

ETF Position Paper

responding to the **Green Paper** issued by
the European Commission on **the Common
Fisheries Policy Reform** (COM(2009) 163 final)



EUROPEAN TRANSPORT
WORKERS' FEDERATION



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1. INTRODUCTION

Fisheries may seem a rather modest sector when compared to other economic activities and in terms of their relative weight in global employment. However, it is a sector confronted with both structural and circumstantial difficulties, though it plays a fundamental role in the economies of the coastal regions where are concentrated direct and related jobs that it creates, particularly in the catching, processing and marketing activities. Moreover, fisheries make a very positive contribution to the Europeans' food and health by supplying quality products guaranteeing thereby a healthy and well-balanced diet to their consumers. Yet this supply has to respond to an ever-growing demand, and depends increasingly on imports.

Against this background, ETF which represents employees of the catching sector urges that a consistent and long-term strategy be implemented to ensure the sector its economic, social and environmental sustainability. Conscious that sustainability targets are hard to achieve in spite of clearly stated goals in the 2002 reform, it is now more than ever essential to initiate a new reflection on the Common Fisheries Policy – CFP - future, if we are to respond to the challenges of the sector, such as conserving resources, safeguarding quality jobs and adequate pay levels, and promoting a better economic profitability. Already for some years now, ETF has firmly embarked upon the road of a sustainable development of fisheries, particularly within the framework of the TRUST¹ project which was implemented in 2007 and 2008. This is how should be interpreted the present contribution to the Green Paper, prepared by the ETF Fisheries Section, in order to try and reply to most of the questions raised by the Commission, and to express more general considerations in view of materializing the main strategic orientations defined by the ETF Fisheries Section.

It is now more than ever essential to initiate a new reflection on the Common Fisheries Policy – CFP - future

¹ TRUST is an acronym standing for Trade Union Vision on Sustainable Transport. This project was launched by ETF in October 2006 and terminated in March 2008. It was a project funded by the European Commission. More information on the project are available on the website: <http://www.itfglobal.org/etf/trust.cfm>

2. ANALYSIS OF, AND REPLIES TO, QUESTIONS RAISED BY THE GREEN PAPER

2.1. Response to the structural challenges for the CFP

2.1.1. Overcapacity: how to strike a proper balance between profitability and sustainable employment

ETF recognizes that overcapacity of the European fishing fleets continues to be one of the CFP's major problems. If past measures, as those provided in the 2002 reform and the multi-annual guidance programmes, have failed to significantly curb this strong trend, the very negative assessment made by the Commission should however be qualified. Indeed, progress has been made in certain Member States which have achieved the capacity reduction objectives. In addition, ETF does not share the Commission's vision of overcapacity. The concept should be altogether redefined with a view to adding to the fleet total tonnage and engine horsepower, the distinction between active capacity generating the fishing effort and passive capacity which has no impact on the effort², on the one hand, and the impact of the fishing gears or types of nets, on the other hand. This change could have a positive effect on both living conditions and safety on board.

Nevertheless, a renewed CFP cannot overlook the necessary implementation of new and more efficient programmes to adapt the fleets to available resources. Legislation seems to be the most appropriate way forward, but it is important to provide for binding management and control measures.

On the other hand, ETF wants to insist on the need to update the data available on the current status of the fleets in the Member States – as well as on the social conditions and employment situation in the sector –, taking into account the huge prevailing gaps between different geographical areas and breaking down such data according to the various fishing technical gears.

² To increase the tonnage of a ship does not mean necessarily increasing its fishing capacity. A tonnage increase should not be per se liable to penalties if there is no increase of the fishing capacity, just an improvement of the working and safety conditions.



As for the establishment of a one-off scrapping fund, ETF urges policy makers to take into account its social cost. Too often fishermen have been made redundant without any compensation or being offered alternative jobs. The one-off scrapping fund contemplated by the Commission should include the funding of social measures, training support schemes and/or subsidies to redeployment marine activities such as aquaculture, processing and preservation industries, or even the shipping industry.

