

**ANNEX PAPER TO ACCOMPANY RESPONSE TO
EC GREEN PAPER ON REFORM OF COMMON FISHERIES POLICY**



**THE NORTHUMBERLAND SEA
FISHERIES COMMITTEE**

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REFORM OF THE COMMON FISHERIES POLICY

QUESTIONS IN THE GREEN PAPER CONSULTATION

ITEM 4

"OVERCOMING THE FIVE STRUCTURAL FAILINGS OF THE POLICY"

4.1. Addressing the deep-rooted problem of fleet overcapacity

Should capacity be limited through legislation? If so, how?

YES- capacity needs to be brought into line with available resources, either by removing vessels from the fleet or restricting time at sea

Is the solution a one-off scrapping fund?

Possibly if those that leave the fleet are restricted from re-entering. This could be assisted by removing the licences of those who don't currently fish i.e. paper licences as it would prevent re-entry into fishing on the cheap often with greater catching capacity

Could transferable rights (individual or collective) be used more to support capacity reduction for large-scale fleets and, if so, how could this transition be brought about? Which safeguard clauses should be introduced if such a system is to be implemented? Could other measures be put in place to the same effect?

Unlikely, as how do you equitably hand out ownership rights? Ownership also ultimately ends up in the hands of a relatively few i.e. pelagic fisheries – which discourages new entrants into fisheries.

Should this choice be left entirely to Member States or is there a need for common standards at the level of marine regions or at EU level?

Common standards across the whole EU, but with ability to increase legislation in national waters which apply to all vessels and not only the national state.

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4.2. Focusing the policy objectives

How can the objectives regarding ecological, economic and social sustainability be defined in a clear, prioritised manner which gives guidance in the short term and ensures the long-term sustainability and viability of fisheries?

Objectives need to ensure that there is no determinate of the objectives or the sustainability. If no short-term damage this will lead to long-term sustainability.

Should the future CFP aim to sustain jobs in the fishing industry or should the aim be to create alternative jobs in coastal communities through the IMP and other EU policies?

Yes – while overcapacity exists there will still be a need in the future to have experienced fishermen when stocks have recovered towards MSY. More effort should be placed on developing new fishing stocks and maximising by catch potential.

How can indicators and targets for implementation be defined to provide proper guidance for decision making and accountability? How should timeframes be identified for achieving targets?

Indicators and targets need to be attainable and assessable. Time scales should be short but allowed to develop into the next stage. Failure to meet targets needs to be assessed early and remedial action implemented.

4.3. Focusing the decision-making framework on core long-term principles

How can we clarify the current division of responsibilities between decision-making and implementation to encourage a long-term focus and a more effective achievement of objectives? What should be delegated to the Commission (in consultation with Member States), to Member States and to the industry?

Overall decision-making should remain with the EU. Individual nations should also be able to bring in legislation that affects all vessels fishing in national waters.

Do you think decentralised decisions on technical matters would be a good idea? What would be the best option to decentralise the adoption of technical or implementing decisions? Would it be possible to devolve implementing decisions to national or regional authorities within Community legislation on principles? What are the risks implied for the control and enforcement of the policy and how could they be remedied?
Yes – decentralised technical measure would be good but must apply to all equally.

How could the advisory role of stakeholders be enhanced in relation to decision making? How would ACFA and the RACs adapt to a regionalised approach?

Stakeholders need to be empowered to believe that their contributions count and be involved at all levels.

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4.4. Encouraging the industry to take more responsibility in implementing the CFP

How can more responsibility be given to the industry so that it has greater flexibility while still contributing to the objectives of the CFP?

There is a need for all fishers to be members of PO's, this includes the under 10m. Processors should alter demand/catch regimes to ensure fish are caught when in best condition and not when most plentiful. Greater use of alternative species should be investigated.

How could the catching sector be best structured to take responsibility for self management? Should the POs be turned into bodies through which the industry takes on management responsibilities? How could the representativeness of Pos be ensured?

POs should have greater regulation of management of quota entitlements. POs would need to be proportionate to membership and still take account of track records.

What safeguards and supervisory mechanisms are needed to ensure management by the catching sector does not fail, and successfully implements the principles and objectives of the CFP?

On board monitoring and greater scientific research aboard actual fishing vessels.

Should the catching sector take more financial responsibility by paying for rights or sharing management costs, e.g. control? Should this only apply to large-scale fishing?

