

**To: European Commission – Directorate-General for Maritime Affairs and Fisheries**  
"CFP Reform"  
B-1049 Brussels, Belgium  
[mare-cfp-consultation@ec.europa.eu](mailto:mare-cfp-consultation@ec.europa.eu)

Brussels, 31 December 2009

**CFP reform response by:**

European Anglers Alliance (EAA)  
Federation Internationale de la Pêche Sportive en Mer (CIPS/FIPS-M)  
European Fishing Tackle Trade Association (EFTTA)

- EAA represents angling organisations in 12 European states with some 3 million affiliated anglers.
- FIPS Mer is a worldwide organisation representing competition anglers in 38 states including 22 European states.
- EFTTA is a Trade Association for Manufacturers and Wholesalers of sportfishing equipment. Membership is open to manufacturers, wholesalers, agents, the press and related organisations in the tackle industry. EFTTA currently has over 250 members.

**Dear Commission,**

EAA, FIPS-M and EFTTA are happy to send you our response to your CFP reform consultation. We welcome the Commission's 2020 vision very much and sincerely hope it will be achieved.

Our response falls into two parts:

**PART 1 – Recreational fisheries and the CFP reform**  
**PART 2 – Answers to some of the Green Paper questions**

With kind regards,

**EAA**  
Mr. J. Crudden  
Chairman Subgroup Sea



[www.eaa-europe.eu](http://www.eaa-europe.eu)

**FIPS Mer**  
Mr. J.J.A. Bongers  
Deputy Secretary



[www.fipsmer.org](http://www.fipsmer.org)

**EFTTA**  
Mr. Jean Claude Bel  
CEO



[www.eftta.com](http://www.eftta.com)

**Contact:** EAA and EFTTA's office in Brussels, Rue Luxembourg 47, tel +32 (0)2 286 5956, GSM +32 (0)498 84 05 23  
e-mail: [email@eaa-europe.eu](mailto:email@eaa-europe.eu) , Jan Kappel

# PART 1 – Recreational fisheries and the CFP reform

## Introduction

The term Recreational Fisheries covers various segments<sup>1</sup>. In most countries recreational angling (rod and line fishing) is the biggest of these segments measured in numbers of participants and/or economic benefits and jobs. In Europe there are some 8-10 million recreational sea anglers. The annual socio-economic value is estimated 8-10 billion euros; tens of thousands jobs depend on anglers' expenditure. Recreational angling (rod and line) is done for leisure and sport. In some countries angling tourism is a well developed and growing business segment, while others have an unused potential.

Angling is an environmental low impact activity. Well managed it is a most sustainable way of catching fish. It does little to no harm to the aquatic environment and it allows release of unwanted or illegal-to-keep fish with a very low mortality rate in general.

The angling sector has shown a remarkable resistance against pressure from the present global economic crises. When the economy weakens people tend to seek nearby and cheap outdoor pleasures like recreational angling.

Recreational sea angling and other recreational fisheries are paid scant attention by the CFP and the European Commission. When the CFP was introduced in 1983 there was no consideration of the recreational fishing sector, properly due to lack of European level representation and a lack of socio-economic studies of the sector at that time. EU level representation is in place today at least for the recreational angling segment. A number of socio-economic studies have been published recent years but more needs be done.

Our experience is that the commercial fisheries sector is given priority status and benefits from European Community with support and protection over and above, sometimes against, other legitimate users of sea space and public fish stocks e.g. particularly recreational angling. This is not fair from a stakeholders' point of view and it is not sensible in economic terms either. Neither does it accord with the FAO, Code of Conduct for Responsible Fisheries<sup>2</sup>. We find that this flaw is a direct consequence of the lack of recognition of recreational fisheries by the CFP, the way the CFP is phrased in general, the lack of workable definitions and solid catch and socio-economic data on both commercial fisheries and various recreational<sup>3</sup> and small scale fisheries<sup>4</sup>. This is something we also stressed in our response last time the CFP was up for reform (2001).<sup>5</sup>

---

<sup>1</sup> Three different European recreational fisheries definition approaches, which don't contradict but complement each other:

a) the recreational angling definition by EAA (2004) <http://www.eaa-europe.eu/index.php?id=21> ;  
b) EIFAC Code of Practice for Recreational Fisheries (2008), p. 20-21; <ftp://ftp.fao.org/docrep/fao/011/i0363e/i0363e00.pdf>  
c) "FINAL REPORT, EU contract FISH/2004/011 on "Sport Fisheries" (or Marine Recreational Fisheries) in the EU For The European Commission Directorate-General for Fisheries"; (2006) M. G. Pawson, D. Tingley, G. Padda1, and H. Glenn [http://ec.europa.eu/fisheries/publications/studies/sportfishing\\_2006.pdf](http://ec.europa.eu/fisheries/publications/studies/sportfishing_2006.pdf)

