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2012 Common Fisheries Policy Reform

*Long Term Management Plans
and Regionalisation of EU Fisheries*



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This is a document for discussion purposes which WWF hopes will assist in moving European fisheries policies towards sustainability.

We would welcome any comments on this and should you require more information on our thinking or wish to discuss this please contact us.

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Background

The 2002 review of the Common Fisheries Policy (CFP) Regulation established the commitment to introduce recovery plans and *multi annual management plans*. The Regulation also made a clear commitment to apply the *precautionary principle* and progressively implement an *ecosystem based approach* to fisheries management.

Multi annual management plans

To date only 17 of the 96 EU stocks are covered by either recovery or management plans¹ and the quality of the different plans has varied considerably. While some have brought about improvements others have been criticised for failing to be precautionary enough. Critically most plans to date have been stock specific rather than addressing fisheries that often catch a range of species. None of the plans cover Mediterranean fisheries despite the Mediterranean Regulation requirement for management plans to be adopted by the end of 2007².

Ecosystem based approach

While there has been some progress with respect to the ecosystem based approach to fisheries management, it has been introduced on a somewhat piecemeal basis to date. WWF believes that there is a need to establish a more formalised approach to the delivery of ecosystem based fisheries management.

Good Environmental Status

Since August 2008 Member States now have clear commitments under the Marine Strategy Framework Directive (MSFD) to achieve good environmental status (GES) by 2020. Detailed indicators must be rolled out by 2010 and an initial assessment of the state of the seas to be completed by 2012³.

Precautionary Approach

Year on year there has been a tendency for the Council to set Total Allowable Catches (TACs) significantly higher than are sustainable or advised by the International Council for the Exploration of the Seas (ICES). Between 2003-2008 this was the case for 48% of stocks with the difference between TAC and sustainable catch varying between 43-57% which has undoubtedly contributed to the poor status of European fish stocks⁴. This is far from precautionary and must change if we are to achieve sustainable management of fisheries.

All four of these important environmental commitments (application of precautionary approach and ecosystem based approach, adoption of multi annual management plans, and commitment to GES), can be better delivered with some key changes to the Common Fisheries Policy Regulation, and in doing so improve the chance of EU fisheries* being managed sustainably.

Regulatory changes are not the only requirement however as history has demonstrated only too well that key to the success of sustainable fisheries management is the political will to drive it forward. The 2012 review of the CFP offers a vital opportunity to arm Member States and stakeholders with the right incentives and tools to deliver lasting improvements to EU fisheries.

¹ MRAG, 2009. A vision for European fisheries – 2012 reform of the EU Common Fisheries Policy. A report for WWF

² COUNCIL REGULATION (EC) No 1967/2006 of 21 December 2006 concerning management measures for the sustainable exploitation of fishery resources in the Mediterranean Sea

³ Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for community action in the field of marine environmental policy (Marine Strategy Framework Directive)

⁴ Daw and Gray, 2005 Fisheries science and sustainability in international policy: a study of failure in the European Union's common Policy. Marine Policy. 29: 189-197

* in community and national territorial waters as well as in external waters.

Here we outline some of the key changes that we believe need to happen with respect to the adoption and implementation of long term management plans (LTMPs). Most importantly by adopting our proposed approach of mandatory LTMPs for EU fisheries, arrived at via stakeholder engagement, the EU can deliver a sound model for the regionalisation of the CFP and the much needed devolution of decision making.

What needs to change in the reform?

Establish mandatory requirement for Long Term Management Plans and action for failure to comply

One of the reasons for such a slow uptake of LTMPs is that the commitment to adopt these plans is vague – “*adopt...as far as necessary*”. Another is that there are no timeframes identified for the adoption of the plans. To put LTMPs on a firmer footing both points need to be addressed.

Regulation text should specify a mandatory requirement for all European fisheries to have functional long term management plans agreed within a specific timeframe, and that these comply with a basic set of requirements set out in the Regulation. WWF believes that a reasonable target would be a deadline of 2015 for the agreement of all LTMPs.

Should Member States and stakeholders fail to meet this deadline some form of recourse needs to be identified within the Regulation. In US fisheries⁵ where a fishery is identified as overfished, Regional Fisheries Management Councils - who are responsible for submitting plans and managing fisheries at a regional level - are required to identify management action to address the overfishing issue within 24 months. Should they fail to achieve this the Secretary of Commerce will develop an appropriate plan or course of action on their behalf within a nine month timeframe. Similar recourse must be considered within EU fisheries in the instance of either failure to adopt a plan or failure to act on an agreed recovery or rebuilding management requirement, ie. the Commission would be obliged to develop “interim plans” in cases where stakeholders fail to do so within a given timeframe.