The fund can in no way be set up without making sure that all provisions be previously in place to avoid that the support given be earmarked to adapt existing vessels, even build new ones that might further increase the capacity surplus. Moreover, it is essential that the fund does not only benefit to the owners of the vessels but also to fishermen whose jobs would be virtually jeopardized. It is of primary importance to make financial resources available to prevent, limit and/or compensate the negative impacts of lay-up and possibly scrapping schemes on employment.

With this caveat, ETF fully agrees with the need acknowledged in the Green Paper for the sector to ensure in the long run its own economic viability and to break away from its dependency on public subsidies which cannot be but targeted and selective with a view to resolving structural problems.

ETF wants to be cautious vis-à-vis the introduction of market instruments such as the ownership of transferable fishing rights (ITQs)³ to solve the overcapacity problem. ETF wants to warn against

³ ITQs : Individual Transferable Quotas

challenging too promptly the capacity management through a system of TACs and quotas. Whatever its defects, this system is not easy to replace. Alternatives which would give the preference to management systems based on a reduction of the fishing effort or ITQs should never be introduced without



carrying out previously a rigorous socioeconomic impact study which should unveil that the change of the system is sound and adequate, and is not to have any impact on employment and working conditions. Moreover, if the reduction is induced by a lower number of days at sea, ETF wants to recall that such a system shows unacceptable drawbacks since fishermen are subject to longer hours of work which may entail more fatigue and greater risks of labour accidents. Anyhow, the concerned Member States should decide on the most suitable management system.

Should a capacity management system be implemented on the basis of transferable fishing rights for specific fisheries, ETF urges the Commission to provide for all necessary safeguard measures and efficient protective clauses to avoid concentration of ownership in a handful of large

companies or investors to the detriment of coastal communities. The latter might then be forced out of the market. The impact on employment and land management would be highly negative.

According to ETF, the safeguard measures and protective clauses can be broken down as follows:

- ▶ To avoid any type of speculation and opportunistic attitudes of powerful and unscrupulous operators, the fishing rights should be granted for a precise period of time without being the object of speculative trading;
- ▶ The granting and management of such fishing rights should be supervised by the public authorities – national but even local authorities – and not left to the market forces; when a fishing company ceases its activities, the fishing rights should be given back to the public authorities which are competent to reassign them to a new operator;
- ▶ The operator who is granted fishing rights by another company could take advantage of such rights without increasing his staff; ETF could not accept such a situation and refuses that transferable rights be used to push a number of workers out of the productive circle; fisheries enterprises have to be seriously committed to the social and environmental sustainability of their activities and guarantee stable jobs in a given the fishing area; to this end, ETF asks that the transfers of rights be one of the issues dealt with by employers and trade unions as part of their social dialogue.

2.1.2. Focusing better the strategic objectives

ETF is opposed to a hierarchical ranking among the strategic dimensions of sustainable development. On the contrary, it defends a balanced approach that, over the long term, would give the same importance to the economic, social and environmental pillars. Fisheries do not follow the same economic productivity logic as most of the other sectors of activity, and it is not always easy to maximize the exploitation of this resource by minimizing operational costs, as catches are always random. Let us remind that the importance of fisheries in the regions concerned exceeds by far the contribution of this sector to the GDP. Fisheries should rather be seen as an activity that generates direct and indirect employment, which in turn guarantees a decent income for its workers, and strengthens the economic fabric of coastal communities in regions where job opportunities are often rare.

While the Commission seems to consider that ensuring the future of fisheries «is and should remain an important strategic objective of the European Union», ETF is surprised that the Green Paper, just as the reform of 2002, pays so little attention to the social dimension of the future CFP, both from the point of view of job protection and of working and safety conditions, and regrets that this dimension be not included in the strategic objectives identified by the Commission.

With regard to the management of stocks, their replenishment should be compatible with the maximum sustainable yield (MSY), as established at the 2002 World Summit on Sustainable Development. However, it is not advisable for ETF to develop the prevailing confusion in the public opinion between the concepts of “maximum yield” and “yield beyond the safety biological boundaries”. If some flexibility could be accepted on an ad-hoc basis for the resource exploitation beyond the maximum sustainable yield, should be strictly prohibited any form of exploitation beyond the safety biological boundaries. In addition, a continued improvement of the resources and its stabilization at sustainable levels of exploitation should go hand in hand with socio-economic impact assessments to prevent possible social consequences of restructuring measures. ETF insists on the need to actively involve the social partners in these studies, particularly in the preparation of their specifications, in the consultations with stakeholders, and in the drafting of their conclusions. This will allow gaining a global vision of the economic, social and environmental issues at stake, and if necessary, obtaining the financial support that is required to protect jobs and companies, as well as to fund vocational training. Indeed, according to ETF, to preserve jobs, there has to exist the political will to grant a selective financial support in order to guarantee a decent income for fishermen, especially during stock recovery periods.