<sup>2</sup> FAO, Code of Conduct for Responsible Fisheries. Cutting from the Introduction: "Fisheries, including aquaculture, provide a vital source of food, employment, recreation, trade and economic well being for people throughout the world, both for present and future generations and should therefore be conducted in a responsible manner. .. The Code recognises the nutritional, economic, social, environmental and cultural importance of fisheries, and the interests of all those concerned with the fishery sector. The Code takes into account the biological characteristics of the resources and their environment and the interests of consumers and other users..." <http://www.fao.org/docrep/005/v9878e/v9878e00.HTM>

<sup>3</sup> "At present, it is not possible to produce a comprehensive, quantitative overview of the importance of MRF (Marine Recreational Fisheries) because the information is neither available for each country nor is it in a consistent format. This suggests that new studies are required to provide robust information upon which to make decisions,..."; page 4 in "FINAL REPORT, EU contract FISH/2004/011 on "Sport Fisheries" (or Marine Recreational Fisheries) in the EU For The European Commission Directorate-General for Fisheries"; (2006) M. G. Pawson, D. Tingley, G. Padda1, and H. Glenn [http://ec.europa.eu/fisheries/publications/studies/sportfishing\\_2006.pdf](http://ec.europa.eu/fisheries/publications/studies/sportfishing_2006.pdf)

<sup>4</sup> Commissioner Borg: "...we should consider what the definition of small-scale fisheries should be, and who should come up with that definition." [http://ec.europa.eu/fisheries/press\\_corner/speeches/archives/speeches\\_2009/speech09\\_20\\_en.htm](http://ec.europa.eu/fisheries/press_corner/speeches/archives/speeches_2009/speech09_20_en.htm)

<sup>5</sup> EAA CFP reform response 2001, p. 1: "An examination of the various CFP regulations demonstrates that the CFP was created with a cultural mindset to recognize as the only user stakeholders of natural fish stock resources commercial fishermen. The interests of the recreational sector have been totally overlooked and the considerable socio-economic impact

### **We welcome “more and bigger fish”**

As anglers we are pleased to see included the Commission’s vision a wish for “*larger fish populations composed of mature and bigger fish.*” We are aware that catching immature fish in theory can provide additional catch biomass under certain circumstances but there are too many uncertainties, which make “recruitment fisheries” a hazardous strategy e.g. poor data collection and late delivery of data. We argue that all fish should be allowed to spawn at least once to secure financially and ecological robust and sustainable fisheries for the future. More of the smaller fish in the seas means more biomass, more feed for the bigger fish and better protection against loss of biodiversity.

### **Recreational angling is not only fish catching but also economy and jobs on a large scale**

We urge that in future recreational angling shouldn’t be looked at and dealt with only for the amount of fish we catch. It should also be valued for the huge sustainable economy and the number of jobs supported by recreational angling often in the most remote parts of Europe and the other social and life enhancing benefits it has to offer society and its practitioners. The potential for more sustainable development, income and jobs to be created via this sector should be exploited and supported. The sector has shown a remarkable resistance against pressure from the present global economic crises<sup>6</sup>. This is no coincidence. We have seen this before. When the economy weakens people tend to seek nearby and cheap outdoor pleasures like recreational angling.

Recreational angling’s development potential is very much dependant on fish availability, fish size (big fish) and access to good fishing spots. The present situation is far from ideal with regard to the fish availability and size as stressed by the Green Paper in several places.

### **Discards down, mesh sizes and MLS up**

We agree fully the Commission’s aim to reduce and eradicate discards and also the wish to increase the mesh sizes as one of the measures to achieve less discards as stated by Commissioner Borg in a speech earlier this month<sup>7</sup>:

*“..our proposal [technical measures] sought to improve the selectivity of fishing gears in the Atlantic and North Sea and thus bring down discards by obliging fishermen to engage in higher selectivity by increasing mesh sizes...”*

In our opinion it would make much sense to increase the minimum landing sizes at the same time as most of the EU minimum sizes today are set below the fish’ maturity length.