For fisheries in external waters targeted by European vessels, WWF believes that the revised CFP text should commit the EU to supporting, in its international negotiations with Regional Fisheries Management Organisations, or relevant coastal states, the development of long term management plans consistent with EU policy.

Identify specific, precautionary, measurable and time limited targets

The failure to establish clear, measurable targets and the requirement for harvest control rules are identified as major reasons why many fisheries management plans fail. **There needs to be a requirement within the Regulation that targets are specific, precautionary, measurable and that harvest control rules are a key element of all plans.**

Clear time frames must be established in plans within which to meet management targets be they operational, data collection or assessment. This will assist in the delivery of targets and provide a guiding structure for implementation.

Capacity analysis

Part of any long term management plan should be a thorough description of the fishery including biological, social and economic considerations. This should allow an assessment

⁵ Magnuson-Stevens Fishery Conservation and Management Act, amended 2007.

of fleet capacity in relation to available resources to be undertaken. Where overcapacity is identified targets must be set to reduce it.

Failure to mitigate overcapacity will severely undermine the chances of success for long term management plans from the outset. As with any of the required components within a plan if it is not adequately addressed the Commission will not be able to approve the plan.

A clearer commitment to an ecosystems approach and impact assessments of fisheries

Currently Member States are committed to progressively implementing an ecosystem approach. WWF believes that the commitment to an ecosystems based approach to fisheries management should be more explicit in the new regulation. **This can be achieved by specific reference to management plans being ecosystems based and introducing environmental impact assessments.** This will mean moving away from single species management to one where the fishery or geographical area is the management focus.

For any plan to be precautionary and ecosystems based there is a need to assess not only the impact of the fishing operation on the target species but also to assess impacts on non target species (including mammals, turtles and birds) and habitats. Critical habitat and predator/prey relations should also be considered. To fully assess the impacts on any one stock within a fisheries/region plan there is also a need to look at, and take account of, all the fishery operations that affect the stock either directly or indirectly.

Focus on catches rather than landings

To date CFP quota targets have been measured on the basis of landings and have failed to deliver sustainable management of stocks. **There is an urgent need to base management on what is being removed from the sea in the first instance, ie to set quotas on the basis of what is removed rather than landed.** The recent statement by Danish, German UK and Scottish fisheries Ministers to start accounting for all fish removed with the adoption of onboard CCTV cameras is a clear and welcome contribution to this approach⁶.

Build in discard mitigation strategy

The Commission currently has a 2012 commitment to eliminate discards. **A means of supporting this and improving overall sustainability of fisheries is the inclusion of a clear discard mitigation strategy within each plan.** This should identify the management measures that will be used to reduce discard levels over a given timeframe as well as requirements to share knowledge and develop training around discard reduction to maximise discard reduction across fleets. Exceptions would of course be made if a fishery can demonstrate that there are no discards associated with its operation.

Implement other impact reduction strategies

Each plan should be guided by the impact assessment and adopt measures to address impacts identified either on target or non targets species or habitat. These will invariably involve the use of a range of management tools ranging from technical measures to time/area closures or other effort management measures.

Ensure mixed stakeholder involvement

Key to the success of any management plan is that it is developed, implemented, monitored and reviewed by the right mix of stakeholders. There should be a balance of powers shared among industry (including industry representatives from outside the catching sector, such as processors or retailers who can provide a market perspective), government,

⁶ www.scotland.gov.uk/News/Releases/2009/10/08161207

scientists, control agencies, industry, nature conservation organisations, NGOs and other interests.

It is also likely to work best when no one interest group is overly dominant, as is the case with the current RACs (with a two thirds industry to one third other interests balance). WWF see LTMPs being developed by stakeholder groups more mixed than the RACs. This does not mean that there is no role for RACs but simply that while in their current state they should not be considered the default stakeholder group for development of plans. A more mixed group should be possible to achieve at different scales, regardless of how big or small, which is a vital consideration given the aspiration that all European fisheries are covered by LTMPs.

