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Directorate-General for Maritime Affairs and Fisheries – MARE A,
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99 rue Joseph II,
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To whom it may concern,

Within this letter several proposals relating to the 2012 Common Fisheries Policy Review are outlined. All seven are sketch within a European Union context where such concerns are relevant and present in many marine Member States. It is the hope of this author that these proposals are considered individually and analysed justly.

It would also be of great benefit to receive a response or feedback relating to the proposals within this letter via email or a formal letter. As a Masters student of European Integration Studies at the University of Limerick, I would be sincerely grateful in receiving such information. I'm also taking into consideration the volume of responses which the European Commission will have received within the nine month open consultation period from other citizens, organisations and Member States alike. Therefore an individual response to the enclosed proposals might take some time.

Hoping to hear from you at your earliest convenience,
Ciarán O' Driscoll

1.

Within the Commission Green Paper for the 2012 CFP review, there is an emphasis to bring into the decision making process a greater participation from shareholders. To include those who are directly affected in the outcomes by the finalised decisions of the Union's institutions, their presence could develop a greater return in policy practicality, implementation and enforcement.

Therefore this author proposes to have a defined number of representatives(s) from a defined number of the Regional Advisory Councils present when the European Parliament Committee on Fisheries convenes.

They should not have the right to vote due to their participation within the framework of the RACs where they are able to express their own voting rights on their drafted opinions.

Even if the RAC's opinion has been circulated to the European Parliament Committee, the representatives(s) should be entitled to be present and give a brief oral opinion to the Committee at each meeting. The opinion can relate to the circulated opinion or be a more specifically orientated one.

The representative(s) will be directly affected by decisions from the Committee, who now have greater scope to shape fisheries proposals from the European Commission now that fisheries are under the co-decision procedure due to the Treaty of Lisbon.

2.

This author also recommends a greater presence of fisheries representatives at Member State level in the area of European Union scrutiny committees. With the participation of national parliaments in the decision making process under the Treaty of Lisbon, Member States now have a pivotal role within the decision making framework. Thus Union scrutiny committees of Member States will gain considerable needs in order to fulfil their defined roles if they are to be effective.

Therefore with such a direct role in Union decision making, Member State Union scrutiny committees should have representatives from national fishery organisations and/or RACs involved if the policy area is involved. Their presence in the scrutiny process could be an opportunity to bridge the often significant democratic deficit.

This is critical to those involved in fisheries, many of whom have developed a deep sense of frustration, scepticism and unease with the Union relating to fisheries. The feeling of non-participation within the decision-making framework has permeated many Member State shareholders involved in fisheries.

If the European Commission is sincere in its wishes to build a 'culture of compliance',¹ this sense of continually being ignored needs to be addressed rapidly if any progress after 2012 is to be a reality.

¹ Commission of the European Communities, (2009) *Green Paper: Reform of the Common Fisheries Policy COM(2009)163*, Brussels: Office for the Official Publications of the European Union, p. 14

3.

Also, the European Commission should survey what impact the European Parliament will have on fisheries under co-decision. Both its negative and positive outcomes should be assimilated within a report within three years of the first proposal on fisheries issued by the European Commission to Union's institutions and bodies.

Due to the length often incurred with legislating under co-decision and the sensitivity which accompanies this competence area, an initial indication of how the European Parliament has affected fisheries will be established after three years.

The report should indicate whether the European Parliament should or should not have greater scope or sharing power with the European Council on other aspects of fisheries policies. Possible changes in the roles and reactions of the European Commission itself and other Union relevant institutions and bodies should also be taken into account.

The time line of three years also takes into account that initial fisheries proposals will be within the early stages after the 2012 CFP Review. If there is a negative experience relating to how the European Parliament has impacted these initial European Commission proposals, a rapid remedy should be sought within a specific and swift timeframe involving the relevant Union institutions and bodies.

The need for such a speedy remedy relates specifically to the review process which in its nature of occurring every ten years can mean a delay in solving issues relating to errors in the CFP.

4.

Although the European Commission is looking towards a more medium to long term approach to reviewing the quotas, structural funding, etc, the European Commission should under take more dynamic mid-term assessment reports of how the relevant review is proceeding. By publishing progressions or errors, the fishing sector could produce, via public consultations, proposed solutions to such areas instead of waiting until the next review for direct public interactions.

This is another opportunity to include the sector and taking into consideration their opinions and concerns, and possibly amend the deepening democratic deficit present in the sector.

5.

This tool of public consultations should be taken seriously as a route for which stakeholders could channel continuously, or within certain defined periods i.e. during the summer months where both the European Parliament and Council of Ministers are on their summer holidays, opinions or solutions on pressing concerns. It can give the European Commission immediate assessments to how the sector is affected by newly implemented legislation.

Besides public consultations, other means of internet social websites (Facebook, Twitter, Youtube, etc) should be utilised in future consultations relating to fisheries and other policies areas of the Union. The networking of information through these popular and accessible websites could generate a greater fostering of participation from stakeholders.

The need to project a concern and a willingness to listen to the sector is another effort where the European Commission could lower the severity of the democratic deficit.

6.

The European Commission should also consider placing some of its employees on fact-finding work placements within the fishing industry as it did with agriculture earlier in the 2000s.

Although the European Commission receives information from relevant Member State governmental departments, organisations and through its own means of collecting data, there is no significant alternative to a 'hands on approach' in how the industry operates and is affected by witnessing those directly working within it.

7.

This author also proposes the possibility of including fishermen within scientific marine surveying. Although they provide data from their recorded landing itinerary, the amount of fish dumped as a result of by-catch is significant loss of information.

By including more of the Unions fleet in detailing the amount of species caught, the conditions in which they acquired, etc, a greater image of the situation of fish stocks within and beyond the Union Economic Exclusion Zone can be produced.

There is also widespread disillusionment within the sector relating to the methods which marine scientists conduct their surveys and the delay of between two-three years in processing and publishing the relevant information. Which bring into question the data's relevance and accuracy.

This comes at a time of a growing anxiety to how the marine environment will be effected by climate change and its impact on European coastal communities where fisheries are often the sole economic pillar of the region. By establishing a Union-wide system for collecting marine data via its fleet of 85,500 vessels,² the European Union could have available a vast and detailed amount of meteorological, marine and fishing practices at their disposal.

² European Commission, (2009) *Facts and Figures on the EU fishing fleet*, [Available: <http://ec.europa.eu/fisheries/fleetstatistics/index.cfm?lng=en>, Accessed: 30.12.2009]