

MARE ^{Activée}

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Dear Sir

In response to your call for stakeholder input regarding the Green Paper on the Reform of the Common Fisheries Policy (COM[2009]163 of 22.4.2009) the Marine Stewardship Council wishes to contribute its observations.

The MSC welcomes the review of the Common Fisheries Policy and anticipates benefits for those wishing to demonstrate sustainable fishing practices in addition to further growth in market opportunities for certified sustainable seafood.

Our input will focus on two questions in the Trade and Market section of the Green Paper that deals with the importance of market mechanisms and eco-labels in helping to encourage recognition of and support for the action being taken to safeguard seafood supply.

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

European retailers and consumers are increasingly aware of fisheries sustainability issues and seek means to ensure they are sourcing and consuming seafood from sustainable and well managed fisheries.

Credible and robust third party certification and eco-labelling schemes for fisheries products have proven to be an effective tool to create market-based incentives for the establishment of sustainable fisheries worldwide.

The Marine Stewardship Council's (MSC) Principles and Criteria for Sustainable Fishing represents one such globally recognised standard for fisheries and its certification and eco-labelling programme is proven to generate market incentives for fisheries to operate sustainably.

Interest and confidence in the MSC has grown dramatically in recent years with 12% of the world catch for human consumption in the programme, and 7% already certified.

Numerous environmental benefits have been recorded including by-catch reduction, successful implementation of management plans, reduced impact on ecosystems and non target species, reduced risk of fraud and improved protection against IUU fish entering the supply chain, improved awareness of issues by fisheries managers and fishers themselves leading to better acceptance of changes required but also economic benefits like maintenance of existing markets; more stable prices; and in some cases price premiums of up to 25%.

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Because of this demonstrated success, the new Common Fisheries Policy should ensure that credible eco-labelling and certification schemes are considered as integral to any market-based strategy for driving sustainability.

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

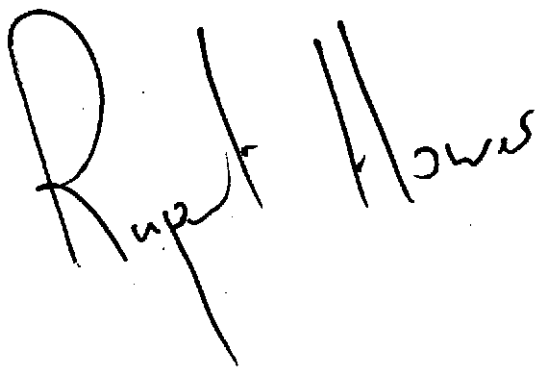
Consistent with previous contributions to EU policy documents (e.g. Commissioner Borg's Communication : "Launching a Debate on a Community Approach Towards Eco-labelling Schemes for Fisheries Products" - COM[2005]275 of 29.6.2005), the MSC will continue to emphasize that it shares the Commission's concern about the possible consequences of poorly governed and managed eco-labels. It is imperative that such programmes operate with due regard to the key requirements of robust science, transparency, accountability and stakeholder consultation if they are to remain effective. Maintaining high standards will ensure that the consumer's trust in eco-labelling is undiminished.

To increase credibility, consistency, and adoption in the market, the MSC recommends that a future CFP should incorporate consideration of eco-labelling and certification schemes, compliant with agreed minimum guidelines, into a market-based strategy promoting sustainability and independence.

In support of this the MSC would welcome that, at the very least, schemes should be recognised for their compliance with the FAO's Code of Conduct for Responsible Fisheries and their Guidelines for the Eco-labelling of Fish and Fishery Products from Marine Capture Fisheries. These standard-setting schemes should also adhere to international, normative documents that are applicable to all social and environmental standards and set best practice in this field such as the ISEAL Code of Good Practice for Setting Social and Environmental Standards.

Thank you for providing us with an opportunity to comment.

Yours faithfully

A handwritten signature in black ink, reading "Rupert Howes". The signature is written in a cursive, slightly slanted style.

Rupert Howes
Chief Executive

With Compliments

Dear Sir,

I would like to submit the Marine Stewardship Council's response to the EU Green Paper on the Reform of the Common Fisheries Policy. I realise that we have missed the deadline and apologise most sincerely for this. Unfortunately the severe weather we have been experiencing has had a big impact on the ability of members of staff to get into the office and send our response, but I hope that you may still be able to accept it.

Yours faithfully

Louisa Sherry, Executive PA to the Chief Executive



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