Rebuilding and recovery processes with built in trigger levels

Article 5 of the 2002 Regulation identifies the commitment for the Council to adopt, as a priority, recovery plans for fisheries exploiting stocks which are outside safe biological limits. The objective of the recovery plans is to return the stocks to within safe biological limits. Article 6 commits Council to adopt as far as necessary a multi annual management plan to maintain stocks within safe biological limits.

The EU has indicated its intent to move away from the terms 'recovery' and 'multi annual management' plans and talk instead about long term or multi annual plans with the emphasis on fisheries being managed sustainably rather than making artificial distinctions between stocks 'in danger' and those that are 'safe'.

WWF understands their intent but believes that **there is an urgent need to recognise when a stock is in a critical state and to take appropriate action**. The reason being that the management measures required to recover a species are quite often more radical than those needed to rebuild or maintain a stock at sustainable levels. For example it has been identified that one of the key measures for stock recovery is a rapid and often large reduction in effort to reduce catches and the establishment of a short deadline within which to meet targets⁷. Given the low number of plans already in place and the large number of EU stocks still considered 'outside safe biological limits' WWF believes that there remains merit in prioritising the fishery(ies) for those species for plan development and implementation. This approach should also reduce the possibility of continued overfishing on critically low stocks.

There should also be a requirement to build into any long term management plan a trigger level, for example when biomass drops below a critical level, such as Blim (the stock Biomass limit reference point), at which point the plan moves from 'normal' management to 'recovery' mode. It is vital to make sure that mortality does not exceed Fmsy (the fishing mortality rate that would, in theory, deliver maximum sustainable yield from a particular stock year after year).

Need to prioritise ecological sustainability

The stated objective of the current CFP is to provide for sustainable exploitation of living aquatic resources and of aquaculture in the context of sustainable development, taking account of the environmental, economic and social aspects in a balanced manner. As it is currently worded there is no prioritisation among these three objectives. Without environmental sustainability it is unlikely that economic and social sustainability will be achievable and for this reason **there is a strong case for giving the environmental sustainability of any fishery a higher priority within management considerations**.

⁷ Wakeford, Agnew & Mees (2007). Review of institutional arrangements and evaluation of factors associated with successful stock recovery plans

Adopt risk assessment

A major challenge within EU fisheries management is either lack of data (no stock status for approximately 55% of CFP managed stocks, 73% for which stock size and fishing mortality cannot be explicitly determined)⁸ or large degrees of uncertainty in the data that does exist.

In many cases the cost of collecting detailed scientific information for scientific assessment will be prohibitive but this is something which can be assessed. Where fisheries remain data poor only the most precautionary exploitation or removal rates should be established. A Productivity and Susceptibility Analysis (PSA) can be applied to assess fishery species or stocks based on comprehensive screening of risk for a set of predetermined measurable attributes. If the analysis shows that there is considerable risk of depletion the more costly collection of scientific data can be considered.

If the PSA does not indicate risk of depletion then managers can adopt the use of risk assessment for the fishery to determine exploitation levels.⁹ Risk assessments are deployed successfully by countries like Australia and Canada and look at a variety of risks within the fishery which assist in setting a precautionary harvest control rule. Basic life history information such as longevity of species, reproductive capacity etc, taken alongside other biological information relating to the fishery can be used to provide estimates of how they may be exploited. In the US to set effective catch limits managers evaluate: (1) the vulnerability of the fish population to fishing pressure; (2) the uncertainties in scientific information about the status of the fish population; and (3) the uncertainties in the effectiveness of management tactics. From this information, scientists can determine a sufficiently precautionary buffer to help ensure that overfishing does not occur even in the absence of detailed information¹⁰.

The Marine Stewardship Council (MSC) has developed a Fisheries Assessment Methodology which they use to assess fisheries where data is sparse¹¹. This can be used to show stakeholders what some of the options are.

⁸ MRAG, 2009. A vision for european fisheries – 2012 reform of the EU Common Fisheries Policy. A report for WWF

⁹ Smith, E.J. Fulton, A.J. Hobday, D.C. Smith and P. Shoulder, 'Scientific tools to support practical implementation of ecosystem based fisheries management', ICES Journal of Marine Science, Vol. 64, 2007, pp. 633 - 639.

¹⁰ Rosenberg et al (2007) Setting Annual Catch Limits for US fisheries. Lenfest Ocean Programme Research Series, September 2007.

