

## Common Fisheries Policy Green Paper – COSLA interim Response

### Introduction

The Convention of Scottish Local Authorities (COSLA) is the representative voice of all 32 Scottish Local Authorities both nationally and internationally. On 22 April 2009, the European Commission published a Green Paper on the future of the EU's Common Fisheries Policy (CFP). The Paper looks at the current problems and challenges of the Policy and launches a broad public debate and consultation on how these shortcomings should be tackled. All interested stakeholders (fishermen, fish processors, retailers, environmentalists, consumers, taxpayers, citizens) have until 31 December 2009 to respond to the Commission's consultation which will be the first step of the process to fundamentally reform the CFP.

As regards to COSLA Leaders agreed in February 2009 that the CFP should become a higher priority within COSLA's EU Priorities. With the wide range expertise already available amongst the relevant Scottish stakeholders however, and certainly so among Scottish MEPs, COSLA's involvement in this area has mainly concentrated on those areas where COSLA has specific experience and know how; **notably the impact of CFP reform in the sustainability and economic regeneration prospects of Scotland's coastal communities.**

**Below is an interim response, as COSLA Regeneration and Sustainability Executive Group agreed that a number of additions to enrich this text would be sent at a later date.**

### **Detailed COSLA Response to questions in the Green Paper most relevant to Scottish LAs:**

#### ***1. (4.2) 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 (Integrated Maritime Policy) and other EU policies?***

- COSLA believes that as regards to the interests of Scottish Councils, the future CFP should ensure that the economic sustainability of coastal communities must be one of the main focal points of the reform. The bottom-line is that coastal communities should not be worse off in financial terms and that access to funding should be possible in a simple and direct way.
- COSLA believes that the new CFP needs to be made more effective, simpler and closer to the people who are directly affected. There needs to be a deeper 'regional dimension' based on clear principles and lines of accountability agreed EU-wide but with the regional and local level given further responsibility than is currently the case.
- The local level thus needs to be given more responsibility which will assist in contributing to building confidence in those affected coastal communities.

- Additionally, the knock on effects of reducing the commercial fishing fleet needs to be looked at very carefully as commercial fishermen are supported by a significant number of downstream jobs. Approximately two thirds of fishing-related employees work in the downstream selling and processing sectors, while the remaining third work in the upstream sectors such as engineering and chandlery.

**2. *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?***

- COSLA would advocate an outcome based approach at the local level so as each local authority and their partners can adapt their indicators and targets policy according to their specific local needs, priorities and circumstances.
- COSLA believes that a Multi Level Governance approach could be most appropriate way of implementing an outcome-based policy to achieving targets where the EU would set high-level objective with longer term targets which would then give room for flexibility at the local level, which can be very diverse between the different Member States.
- Any form of EU intervention should provide real added value over national or subnational support schemes such as the importance of providing incentives, innovative ideas etc. as well as stricter penalties for those who have failed to stick within the set framework.

**3. (5.1) *How can overall fleet capacity be adapted while addressing the social concerns faced by coastal communities taking into account the particular situation of small- and medium-sized enterprises in this sector?***

- COSLA would support moves towards a differentiated management-regime of CFP across Member States if such approach could protect small-scales inshore fleets from market forces and allow their coastal communities to focus on social and economical objectives.
- Variability is manifest in respect of the issue of overcapacity. This is a key structural problem in the current operation of CFP. Overcapacity needs to be dealt with equitably on a case by case basis.

**4. (5.1) *How should small-scale fisheries be defined in terms of their links to coastal communities?***

- Fishing methods, fleet structures, and economic and social drivers vary enormously across regions and Member States. A reformed policy must take account of this variability.
- A set definition of what constitutes coastal/inshore fisheries is needed as these will vary from Member State is needed to be set at regional level and agreed upon at European level, but this should only happen by previously involving a bottom up consultation as to allow each country's coastal communities to argue its case up.
- We agree that the future survival of Scottish coastal communities will be dependent on diversification and establishing a sustainable economic base that provides wide range opportunities that will anchor the talents of future generations rather than forcing them to migrate to larger towns and cities in search of a better quality of life.

