

# CORNWALL SEA FISHERIES DISTRICT

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European Commission  
DG for Maritime Affairs and Fisheries  
“CFP Reform”  
B-1049 Brussels  
Belgium

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Dear Sir or Madam

## **Response to the Reform of the CFP Green Paper**

1. Thank you for the opportunity to respond to the Green Paper consultation on the forthcoming reform of the Common Fisheries Policy. The Cornwall Sea Fisheries Committee is one of twelve committees in England and Wales that manage the fisheries in the inshore waters out to six miles. The committees will be replaced in April 2011 with Inshore Fisheries and Conservation Authorities (IFCAs) under the Marine and Coastal Access Act 2009 (MaCA Act).
2. Due to the specific inshore interest of my Committee, this response will naturally concentrate on how the proposed CFP reform may affect the sustainable management of the inshore fisheries. Offshore aspects will be commented on where it is envisaged that they may impinge on, or affect the inshore fisheries.

### Section 1

3. The “Vision for European Fisheries by 2020” is fully supported, but like any vision, the real challenge will be in the delivery of such an aspirational ideal. A successful delivery requires the will for all national member state administrations to work together, in conjunction with the Commission, scientists, fishermen and environmentalists, in a common approach. If any of these interests or sectors feels they are disenfranchised or that they are not a full ‘partner’ for change, then the vision will not be deliverable.

### Section 2

4. It is encouraging to note that the Green Paper recognises that the present CFP has not performed as it should, because until such an admission is made, it is not possible to take stock of the situation and to move on.

Continued page 2 ...

5. It is agreed that reform should not be incremental and piecemeal, however, my Members will be keen that any impacts on people, jobs and communities must be properly assessed and managed sympathetically. Many in the industry have invested heavily over recent years, in part basing their forecasts on the contents of the present CFP. It is ironic that the reformed CFP may effectively close down or severely limit their operations.
6. It is disappointing to note that the document continues to expound the concept of too many vessels chasing too few fish as being the single main factor for the problems being experienced by the EU fleets. We feel that of direct relevance and possibly at the crux of the problem is the issue of discards, whether through over-quota dumping or undersize/non commercial species discards. It is recognised that the Commission and Member States have already done some good work on this subject, however, significant discards in many fisheries in Europe are still impacting on the fishable stocks. This is very much a chicken and egg scenario, in that a reduction of discards to negligible levels would help the stocks to recover, which would allow the fleets to be more economically viable, which would allow less reliance on fish imports for the EU and so on.
7. Section 3  
This Committee provided a lengthy and very detailed response to the previous review of the CFP in 2002. In hindsight, although the main changes made at that time have gone some way towards addressing some of the ills of the CFP, they did not have the effect that the Committee had hoped. As envisaged by the Members at the time, the RACs have not represented the inshore sector very well, if at all, although they have worked well as a means for the industry to get its voice heard.
8. Section 4  
Mention has been made above regarding the perceived over capacity of the fleet and the link with discards. Unless the issue of discards is comprehensively addressed, the fleet will always be 'overcapacity'! To control the level of discards will need some creative thinking, in conjunction with technical developments in gear.
9. In 2002, my Members were completely against transferable fishing rights because of the possibility of the rights being bought up by one or two companies/individuals, although they did support individual (non transferable) rights as a means of managing quota and effort. They were, and remain, concerned that local artisanal fishing communities would disappear as the rights were gradually bought up. I have not sensed any change in my Members views to that vitally important issue. The main point to consider is that the jobs in the industry should be maintained at the level that can be balanced and sustained by the resource. This is not necessarily achieved by one or two interests buying up all the rights.
10. It is felt that decentralisation of the decision making would be a good outcome from this review. Encouraging the industry to take more responsibility can only benefit the process of CFP management in the long term, by reducing cost and increasing compliance through better 'buy in'.

11. Safeguards would need to be put in place to make certain that inshore management links with the wider management regime to ensure that the small vessels and inshore fishery are not unfairly disadvantaged or adversely affected.
12. Section 5  
As recognised in the Green Paper, small scale coastal fishing fleets are different to offshore fleets, having (generally) lesser impacts on the environment whilst employing a significant number of people. These fleets should be managed with the focus on social objectives. Coastal communities within peripheral regions such as Cornwall are heavily dependant on the traditional fishing industry to survive. In those small ports where the fishing industry has already been lost, the 'community' dies and the village becomes a source of second or holiday homes that in the winter months are closed up. This has a knock-on effect for the ancillary village employment that was once supported by the fishermen and their families, such as shops, garages, banks etc., all of which subsequently close, usually only reopening as tourist shops.
13. It is felt that it is crucial to differentiate the management inside the 12 mile limit from that outside and it is felt this will be a very positive step. The 12 mile zone should be the reserve of small scale fishing only. If in the unwelcome event that the principle of historic rights for other Member States in the 6 to 12 mile limits is to be continued, then those vessels must comply with the legislation of the Member State that is hosting the access. To do otherwise will simply continue the lacuna in which a Member States own vessel can be restricted for conservation reasons inside its 6 to 12 mile limit, whilst another Members State vessel (often larger than the local vessels) is not affected by the restriction. This process goes against all natural justice. To require properly made legislation to apply to all vessels would be a non discriminatory process, because all vessels would be similarly restricted by the same regulation.
14. The new IFCAs will be able to contribute and take a full part in the management of the inshore sector around England. The MaCA Act will give the IFCAs new powers to more effectively manage the fisheries within their districts, including restricting the areas to fish, controlling the level of effort, controlling the types of gear and increasing minimum fish sizes. The inshore sector in the UK has expressed interest in 'hours at sea' as a form of effort control and this can be monitored with suitable tracking equipment. IFCAs will be well placed to introduce localised management schemes like this over the coming years.
15. IFCAs will also be well placed to provide good quality scientific information. The tools are presently being put in place to ensure that there is a good sharing of information and data between the IFCAs, CEFAS and Natural England. This can only benefit the management of the inshore fisheries.

16. Aquaculture of shellfish is an increasingly important activity around Cornwall. It is felt that, as aquaculture is a very localised industry, it is better left to Member States to manage and develop on a national basis, rather than being integrated into the CFP. A comprehensive strategy is needed to encourage new development whilst ensuring any impacts on the environment or other sea users is minimised. Good links already exist between aquaculture interests and these should be encouraged and developed to permit knowledge transfer.
  
17. Summary  
The review of the CFP is a major challenge for the Commission and all interested parties. The Green Paper is a good document which asks all the right questions, but as alluded to above, the delivery of its vision will be a very difficult task for all concerned. As in 2002 at the last review, the inshore managers in the UK are hopeful that the CFP 'comes of age' and properly delivers on the promises that have been voiced since its inception. This present review is much more positive from the perspective of inshore fisheries than previous reviews, so from this aspect alone, the document has to be strongly supported.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Edwin J Derriman', written in a cursive style.

Edwin J Derriman  
Chief Fishery Officer