### **Not much attention paid to recreational fisheries in the Green Paper**

We were surprised to find recreational fisheries mentioned only once in the Green Paper (page 15):

*“Many coastal communities remain dependent on fisheries for their income, some of them with limited potential for economic diversification. It is therefore essential to secure a future for coastal, small-scale, and recreational fishermen taking fully into account the particular situation of the small- and medium-sized enterprises.”*

This doesn’t respond well with the fact that in recent years recreational fisheries have been increasingly made subject to EU’s fisheries legislation. The latest example is the inclusion of Article 55 named “recreational fisheries” in the fisheries control regulation adopted by the Council 10 November<sup>8</sup>. The Regulation requires among other things that “*Member States shall ensure that recreational fisheries on their territory and in*

---

of the recreational sector has remained unrecognized. As already mentioned in our initial comment this is a failing of the current CFP and should be addressed as part of the reform.”

[http://www.eaa-europe.eu/fileadmin/templates/uploads/Positions/EAA\\_contribution\\_to\\_CFP\\_Greenpaper\\_2001.pdf](http://www.eaa-europe.eu/fileadmin/templates/uploads/Positions/EAA_contribution_to_CFP_Greenpaper_2001.pdf)

<sup>6</sup> “Record number hooked on fishing as the recession bites”, 31 Dec 2009,

[www.dailymail.co.uk/news/article-1239550/Fishing-increase-recession-bites.html](http://www.dailymail.co.uk/news/article-1239550/Fishing-increase-recession-bites.html)

“Despite Economy, Fishing License Sales Up”, 20 Oct 2009, [www.asafishing.org/newsroom/news\\_pr102009.html](http://www.asafishing.org/newsroom/news_pr102009.html)

“More Americans go fishing as recession deepens”, 19 March 2009,

<http://uk.reuters.com/article/oddlyEnoughNews/idUKTRE52I0GQ20090319?sp=true>

<sup>7</sup> Speech by Commissioner Joe Borg at the plenary session of ACFA (Advisory Committee on Fisheries and Aquaculture), Brussels, 9 Dec 2009 [http://ec.europa.eu/fisheries/press\\_corner/speeches/archives/speeches\\_2009/speech09\\_21\\_en.htm](http://ec.europa.eu/fisheries/press_corner/speeches/archives/speeches_2009/speech09_21_en.htm)

<sup>8</sup> <http://register.consilium.europa.eu/pdf/en/09/st13/st13669.en09.pdf>

*Community waters are conducted in a manner compatible with the objectives and rules of the Common Fisheries Policy.”*

Another example is the recreational fishing provisions in the Data Collection Regulation<sup>9</sup>. In Article 2 recreational fisheries is explicitly made an integrated part of the “fisheries sector”: “...(a) ‘fisheries sector’ means activities related to commercial fisheries, recreational fisheries, aquaculture and industries processing fisheries products;”

### **Fish and fisheries are public resources**

It should be made very clear in the reformed CFP text that fish and fisheries are publicly owned resources<sup>10</sup>, that there are more and other stakeholders than commercial fisheries, aquaculture and their processors. The allocation procedures should determine who will utilize the public resources and by how much, not just allocate all stocks for the commercial fishery. This is common sense and a well established principle in some EU Member States and abroad.<sup>11</sup>

### **Economic benefits from recreational fisheries are as valuable as those from commercial fisheries**

There is a perception and flawed “argument” that recreational angling/sportfishing is just “fishing for fun”, which consequently should serve as a justification for treating the recreational sector as a less important sector to commercial fisheries and aquaculture only to be shown any real interest when considered an intrusive competitor, to be restricted or defied. An example on this kind of flawed thinking can be found in a CFP reform response of 9 December delivered by the fishing industry dominated advisory body, the Advisory Committee on Fisheries and Aquaculture (ACFA)<sup>12</sup>:

*“It also must be ensured that recreational fishing does not enter into direct or indirect competition with coastal and small-scale fishing.”*

Why is that important? Why not ensure “*that commercial fishing does not enter into direct or indirect competition with recreational fishing*”? Arguably it is commercial fishing – or maybe more so the managers and decision makers to be fair - which is the cause of decimated fish stocks, not recreational fishing.

In November a new control regulation was adopted by the Council, which explicitly forbid sales of recreational catches, so this kind of competition is outlawed by now. What remains is the possible competition over access to catching fish and fishing spots.

