

Response to the Green Paper on the Common Fisheries Policy

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INTRODUCTION

EuroCommerce welcomes the opportunity to comment on the DG Mare's Consultative document on the future of Europe's Common Fisheries Policy (CFP).

Global management of the oceans should involve all relevant users of marine resources in a more responsible way.

The seafood industry has a significant impact on sustainability through all its dimensions: economic, social and environmental.

This is why retailers, as an important actor in the seafood supply chain, **take their responsibility to protect the interests of its customers**. All actors in the supply chain, including retailers, must adopt better practices to mitigate the industry-wide impacts on the marine resources. However, all actors must also demonstrably meet the regulatory requirements for their own scope of activities and retailers cannot be held responsible for this, being the endpoint of sale.

EuroCommerce agrees in general with the Commission's vision and analysis on the shortcomings of the current **CFP**, however some further comments are made below. We are aware of the complexity of this subject that requires a wide knowledge (ecosystem vision, biology of wild resources, aquaculture impacts) and organisation (= Ecosystem vision). It is the duty of policymakers to propose a framework with appropriate tools to allow all actors to implement sustainable practices, ensuring the future of resources and, thereby, their own future.

OVERCOMING THE FIVE STRUCTURAL FAILINGS OF THE POLICY

1. Addressing the deep-rooted problem of fleet overcapacity

Retailers are aware of the complex problems faced by the industry which haven in extreme cases, already led to the disappearance of some species of fish.

It seems important to underline the fact that **behind environmental impacts linked to overcapacity, there are also social and economical impacts**: overcapacity leads to overfishing which could, in turn, result in the disappearance of species. International concerns are shared by retailers who have stopped offering threatened species. Consequently, the threat of extinction of species is also a threat for the sustainability of many related activities further down the supply chain.

Thereby, retailers invite the regulators to provide a **clear legal framework to ensure sustainability of the marine resources**. It is possible to share responsibility between Member States and marine regions, but the Commission and European Parliament need to describe clearly their respective roles and create a simple and enforceable framework.

2. Focusing the policy objectives

The CFP has to aim at overall effectiveness in mitigating **ecological impacts**. Without sustainable resources there is no sustainable production (fisheries).

Social and economic impacts are connected to a more effective environmental impact mitigation strategy.

Science based management plans for the marine resources have to be the starting point. Nowadays, there seems to be a lack of communication between policymakers and scientists competent for these questions. In this area, it is important to take thoughtful decisions, based on a **scientific approach**, not influenced by political preferences.

This is why, for example, the quotas should be set and followed, based on solid scientific advice, using a precautionary approach (estimation of discards, illegal fishing,...). A clear distinction must be made between fish caught and fish landed, since discards and by-catch are often underestimated in setting quota. A precautionary approach should be taken when using estimates for by-catch and discards in determining catch quotas. Within the regions, there should be a sharing of the rights between the pelagic vessels and the coastal ones. This is however a very delicate issue, which needs clear guidance through the IMP/CFP legal framework.

The main focus of the CFP should not be to create jobs in the coastal communities. Indeed, it seems that the development of the coastal communities is a matter of rural, regional and spatial planning developments and should not explicitly be dealt with by the CFP.

3. Focusing the decision-making framework on core long-term principles

The involvement of a new structure, **Marine Regions (MR)** (see the Water regions of Europe, based on river basins), should be installed. Within these, the tradable fishing rights are crucial to impose on industry that they take the responsibility for both the production and the sustainability of the region. The Regional Fisheries Management Organisations (RFMO), the Regional Advisory Committees (RAC) and the Producer Organisations (PO) should be incorporated in the MR.

The Commission's role is to put the framework and guiding principles in place for handling the MRs. These would be much more autonomous and focused on the marine resources than a single MS could be. The Fisheries policy will only be efficient in a framework where it is thought of globally and acted on locally.

The focus should be on the applicability and the effectiveness of the decision-making framework. Discussion should be facilitated by a flexible framework, open to all stakeholders.

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

The key is **tradable rights and participation** in the governing body of the Marine Regions: Producer Organisations (PO) could have a role in the "government" of the MR. They could also be the lower level of a Marine Regions' administration being the local body that administrates the quotas and the tradable rights.

To ensure the efficiency of the CFP, we should keep in mind that there is a need for using technical equipment for the single vessel and for the PO or similar. The "government" of the MR will be responsible for the supervision of the regions and the lower levels would report to them. Technical systems for traceability and safety of fishermen could also be used for contact to the market and, of course, reporting.

Responsibility of the industry will depend on the clarity of its role in the implementation and improvement of the CFP based on **the strategic objectives** related to the scientific data.