Concerning indicators, yardsticks and objectives for the implementation of the policy, ETF considers that they should be formalized on the basis of scientific advice, experts’ assessments which have to be updated regularly in close cooperation with the sector’s stakeholders, including the employed fishermen.

2.1.3. Refocusing the decision-making framework

ETF fully agrees with the idea of revising the decision-making process in order to make policies more understandable, effective, and less costly. For instance, the existing system, where total allowable catches (TACs) are decided at the highest political level, has proven inappropriate. A distinction should be made between, on the one hand, the fundamental principles, which would be decided by the Council, together with the European Parliament following the Lisbon Treaty ratification, and on the other hand, the implementation of these principles which should be entrusted to the Member States, the Commission and the stakeholders. ETF wishes to highlight in this context that the consequences of generalizing the co-decision procedure, which will be inferred by the entry into force of the Lisbon Treaty, should be evaluated.

Priority should be given to an effective and fast decision-making process that goes beyond short-term national interests and political pressure. Moreover, an increased decentralization of the power to devolve the decisions on technical matters (micro-management) to local and regional authorities seems to be the right way to go.

Aware that shared stocks and ecosystems cover extensive areas, ETF welcomes the idea of the Member States being made responsible for managing the CFP main principles and standards through a close cooperation within the bounds of marine regions.

Finally, ETF points out that the decision-making process should take full advantage of the opinions prepared by advisory bodies such as the Advisory Committee for Fisheries and Aquaculture (ACFA), that deals with cross-cutting issues, on the one hand, and the Regional Advisory Councils (RACs), that are more focused on questions of conservation and management of resources on a regional basis, on the other hand. In this respect, ETF reaffirms that it is of great importance that trade unions be participating in these regional bodies and it calls upon the Commission to make available all necessary means, even material, to fulfil this objective (ETF representatives should attend the RACs Executive Committees' meetings and General Assemblies, and their attendance cost should be refunded). Indeed, ETF considers that the participation of workers' representatives in these bodies is essential and should be encouraged. And, the work and opinions of the Sectoral Social Dialogue Committee for Sea fisheries – of which *Europêche-Cogeca* and ETF are members – should be given more serious consideration.

2.1.4. Encouraging the industry to take more responsibility

ETF welcomes that the industry be encouraged to take more responsibility for implementing the CFP. There are many positive examples of fishermen who take good care of the resource management.

Against this background, the use of individual or collective fishing rights, depending on the local context, could be examined for some specific fisheries. However, ETF reminds again that these rights should not be of a permanent nature and owned by private operators. Indeed, fishing companies or economic interest groups should not be allowed to take over natural resources whose management should remain in the public domain.

ETF underlines that every management system must be based on an assessment of available resources, made on the basis of reliable and updated scientific advices, and must be subject to annual and multi-annual plans. Quotas or fishing rights should therefore be managed by a public authority, i.e. competent authorities in the Member States, which would be made responsible for managing unexploited fishing opportunities, notably in case of termination of activity.

Besides, ETF is of the opinion that the current cooperation of the sector in the resource management could be strengthened, notably through the introduction of inspectors on board, through the use of appropriate technological means and the adaptation of electronic logbooks that would enable to collect data for scientific purposes.

Moreover, more value, notably through the grant of financial support, should be given to all environmental protection initiatives in which fishermen are sometimes quite actively involved, and which contribute to strengthening their sense of responsibility for environmental issues.



ETF considers that this enhanced accountability of the sector should also be based on a stronger position of the producers on the market, by grouping supply within Producers' Organizations (POs) or other forms of association, so as to decentralize management and connect it closely to local issues, such as the organization of fishing activities, or imposing sanctions when catch plans are not complied with. ETF thinks that such groupings would make it possible to reform the market in a way that would increase the value of fish products to the benefit of the catching sector.