- Diversification also needs to be seen within the context of the importance of the fishing industry. For example, harbours tend to be used by a range of industries and if one industry, such as fishing, pulls out it can affect the viability of the harbour and therefore adversely affect the other local industries.
- A future CFP must primarily ensure the sustainability of coastal communities that are dependent on fisheries. Many coastal communities are dependent on fisheries, having built up the supporting infrastructure for the industry and in many such areas there are very few opportunities for economic diversification. Therefore the reform of CFP should not use the promise of creating alternative jobs in communities which have no or very limited other employment, without ensuring that there is a genuine and realistic case in these areas for non-fishing sector related sources of employment.
- Indeed, the relationship between small-scale fisheries and coastal communities needs to be seen in the wider context of Territorial Cohesion where all communities across the EU, particularly those which have specific structural handicaps are supported. This implies addressing economic regeneration, sustainable development and accessibility in addition to the fishing activity.

**5. (5.1) What level of guidance and level-playing field would be required at EU level (regarding a differentiated fishing regime)?**

- COSLA would like to see the Commission provide a minimum set of clear overarching guidelines with long-term strategic outcomes and targets set at EU level. These guidelines however should leave enough flexibility for the national level and sub-national level to deliver locally/regional appropriate management measures as the regional and local level is the most appropriate to identify the social and economic requirements and targets for their fishing fleet and coastal communities. This could, for example, be done at the local level in Scotland through the work of the Inshore Fisheries Group.
- In this respect local partnerships are essential to ensure that the specific assets and drawbacks of a given coastal community are properly addressed. Similarly, we would advocate Multi Level Governance mechanism (engaging EU, national and local levels) such as the Single Outcome Agreements that already exist in Scotland between the national and local level. Such approaches would identify respective responsibilities and actions that need to be taken to achieve a given goal (for instance, ensuring recovery of a local fishing resource). This should provide a degree of flexibility for each side on how to achieve the common goal while ensuring mutual accountability if the outcome has not been met.

**6. (5.7) What should be the top priorities for future public financial support and why? What changes can the sector not manage to bring about on its own and therefore require public financial support?**

- COSLA would welcome, at the very least, a 'one stop shop' that would ensure that local authorities' external funding managers had a user friendly access to EU funding sources as to ensure that they would fully benefit from them. Clearly there is great scope for coordination, cross referencing alignment of eligibility cost, consolidation and potentially merging the wide diversity of EU funds with a Territorial impact as well as aligning with the domestic funding sources. While recognising the technical difficulties of having single fund, achieving that from the point of view of the end user (for instance ensuring that application

methods, eligibility rules, accounting audit and report standards are similar for all different EU funds) should be clearly attainable. This is an issue that we and many of our European counterparts would like to be clearly addressed in the context of the EU Budget Review.

- COSLA also strongly believes that although there is scope for greater coordination and consolidation of EU funds with a territorial dimension, it is important that care is taken to ensure that at least the same level of funding remains for fishing. The fishing industry should not lose-out as a result of this process.
- As already indicated by the Commission earlier this year at a meeting with Commissioner Joe Borg attended by COSLA Vice President Cormack McChord, COSLA would welcome the creation of a Coastal Fund to support the economic and social development of peripheral heavily dependent fishing communities. COSLA are quite open to considerations whether the EFF should remain or not and be aimed mostly at the fishing industry or its policy objectives should be shared between the industry and local economic development needs.
- COSLA would also underline that it would make sense for there to be a degree of flexibility here to account for different circumstances in different parts of Scotland. There will be areas where support would be necessary essentially in local economic development and other areas where the support for fishing related activities would be more predominant.
- Irrespective of potential EU support for the industry COSLA believes that it is crucial that a critical mass of funds are available post 2013 for Scottish coastal communities on economic development hopefully with as much as simplification of funding streams as possible in technical and political terms.

**7. (5.7) *How can we change the focus of EU financial resources to promote innovation and adaptation to new policies and circumstances? Does any new policy area require funding? Should public financial support be focused on specific transitions?***

- Coastal regions have great potential to become centres of excellence for renewable energy, sustainable tourism and creative industries, given their natural assets. However, coastal areas are often peripheral and require the development of infrastructure to link them to the core EU single market.
- COSLA believes that local partnerships are the key tool to maximise local input, partnership and delivery in the structure and management of EU Funds and that it is essential that the partnership principle at the local level should be fully implemented to ensure that spending of the funds are fully effective. We always strongly advocate the need for local partnership structures and “*place based approaches*” as the crucial way to ensure that EU funding reaches the ground benefiting local communities.
- Indeed Scotland is quite advanced in the development of partnership structures, as shown below. Therefore the challenge would be to integrate work and find synergies among the below structures:
  - A good example of these structures is the Local Coastal Partnerships that exists within the wider context of the Maritime Policy and that have been highlighted at EU level as a good example of local engagement. For Local Coastal Partnerships to play a full role in CFP they should ensure that local fishing interests are clearly represented in them.