---

<sup>9</sup> COUNCIL REGULATION (EC) No 199/2008 of 25 February 2008 concerning the establishment of a Community framework for the collection, management and use of data in the fisheries sector and support for scientific advice regarding the Common Fisheries Policy. <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:060:0001:0012:EN:PDF> and

COMMISSION DECISION of 6 November 2008 adopting a multiannual Community programme pursuant to Council Regulation (EC) No 199/2008 establishing a Community framework for the collection, management and use of data in the fisheries sector and support for scientific advice regarding the common fisheries policy <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:346:0037:0088:EN:PDF>

<sup>10</sup> We were happy to read Commissioner Borg's press release of 17 September last year “Common Fisheries Policy: Commission launches a mid-term review”. In that release Mr Borg stressed that fish stocks are “public resources”: “fishermen must be made responsible and accountable for the sustainable use of a public resource.” <http://europa.eu/rapid/pressReleasesAction.do?reference=IP/08/1339&format=HTML&aged=0&language=EN&quiLanguage=en>

<sup>11</sup> The US “CFP” – the Magnuson Stevenson Act – is a good example for EU to learn from. In the US recreational fisheries are treated as a sector as important as commercial fisheries. One out of many examples can be found in the section 104-297(28), which defines the term “optimum”, with respect to the yield from a fishery, as: “the amount of fish which (A) will provide the greatest overall benefit to the Nation, particularly with respect to food production and recreational opportunities, and taking into account the protection of marine ecosystems...”; <http://www.nmfs.noaa.gov/sfa/magact/magword.doc>

A “DRAFT NOAA CATCH SHARE POLICY” (June, 2009), shows that US strives to treat all interests “fair and equitable”; page 8: “The allocation of quota among competing segments in a fishery has been one of the most difficult policy decisions for the Councils in the past. National Standard 4 of the MSA requires that any allocation of fishing privileges be fair and equitable. Allocations of quota to recreational, commercial, tribal, aboriginal and subsistence sectors; among gear types within a sector; and reserving quota for reasons of research, conservation, forage and/or scientific and management uncertainty are all decisions currently made by Councils.” [http://www.nmfs.noaa.gov/sfa/domes\\_fish/catchshare/docs/draft\\_noaa\\_cs\\_policy.pdf](http://www.nmfs.noaa.gov/sfa/domes_fish/catchshare/docs/draft_noaa_cs_policy.pdf)

<sup>12</sup> Page 8; “ACFA OPINION ON THE COMMISSION GREEN PAPER CONCERNING THE REFORM OF THE CFP” [http://ec.europa.eu/fisheries/dialog/091209\\_opinion\\_en.pdf](http://ec.europa.eu/fisheries/dialog/091209_opinion_en.pdf)

Our point is that where different interests seek access to the same resource or area conflicts might arise. These potential or real conflicts should be negotiated and not – as ACFA suggests – solved by giving priority to one sector's interests over all others. And most certainly it should not be a task for public authorities to assist one sector in preserving and protecting this sector's interests against other legitimate interests as ACFA suggests. It is important that the reformed CFP makes that clear and recognises all fisheries interests. We are confident that this will happen when pushed by other policies and legislation such as the Integrated Maritime Policy, ecosystem based management, the Marine Strategy Directive, Marine Protected Areas, spatial planning etc., which all integrates or subordinate the CFP within a broader frame of interests and objectives. These policies will hopefully do away with narrow "silo thinking" and bring in a more holistic approach to management of fisheries along and together with other maritime activities. We also foresee more emphasizes on how to secure and grow "ecosystem services"<sup>13</sup> - another new term in the vocabulary - to the benefit of all marine stakeholders, and, hopefully, with a requirement to treat all marine interests "fairly and equitably".

Anecdotally: When the "Foot and Mouth" disease haunted the UK in 2001 all attention and emergency aid was directed on to the agriculture sector for obvious reasons, but – which came as a surprise to many – at the end of the day the tourism sector suffered far the most in loss of income and jobs. The closure of all footpaths and bridleways effectively kept anglers, hunters and other nature lovers at home and the tourists away, which translated into huge losses for the dependant businesses<sup>14</sup>.

### **Angling makes children and their parents eat more fish – good for the commercial fisheries sector**

Parents often shy away from buying and preparing fish meals simply because a lot of children don't like fish. However, when a child catches a fish it is very common that the child also wants to take part in eating that fish. This way angling is a lever to make children eat fish and/or more different kinds of fish.

