



European Commission – Directorate – General for Maritime Affairs and Fisheries
“CFP Reform”
B-1049 Brussels
Belgium
mare-cfp-consultation@ec.europa.eu

Contribution to Green Paper Reform of the Common Fisheries Policy

Initial remarks

Sportvisserij Nederland wishes to take the opportunity to respond to the consultation on the Reform of the Common Fisheries Policy. In this contribution we focus on key issues regarding recreational sea angling in the light of the reform of the CFP.

Our organisation represents the interests of 2 million recreational anglers and their organisations in the Netherlands, consisting of approximately 900 member organisations, 550.000 affiliated anglers and 20.000 volunteers (see our website www.sportvisserijnederland.nl.)

In the Netherlands there are approx. 650.000 recreational sea anglers who spend approx 2 million fishing trips in Dutch coastal waters and the sea (shore, small boats, charter boats) on a yearly basis. Their participation supports a significant and diverse industry in the coastal communities, which in turn provides approx. 1000 jobs, most of them in coastal communities. Certain sectors, including e.g. charterboat fishing are partly responsible for generating employment opportunities in the commercial fisheries sector as well. Socio economic figures regarding recreational sea angling in the Netherlands are derived from a study in 2004 carried out by the Dutch Agricultural Economics Research Institute (LEI), in 2004, and were updated with the results of a questionnaire on recreational sea angling in 2006 conducted by TNS NIPO on behalf of Sportvisserij Nederland.

Recreational sea anglers in the Netherlands and in other European countries have witnessed a significant decline in fish stocks in sea and coastal water in the last thirty years. Notwithstanding the fact that without the CFP the situation would undoubtedly have been even worse, the analysis on the shortcomings of the policy is shared by our organisation and our members. Sportvisserij Nederland endorses the analysis of thirty years Common Fisheries Policy, laid down in the Dutch Fisheries Minister's vision on the new European fisheries policy “Vis als duurzaam kapitaal”¹, as a result of the Dutch consultation on the Green Paper during 2009. In our response we refer, where necessary, to this consultation paper.

¹ http://www.minInv.nl/pls/portal/url/page/minInv/actueel/voorlooppagina?p_file_id=44862 - 12k -



We endorse the horizon for 2020, outlined as such in the Dutch Fisheries Minister's vision on the CFP reform.

The fish stocks and the ecosystem of which fisheries is a part of, are the future capital for a sector which feels responsible for sustainable management thereof. Protection of the ecosystem, sustainable fishing techniques resulting in healthy fish stocks with a varied species composition and a healthy age structure, are also ideal preconditions for a further development of recreational sea angling. The realisation of these ambitions included in the Green Paper will have important positive effects on the industry as well as on recreational sea angling as a sector in Europe, and employment related thereto in coastal areas.

Recreational sea angling and the Common Fisheries Policy

We have noticed that the Green Paper as well as the Dutch Minister's vision on the CFP reform do not give explicit attention to the recreational fishing sector in general and more specifically to the recreational angling sector that we represent. This is a serious lost opportunity, since as such our sector very much depends on healthy fish stocks as well as to a management aimed at improving the stocks and a healthy ecosystem. Our sector is more than willing to contribute to these goals. We think that recognition of recreational sea angling interests following the 2002 reform, resulting in improving governance and the setting up of the RAC's should have been an overriding argument to include recreational sea angling in the Green Paper.

Although there is a reference to recreational interests in par 5.1 of the Green Paper, this does not do justice to the current situation in Europe where 8 to 10 million sea anglers are active. According to the EU commission publication "Maritime Facts and Figures"² recreational sea angling and the related industry generate a related industry of 8-10 billion Euros.

On the other hand, the absence of the recreational sector in the Green paper can also be seen as a confirmation of the fact that sea angling is not included in the issues related to overfishing, overcapacity and management problems, as referred to in the Green Paper. 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 releases of unwanted or illegal-to-keep fish with a very low mortality and discards rate in general.