No, the catching sector should not bear the cost as this will drive up fish prices. Even large-scale should be exempt. In-house management of POs should however be self-funded as it would encourage better stock management and use of resources.

When giving more responsibility to the industry, how can we implement the principles of better management and proportionality while at the same time contributing to the competitiveness of the sector?

Managing stocks would be better undertaken if greater ability to harvest when stocks are most in demand could be encouraged. At present there is a need to harvest as soon as possible to ensure that each fisher gets some of the quota, knowledge that quota would be available throughout the year would allow more selective harvesting.

Are there examples of good practice in particular fisheries that should be promoted more widely? Should incentives be given for the application of good practices? If so, which?

Yes – any fishing activity that is currently sustainable should be encouraged. The newly emerging Northumberland hand-line mackerel fishery should be expanded, current quota is very low but demand is high. Little overall damage is done to stocks but boats effectively can only fish one day a week. By allowing diversification on to this type of stock, can relieve pressure on other less sustainable stocks.

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4.5. Developing a culture of compliance

How can data collection systems be improved in the short and medium term to ensure coherent information for enforcement purposes?

EU wide monitoring by other than local nationals, including covert operations.
All records should be to the same requirements.

Which enforcement mechanisms would in your view best ensure a high level of compliance: centralised ones (e.g. direct Commission action, national or cross-national controls) or decentralised ones?

Cross national.

Would you support creating a link between effective compliance with control responsibilities and access to Community funding?

Yes

Could increasing self-management by the industry contribute to this objective?

Yes

Can management at the level of geographical regions contribute to the same end?

Yes

What mechanisms could ensure a high level of compliance?

Robust enforcement of infringements

ITEM 5

“FURTHER IMPROVING THE MANAGEMENT OF EU FISHERIES”

5.1. A differentiated fishing regime to protect small-scale coastal fleets?

How can overall fleet capacity be adapted while addressing the social concerns faced by coastal communities taking into account the particular situation of small- and medium-sized enterprises in this sector?

First write off all licences not in use, then target decommissioning at those vessels that are most destructive to stocks, and not at the old outdated vessels. Capacity in coastal areas is relatively stable but ability to cap effort locally should be enhanced.

How could a differentiated regime work in practice?

There is a need for local small scale fishers to have equal representation as for larger fishers. The under 10 m fleet needs strong PO representation. Small scale sustainable method should be encouraged and adequate quota set aside.

How should small-scale fisheries be defined in terms of their links to coastal communities?

The under 12 m fleet all fish on a local basis even when operating out of other ports. Vessels from North East England fish local grounds during the winter and Scottish grounds in the summer (the reverse being true for Scottish vessels) although each make contributions to local economies but at differing

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times. This assists in the survival of local communities even though the participants can be migratory.

5.2. Making the most of our fisheries

How can long-term management plans for all European fisheries be developed under the future CFP? Should the future CFP move from management plans for stocks to fisheries management plans?

Future CFP should manage the fishery and not the stock, as many fisheries comprise a mixed stock.

Should we consider reforming the CFP in two steps, with specific measures to move to MSY prior to 2015 followed by measures to maintain MSY as the upper exploitation level after that date?

Yes where possible

How could the MSY commitment be implemented in mixed fisheries while avoiding discards?

All by catch should be landed (unless it can be returned alive) even if it has limited value. Any profits should be reinvested in management and therefore not create demand for what are often undersize commercial species. Investment in new technical measures should be encouraged and temporal closures considered in areas of high by-catch.

What should the main management system be for Community fisheries and to which fisheries should it apply? Catch limitations? Fishing effort management? A combination of the two? Are there any other options?

Main management measures should be targeted at those stocks most under threat. Effort management is generally better than stock management.

What measures should be taken to further eliminate discards in EU fisheries? Could management through transferable quotas be useful in this regard?

Transferable quotas have a part to play if they are sufficiently flexible to allow all catch to be kept.

5.3. Relative stability and access to coastal fisheries

How could relative stability be shaped to better contribute to the objectives of the CFP? Should it be dismantled or if not should it become more flexible and if so, how? How could such alternatives be set up?

Relative stability needs radical overhauling - the changing nature of fish stocks and local demand means that differing species are being targeted by non traditional countries.

Should access to the 12 nm zone be reserved for small-scale fishing vessels?

Territorial seas should be exclusively for national states. Historic rights should be scrapped as these rights occurred at a time when fishing practises were different.