### **Consumer demand for commercially caught fish is positively correlated with number of anglers**

Very few of Europe's 25 million recreational anglers are able to or interested in providing themselves with more than a fraction of all the fish they consume over a given year. The largest bulk of anglers go fishing less than 5 times a year. Most of the fish they consume are caught by commercial fishermen, bought at the supermarket or a local fish shop. We can't refer to any specific study but we have no doubt that angling increases people's taste for fish and make them and their families eat more of it, in particular the children. In other words, angling supports the commercial fisheries sector by boosting demand for marketed fish.

### **ACFA does not represent all fisheries interests – recreational fisheries interest group needed onboard**

Recreational angling is represented on all 7 Regional Advisory Councils (RACs). EAA and FIPS-M are members of all RACs. But as the above mentioned ACFA CFP response clearly shows there is a problem with the composition and membership of ACFA. It lacks representation of all fisheries stakeholders. Recreational fishing – including recreational angling – has no representation on ACFA. EAA has asked to be represented on ACFA for more than a decade but to no avail. In an ACFA evaluation report<sup>15</sup> from last year this can be read: "The EAA has expressed interest in participating in ACFA. Participation of EAA in ACFA could be relevant on some specific topics, where the EAA could be called in. However, the majority of EAA's members are active in inland fresh water and the marine anglers seldom leave the coastal areas. Recreational fishing is a regionalised activity and their representation on RACs (which is also the case) seems more relevant than on ACFA."

We were promised years ago that we would be "called in" when something of our interest was on the ACFA agenda. It has only happened once or twice. We cannot rely on other people to guess or decide what is relevant to us. We need to be fully integrated in the ACFA body. Now we urge that a recreational fisheries working group is established as a fifth working group on ACFA. ACFA needs to broaden its representation to be able to provide all the important information and advice for today's decision makers and managers. They need

---

<sup>13</sup> Much more about "ecosystem services" on DG Environment's home page:  
<http://ec.europa.eu/environment/nature/biodiversity/economics/>

<sup>14</sup> "Foot and mouth: Disaster for tourism as losses far outstrip those of meat industry"; The Independent, 11 March 2001  
<http://www.independent.co.uk/news/uk/this-britain/foot-and-mouth-disaster-for-tourism-as-losses-far-outstrip-those-of-meat-industry-686869.html>

<sup>15</sup> "DG Maritime Affairs and Fisheries, Intermediate Evaluation of the Advisory Committee for Fisheries and Aquaculture (ACFA) Final Report," (August 2008); report by COWI  
[http://ec.europa.eu/fisheries/publications/studies/acfa\\_evaluation\\_2008\\_en.pdf](http://ec.europa.eu/fisheries/publications/studies/acfa_evaluation_2008_en.pdf)

this data to be in a position to decide and act wisely in fisheries management issues and other marine and maritime issues of importance. A recreational fisheries working group on ACFA will provide a much needed and useful European platform for recreational fisheries and dependant business such as the tackle trade, boating and tourism.

### **RACs, Regional Advisory Councils**

The present CFP's Article 31(2) reads: "Regional Advisory Councils shall be composed principally of fishermen and other representatives of interests affected by the Common Fisheries Policy, such as representatives of the fisheries and aquaculture sectors, environment and consumer interests and scientific experts from all Member States having fisheries interests in the sea area or fishing zone concerned.

We suggest that the word "principally" should be deleted. It is an odd construction from a democratic point of view to have one interest (commercial fishermen) with a guaranteed majority as they were given by a Council Decision, July 2004<sup>16</sup>.

### **Recreational angling and angling tourism - huge sustainable growth potential**

Only a few European Member States have developed any development policy or plan for recreational angling and angling tourism (good examples are Ireland and Sweden). While the commercial fisheries sector has to struggle still for some years to achieve the Commission's 2020 vision the recreational sector is ready to go and grow. This it can do without doing much, if any, harm to the commercial sector. Recreational angling uses much less of the fish resource than the commercial sector to generate the same amount of income<sup>17 18</sup>. Often the two sectors don't fish for the same species. The Marine Protected Areas and their buffer zones to be put in place now all over Europe provide eminent angling areas, where fish stocks can replenish, fish grow bigger and angling can prosper and provide much welcome economy to the local communities nearby of which some might suffer from decommissioning or displacement of commercial fishing vessels to other areas.

