimination or phasing out of all public subsidies to the sector.

The best way to bring about these changes, to eliminate overfishing and overcapacity, and bring the level of fisheries to a sustainable level, is to apply rights based management. This will both promote long-term thinking within the fisheries sector and ensure that those who will have to reduce their catches in the short term will benefit in the long term.

### Regionalization

The Green Paper outlines the difficulties created by the current centralized decision-making framework and proposes some options to improve the situation. According to the Paper, one “option to be carefully considered would be to rely wherever possible on specific regional management solutions implemented by Member States, subject to Community standards and control. The Treaty stipulates that the policy must be based on exclusive Community competence but this would not prevent implementation decisions from being delegated to Member States, provided they are bound by decisions on principles at Community level. For instance, decisions on certain principles and standards such as fishing within MSY, adapting fleet capacity to available resources or eliminating discards could remain at Community level, but it would then be left to Member States to regulate their fisheries within these Community standards. In most cases this delegation would need to be organized at the level of marine regions because shared fish stocks and shared ecosystems cover wide geographical areas and cannot be managed by individual Member States acting in isolation. Member States would therefore have to work together to develop the set-ups required.”

Iceland is supportive of the concept of regionalization. In the introductory chapter of the Green Paper, it is stated that the rationale behind exclusive Community competence in fisheries management is that “fish move across national jurisdictions.” This rationale clearly supports that a Member State should take decisions on the management of local fish stocks within its exclusive economic zone and that such decisions should not be taken at the Community level. In the case of fish stocks shared by two or more Member States, it would also be fully consistent with the rationale if the relevant Member States would take decisions on the management of such stocks. If the fishery can be better managed by the Member State or Member States directly involved than at the Community level, there is no reason to maintain the authority to manage at that level. The aforementioned rationale does not call for decisions on the management of individual fish stocks to be taken at the Community level and decisions should only be taken at that level in the case of questions of general principles. This approach is consistent with the principle of subsidiarity as well as provisions of global fisheries instruments, such as the UN Fish Stocks Agreement, and with the general agreement in global discussions on fisheries management that decisions are best made at the national (local stocks) or regional (shared stocks) level.

## Compliance

The Green Paper recognizes that there is a serious lack of compliance with current fisheries rules within the EU. Compliance is a fundamental issue in any fisheries management and a reform of the Common Fisheries Policy will be in vain unless the new rules are effectively implemented and complied with.

To a large extent, improvements in compliance are dealt with in a separate process that is parallel to the reform of the Common Fisheries Policy. The new EU Control Regulation will hopefully strengthen fisheries control considerably but given the fundamental importance of compliance, it should also be considered what can be done in the context of the reform process to promote better compliance.