On the other hand, the possibility of making this sector pay for using a natural resource, as implied in the Green Paper, is extremely worrying for ETF. According to our Federation, it would be outrageously unfair to charge fishing rights from a sector that belongs to a primary economy already in crisis, submitted to high operational costs and severely fluctuating circumstances (ups and downs of the fuel price). Though



they would appear very necessary, investments are too often to be given up by the sector which has great difficulties in obtaining loans from the financial markets.

2.1.5 Developing a culture of compliance

ETF is of the opinion that the data collection systems used to implement the regulations should be developed further and receive financial support. The catching sector could play a primary role in this mechanism, as explained in Paragraph 3.1.4.

In order to be efficient, the implementation of control mechanisms should be shared among the Member States and the Commission, and involve stakeholders as much as possible. ETF moreover in favour of establishing a scheme that would link the respect of measures to the possibility to access Community funds, and welcomes therefore the new control regulation.

2.2. Further improving the management of EU fisheries

ETF takes note of the suggestions put forward in the Green Paper for improving fisheries management in the EU, and wishes to make the following general comments.

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

Small coastal fleets generate many direct and indirect jobs, and actively contribute to more dynamic socio-economic structures in the coastal communities that are part of the European cultural heritage. Consequently, ETF is in favour of a differentiated treatment for this kind of fisheries in a way to guarantee exclusive fishing possibilities, and based on social objectives which should however not be excluded from resource management measures. But ETF would like to point out that first and foremost an agreement should be reached on the criteria (size, time spent at sea, distance from the coast, number of people working onboard, type of fishing activity, etc.) to be taken into account in a definition of this kind of fisheries, which vary considerably within the EU. ETF wishes that such definition be drawn up at national or even local level, but disagrees with an EU-wide definition and this in order to take into account the very broad diversity of national and regional situations. ETF suggests, also, that an economic study of the coastal fleets be conducted to define the quotas that are necessary to maintain the activity and the jobs, while taking into account the pressures exercised upon the resource.

2.2.2. Making the most of our fisheries

In order to make the best possible use of the resource, ETF – as well as the Commission – suggests that, by 2015, resource management be compatible with the objective of the MSY, which beyond this date should continue to be the reference for maximum exploitation level. However, ETF does not see any alternative to a management system based on TACs and quotas, but would like it to become a multi-annual tool. Regarding mixed fisheries, they should receive special support through pilot actions, so as to eliminate discards. In this sense, ETF expresses its support to a progressive but maximum reduction of all discard practices with a view to achieving their total ban.

2.2.3. Relative stability and access to coastal fisheries

Regarding relative stability, ETF wants to distance itself from the Green Paper that describes this system as ineffective and inflexible. On the contrary, ETF considers that it should remain as one of the corner-

stones of the CFP, and that any possible modification to the system should necessarily be negotiated among the Member States. Moreover, ETF does not see any valid reason to question the twelve-nautical-mile rule to define exclusive coastal fishing rights.

2.2.4. Necessary improvement of the market and of trade practices

As set forth in the Green Paper, fisheries and aquaculture only receive a small part of the price paid by the consumers to retailers. The current market organization is not satisfactory, and consequently the profitability of the sector is very low, which is compounded



by exogenous shocks such as the steep rise in gasoil prices. ETF would like this situation to be corrected, as the sales sector has exploded into an excessive number of operators on the one hand, and a heavy concentration of buying syndicates that fix and impose prices on the producers, on the other hand. ETF thinks that it is urgent to revise the market organisation by encouraging cooperation and consolidation of producers' organizations, for instance at the national level. To the above described dysfunctional situation, one should add a lack of political will to increase transparency and traceability in the trade of sea products. ETF hopes for the establishment of a traceability system "from sea to plate" that would make indications such as origin and date of catch of the product mandatory. Finally, ETF notes that although the control of sea products landed in EU ports may seem satisfactory, this is not the case

for frozen products and for imports by land. Hence, it would be desirable to tighten these controls by means of some EC actions community to this effect.

