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European Commission  
Directorate-General for Maritime Affairs and Fisheries  
CFP Reform  
B-1049 Brussels  
Belgium

## **CONTRIBUTION BY THE FINNISH MINISTRY OF AGRICULTURE AND FORESTRY ON THE REFORM OF THE COMMON FISHERIES POLICY**

The European Commission has in its Green Paper on the Reform of the Common Fisheries Policy (COM(2009)163 final) amongst others invited Member States governments to have their say on the future CFP. The Finnish Ministry of Agriculture and Forestry hereby submits its general views on the reform of the CFP.

The Finnish Ministry of Agriculture and Forestry would like to emphasise two important questions which are 1) a regional approach to fisheries management and 2) small-scale coastal fisheries.

The Ministry is of the opinion that it is necessary to develop a regional approach to fisheries management, as outlined by the Commission. This would ensure that decisions on fisheries would be prepared and made closer to the stakeholders and the Member States of the region. Thereby one could take account of the specificities of the marine regions (e.g. the Baltic Sea) and of the fisheries conducted in the area. The developing Integrated Maritime Policy and the Marine Strategy Framework Directive have as their fundamental basis a regional approach, which now needs to be formulated into the Common Fisheries Policy.

The decision making at highest political level in the Council and European Parliament should in the future focus on general principles and objectives of the fisheries policy. This is in line with other EU policies and the principle of subsidiarity. Decisions on implementation would be made at the regional or where appropriate at Member State level. Decisions at regional level are likely to find the best solutions for the development of sustainable fisheries and for avoiding unnecessary harmonisation of rules.

There is a longstanding tradition of regional fisheries management in the Baltic Sea. The IBSFC managed successfully fisheries for many decades. There is hence a readiness in the region for assuming responsibility of regional management. A regional approach is also supported by the structure of Regional Advisory Council's and would thereby increase consultation of stakeholders and compliance by the industry.

The Ministry fully supports the thought of a differentiated regime for small-scale coastal fisheries. Small-scale coastal fisheries often targets local fish stocks that are not regulated at the Community level and its effects on fish stocks are generally small. These fisheries are important for the coastal regions as they provide job opportunities in sparsely populated areas with few other employment possibilities. These basic features of small-scale coastal fisheries need to be taken into account in the reform of the CFP, especially when designing rules for financial assistance and management of fishing capacity.

The Ministry is conservative in its approach to some of the elementary issues of the CFP, such as the TAC and quota system, relative stability and access to waters. The Ministry is generally content with how these elements of the CFP have worked in the Baltic Sea. However, the issue of regional specificities of fish stocks should in the future be addressed as described above. Furthermore the Ministry would not be in favour of regulating transferable fishing rights at the Community level. The regime for quota management is best suited for decision at the Member State level.

Finally the Ministry would emphasise that fisheries shall be managed in a sustainable way with the objective of reaching Maximum Sustainable Yields. Management should preferably be based on regionally developed multiannual management plans.

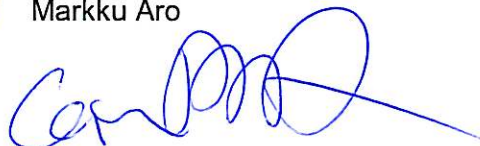
The Ministry of Agriculture and Forestry does not at this stage have a definite view on many of the questions that are raised in the green paper. The Ministry will present its view during the forthcoming deliberations in the Council and the European Parliament.

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