5. Developing a culture of compliance

Decision-makers have to base their decisions on scientific data. That is the only way to implement a strict and robust framework, being both effective and workable. In this case, reporting should be based on fish catches and not only on fish landings, to be powerful and faithful.

A culture of compliance should be created through building a legal framework and could employ independent third-party certification schemes.

There is a need for an accurate regulation and a relevant allocation of powers within the mechanism chosen. It seems obvious that the Marine Region will be the natural body to handle this, but only with clear guidance through the IMP/CFP legal framework.

FURTHER IMPROVING THE MANAGEMENT OF EU FISHERIES

→ A **differentiated fishing regime** does not seem to be relevant: “small-scale” does not signify systematically that the fishery method is sustainable and responsible. FAO has a global vision on the obligations applied to the operators. Retailers consider **it would be better to be in line with the international regulation and simply follow the precepts of the FAO Code of Conduct for Responsible Fisheries as a basis.**

→ To develop a **long-term management plan**, there should be management plans for marine resources, including fishery, according to every single MR.

It is difficult to say whether CFP should be in two or even more steps, the most important thing is to get the management plans adopted **to safeguard a sustainable and necessary growth of the marine resources using scientific data.**

→ The **relative stability** should probably be dismantled. It is a matter for the new CFP to define how the limited marine resources should be managed within the MRs. The only viable way to handle this is to take the management of the marine resources as the precondition. The leading slogan should be to use and not misuse and to be able to harvest the marine resources in a sustainable way, together with a scientific monitoring.

→ Ensuring the provenance of products and being able to inform consumers are the basis of retailers' work. CFP has to involve different stakeholders of the sector to move toward more responsibility, and facilitate data collection to ensure a complete traceability in order to correctly and accurately inform consumers. In this context, **certification**, which is the method for private operators to get acknowledgement through employing an independent third party operator, could constitute a tool towards more transparency and absolute traceability.

→ The **Integrated Maritime Policy (IMP)** is the framework within which the CFP has to be incorporated. In it, the eco-system approach is a prerequisite.

Rural development is also important for coastal areas. Aquaculture could be a link between fishermen using their skills and education in their efforts for a sustainable marine region. CAP also plays a role, as well as Regional and Spatial planning.

If the CFP is integrated in IMP, it will constitute an additional tool to consider in maritime management.

Once again, **CFP needs to be based on scientific management plans** to be effective and sustainable regarding environmental issues.

→ **ICES**, and similar for all marine regions in EU waters is the natural focal point in this. To lay down its importance, a Maritime Resource Centre in connection with the Joint Research Centre, should be developed.

There is a need to involve the fishermen in Research. This is called participatory research and is developed, for example, within organic farming. Scientists and fishermen manage together a common good (the marine resources), so it could be discerning to organise **working groups** to share points of view and experiences between professionals from different backgrounds (in France, for example, in the frame of the CNPMM (Comité des Pêches)).

→ **External dimension:** it is obvious that the external dimension of the CFP has to equally promote responsible fisheries and sustainability. It has to be based on international agreements within the UN/FAO system. The EU has to show a good example of management and responsibility beyond its borders: establishing a payment for the right to fish in the high seas could be a good idea in the frame of good maritime governance.

→ **Aquaculture should be fully integrated in the IMP:** given that aquaculture may have an impact on the environment (parasites, escapes...) and that carnivorous species need marine protein as part of their feed, a growth of it could be a threat to the wild catch. Already today a lot of fish is used for feed in agriculture as well as in aquaculture. You could say that **aquaculture is linked both to CFP and CAP**. There is a need for directed research both on development of breeds of suitable species and for a continuing development of a sustainable aquaculture production which does not constitute a threat to the wild catch.

For many of the coastal zones in Europe, a development of a thriving aquaculture industry could build on the engagement of fishermen. Food industry also has to look for other raw materials, otherwise the wild catch would be scarce and more costly.

EuroCommerce and the commerce sector

EuroCommerce represents the retail, wholesale and international trade sectors in Europe. Its membership includes commerce federations and companies in 31 European countries.

Commerce plays a unique role in the European economy, acting as the link between manufacturers and the nearly 500 million consumers across Europe over a billion times a day. It is a dynamic and labour-intensive sector, generating 11% of the EU's GDP. One company out of three in Europe is active in the commerce sector. Over 95% of the 6 million companies in commerce are small and medium-sized enterprises. It also includes some of Europe's most successful companies. The sector is a major source of employment creation: 31 million Europeans work in commerce, which is one of the few remaining job-creating activities in Europe. It also supports millions of dependent jobs throughout the supply chain from small local suppliers to international businesses.