2.2.5. Integrating the Common Fisheries Policy in the broader maritime policy context

Integrating the CFP in the Integrated Maritime Policy (IMP) is fundamental, as numerous other human activities have an impact on, and interact with fisheries. ETF regrets that to this day this integration has not become a reality, as it had been promised in the action plan for an integrated maritime policy. The exploitation of the sea grounds, the creation of offshore windmill parks, the construction of major public

works (like bridges) in marine areas traditionally dedicated to fisheries, the degradation of the marine environment by land-based polluting industries, are but some of the numerous examples of competing uses of marine areas and of the resulting contamination. ETF suggests acknowledging the legal right of the fish-catching sector to be consulted in the planning of marine areas, and providing in the future CFP for compensation mechanisms for fisheries and fishermen who may lose fishing opportunities. In addition, ETF considers that integrating the CFP in the IMP means more than being concerned with environmental impacts; indeed, a real social dimension should be included. A renewed CFP implies that the repercussions of competing activities exploiting all the same marine environment on the catching sector's employment be anticipated. Competition amongst different sector would in fact ineluctably result in the sacrifice of an ever higher number of jobs in fisheries. A proactive promotion of vocational training, even the implementation of integrated training curricula, and a more holistic knowledge of the marine environment should be achieved with a view to fostering the creation of sustainable jobs and the occupational re-conversion in maritime clusters.

2.2.6. The knowledge as a base for the policy

Knowledge should continue to support the CFP. To this effect, more financial resources should be dedicated to research – at present, they are far from sufficient – to develop and improve our knowledge of the stocks (only 30% of them are known) and of marine biology. ETF considers that the value of fishermen's knowledge of their environment is not sufficiently enhanced, and that the scientific community should co-operate more with them, for instance through an institutionalized dialogue and a more systematic use of sampling programmes (including self-sampling) for data collection on board of fishing vessels, but on the basis of a scientific protocol.

2.2.7. Structural policy and public financial support

As far as financial support is concerned, ETF notes that the objectives of the CFP have not been achieved, because certain segments of the sector still depend too much on public financial support. The goal of economic sustainability should be pursued, provided the market organization is revised in depth. ETF points out that, for the time being, the efforts should be aimed at reducing fleet capacities, at changing fishing methods, and at developing energy-saving fisheries. Moreover, ETF favours linking firmly the granting of EC funding to the achievement of strategic objectives by the Member States. However, ETF also wants to insist on the need to dedicate public aid as a matter of priority to the socio-economic consequences of the restructuring processes. It would be opportune to introduce within the eligibility requirements to be granted public funding the compliance with social standards and the signing of

collective agreements which would be the proof of an effective social dialogue practice between workers' and employers' organizations.

2.2.8. Towards a responsible international dimension of the CFP

A renovated CFP should promote responsible and sustainable fishing, including in areas beyond EU waters, as well as better global governance of fisheries. Through its active participation in the decisions made in international agencies (UN, FAO) and Regional Fisheries Management Organizations (RFMOs), the EU has an important role to play in this field, such as promoting more effective control of operations in the high seas and fighting against illegal, unreported and unregulated fishing (IUU), as well as participating in the development of an effective eco-systemic approach extended to all seas of the planet.

ETF notes that with the 2002 reform, the spirit instilled in the fisheries partnership agreements (FPAs), has contributed to achieve the above mentioned objectives but the balance drawn by ETF is all the same disappointing. The Commission should be encouraged to carry out an in-depth evaluation and case-by-case study of these agreements prior to reviewing the CFP external dimension to which ETF is largely favourable. The part of the study dedicated to social issues should be drawn up in cooperation with the European social partners who should already been involved in the drafting of its terms of reference. Issues to be studied would be how financial resources are spent to strengthen the social partners' action ("capacity building"), to enhance the working conditions of employed fishermen – be they EU or third-countries' nationals -, as well as the living and working conditions prevailing in third countries signatories of agreements.