¹¹ Marine Stewardship Council Fisheries Assessment Methodology and Guidance to Certification Bodies including default assessment tree and risk based framework. (2009). MSC

Key elements of a Long Term Management Plan (LTMP)

Given the varied nature and scale of European fisheries WWF believes that there is a need to identify the basic minimum requirements that should be met by any LTMP when it is being developed. The current Regulation addresses some of these but we believe there is a need to be more specific about the actual criteria that each LTMP follows and to be clearer about setting timeframes. Establishing clear criteria will assist in a more uniform approach to the creation and implementation of LTMPs across European fisheries. We envisage the process taking the following steps:

1. Identify what the plan should cover

One of the first jobs facing Member States and stakeholders will be to identify the appropriate management unit for LTMPs – this should be the fishery (ie. set of fishing vessels with a similar fishing pattern, using similar gear, targeting similar set of species and operating in the same area) or a fishing area (a well defined geographical area usually supporting the activity of several fisheries or operational units).

In the case of the many EU multi species fisheries it is likely that a long term plan will look at a set of stocks that interact through their fisheries via mixed species targeting, bycatch, habitat effects or where fleets can switch targets rapidly. Because information on these factors is incomplete the set of stocks included in any plan should be considered preliminary and open to review over time. There needs to be information to consider trade-offs for a selection of stocks.

2. Establish effective stakeholder group to develop, implement, monitor and review plan(s). By identifying the management unit of LTMPs there should be a clear view of what level of stakeholder engagement is required. Many will be multi Member State while some may only have one or two Member States involved. (See comments above regarding make up of stakeholder groups).

3. Apply sound science

This will be essential for undertaking initial impact and capacity assessments, as well as establishing, assessing and reviewing targets and informing stakeholders when making decisions within the plan. Both dedicated country or community scientific research as well as data generated by science and industry partnerships should be included. Where fisheries are data poor risk assessments can be used to generate precautionary catch allocations and Productivity and Susceptibility Analysis (PSAs) can be used to identify the need for more data collection.

Given the expense involved in collecting data the idea of sharing costs for regional/fisheries based collection programmes should be established.

4. Describe the fishery

Once the scope of the plan is established each plan should contain a detailed description of the management unit – ie. fishery or fisheries, including, but not limited to, the number of vessels involved, the type and quantity of fishing gear used, the species of fish involved and their location and status, the cost likely to be incurred in management, actual and potential revenues from the fishery and any recreational interest in the fishery. Essential fish habitat should also be described and identified within the fishery. An analysis of capacity in relation to available resources should be undertaken at this stage.

5. Identify High level objectives

The current objective of management plans is to maintain stocks within safe biological limits for fisheries exploiting stocks at/or within safe biological limits. The overall objective of CFP is to deliver a fishery which is ecologically, economically and socially sustainable. Given the

commitments Member States currently have under the MSFD, WWF believes that environmental integration of community policies dictates that the target of Good Environmental Status for the marine environment by 2020 be included in plans. This commits fisheries management to address wider ecosystem impacts as identified under the assessment of the fishery. This will improve overall ecosystem health which in turn will benefit the health and well being of the fish stocks and those exploiting them.

6. Undertake Impact assessment

All potential sources of mortality should be assessed for major species and the impact of the fishery on target as well as non target species (including mammals, turtles or birds) and any critical (fish or other) habitats should be documented. As well as impacts of the fishery there is a need to assess impacts on stocks within the fishery either directly or indirectly.

7. Identify Target(s) and reference points

It is critical that these are clearly set out within an established timeframe and that they are measurable.

In 2006, the Commission proposed the adoption of Maximum Sustainable Yield (MSY) as a target for all European fish stocks, and that this should be expressed in terms of target fishing rate rather than biomass. There is growing agreement that F_{msy} (the fishing mortality that delivers maximum sustainable yield) should be considered an upper limit rather than a management target reference point. However with so many EU fisheries so far from MSY **WWF takes the position that this represents an acceptable working short to medium term goal.** For long term management and for fisheries which are below or at MSY the alternative targets of $F_{0.1}$ (a more precautionary lower exploitation level based on yield per recruit analysis) and F_{mey} (the fishing mortality that delivers maximum economic yield) are preferable because they are generally lower risk in terms of over-exploitation than F_{msy} and result in higher stock sizes and greater profitability than when stocks are fished at F_{msy} or similar proxy¹².