### **European Fisheries Fund (EFF)<sup>19</sup>**

From reading national EFF operational programmes<sup>20</sup> It is our impression that this multi-billion euro fund is very little used to develop recreational sea angling and fishing tourism. This is a pity. It most certainly means a lot of missed opportunities to provide jobs and stimulate the economy of the coastal communities so badly needed in the coastal communities. It could help secure employment and income for some commercial fishermen made redundant by fleet adaptation and the global economic crises. And it could provide more economic input to very remote localities. The lack of consideration for this kind of use of EFF most likely can be attributed to the sparse information given about the recreational angling sector and fishing tourism in the EFF Council Regulation. We

---

<sup>16</sup> Council Decision of 19 July 2004 establishing Regional Advisory Councils under the Common Fisheries Policy; Article 5(3): "In the general assembly and executive committee, two thirds of the seats shall be allotted to representatives of the fisheries sector and one third to representatives of the other interest groups affected by the Common Fisheries Policy."  
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2004:256:0017:0022:EN:PDF>

<sup>17</sup> "For example, in the United States, the total national economic impact from commercial finfish fisheries is 28.5 percent of the impact created by marine recreational fisheries (Southwick Associates 2006), and in the case of the striped bass resources, which are shared between the commercial and recreational sectors, anglers harvest 1.28 times more fish, yet produce over 12 times more economic activity as a result (Southwick Associates 2005)."; page 44, report "The Sunken Billions: The Economic Justification for Fisheries Reform" (2009), The International Bank for Reconstruction and Development / The World Bank  
<http://siteresources.worldbank.org/EXTARD/Resources/336681-1224775570533/SunkenBillionsFinal.pdf>

<sup>18</sup> "Under the assumption of a continuation in the present management regime and a constant commercial salmon catch at 2002 levels, the present net socio-economic value of the commercial fishery is estimated at €35.9 million. On the same basis, we would estimate that the overall salmon angling resource would be valued at €91.6 million in present value terms."; page 11. Table 3.9, page 51 shows that angling accounted for 13% of the salmon catches in 2001; commercial fisheries 87% "An Economic/Socio-Economic Evaluation of Wild Salmon in Ireland" (2003) Submitted to the Central Fisheries Board by Indecon International Economic Consultants, INDECEN International Economic Consultants  
[http://www.cfb.ie/pdf/CFBMIDAPRFI\\_17.pdf](http://www.cfb.ie/pdf/CFBMIDAPRFI_17.pdf)

<sup>19</sup> COUNCIL REGULATION (EC) No 1198/2006 of 27 July 2006 on the European Fisheries Fund  
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2006:223:0001:0044:EN:PDF>

<sup>20</sup> EFF - National operational programmes [http://ec.europa.eu/fisheries/cfp/structural\\_measures/operational\\_programmes\\_en.htm](http://ec.europa.eu/fisheries/cfp/structural_measures/operational_programmes_en.htm)

suggest that as when the EFF is revised to rephrase as a minimum Article 1 (the scope) and one or more of the definitions in Article 3. E.g. we find it sensible to change the definition of 'fisheries sector' in the EFF Regulation in the direction of – or replace it with -the definition laid down in the Data Collection Regulation<sup>21</sup>:

**EFF, Art 3(a):**

"fisheries sector": the sector of the economy, including all activities of production, processing and marketing of fisheries and aquaculture products;

**Data Collection Regulation's Art 2(a):**

'fisheries sector' means activities related to commercial fisheries, recreational fisheries, aquaculture and industries processing fisheries products;

There is an urgent need for funding to improve data collection and reporting about the recreational fisheries sector. The new control regulation's Art 55(3) has made sampling plans obligatory. We fear that these sampling plans won't separate adequately angling from other kinds of recreational fisheries and we fear that the socio-economics will be left out due to a wish for cost savings. This is not appropriate. Sufficient funding from EFF could remedy the situation.

EAA has designed a socio-economic study to survey all-Europe's sea and freshwater recreational fisheries, RECFISH.<sup>22</sup> A pioneer survey was successfully conducted in Austria in year 2000 (sample size: 5.492). The survey gave much useful information. Surprisingly from landlocked Austria 40,000 anglers went sea fishing in other countries.<sup>23</sup> The survey also showed that when an angler (Austria has 410,000 of them) plans his/her holiday and look through information material about a region 18 % look "always" for information, whether and which possibilities there are for angling and 13 % do it "sometimes"; 33% = 135,000 anglers (+ family members).