Insofar as the future CFP wants to strengthen its partnership policy with some third countries, ETF wishes that the financial aid and technical assistance granted in exchange for fishing opportunities contribute to reinforce the capacity of the partner countries to develop a sustainable fishing policy while tightening the monitoring and control of the fishing effort in the concerned regions' waters. If no significant progress is achieved, ETF would rightly challenge the advisability to maintain the FPAs which in their current form allow EU private operators to continue their fishing activities without giving any compensation to the society as a whole. FPAs contribute undoubtedly to create EU and non-EU jobs and to respond to an increasing demand of sea products on the European market. But these economic aspects should not shy away the environmental and social duties inherent in the external policy. ETF asks the Commission to engineer a new architecture so that FPAs be in a position to guarantee a proper use of the European tax-payers' money through an effective control of the fisheries sustainability goals in the partner countries' waters. This new architecture must establish a shared liability of the partner countries' authorities for the proper use of the funds made available.

In addition, exploitation of resources by EU vessels must also be governed in the future by the principle of the maximum sustainable yields in order to avoid that be endangered the future of stocks and of local coastal communities living also on these resources.

ETF observes that these FPAs have developed in a context which is far different from the current one, where the majority of the crews on board of the EU ships that had access to partner countries' waters were composed of workers from the EU. The current situation has changed considerably with the growing use of third countries' labour whose pay and working conditions are often of a lower standard.

In this context, ETF demands more emphatically than ever that the CFP external policy be endowed with a real social dimension which would pursue the long-term objective of non-discrimination between EU and non-EU or third-country workers with regards to both working conditions and remuneration, and access to training. For ETF, it is likewise important that the recruitment of non-EU fishermen be covered by social dialogue to guarantee fair living and working conditions to the crews of EU vessels fishing in the waters of partner countries. ETF and its global umbrella organization ITF, would really wish to be involved in future negotiations between EU employers and third-country employees with a view to developing collective agreements defining decent social standards as they are already in place in the merchant navy at international level. This demand is all the more urgent as no minimum wage for employed fishermen has been established in the framework of the International Labour Organization. Furthermore, ETF proposes that unions of the flag country be also involved

in the collective bargaining process in order to reinforce the social dialogue culture in countries which have not or inadequately developed these practices. To establish and strengthen the social dialogue in the partner country's sector should be one of the development objectives to be supported by FPAs.

ETF reiterates its call for the EU fishing fleets to respect local communities and the rights of local workers. The social clause negotiated by the European social partners and included in the FPAs constitutes a progress towards the recognition of these rights and of the true value of work, but its effectiveness remains to be seen. This is why ETF would like a better and stronger definition of the legal value of this clause. Respect for the rights of workers might even become a prerequisite for granting fishing rights in



the waters of the third countries concerned. Until the social clause is reinforced, the Commission should without further delay coordinate its endeavours with international bodies, more precisely with the ILO, with a view to improving the respect of the fundamental rights of third countries' workers.

2.2.9. Developing a sustainable aquaculture

ETF considers that aquaculture should be fully integrated as a pillar into the revised CFP, so as to overcome its stagnation at European level, and to become economically viable, generate quality jobs, and comply with marine environment protection regulations. Great attention should also be paid to the quality of its production, which should be submitted to market surveillance rules. Indeed, all risks of overproduction should be avoided, as this would upset the market equilibrium of sea fishing products.

3. THE RENOVATION OF THE CFP CANNOT OVERLOOK THE ADOPTION OF A TRUE SOCIAL DIMENSION

While recognizing that social measures to accompany the implementation of the CFP are defined at national level, an ambitious reform of the CFP must however foresee an EU framework to respond to the socio-economic crisis challenges both of a structural and cyclical nature, with which the industry is confronted. For ETF, the reform promoted by the Commission is a unique opportunity to enrich the CFP with a real social dimension.

ETF greatly regrets that, in general, the Green Paper does not sufficiently take into account the social aspects of the CFP. The Commission hardly makes direct reference to, or altogether omits, subjects like training and professional qualifications, recruitment, improving working conditions, promoting a culture of safety, remuneration levels, and others.

ETF draws the attention to and regrets this absence of a social dimension which in turn entails the absence of a proper unit responsible for social issues within the DG MARE. Therefore ETF urges the Commission to take all steps needed to modify the organization of its services, to set up an administrative unit responsible for social matters related to the CFP, which ought to develop a fruitful cooperation with other units and directorates general, such as DG EMPL. The idea of creating a Task Force involving different DGs concerned by the CFP reform should also be further explored by the Commission.

