

# Irish Fishermen's Organisation

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VIEWS ON THE GREEN PAPER REFORM OF THE CFP.

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Fish have for many thousands of years been a principle source of protein for mankind. To-day fishing and aqua-culture are two of the most important uses of the sea, and not only provide a healthy and enjoyable source of food but also create much-needed jobs in coastal areas which in turn maintain social and economic well being in these regions. The Common Fisheries Policy which regulates all aspects related to fisheries and aqua-culture in European waters, it is to be reviewed before the end of 2012. The policy has been in place for the last 30 years, and its review is likely to have profound implications for the future of the European fishing industry, and the coastal communities so dependent on its vitality. The European Commission for fisheries has produced a green paper detailing items to be discussed during the review.

## ANSWERS TO QUESTIONAIR

### 4.1.Should capacity be limited through legislation.? If so how.?

Under MAGP 1-2-3-4 Member States had ceilings on the amount of capacity that each State could have under the regulation, made up of (GTs) and (KWs) further broken down in to different segments, Pelagic Vessels, Demersal Vessels, Beam Trawlers, and Specific Bivalve Vessels. These ceilings are the starting point in all member States, and all decommissioned vessels, will reduce these (GTs) and (KWs). MAGPs should be re-instituted under Regulation, and taken seriously.

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

Decommissioning is a very clear cut way of reducing fishing fleets.

### 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 affect?

The Irish Fishermen's Organisation has always been opposed to individual or collective transferable quotas, as are Irish fishermen generally. The (ITQ) concept is not good, and has been shown to be of no benefit in other jurisdictions. It has very serious down sides. ITQs quickly lead to concentration of owner ship (and very likely eventually non Irish ownership. This system has been widely used elsewhere in the EU and has shown none of the advantages its proponents claim, as stocks have steadily and substantially decrease where it operates. It would involve the transfer of public to private ownership and this cannot be supported from a public policy point of view. Accepting the ITQ concept in any shape or form would be an irreversible legal and political one-way street

### Should this choice be left entirely to Member States, or is there a need for common standards at the level of marine region or at EU level.?

Should be left entirely to Member States.

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

- (1) Make some scientific calculations of the state of the stocks, at present an un-known.
- (2) Determine the optimal resource required to maintain the present EU fleet, a known.
- (3) Market Forces, Fleet, Fish, Regulations, Opportunities, Quota, Days at Sea, plus the effects of natural predators, seals, sea-birds, the vagaries of the oceans, good year classes, bad year classes. All have a bearing on MSY.

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.?

Should aim to sustain jobs in the fishing industry. The issue as we see it, centers on what might be termed organic versus induced employment. It is not easy to see how coastal areas can function if control and use of resource is concentrated in a few hands, and the organic employment opportunities that the resource could offer are correspondingly reduced. Experience has shown that it is very difficult and extremely expensive to remedy this situation by attempting to create induced employment through manufacturing processes or other such activities. These almost always have to be accompanied by substantial financial incentives and are liable to cease as soon as the support stops.

How can indicators and targets for implementation be defined to provide proper guidance for decision making and accountability?

A new MAGP with clear targets and dates, data on fleets, fish and fishermen.

How should time frames be identified for achieving targets ?

The clock is ticking towards 2015.

4.3. 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), and to industry?

The Lisbon Treaty stipulates that the policy must be based on exclusive Community principles. One option would be to delegate more of the current detailed to the commission in cooperation with Member States and the European Parliament through the so-called comitology procedure. Under this procedure, the Commission drafts proposals in close consultation with Member States and the European Parliament. Would opt for this.

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

Stakeholders will always be in an advisory capacity.

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

Retain the ACFA as the main conduit for advice to the Commission. The RACs should advise through one of the working groups of ACFA this would cater for any regionalised approach.

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

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

Experience has shown that devolving powers to fishermen has not worked, self-regulation does not work. Regulation and control must be done at arm's length, and be applied evenly and fairly by external agencies.

Should the POs be turned in bodies through which the industry takes on responsibilities?

No.

Since the setting up of producer organisations, in 1974 they have the power to control their members.

How could the representativeness of POs be insured?

With great difficulty, as there are many vessels not in POs.

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

Supervisory mechanisms are already in place, and the catching sector must comply with the regulations, the difficulty is there are so many rules.

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.

No costs are already too high.

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.

Are there examples of good practice in particular fisheries that should be promoted more widely?

There are many claims to good practice, but new rules, and market forces, play havoc, with the best made plans of men, or women.

Many of the nephrops fisheries are fished sustainably.

Should incentives be given for the application of good practice? If so which?

Good practice should be the goal, it should bring its own reward.

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

Systems are already in place, electronic log books, sales docketts

Which enforcement mechanism 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?