Key issues in the CFP now and in the future

1. Tackling overcapacity

² http://ec.europa.eu/maritimeaffairs/pdf/facts_fig_en_bat_060523.pdf -

Reduction of fleet overcapacity is essential to make long term management plans work and to achieve more sustainable fishing. Capacity in terms of fish catching capacity has risen through technical innovation over the years and has outpaced current reductions. Proper assessment of capacity is necessary to be able to identify its effects in a fishery and to implement a reduction strategy that is legally binding for a fishery. The size of the fleet and its fish catching capacity must be proportionate to the stocks and fishing opportunities.

A one-off scraping fund is not the solution to the problem of overcapacity. The use of individual or collective transferable rights by the industry is already successfully practised in different fisheries in the EU and has been a good incentive for the industry to take responsibility.

Specification of these rights, responsibilities of use need to be clearly defined. The procedure of granting rights should be transparent and needs the inclusion of environmental impact assessments and appropriate mechanisms to enhance compliance. Above all fish stock resources are “humanities natural heritage”. Assignment of fishing rights should not exclude the rights of other stakeholders and should not compromise the fundamental principle that marine fisheries are gaining access to publicly owned resources.

2. Imprecise policy objectives

The primary objective of the CFP should be ecosystem based fisheries management. The CFP needs to prioritise its objectives; the current CFP fails in that respect. Restoring productivity of the seas will lead to more social and economic viability in general, for the fisheries sector as well as for other forms of human use, like tourism values. Clear standards need to be implemented in the CFP to reach these goals.

Jobs in the fishing industry as well as other socio economic sectors are a by-product of ecosystem based management resulting in better fish stocks and healthy seas. The Integrated Maritime Policy can be a driver to create and maintain alternative jobs, such as in marine tourism, like the charterboatsector. Commercial fishing should not have any special status beyond other economic activities.

3. The decision making system: from short time to long time focus

The system of short time decision making on TAC's and quotas via the Council of Ministers is an inherent failure of the CFP. Political decisions based on the short time needs of the commercial sector have resulted in years of overexploitation. Our contention is that only when the welfare and the sustainability of the resources themselves becomes the priority, will the long-term welfare of all exploiters be better assured.

The Green paper gives several options to overcome the problems of the current CFP in this respect. Sportvisserij Nederland favours the option in which actual



fisheries management takes place at Regional marine level, with the inclusion of Member States and all stakeholders, represented at equal level. The responsibility for ecological and biological principles as well as legislation and guidance on control and enforcement should remain at Community level. The establishment of a mandatory system of long term management plans, to be achieved within a proper time scheme, is the key to better management. The regional management organisation, in which balanced stakeholder representation is incorporated, will have all the legal instruments to approve LTMP's, to produce technical measures, to regulate fisheries and to monitor and evaluate. Multispecies stock management is preferable, but single stock management – such as the example of the successful management of Bass (*Dicentrarchus labrax*) in the Irish republic– may be preferable when it meets all the relevant ecological and socioeconomic requirements.

We agree fully the Commission's aim to reduce and eradicate discards and also the wish for increased mesh sizes as one of the measures to achieve less discards as stated by Commissioner Borg in his speech of 9 December 2009. In our opinion it would make much sense to increase the minimum landing sizes at the same time. Banning discards, as referred to in the Dutch vision at spearhead 1: "sustainable use of ecological capital" is an ambition which must be realised within the shortest term possible.

Cancellation of minimum sizes – referred to as a possible option in the Dutch fisheries Ministers vision (page 27) is absolutely undesirable. Most of the EU minimum landing sizes (MLS) today are set below the fish' maturity length. Increasing MLS should be one of the focus points in the technical CFP and or national fisheries management now and in the future.

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 and better recruitment resulting in more juvenile fish secures more biomass; more feed for the bigger fish and increased protection against loss of biodiversity.

4. Encouraging the industry to take responsibility in implementing the CFP

Regionalisation of the CFP and LTMP's will encourage the industry to take more responsibility. With proper legal safeguards this will encourage a more proactive involvement in the management. The regional approach must also involve stakeholders as outlined above. Via co management fishermen can be part of the management process and this will lead to better compliance.