WWF recommends an interim short to medium target of F_{msy} ie. that MSY be achieved by 2015 for overfished stocks and that for those stocks below or at MSY and then both MEY and $F_{0.1}$ should be the target by 2015. For all fisheries the aim should be to have them operating according to MEY in conjunction with $F_{0.1}$ by 2020 unless GES standards dictate a more abundant target in a particular location.

Means of achieving this target need to be clearly identified in the plan alongside expected timeframes.

There are often concerns raised over the appropriateness of MSY as a target for multi species fisheries. Within a mixed fishery it is likely true that MSY will be difficult to reach for all species simultaneously. However this is where different management options need to be considered and trade offs made in relation to biological and economic priorities. This will rely on best science being available to inform the decision making process.

Within the targets, unless it can be demonstrated that the fishery is discard free, a discard mitigation plan should be incorporated. Depending on the impact assessment it is likely that there will be a need to include other targets for reducing impacts on either target or non target species or habitats. For example, minimising bycatch of certain species or avoidance of particular habitats.

If the capacity analysis has identified overcapacity within the fishery then a strategy to mitigate this needs to be incorporated into the targets for the plan. The details of achieving reductions needed to meet targets are likely best achieved at Member State level. Failure to do so should trigger EC review, given that failure to address overcapacity will make achievement of other targets unrealistic.

¹² Studies supporting reform of the Common Fisheries Policy. A vision for European fisheries post 2012 A report for WWF by MRAG Ltd, March 2009

If plans are to be ecosystem based and integrate MSFD commitments then wider stock and ecosystem based targets need to be identified. These need to be consistent with related descriptors and indicators for good environmental status (GES) according to Annex I of the MSFD¹³.

8. Set Harvest Control Rules

It is essential to identify unambiguous harvest control rules for all target species as well as clear limit and target reference points. It is very important that limit reference points are precautionary enough to ensure that the measures taken under the plan stand a high chance of succeeding.

9. Deploy Effective Management Tools

There will be a range of tools which can be deployed by the management body in order to meet targets. The most appropriate should be deployed and it is likely that any one fishery will require a mix of tools. These could include technical measures (selectivity, minimum mesh size, gear restrictions), capacity management, spatial measures such as time/area closures and other effort management.

10. Ensure effective Compliance, Monitoring and Control

Effective monitoring and control will be key for the success of any plan and again could be achieved in a number of ways (designated landing areas, radioing ahead landings, electronic logging, onboard observers, onboard cameras). Stakeholder participation and agreement over targets is key to achieving compliance with any management plan. Incentives (such as greater effort allocation in return for use of more selective gear) can also be a means of improving compliance. For persistent offenders higher more punitive penalties and fines need to be adopted across Member States.

11. Review

And finally, no management plan should be considered to be a set of regulations set in stone. It is important that they are regarded as dynamic entities: as new information becomes available they can be adapted and the plans improved. In other words, the plans support adaptive management. Review timelines should be built into plans.

Desirables additions

WWF strongly believes that an effective marketing strategy should form a key component of sustainable fisheries management. This should maximise economic return and factor in continuity of supply resulting in the much desired end point of removing less from the sea but achieving more money for what is removed. However a marketing strategy may be most appropriate at a Member State level rather than regional as markets will vary between Member States and there may also be competition between Member States. As such we would not envisage that this is a mandatory requirement but would certainly like to see such an approach being adopted at implementation level.

In future LTMPs it would be useful to look at the concept of biomass removal to allow a more comprehensive ecosystem approach but given current data and resources this may be

¹³ (1) Biological diversity is maintained. The quality and occurrence of habitats and the distribution and abundance of species are in line with prevailing physiographic, geographic and climatic conditions.

(3) Populations of all commercially exploited fish and shellfish are within safe biological limits, exhibiting a population age and size distribution that is indicative of a healthy stock.

(4) All elements of the marine food webs, to the extent that they are known, occur at normal abundance and diversity and levels capable of ensuring the long-term abundance of the species and the retention of their full reproductive capacity.

(6) Sea floor integrity is at a level that ensures that the structure and functions of the ecosystems are safeguarded and benthic ecosystems, in particular, are not adversely affected.

beyond the capabilities of this reform process timeframe. It should however be something that should be planned for in future management.