With 36 EU Acts associated with structural measures. 74 EU Acts associated with Market Organisation 6 EU Acts associated with State Aid. 508 EU Acts associated with Conservation of Resources. Totalling the 624 EU Acts of the CFP, on top of this we have National legislation, plus the new Control Regulation and the IUU Regulation, are already in place, plus the new Technical Measures Regulation, that is still under discussion. The question is academic, unless there is reform, it will matter little who does the enforcing, very few fishermen, will want to fish, under such a regime.

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

No

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

No

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

The Member State will manage the vessels in its own areas.

What mechanism could ensure a high level of compliance?

Adequate Fish and enough days to fish.

5.1. How can overall fleet capacity be adopted while addressing the social concerns faced by coastal communities taking into account the particular situation of small –and medium-sized enterprise in this sector?

As most of the fishing vessels are small or medium size, there can be over-capacity and over investment, in all of the sectors, restructuring is required across the board. If present market forces persist, high fuel costs, and low fish prices, the fleet will realign, the absence of profit will spell disaster.

How could a differentiated regime work in practice?

Against a differentiated regime, vessels should be treated equally.

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

It is self evident that small-scale fisheries have strong links to coastal communities,

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

All must be treated fairly.

## 5.2. Means of management

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

We believe that management based on fishing effort, days at sea, in the demersal mixed fisheries, would eliminate discarding, would give accurate information on catches, should give accurate information, to scientists, and controllers. Would be easy to control, and make life easier for fishermen.

Should we consider reforming the CFP in two steps, with specific measures to move to MSY prior to 2015 followed by measures to maintain MSY at the upper exploitation level after that date.

You have already started, with the recovery plans for a number of stocks, plus many vessels have been decommissioned across the community.

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

No take zones, at specified times of year.

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.?

Fishing effort management, all vessels in the demersal and shellfish fisheries. Pelagic vessels operate on a seasonal basis.

How the system would work, all vessels in the demersal and shellfish fisheries would have 21 days per month to fish, with no trading in days, or carrying forward of any days not fished in the previous month, subject to the GTs and KW ceilings, the vessels licensing entitlements, in the EU fishing zones, also regulation fish sizes, and technical measures. All subject, to local national and EU rules. The easiest fisheries to manage are those with ample quota and sufficient days to fish.

What measures should be taken to further eliminate discards in EU fisheries,? Could management through transferable quotas be useful in this regard,?

Opposed to transferable quotas. Technical measures for some species, would be beneficial. Some quotas are so small in many areas that there is not enough to go around.

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.?

The green paper clearly outlines, some of the fault lines, in the relative stability system, the lack of flexibility, the discarding of fish, to remain inside a rigid legal system, it has also led to the trading in quotas, and days at sea, enabling those with money to keep their fleets fishing, at maximum effort, it poses a threat to coastal communities, and does absolutely nothing for conservation, or stock recovery. It is discriminatory, the only thing common is the name the CFP.

Relative Stability should be changed. We believe that the allocation of all TACs across the areas say V11 should be at the use of the member state to allocate to its vessels, instead of the present system where the area is broken down to V11A V11FG V11HJK V11BC V11DE with a five way divide and no flexibility.

Since the last review of the CFP in 2002 all demersal and shellfish fisheries are in effort regimes, and all fishing vessels must have track record for the areas in which they fish. This is a sea-change.

There can be no influx of vessels from other areas.

That is why we proposed the days at sea regime, above.

Should access to the 12 mile zone be reserved for small-scale fishing.?

Ideally yes.

There is a strong indication that the day of the less capital-intensive smaller vessel has arrived.

Most boats currently in the Irish fleet are relatively small- the bulk being under 18 metres.

These provide a substantial volume of high- value landings and generate locally important economic activity over a widely dispersed area. They have a very important contribution to make and should be central to future policy. It is also the case that these vessels are usually able to operate at reasonable income and cost levels.

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

As 65% of all EU fish is imported, it would be very difficult to determine whether they are market efficient, or sustainably exploited. The 35% caught by member states are subject, to all the market and catching, regulations of the EU.

How can the future CFP best support initiatives for certification and labeling/?

These should be the norm under regulation.

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

Traceability and transparency are essential for the consumer.

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

It must be assumed that fish caught in EU waters, come from sustainably managed fisheries.

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

An impossible task, as they can only control their members.

Which new market based policy instruments could be implemented through POs?

Because of the intervention system, and the carry over system, linked to the with-drawl prices, all these systems, have retarded the marketing of fish, and have tended to keep POs from being serious marketers. Most fish is sold by co-operatives or private enterprise companies.

How can fishermen improve their position towards processing and distribution?

Systems are already in place, but there is a clear need for rationalization.

What is the role of trade policy in balancing the interests of producers, consumers and our relations with exporting countries.?