The Commission limits itself to expressing its deep conviction that the decline in employment, particularly in the fish-catching sector, seems to be unavoidable. Let us recall that the number of jobs in this sector has dropped by 30% in the last ten years. Any loss of jobs in this sector has necessarily a negative impact on land-based employment (processing sectors and both upstream and downstream activities), which is certainly worrisome from a social point of view.

The situation of employment and working conditions in the fisheries sector is far from good, and the European decision-makers should give this some very serious thought. The ageing of the fleet, the



high rate of labour accidents at work, the low pay levels, the lack of investment in vocational training contribute to make this sector less attractive, especially to younger Europeans.

A reformed CFP worthy of its name should develop a coherent long-term strategy to ensure the social sustainability of the sector and an adequate inclusion of the human element. Consequently, ETF would like a horizontal, cross-cutting integration of social matters in all aspects of the CFP and an enhancement of the social dimension which is as fundamental as the economic and environmental dimensions. ETF is extremely worried by the still prevailing precarious and deplorable living and working conditions on certain EU fishing vessels active in EU waters. ETF – with the support of its international organization, ITF, which has a broad network of inspectors throughout the world and, more particularly, in Europe - has measured how distressful is the social situation of employees in the sector and it will no longer tolerate such a disgraceful treatment. Numerous cases of illegal work, without any social security or labour contract, without any respect of the workers' fundamental rights were observed. ETF and ITF (with their inspectors) are willing to support the work that the Commission is intentioned to do to put an end to these unacceptable practices.

ETF would like to bring up in the following part questions such as training, qualifications, safety and working conditions as points to reflect upon, in order to respond to the social challenges that await the sector.

3.1. Promotion of training, recognition of qualifications and professional redeployment

Even though each Member State has its own training system and exclusive competence for education and vocational training, ETF would advise that the possible added value of harmonizing training criteria be evaluated. Thus, the Commission could reflect on the implementation of a common base for qualifications and diplomas in which social partners ought to be involved. The scheme should be based on the highest possible standards in view of possibly increasing worker mobility in the sector, solve the shortage of workforce that affects in certain specific segments of fisheries, and at the same time, strengthen prevention of accident risks. Such harmonization would only be meaningful if it contributes to upgrade the vocational training level. Every national system which would provide for higher training standards as part of this harmonization ought to be safeguarded.

Furthermore, ETF wishes that the Commission be supportive of the inclusion by the Member States of learning modules on marine biology and ecosystems in training curricula for fishermen.

To remedy the declining attractiveness of fishermen, vocational training has an important role to play. Ongoing initiatives in Europe seem limited and fragmented (inadequacy of financial resources is the main reason) and tend to be disconnected from other vocational training sectors. Therefore the Committee wishes that vocational training courses for the industry be better integrated into training schemes for other related occupations.

Furthermore, the sector has developed strategies to solve the problem. However to be effective long-term strategies should be designed which would lay special emphasis on measures aimed at upgrading the workplace conditions, the fishing fleet modernization, the integration of fisheries training into training schemes for maritime clusters in order to maintain the link between our sector's workers and a broader marine environment, avoiding thereby to lose acquired skills.

3.2. Promotion of a culture for safety-at-sea

Fishing is among the most dangerous professional activities in the world. Moreover, attention has been drawn to the obsolete nature of the EC fleets, as a result of the incentives to scrap fishing vessels and the existence of strict rules for the construction of new ones. The old age of the fleet inevitably leads to a

higher risk of accidents. In view of this, ETF thinks that it is urgent to implement measures to improve safety conditions, as announced in the action plan of the Commission for an Integrated Maritime Policy,



although this has not been put into practice until now. Legislation on health and safety should also be improved at both national and EU level and be supported by inbuilt effective field enforcement mechanisms.

In order to develop a true culture of risk prevention, ETF also proposes to collect harmonized statistical data on accidents, which is currently lacking at EC level. This data base would lend support to an appropriate regulatory instrument, particularly for small vessels of less than 15 meters, not covered by international or European regulations, in spite of constituting the bulk of the EC fleet. And, finally, ETF asks for a revision and updating of health and safety rules, and a stricter control of their implementation.