In the year 2000 only Finland and Sweden conducted recreational fisheries surveys on a regular basis. Also a combined Nordic study was published in year 2000 (Norway, Denmark, Sweden, Iceland and Finland). Most European countries had never done a single socio-economic study on this sector at that time. Since then a number of countries have produced their first study (e.g. Germany, France, England-Wales, Scotland, Northern Ireland, Netherlands, Czech Republic, Belgium (Flanders), Lithuania, Denmark (delivery next year) and a study for a regional part of Portugal). A few nations and localities have produced specialised tourism fishing figures and reports.

We sincerely hope and expect that those countries that still haven't done any studies will do so in the near future, and we hope that these studies will be repeated on a regular basis in the future. This is most necessary to provide most valuable trend data. In this regard the Community and the EFF fund could play a vital instrumental role in co-ordinating national efforts with regard to timing for survey period and deliveries. Also by setting some minimum criteria or guidance as to what to survey and how to design questionnaires etc. to secure that results from national studies are comparable across the borders in time and methodology.

We have not been successful in finding the funding to do the full pan-European RECFISH project, which would need 1-2 million euros dependant on details and aspects to be covered. This is a small amount of money in EFF terms. If Member States coordinated their efforts around RECFISH some of them might be able to save money on their survey account and/or be able to do more survey of the recreational fisheries sector. For sure coordinated planning would provide more useful data, for the same amount of money or maybe even less.

----- END of Part 1 -----

---

<sup>21</sup> See footnote [8](#)

<sup>22</sup> RECFISH presentation on the EAA website: <http://www.eaa-europe.eu/index.php?id=20>

<sup>23</sup> EAA and EFTTA presentation at 'Marine and Coastal Tourism in Europe', Barcelona, 14. May 2007 – see slide 14 onwards. <http://www.ebcd.org/Maritime%20Affairs/MARINE%20TOURISM/presentations/EAA.pdf>

## PART 2 – Answers to some of the Green Paper questions

### 4.1. Addressing the deep-rooted problem of fleet overcapacity

- Should capacity be limited through legislation? If so, how?
- Is the solution a one-off scrapping fund?
- 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?
- 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?

We can see from other CFP consultation responses on the Commission's website that there are many suggestions and opinions. Here we'll only mention a few principle things and worries of ours:

- no matter what scheme is preferred the fish and fisheries must remain publicly owned resources.
- when allocating resources to and between segments all interests should be treated "fair and equitable"
- as for transferable fishing rights: Fishing "rights" are quasi rights. Fish and fisheries are public resources.
- leasing should be considered along with or instead of ITQs (Individually Transferable Quotas) as a way to secure public income from this trading and to secure or ease the allocation of fishing permits or quotas to such as small-scale fisheries which often cannot afford to pay the market prices for quota. This will avoid that all quotas end up in the hands of a few companies.
- ITQs is no panacea. There are many pitfalls. It should only be introduced after careful investigation and consultation that it actually can deliver what is hoped for in the short and the long term. This will vary from one region to another, from one fishery to another.<sup>24</sup>

As anglers we have good reasons to fear some ITQ and other "rights based" management schemes. In a presentation by Dr Bjørn Hersoug given at a workshop in the European Parliament he portrayed case studies from 5 countries - Norway, Iceland, New Zealand, South Africa and Chile - that have implemented rights-based fisheries management in various forms (i.e. licence regimes, Individual Vessel Quota (IVQ) and Individual Transferable Quota (ITQ) schemes). One of his conclusions was that:

"Strong rights for one group (fishers) may imply weak or unclear rights for other stakeholders, such as aboriginals, recreational fishers, aquaculture farmers and environmentalists. It is difficult or impossible to foresee that these groups can handle their concerns on the market."<sup>25</sup>

EAA delivered a brief response to the "Consultation on Rights-Based Management (RBM) tools in fisheries" (2007)<sup>26</sup>. The introduction reads: "For us as anglers we have a problem with the basic principle in Right Based Management (RBM) that some stakeholders are given 'ownership' or 'quasi rights' to parts of our common resource, the fish stocks, if this means that we as anglers are losing rights."<sup>27</sup>

---

#### <sup>24</sup> **Some ITQ critics:**

"Open warfare declared over fate of fishing industry; UK and Scots ministers in spat about ban on the permanent transfer of quotas", 21 May 2008

<http://www.pressandjournal.co.uk/Article.aspx/648913?UserKey=0>

"US Professor strongly critical of ITQs", 25 march 2009

<http://www.fishsec.org/article.asp?CategoryID=1&ContextID=344>

"ITQs not always profitable, study shows", 24 June 2009

<http://www.fishsec.org/article.asp?CategoryID=1&ContextID=399>

"ITQs no success story, Canadian study claims", 18 Aug 2009 <http://www.fishsec.org/article.asp?CategoryID=1&ContextID=421>