- Existing LEADER Local Area Groups (LAGs) are also excellent examples of bottom-up community-led means of delivering funds and could be very effective in regenerating coastal communities and helping them to develop their local areas. Indeed we understand that this approach is soon to be piloted in Scotland through Axis 4 of the EFF and could potentially provide a model for a marine and coastal fund. Moreover, linking LAGs and Inshore Fisheries Groups could be best placed to maximise local input and effective local spending.
- The Marine Planning Partnerships that will be responsible for regional marine planning under the Marine (Scotland) Bill should have an input as well. For targeting measures, however, these should come from the fishermen themselves.
- Finally, Inshore Fisheries Groups should be also involved as they have the potential to improve the economic and environmental sustainability of the fishing industry by including the fishermen's interests.

***8. How can we reinforce the synergies between the different forms of support and the different partners in the fisheries sector and the development strategies of coastal states?***

- COSLA would welcome the creation of a Coastal Fund-type of instrument that would specifically be addressed to support the economic, social and sustainable development of coastal communities which are heavily dependent on the fishing industry. This is crucial in the context of Cohesion Policy post 2013. A marine and coastal fund could add value to the CFP through focusing on coastal communities and territories rather than a specific sector. By focusing more directly on the needs of coastal towns and maritime industries, a marine and coastal fund could address gaps in the provision of support for regional development in the Structural Funds which are becoming more and more restrictive in what they can support in Competitiveness Regions.
- From an economic point of view, financial support to diversify the economy will be an important feature of enhancing the economy of coastal communities and this could be a feature of the Coastal Fund as it is important that communities are not solely reliant on one sector.
- Support for issues of environmental sustainability should also be integral to the Coastal Fund given the extreme fragility of many of our coastal communities to the affects of Climate Change.
- Coastal areas are likely to face a number of challenges from Climate Change and there is a need to prioritise adaptation measures. Fisheries aquaculture, ecosystems, biodiversity and coastal erosion and subsequent flooding should be priority areas for intervention. In this context, there is a need for an EU adaptation strategy which is cross-cutting and, as suggested by the 2009 White Paper on Adapting to Climate Change, takes a strategic approach ensuring coherency across different sectors and levels of government.
- As highlighted above we also believe that a critical mass of funds should be made available post-2013 for coastal communities for economic development with as much simplification of funding streams as possible. This does not prevent that a given strand of the fund or a separate funding instrument addressed the specific issues of the fishing industry.
- We believe that devolved management is the most effective way to support the different partners in the fisheries sector and the development strategies of coastal states. A Regional Based Management-type structure could be a good way forward to achieve this

with overarching guidelines with long-term strategic outcomes and targets being set at EU level but full control of the decision-making and implementation process being taken at the Member state and sub-state level.

- Scotland's current pilot scheme of Inshore Fisheries Groups (IFGs) which develop local fisheries management plans and are made up of the relevant stake holders is a good example of local management protecting both small scale-scale fleets and their coastal communities. We believe that, although only having recently been set up in Scotland, this regional framework model has the potential to be used in other Member States.
- In this framework, COSLA would also like to underline that local communities are not just consulted but actually participate in the management of their local fishing resources.
- It is through sensitive inshore management regimes, which give preference to local, small scale fishing interests and which encourage collective community management schemes, including community quotas, that the social objectives of fisheries policies are best assured. In Scotland, the establishment of Inshore Fisheries Groups provides a real prospect of this being realised.
- Finally we would like to see more assistance and access to accreditation schemes and marketing advice for small scale local fisheries.

***9. 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?***

- COSLA believes that aquaculture could provide new opportunities for those coastal communities that lie in close proximity of suitable waters.
- However, we note the claims that the development of aquaculture can have negative consequences to the traditional catching sector. CFP reform should consider how to avoid conflict between aquaculture development and commercial fishing. This issue should be addressed using clear scientific evidence. If that issue is addressed (as well as that of sustainability, environmental and planning issues that the establishment such plants entail) we agree with other stakeholders that aquaculture could become a fundamental pillar of the future CFP. The sustainability of catching fish oil, which is then used to produce aquaculture feed also needs to be addressed.
- In any case we strongly believe that any such development of aquaculture within the CFP needs to be undertaken from a bottom up perspective that takes into account the diversity of situations across the EU and that puts the economic viability of coastal communities as the starting point of any such consideration.