



## **EC GREEN PAPER 'REFORM OF THE COMMON FISHERIES POLICY'**

### **RESPONSE ON BEHALF OF COMHAIRLE NAN EILEAN SIAR**

Comhairle nan Eilean Siar outlines its response to the EC Green Paper 'Reform of the Common Fisheries Policy' below:

#### **FLEET OVERCAPACITY**

- 1.1 The CFP Reform proposals identify fleet overcapacity as a fundamental problem for the long term sustainability of the European fishing industry. This may be true in general terms but it fails to recognise the efforts undertaken by the Scottish fleet to address this issue, namely two rounds of vessel scrapping schemes. In addition in relation to catch results relative to quota availability, over the last three years the West of Scotland nephrops quota has been under fished indicating there is not a vessel overcapacity issue in the sector.
- 1.2 Any efforts at reducing overcapacity should be targeted at sectors and countries where there is clear overcapacity.

#### **DISCARDS AND EFFORT BASED MANAGEMENT**

- 2.1 The existing quota system for individual fish species, set with reference to Minimum Sustainable Yield, has been disastrous for mixed fishery areas such as Scotland and especially the Outer Hebrides. Mixed fisheries management measures have been aimed at protecting the most vulnerable stock species i.e. cod. However the characteristics of a mixed fishery and the impact of individual fish species quota leads to the greatest iniquity and shame of the current CFP – discards.
- 2.2 Moving to an effort based management system may offer a more sustainable way of managing mixed fisheries. The opportunity of landing all marketable species caught would end the waste of valuable natural resources, increase industry profitability and provide better science for fisheries managers.
- 2.3 However alongside effort based management selectivity improvement measures must also be implemented. This could include gear improvement, area avoidance and complete discard bans. Enhanced monitoring also has a role to play with an augmented Vessel Monitoring Scheme and the use of Close Circuit Television.
- 2.4 Recognition must be made of the characteristics of an inshore mixed fishery. In general white fish by-catch levels are small but can be an important element of the fleet catch composition. However the additional cost of buying or leasing quota for small quantities of by-catch species makes it uneconomic to land that fish. Rather than enforce monthly quotas which result in discarding once those quotas are reached a maximum percentage by-catch should be introduced which can be landed all year for demersal species.
- 2.5 It will be imperative that any allocation of effort between Member States is discussed and negotiated in an open and transparent manner.

## **RIGHTS BASED MANAGEMENT (RBM) SYSTEM**

- 3.1 The Commission argues that one method of addressing overcapacity is to move to an Individual Transferable Quota (ITQ) system which assigns tradable property rights to access fisheries whether through quota or effort.
- 3.2 Evidence from other countries indicates this change does lead to the consolidation of fleets through market forces. However it consolidates access to fishing opportunities in the hands of larger, more industrial enterprises at the expense of smaller fishing operations which characterises many of the fishing communities around the Scottish coast. It is a direct threat to the sustainability of many remote, rural areas and the social cohesion derived from the fishing industry.
- 3.3 The Green Paper suggests that an ITQ system can be complimented with proper safeguard clauses to avoid excessive concentration of ownership or negative effects on smaller-scale fisheries and coastal communities. However experience indicates that any safeguards introduced will be limited through operational or political factors driven by large industrial size operators resulting in the long term demise of many coastal communities.
- 3.4 Comhairle nan Eilean Siar recognised the importance of securing access to local fishing opportunities following quota being sold from the area and has initiated a Community Quota scheme. It ensures some degree of long term assurance that fishing opportunity is available locally which supports fishing employment, infrastructure investment, local processing capacity and contributes to the economic and social sustainability of coastal communities.
- 3.5 The move to ITQs is opposed by Comhairle nan Eilean Siar although safeguards for access to fishing opportunities for small, coastal communities should be developed.

## **RELATIVE STABILITY AND ACCESS TO COASTAL FISHERIES**

- 4.1 The Green Paper asks if the concept of relative stability should be replaced with a more flexible system which allows alignment of national quotas with the real needs of national fleets. This discriminates in favour of those nations which to date have taken limited steps to reduce fleet capacity relative to fishing opportunities compared with other areas such as Scotland.
- 4.2 Consistent with its view on a RBM system the Comhairle is opposed to dismantling relative stability unless the interests and wider social benefits of small-scale coastal fleets are transparently and unequivocally protected.
- 4.3 Alongside the notion of relative stability is the concept of restriction of fishing opportunities within 12 nautical miles with exclusive national fleet access within 6 miles and restricted access for other fleets with historic fishing patterns within 6 to 12 miles. Given the social and economic importance of small scale coastal fisheries exclusive access should be extended to 12 nautical miles with restricted access to 24 miles.
- 4.4 Linked to that move, devolved regional management responsibility should be promoted. The establishment of Inshore Fisheries Groups (IFGs) has started this process and Management Plans which develop a profitable, well managed and sustainable fisheries area can only be encouraged. In addition local decision making results in local accountability, closer involvement of stakeholders with better buy in to objectives.

## **POLICY OBJECTIVES AND SMALL SCALE FISHERIES**

- 5.1 It is encouraging to note that the Green Paper distinguishes between large scale industrial fishing fleets and small scale coastal community fleets and recognises the important role the small scale fleet plays in the social and cultural identity of coastal areas.
- 5.2 A proposed differentiated management regime for the two fleets is welcome. Measures such as direct quota allocation to community schemes which support low impact small scale fisheries (e.g. line caught mackerel) would help sustain innovative fishing enterprises and communities throughout the year with minimal impact on stocks.
- 5.3 In addition the distinction would follow through to public financial support. The Comhairle welcomes the approach which expects large scale fleets to be economically self reliant while public funding assists the small scale fleet to adapt to changes in the CFP maintaining economic and social contribution to coastal communities.