<sup>25</sup> "Rights Based Management in Fisheries", workshop report, Sept 2007; page 7,

[http://ec.europa.eu/fisheries/cfp/governance/consultations/contributions260207/european\\_parliament\\_en.pdf](http://ec.europa.eu/fisheries/cfp/governance/consultations/contributions260207/european_parliament_en.pdf)

<sup>26</sup> "Consultation on Rights-Based Management (RBM) tools in fisheries", 2007,

[http://ec.europa.eu/fisheries/cfp/governance/consultations/consultation\\_260207\\_en.htm](http://ec.europa.eu/fisheries/cfp/governance/consultations/consultation_260207_en.htm)

Several countries have already introduced ITQs in their national management schemes but mostly for pelagic fisheries it seems. ITQs seem better suited for industrial vessels than for small (inshore) vessels, which should be taken into account by the Commission as well as the Member States before introducing more rights based management for the smaller vessels. The main question for us, which need to be answered before moving on, is: What externalities (negatives) will ITQs have on recreational fisheries in general and recreational angling in particular?

#### 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?
- 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?
- 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?

- Before being too specific on defining the objectives and indicators, targets, timeframes etc. it is of vital importance that the knowledge about fishing effort and fishing mortality are better known and faster known and presented than today. Without robust basic data, the scientists cannot advise properly and many management plans are doomed to fail. There are too many fisheries at present “managed” under the “precautionary principle” due to lack of data, unreliable data or outdated data.

- The future CFP should aim at healthy fish stocks, which is the prerequisite for sustainable fisheries. That will provide some answers what else should be done with regard to the eventual need to create alternative jobs in coastal communities (though the answer could be different short and long term, with the greatest need for alternative jobs in the short term). We would like to stress that the recreational angling sector can and do provide “alternative jobs”/genuine jobs in the coastal communities, and it does so with less fish mortality per income unit.

#### 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?
- 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?
- 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?

The most needed but difficult task seems to be to create a very visible link - or equivalence - between the decision makers, the managed fishermen, the fishing area and the effects on fish stocks from fishing, short and long term. Again better fisheries data is needed. And education of fishermen and other stakeholders in how fisheries science works would make the stakeholders more capable of giving sound advice (on ACFA and RACs) and eventually be given a greater say in the decision making. Scientific advice should be given the final say over e.g. how much TAC and quota can be allocated from one year to another (but still they would need better data at hand). It is not “sustainable” that politicians can “grow the TAC cake” beyond what the fish stocks can sustain as it happens today. There is inspiration how to deal with this to be found in the US management scheme.

---

<sup>27</sup> [http://ec.europa.eu/fisheries/cfp/governance/consultations/contributions260207/european\\_anglers\\_alliance\\_en.pdf](http://ec.europa.eu/fisheries/cfp/governance/consultations/contributions260207/european_anglers_alliance_en.pdf)

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

**4.5. Developing a culture of compliance**

**5. FURTHER IMPROVING THE MANAGEMENT OF EU FISHERIES**

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

**5.2. Making the most of our fisheries**

**5.3. Relative stability and access to coastal fisheries**

It would make much sense to reserve the 12 nm zone for small-scale fishing vessels. It would help streamline the management scheme and make it easier to sort out other questions e.g. advisory bodies, their “jurisdiction” and who and how many to man them etc. The more homogenous the managed subjects, areas and fisheries are the easier and more efficient the management can be. This could be made a task in itself (making the management units and fisheries more homogeneous). In this regard it would be helpful if the decision makers can decide within the 12 nm for all fisheries taking place, including over foreigners with heritage fishing rights within the 6-12 nm. We have examples that local management measures were not implemented due to the free-ride problem with heritage fishermen.

**5.4. Trade and markets – from catch to consumer**

**5.5. Integrating the Common Fisheries Policy in the broader maritime policy context**

**5.6. The knowledge base for the policy**

**5.7. Structural policy and public financial support**

**5.8. The external dimension**

**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?

The aquaculture sector needs to develop more towards environmental sustainable production. We see too many escaped fish, too many sea lice and other negative impacts on the environment and wild fish stocks. So if aquaculture being integrated as a fundamental pillar of the CFP can help in this regard we warmly welcome such a solution.