For any one fishery the key elements may look quite different but will have to take account of the following basic questions:

- What is the direct impact of the fishery on the target species?
- What is the impact of the fishery on non target species and habitats, direct or cumulative that impact broader ecosystem process and functioning.
- What level of fishing can be sustained by the species/habitat in question? Should there be a gradual approach to achieve the goal?
- Is the management plan capable of addressing these issues and implementing in a focussed and time limited manner? If not, what needs to happen to facilitate this?

Regionalisation

By requiring EU fisheries to operate according to LTMPs there will be a devolution of decision making down to catching sector stakeholder level. It is inevitable that there will be some decisions that need to be taken at EU level while some are agreed at Regional level and then finally those that are taken at Member State level. Diagram 1 outlines the model as we see it based on the following considerations.

EU level

WWF envisage that certain requirements will need to be established in the new Regulation for this system to operate (the mandatory requirement for LTMPs; EBFM approach, timeframe for implementation, high level objectives and criteria that each plan should address, as well as penalties for failure to either deliver fully approved plans or elements within the plans within identified timeline).

Each plan once agreed by stakeholders will need to be put before the European Commission to ensure that it clearly meets the criteria set out in the Regulation and stands a good chance of meeting the targets.

At this point the Commission may wish to consult Regional Advisory Councils who should have an overview of the plans operating in their region. In this way RACs can continue to fulfil an important advisory role (they may also advise at a regional level). The Commission will have the right to take action where there is failure to meet the criteria, or where plans are not forthcoming in line with required deadlines.

The final approval of an LTMP will of necessity remain with the European Parliament and Council under the Treaty although this approval would be expected to be routine under the regional scheme we propose.

Regional level

The development of plans, following Regulation requirements, will be established at a Regional level by those stakeholders with an active interest in the fishery/region which is the focus of the plan. This may be one Regional plan or several fisheries plans co-ordinated within a Region.

WWF believes that for the development of plans to work there needs to be right balance of stakeholders and this needs to include:

- Member State (MS) representatives, (perhaps 2-3 for each MS);
- Control agency representative;
- Scientists with appropriate knowledge of the fishery (possibly 2-3 for the plan regardless of number of MS);
- A limited number of key catching sector representatives (3-4 max for each MS)

- Environmental interests (1-2 for each MS, in reality likely to be less given available capacity).

At this level the fundamental components of the plan(s) will be developed and agreed.

Plans would include:

- Description of the fishery;
- Impact assessment of the fishery;
- The targets of the plan;
- Timeframes;
- Harvest control rules;
- Reference and limit target reference points;
- The warning triggers should management fail to deliver recovery;
- Issues specific to the fishery that require special attention such as discard reduction, habitat impacts, functional units etc.;
- Timeframe for monitoring and review;
- Control and compliance – for example identify mandatory requirement for CCTV operation and minimal spot checking by onboard observers;
- Penalties for failure to comply will also be set out at this level.

WWF envisage that ICES (or its equivalent for the Mediterranean where ICES does not play a role) will provide this Regional stakeholder group with the total allowable removal for species and/or total effort levels for the fishery under the plan and depending on the retention of relative stability the plan will identify how the total allowable catch will be prosecuted by individual Member States.

There will need to be agreement at this level as to how to address the impacts on the ecosystem such as impacts on sensitive or critical habitat or species (for example through habitat avoidance or real time closures). There will also need to be agreement over the approach to take on specific management issues that may be identified in the region/fishery (such as discarding, bycatch of non fish species or specific management units).

The agreed plan(s) will then go to the European Commission, Parliament and Council for their attention (see level 1).

Once the final approval has been given by the European Parliament and Council the plans will then go into implementation phase at a Member State level. Regular updates at a regional level will likely be necessary to ensure that plans are operating smoothly and are on track to meet targets.

It should be noted that there may be instances where a fishery is only prosecuted by one Member State in which case the Member State in question would fulfil the role of both developing and implementing the plan. The plan would still need to demonstrate its compatibility at a Regional level and be signed off by the Commission, Parliament and Council.

Member State Level

This is where implementation of the plan takes place. At Member State level WWF envisage a co-management committee being formed of a balanced mix of stakeholders including government managers, control agency representative, national scientist, catching sector representatives, an eNGO and ideally with the addition of a non catch sector market player to offer oversight of the market given the importance of this in maximising financial return for fish caught.