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5.4. Trade and markets – from catch to consumer

How could market mechanisms be used to encourage the development of fisheries that are market efficient as well as sustainably exploited?

“Withdrawal price” needs amending as can currently encourage exploitation of stock for which there is no market.

How can the future CFP best support initiatives for certification and labelling?

CFP should encourage more stock to be MSC accredited.

How can traceability and transparency in the production chain be best supported?

Wet fish should have paperwork indicating landing port and fishing ground, whilst frozen fish should at least show fishing ground.

How could the EU promote that fisheries products come from sustainable managed fisheries, providing a level playing field for all?

MSC accreditation.

How can the POs better work to match production with market needs?

Which new market based policy instruments could be implemented through POs? How can fishermen improve their position towards processing and distribution?

Flexible quotas that manage throughout the year.

5.6. The knowledge base for the policy

How can conditions be put in place to produce high-quality scientific research regarding fisheries in the future, including in regions where it is currently lacking? How can we best ensure that research programmes are well coordinated within the EU? How can we ensure that the resources are available and that young researchers are educated in this area?

While there should be continued research in traditional ways, there should be increased research conducted aboard actual fishing vessel during normal fishing trips. Multi national research should occur, particularly when one stock is targeted by several nations

How can the resources available best be secured and utilised to provide relevant and timely advice?

See above.

How can we better promote stakeholder involvement in research projects, and incorporate stakeholder knowledge in research-based advice?

See above.

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5.7. Structural policy and public financial support

What should be the top priorities for future public financial support and why? What changes can the sector not manage to bring about on its own and therefore require public financial support?

Top priority should be to ensure sustainability.

How can we change the focus of EU financial resources to promote innovation and adaptation to new policies and circumstances? Does any new policy area require funding? Should public financial support be focused on specific transitions such as eliminating discards in the fishing industry?

Increased development of technical measures particularly where lead to eliminating discards.

How can a synergy between the pillars of a future CFP be achieved? Should public assistance be conditional on Member States' achieving policy objectives?

Yes

Should public financial support apply equally to all sectors (small and large scale)? Should the European Fisheries Fund continue to distinguish between convergence and non-convergence regions?

No there are many differing requirements, with small scale operators fishing sustainably.

Should indirect support such as services related to fisheries management (access, research, control) continue to be provided free to all sectors of the industry?

Yes.

Should permanent fisheries subsidies be phased out, maintaining, on a temporary basis, only those aimed at alleviating the social impacts of the restructuring of the sector?

Yes phased out.

5.8. The external dimension

The core objective of the CFP is to promote responsible and sustainable fisheries. Is there any reason why the external dimension of the CFP should be driven by different objectives?

No.

How could the EU strengthen its role on the international stage to promote better global governance of the sea and in particular of fisheries?

Only source international products from sustainable fisheries.

Contrary to the current free access principle in international waters, should fishermen pay for the right to fish in the high seas under the governance provided by RFMOs?

No but should only be able to fish sustainable stocks, although it should be for these operators to prove that the stock is sustainable. If EU charge to fish international waters there could be a tendency to re flag vessels.

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How can objectives such as investment promotion (creation of joint-ventures, transfer of know-how and technologies, investments and capacity management for the fishing industry ...), creation of jobs (on vessels, in ports, in the processing industry) or promoting good maritime governance be pursued in the framework of future international fisheries agreements?

Only invest in sustainable fisheries

How could we make scientific research to assess the sustainability of fish stocks and the control of the fishing activity more transparent and efficient?

More research aboard fishing vessels.

How can we assure better cooperation and compliance with new regulations in developing countries?

Only import sustainable species.

Should EU operators cover all the costs of their fishing activities in third country waters or should the Community budget continue to support part of these costs?

EU operator should cover costs

Should the integration of European fishing fleets and interests in third countries be actively pursued as an objective of the external dimension of the CFP with a view, in particular, to support the development of the concerned partner countries?

Yes

Should aquaculture be included in future partnership agreements?

Yes as it can be part of the captive fishery particular with regards to feeding and potential to pass pathogens to wild stock.

5.9. Aquaculture

What role should aquaculture have in the future CFP: should it be integrated as a fundamental pillar of the CFP, with specific objectives and instruments, or should it be left for Member States to develop on a national basis? What instruments are necessary to integrate aquaculture into the CFP?

No but its effects on CFP should be monitored.