To make sure, there are strict controls, to prevent dumping on the EU market, and to make sure all imports, comply with EU Regulations.

5.5 Integrating the CFP in the broader maritime policy context.

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

The 87000 fishing vessels of the EU play a very important role in the maritime area, and must share this area with many other users, and for the most part, co-habit successfully. There are ships, all kinds of leisure craft, oil/gas rigs and pipes, wind-farms, cables, and harbours.

Where specifically is integration within the IMP required ?

Because the fishing fleets, are most familiar with the marine habitat, and the changing sea conditions, and the only sector to live off the fish of the seas. Integrating it in the maritime policy should be in the area of practical know-how and of its contribution to a better management of the resources of the marine ecosystems.

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 fishing sector should hold a preferential place, via the CFP, in the Integrated Maritime Policy.

How can the future CFP best insure consistency with the Marine Strategy Framework Directive and its implementation?

By having timely and open dialogue with the fishing sector.

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

The present cost of fuel is forcing trawlers to stay ashore, energy efficiency systems will be adopted. The Marine Protected Areas, the Natura 2000 Sites, the Box Closures, the No Take Zones, and the Rules and Regulations, will all play apart. Nature and the Stormy Oceans will look after the Marine Ecosystems, most of the threats to climate change are on the land.

5.6

Fisheries research is of paramount importance within the CFP. It underlines all management policy in the CFP, and provides information on the life history, exploitation and the current state of commercial fish stocks.

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?

How can the resources available best be secured and utilized to provide relevant and timely advice?

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

5.7

How can EU financial resources be developed to provide the flexibility needed to respond swiftly when a crisis occurs?

Retain a percentage of the EFF in a fund ,to cater for such an eventuality.

Should public financial support apply equally to all sectors (small and large scale )?

Yes

Should the European Fisheries Fund continue to distinguish between convergence and non-convergence regions?

Yes, but no grant aid for new vessels in any region.

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

Yes. Vessels are already paying for control, by the use of VMS, AIS, and Electronic Log Books.

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?

No any subsidies given, should be uniform and transparent, across the Community.

5.8

The core objective of the CFP is to promote responsible and sustainable fisheries. Is there any reason why the external dimension of the CFP should be driven by different objectives.?

No the Community fleets in external waters are subject to EU rules.

How could the EU strengthen its role on the international stage to promote better global governance of the sea and in particular of fisheries?

By getting its own house in order, which it is now trying to do, with the New Control Regulation, plus the IUU Regulation.

How can the EU cooperate with its partners to make RFMOs more effective?

By having good information on the fleets and where they operate, and good scientific knowledge on the state of the stocks.

Contrary to the current free access principle in international waters, should fishermen pay for the right to fish in the high seas under the governance provided by RFMOs?

No, but the countries benefiting the most ,should pay the most ,for the running of the RFMOs.

How can objectives such as investment promotion (creation of joint-ventures, transfer of know-how and technologies, investments and capacity management for the fishing industry) creation of jobs (on vessels, in ports, in the processing industry) or promoting good maritime governance be pursued in the framework of future international fisheries agreements?

Must question the value of these arrangements for the EU.

Are the FPAs the best instrument to achieve sustainability beyond EU waters or should they be replaced by other forms of cooperation? Should the regional perspective be explored and either substitute or complement a streamlined bilateral one?

On balance they seem to be doing good work.

How could we make scientific research to assess the sustainability of fish stocks and the control of the fishing activity more transparent and efficient?

The use of VMS data to show where the fleets are operating, the Electronic Log Book to see what is caught, and the Sales Notes to see what is landed.

How can we assure better cooperation and compliance with new regulations in developing countries?

If transgressors, have to pay heavy fines, they will get the message that it don't pay to break the rules.

Should EU operators cover all the costs of their fishing activities in third country waters or should the Community budget continue to support part of these costs?

No the member states involved in the third country agreements should pay.

How could we contribute to increasing the fisheries management capabilities of developing countries, e.g. through targeted assistance?

Yes

Should the integration of the European fishing fleets and interests in third countries be actively pursued as an objective of the external dimension of the CFP with a view, in particular, to supporting the development of the concerned partner countries?

Must question the value of these operations, to both sides, all for helping in the development of countries that are underdeveloped.

How can we reinforce the synergies between the different forms of support and the different partners in the fisheries sector reinforced and the development strategies of coastal states?

By targeted aid to the fishery sector.

Should aquaculture be included in partnership agreements?

No

How could the potential of small-scale fisheries in third countries for sustainability, ecological and social benefits be enhanced?

First the resource must be protected for the small-scale fisheries, it should be part of all agreements, that all large vessels operate outside twelve miles from the coast.

5.9

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?

Should be left to Member States to develop on a national basis.

Joe Maddock.

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