

FISHERIES SECRETARIAT (FISH) VIEWS ON CFP REFORM

INTRODUCTION

The Fisheries Secretariat (FISH) is a non-profit organisation dedicated to work towards more sustainable fisheries at an international level, with a focus on the European Union. Our long-term goal is healthy seas with thriving fish stocks and great diversity. We would like to see a profitable fishing sector working within the limits of the marine ecosystem, preserving the marine resources as well as their habitats.

The Secretariat works towards more sustainable fisheries through information, international co-operation and lobbying. We have a particular mission to support and help other organisations, as well as the public, with information and knowledge. Since 2007, our focus has been the Baltic Sea, with a particular aim to improve the management of Baltic cod stocks and minimise illegal and unreported fishing. This has primarily been achieved through support and collaboration with other stakeholders in the Baltic region, particularly in Poland.

FISH is one of the founding partners of OCEAN2012 – an alliance set up to engage stakeholders with the same views to work together in order to transform European fisheries policy to stop overfishing, end destructive fishing practices and deliver fair and equitable use of healthy fish stocks. OCEAN2012 has submitted an extensive response to the Green Paper, as well as views on how to reform the Common Fisheries Policy. This submission will therefore be brief and highlight what FISH as an organisation sees as the core issues of reform.

POLICY OBJECTIVES AND STOCK MANAGEMENT

The Fisheries Secretariat believes that in the future, the overarching policy objective must be ecological sustainability – not just for the fish stocks but for the marine environment on which they depend – linking the targets under Common Fisheries Policy closely with the Marine Strategy Framework Directive (Directive 2008/56/EC), thereby enabling Member States to fulfil both.

In addition, a more ambitious general stock target than Maximum Sustainable Yield (MSY) needs to be part of the reformed policy, ensuring greater resilience in the face of climate change and other threats to fish stocks.

In order to achieve ecological sustainability, the precautionary principle and an ecosystem-based approach need to be more consistently applied in fisheries management. Also, the scientific advice produced by the scientific bodies for management should be adhered to.

In future, all EU fish stocks should be managed under Long-term management plans (LTMPs). These plans should preferably include not just targets and rules for setting harvest limitations, but also the technical measures that would be needed to ensure this.

The CFP should also set out to minimize the adverse effects on the marine environment in any way possible, including targets for reducing, for example, bycatch, effects of gear and fuel use. This can be achieved through a combination of targets that need to be met, use of “best available technology” and preferential access to resources.

DECISION-MAKING PROCESS

The European Union needs to move away from the highly politicized decision-making process that exists today, especially now that the Lisbon Treaty has come into force, making it even more time-consuming and potentially ineffective. This can partially be achieved through the creation of LTMPs, but FISH believes that only the overarching policy framework should ultimately be dealt with at the Council/European Parliament level.

This overarching framework should include policy objectives, targets, guidelines for implementation, as well as stringent reporting and evaluation systems, enabling the decision-makers to follow implementation and make timely adjustments. The detailed implementation of policy should be dealt with at a more local/regional level, where affected stakeholders can play a significant part in finding ways to achieve the overarching targets. FISH does not believe decision-making power should be delegated to the current Regional Advisory Councils (RACs), but that the fishing sector interests at different levels ought to take greater part in implementation as well as play a more pro-active role in proposing solutions. This would hopefully also result in greater compliance with the rules.

OVERCAPACITY AND STRUCTURAL POLICY

The EU has so far been unable to properly tackle the wide-spread overcapacity in the European fisheries sector. In our view, this is partially because earlier capacity reduction programmes have been flawed from the outset. We do not believe that overcapacity can be dealt with solely through greater ownership of fish resources, i.e. through individual tradable quotas (ITQs) or other rights-based management systems. Neither are continuous scrapping funds a long-term solution.

We believe the EU should consider different ways of reducing capacity, keeping in mind not just the quantity of the fleet but also the quality – what kind of fleet would we like to have in a future sustainable fishing sector and how can incentives be created to achieve that? Sustainable practices in a wide sense can be promoted through preferential access to resources, for example.

In terms of future structural policy, FISH would like subsidies to the sector to be phased out in the long-term, with the possibility of retaining support for positive actions involving stewardship of the resources and activities that are aimed at taking better care of the marine environment.

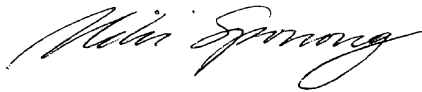
EXTERNAL DIMENSION

This is not a focal area for FISH, but as a general principle the same policy objectives and regulations should apply to EU fishing activities wherever they occur. The EU should seek to play a greater role in achieving global sustainability in fisheries, through its participation in regional management bodies as well as through its fisheries agreements.

Specifically for external fisheries policy decisions, transparency and stakeholder participation needs to improve. In addition, when it comes to fisheries partnership agreements with countries in the developing world, coherence with EU development and environment policy should be a key objective.

With this, we would like to wish the Commission good luck with processing the input from different stakeholders to this consultation, and look forward to the debate about the future options available to improve the current state of affairs.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Niki Sporrang', written in a cursive style.

Niki Sporrang

Director

Fisheries Secretariat (FISH)