Self management of the catching sector is in our view not the prime option.

5. Developing a culture of compliance

Overcapacity is the root cause of much non-compliance. Tackling overcapacity will result in better conditions to develop a culture of compliance. Effective and standardized data collection forms the cornerstone of successful fisheries management. Registration of unwanted by catches and discards calls for standardized and new techniques, such as onboard observers and camera surveillance systems. Special attention is needed for small scale fisheries. These are easily overlooked, while their scale and activities in ecological and vulnerable coastal areas ask for monitoring and control on at least the same conditions as large scale fisheries. A link between compliance and funding is not desirable in our vision. Funding should only be aimed at sustainable fisheries.

6. Small scale fisheries

Chapter 5.1. of the Green Paper relates to the importance of small scale fisheries in European coastal areas. There is no definition of small scale fisheries and this chapter is the only reference in the Green paper to the importance of recreational fishing.

Recreational sea angling strongly depends on healthy stocks and fishing possibilities within the 12 mile zone. Transfer of fishing effort to the 12 miles zone as a result of expansion of small scale fishing vessels is undesirable as it can lead to overexploitation and local overfishing. In relation to the aforementioned, we endorse the view of the Dutch fisheries minister (page 37) that the CFP is not intended to support regions in relation to the further development of small scale coastal fleets. With regard to the upcoming amendment, the time is right – based on custom-made decisions – to reconsider where possibilities are to revise the current historical access rights for non-national vessels within the 12 mile zone in order to meet sustainability requirements.

We agree with the statement in the CFP that “Many vessels are small scale and have a limited environmental impact but small scale fishing can also be harmful to sensitive coastal habitats and its aggregated impact can be significant with real consequences on the state of the stock”.

The 12 mile zone system allows Member States to manage their inshore waters. The principle that access to the 12 mile zone should be restricted to small scale fisheries needs to be maintained.

7. CFP integration with other policies

Reform of the CFP needs to be in line with the requirements of the new Marine Strategy Framework Directive. This will hopefully contribute to finding solutions in conflicting interests (spatial, environmental) between fisheries and other users.



8. Priorities

Sportvisserij Nederland's preferences in relation to the CFP are the following:

- That the sea angling sector is perceived to be a full stakeholder, including all rights and duties. A well accessible sea in which fishing is possible has been the basis for a thriving – but most of all a growing – sea angling culture in Europe for more than a century. In the reformed CFP text it must be set out clear that fish and fisheries are publicly owned resources, that there are more stakeholders than commercial fisheries, aquaculture and their processors and that allocation procedures determines whom to utilize the public resources and by how much.
- Recognition that sea angling is a substantially different sector compared with the commercial sector. We urge that recreational angling in future shouldn't be looked at and dealt with only for the amount of fish we catch but also for the huge sustainable economy and number of jobs supported by recreational angling often in the most remote parts of Europe and the other 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. Economic benefits from recreational fisheries are as valuable as those from commercial fisheries. The recreational 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.
- That with regard to sea angling, as a recognised stakeholder, a more balanced policy related to the quality and accessibility of fish stock is advisable, which relates to sustainability and the sea angler's social economical contribution to society, specifically in coastal areas. When it concerns fish stock management, the recreational angling sector no longer wants to function as the capstone.
- To realise a catch-up effort by providing funding to generate new social economical and biological data related to sea angling on European level. These are vital for proper argumentation of the policy to be implemented
- While observing the European recreational fisheries social position, and the necessity for increased attention for our sector, the current ACFA (Advisory Committee on Fisheries and Aquaculture) set-up must create the possibility for recreational fisheries sector representation. A recreational fisheries working group on ACFA will provide a much needed and useful European platform for recreational fisheries and dependant business like tackle trade, boating and tourism.



Sportvisserij Nederland
www.sportvisserij nederland.nl
Leyenseweg 115
3721 BC Bilthoven
tel 0031(0)306058477
fax 0031(0)306039874

28 th December 2009