



The Shellfish Association of Great Britain

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European Commission – Directorate-General for Maritime Affairs and Fisheries
"CFP Reform"
B-1049 Brussels
Belgium

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GREEN PAPER **Reform of the Common Fisheries Policy**

Dear Sir/Madam

Introduction

I am writing on behalf of the Shellfish Association of Great Britain (SAGB). We are the UK industry trade association based at Fishmongers' Hall, home of the Worshipful Company of Fishmongers; one of the 12 great livery companies of the City of London. Our membership is composed of shellfish farmers, fishermen, commercial traders and companies, Sea Fisheries Committees, scientists and restaurateurs.

We were first founded as the Oyster Merchants' and Planters' Association in 1903, and renamed the SAGB in 1969 as our remit expanded. The SAGB has steadily expanded its range of activities from "harvest to sale" in over a century of support to the industry.

Since aquaculture was treated more specifically in a separate Communication, its position and consideration within the Green Paper was limited. However, we would like to highlight that the growth of aquaculture, particularly shellfish cultivation, has stagnated in Europe while global growth has continued to expand. The reformed CFP must support the growth of European aquaculture.

Inshore Management

We strongly agree with the Commission's thoughts on a differentiated fishing regime to protect small-scale coastal fleets (section 5.1).

SAGB's priority is the maintenance and development of commercially viable shellfisheries and shellfish cultivation operations that do not conflict with ecological sustainability. The key to achieve these goals is national control and management of exploitation in territorial waters out to 12 nautical miles (nm).

This would enable the shellfisheries (and finfisheries) to be managed sustainably and accredited accordingly. National control of the 0-12nm zone is currently by derogation from the CFP until the end of 2012. Foreign access by historic practice to the United Kingdom 6 to 12nm zone is vested in some EU States who fish these shared waters to different technical measures, e.g. lower minimum landing sizes of crab and lobster; this renders accreditation for sustainable management impossible. In 2013, all Member States will have equal access to the common resource, up to the beach, unless the derogation is renewed or alternative arrangements are made.

Efforts to manage the 0-12nm zone sustainably can be compromised by the inability of Member State legislation to be applied equally to all vessels fishing within the area. This can be considered reverse discrimination on the local industry as it often

prevents additional fisheries conservation measures being applied and has potential to undermine initiatives which offer wider marine environmental benefits, such as seasonal closures of nursery areas.

The SAGB believes that permanent reversion of management responsibility in territorial waters (12nm) back to the National State is possible under Article 9 of the CFP Framework (EC No 2371) and that if presented in the right way, would be strongly supported by the industry, conservation agencies, environmental NGOs and relevant Member States of the European Union.

Such a system will allow regional (or local) management measures to be adopted in the 0-12nm zone rather than at present whereby domestic management is effectively limited to 0-6nm due to the inability to impose domestic regulations multilaterally on all vessels in the 6-12nm.

In summary the SAGB wishes to see:

- National legislations applicable to ALL vessels out to 12nm
- Permanent renewal of the derogation in the 2012 CFP reform

The SAGB is not calling for historic access to end. The SAGB does believe however that historic rights of access should not be permitted to bar or undermine effective management.

Improved Science

Harvest Control Rules (HCR) are needed for all wild-caught fisheries. This requires adequate funding for data collection and analysis but will result in long-term effective management. The actual specific HCRs for local/regional vs international fisheries will need to be differentiated and managed on these hierarchical levels.

The UK Shellfish Industry Develop Strategy (SIDS), an industry-funded project to sustainably develop our wild-caught & cultivated shellfisheries, lists a number of issues that affect the industry as a whole, as well as issues that are specific to each sector. The primary overarching factor which limits development arises from the limited resources available for collecting shellfish data; investigating shellfish stock structure and population dynamics; and developing management objectives, reference points, assessments, and management advice for all sectors of the production industry.

Other gaps include the provision of advice on the impacts of fishing on the environment, and advice on the cultivation of shellfish. These problems impinge on achieving effective management and development, but are also likely to reduce the chance of achieving successful accreditation of shellfish fisheries by certification bodies, or the application of Strategic Environmental Assessments procedures, should they become necessary in the future. There is an urgent need to address these shortfalls.

An increased information base, whether from self-collection of data by the managers or from external sources, will greatly assist managers in investigating the distribution and structure of the local and regional shellfish stocks; the state of these stocks and their response to exploitation; the corresponding need or opportunity to manage the fisheries to ensure that harvesting is sustainable and in keeping with environmental obligations; and the most suitable or effective management measures for achieving this.

Ultimately, this knowledge will empower inshore shellfish managers to ensure the sustainability & environmental suitability of existing and novel shellfisheries; to respond to marketing pressures for local seafood products from fisheries that are accredited; to underpin the necessary integration between management at the local, regional, national and European level; to resolve disputes between inshore and offshore fishers, or between different sectors of the industry, with regard to access and management; and to provide independent information for Marine Spatial Planning and the Marine Strategy Framework Directive.

We urge the Commission to consider how best Community science funds can be utilised to more accurately reflect the economic importance of shellfish.

Social Sustainability

We believe the best way for the CFP to deliver a social element, whilst promoting a more efficient and profitable fishing industry is to establish a differentiated fishing regime in the inshore sector (whether 0-6 or 0-12nm) to protect small-scale coastal fleets. Such an approach may strengthen the economic viability of the small-scale inshore fleet and maintain its contribution to the life of coastal communities.

Spatial Plans

Shellfishing, and particularly shellfish cultivation, needs to be considered an equal user of the sea alongside renewables, aggregates, nature conservation and leisure users. There needs to be a concerted effort to ensure that fisheries are considered in spatial plans.

Decision Making Framework

The RACs seem to never consider aquaculture and there remains the need for a pan-European advisory body on aquaculture for the Commission and European Parliament. The SAGB believes that the role of ACFA could be changed to focus purely on aquaculture whilst wild-capture fisheries remain regionally considered through the RACs.

Please do not hesitate to contact us if we can provide any further information.

Yours faithfully



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