At this level the committee will identify how effort and quota will be managed in such a way as to meet the targets established in the plan. This may be best done in association with a comprehensive marketing strategy to improve the economic returns for fish coming onto the market place. For example working with processors/producer organisations to ensure consistency of supply to market year round by limiting quota uptake on a monthly or quarterly

basis, or incentivising strong marketing of minimal discard fish in association with use of CCTV cameras and more selective gear types.

It is also at this level that capacity management will take place – for example will Member States address overcapacity by decommissioning certain fleet segments or by imposing strict effort limitation.

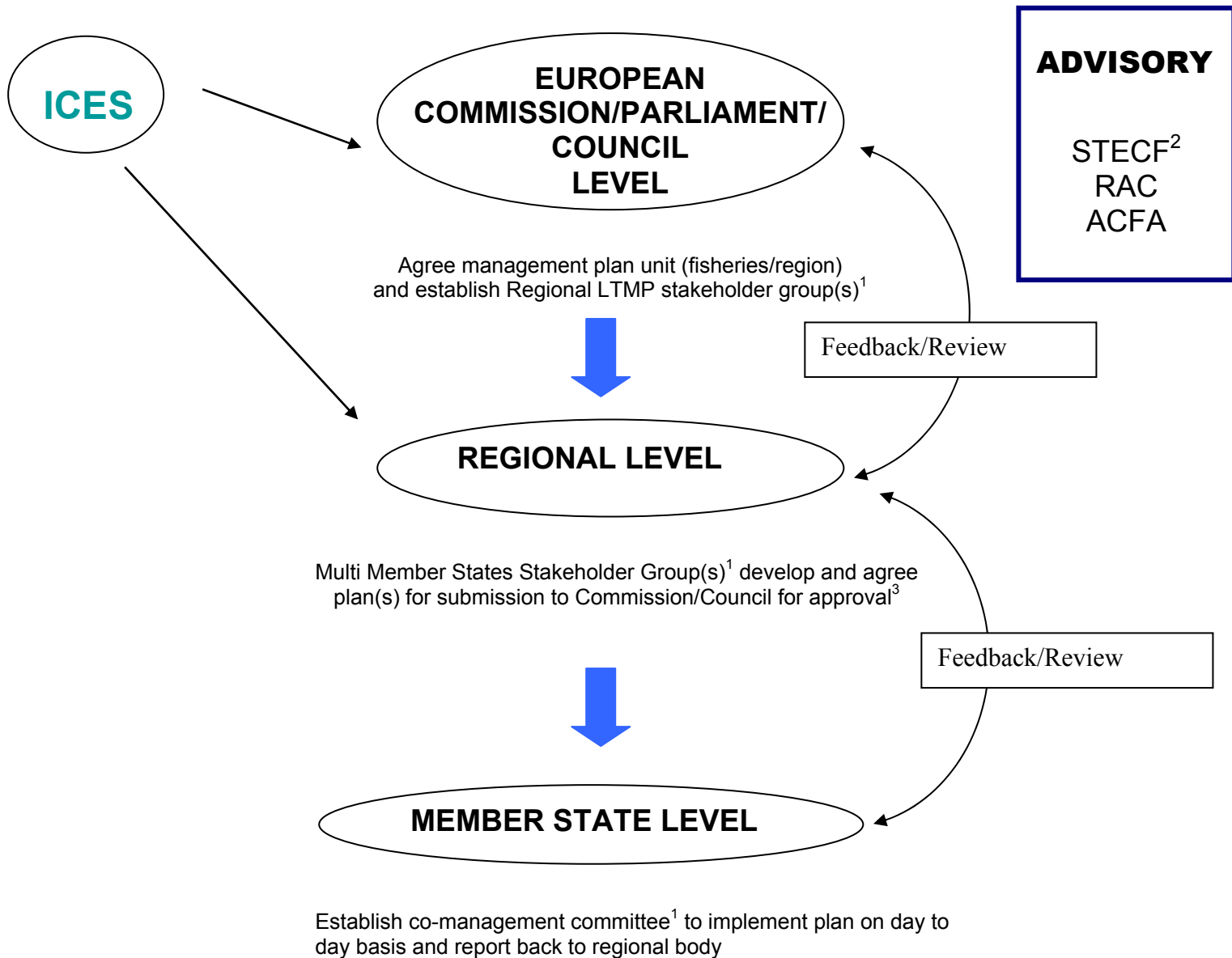
By adopting this model the benefits of long term management plans will be realised as well as the much needed devolution of decision making of the CFP.