Furthermore, ETF regrets that the Member States be not more emphatically encouraged to ratify the International Convention on Standards of Training, Certification and Watch-keeping for

Fishing Vessel P (STCW-F) personnel and the Protocol to the Torremolinos Convention for the safety of fishing vessels. Again, ETF would prompt EU policy-makers to clear this hurdle which hinders more smaller-scale fleets, i.e. most EU fishing vessels.

ETF is therefore convinced that health and safety improvements on fishing vessels will require significant investments in the fishermen's training, and the allocation of financial resources to the implementation of an efficient enforcement and penalty system.

3.3. Improving working conditions and giving a new impulse to the social dialogue in the sector

Improving living and working conditions in fisheries presupposes to enhance the social dialogue in the sector. The ETF wishes that the future CFP be an incentive to promote the creation by the Member States of the necessary conditions for a proper social dialogue. The aim is to enable the social partners, both at national and at local level, to get involved in collective bargaining processes with a view to cope jointly with issues related to wages and the granting of fishing rights (see paragraph 2.1.1.) or the management and distribution of structural funds.

Regarding working conditions, and in addition to the questions of excessive working hours and safety hazard, the conditions of remuneration pose a considerable challenge to the attractiveness of the profession. ETF knows that this is not within the remit of the EU. However the EU cannot disregard this problem in the light of its objectives to create more and better jobs. The EU cannot ignore the core problem of the lack of attractiveness of the catching sector.

The share system that prevails in certain Member States has shown its worth and is deeply rooted in the culture of fishing communities. This system consists in deducting the joint cost from the proceeds of the sales of fish, and share the balance among the owners of the vessel and the crew, according to a previously established apportionment. Because of its nature – direct sharing of operating profit – this kind of remuneration does not guarantee a secured pay level and regular income considering the unpredictability of sea fishing. This is the reason why compensatory mechanisms should be added to this share system, in order to achieve a right balance when catches are inadequate to ensure regular and decent income to fishermen. Systems of this kind are already in place in some countries. Protection facilities for employees who are not always in a position to judge the actual value of the fish caught should be introduced via the collective bargaining processes. In addition, in some countries, fishermen are considered to be self-employed since a part of their wages is variable and consequently, they are not covered by the social security schemes. Against this background, ETF asks the Commission to take full advantage of the future CFP revision to adopt measures that would set the basis of a real EU framework on fishermen's entitlement to a decent and regular pay, and to an effective social security coverage, so as to leave no worker unprotected. Lastly, ought to be highlighted the need to promote the national social dialogue, more particularly in countries where it is faltering so that social partners would feel encouraged to collectively bargain satisfactory working and pay conditions (including working time) for EU crews and third-countries' workers who are too often victims of unacceptable discriminatory treatments.

4. AFTER THE GREEN PAPER

ETF does not support the productivity dogma, the economic hyper-profitability eagerness and the very intense competitiveness that the Commission wants to promote in the European fisheries sector. On the contrary, ETF is of the opinion that the future CFP should foster fisheries which ensure a decent living standard to the largest number of workers instead of concentrating the activities in the hands of a few powerful operators, owners of large fishing companies, to the detriment of more human fisheries supplying more jobs.

Besides the questions raised by the Green Paper, ETF will continue to take a stand and to contribute to the discussion on the other main issues of the CFP, particularly the control policy, the fight against IUU and discards, and the future revision of the common market organization.

Through its position on behalf of employed fishermen, ETF aims at participating very actively in the public debate launched by the Green Paper on the reform of the CFP. ETF represents the legitimate voice of those who work on board fishing vessels day after day and who want to say loud and clear that the reformed CFP that is being formulated should not lack a true social dimension. In view of this, the Commission is urged to reflect upon the attention that it will have to pay to the different contributions received from multiple stakeholders, who each represent their own interests. Obviously, a distinction should be made between private interests and more holistic approaches that respect the public interest.

Finally, ETF wishes to express its willingness to be actively involved in the preparation of the impact assessment that will be conducted by the Commission in follow-up to the Green Paper consultation, which will lend support to its proposal for a new basic regulation of the CFP.

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