Stakeholders will have targets set (and will set some themselves) and will have to develop plans that outline how they intend meeting these. How they do this, using what tools and management measures will be up to them and they will have a free hand as long as they can demonstrate that they are likely to meet their targets.

Effective monitoring and enforcement will be key to the delivery of this approach but this is entirely achievable.

The adoption of designated ports for landing, electronic logbooks, CCTV cameras onboard and the establishment of onboard observer spot checks should go a long way to meeting this. But fundamentally stakeholders should be able to see the merits of a shared goal which ultimately will deliver recovered stocks, healthy ecosystems, and in return increase the economic viability of the fleet.

FRAMEWORK FOR IMPLEMENTING LTMPs AND DELIVERING REGIONALISATION



¹ mixed stakeholder group (government, scientists, fisheries, processors, control, NGOs)

² Currently there is no ICES advice for the Mediterranean. Main guidance on Mediterranean for Commission comes from STECF

³ It is likely that this will be multi Member State but in some instances where only one Member State prosecutes the fishery then it will develop the plan to implementation level, ensure compatibility at Regional level and submit directly to Commission.

Conclusions

The swift and systematic adoption of well designed Long Term Management Plans (LTMPs) will allow Member States to manage EU fisheries on a multi annual basis, in line with the precautionary principle and an ecosystems based approach. In turn, this will contribute to achieving good environmental status (GES), as required under the Marine Strategy Framework Directive (MSFD).

In addition the adoption of well designed LTMPs through a stakeholder process will allow the EU to institute a sound model for the regionalisation of the CFP and the much needed devolution of decision making.

To deliver this, the revised CFP Regulation needs to establish:

- a mandatory requirement for all European fisheries to be managed by LTMPs by a certain date (we suggest 2015);
- the high level sustainability objectives of the plans including commitment to assist in fulfilling the relevant MSFD goals;
- clear actions for failure to develop plans within the required time and penalties for failure to comply with plans once agreed;
- clear criteria as to what must be included in the development and implementation of plans.

Key to the success of the plans will be the criteria and their implementation. These would include the following:

1. Plans are fisheries (or region) based instead of stock specific. This is a major change from what is happening at present, and will be one of the main issues to address but is essential if we are to take an ecosystems approach.

2. Appropriate stakeholder group(s) need to be established, as well as a means of co-ordination at a Regional level. Plans need to be agreed, implemented and reviewed by balanced stakeholder groups, which should include government managers, scientists, industry (processors as well as catching sector), control agencies and NGOs.

3. Description of the fishery(ies) – this should include vessels, gear, species, economics (revenue, management costs), employment, recreational interests.

4. Plans are ecosystem based – they need to introduce impact assessments, taking account of a wide range of impacts on target and non target species (including non fish species) in addition to habitat, as well as the impact of other fisheries/activities on the target species within a fishery.

5. Management is based on total removal and overall impact rather than landings.

6. Analysis and risk assessment are used to address data poor fisheries and allow precautionary quotas to be set.

7. Clear targets and timelines are set, and unambiguous harvest control rules are established

8. At multi Member State level, the plans will need to establish targets other than simply stock and will be informed by the impact assessment process. These could include discard mitigation plans, bycatch reduction plans, habitat protection strategies.

9. The fishery(ies) should be assessed for overcapacity which if identified should require a strategy to bring it into line with resources. Detailed capacity reduction would likely be delivered at Member State level. A marketing strategy (which would help maximise economic return) would also be useful at Member State level.

10. Effective monitoring and control requirements.

11. Formal penalties for failure to comply. These need to be standardised across Member States

12. Triggers for fisheries, which would warn when management has to shift from rebuilding to recovery mode, are established in the plan.

13. Formal periodic review and ability for flexibility in face of new data.

The Commission will need to feel confident that agreed plans meet the Regulation criteria and stand a good chance of meeting the targets. They will also have the right to take action where there is failure to meet the criteria, or where plans are not forthcoming in line with required deadlines. The final approval of an LTMP will of necessity remain with the European Parliament and Council under the Treaty although this approval would be expected to be routine under the proposed scheme

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- conserving the world's biological diversity
- ensuring that the use of renewable natural resources is sustainable
- promoting the reduction of pollution and wasteful consumption