



Chairman:
Duncan MacInnes WIFA

Vice Chairman:
Sandy Patience FAL

Secretary; Peter Davidson HIFA
peterd.davidson@btopenworld.com

WOFFMG
C/O The Secretary
Rona
7 Aultgrishan
GAIRLOCH
Ross shire
IV21 2DZ
Office 0560 262 1366
Mobile 07711399635

Members: Western Isles Fishermen's Association; Ullapool and Assynt Fishermen's Association; Shetland Fishermen's Association; Orkney Fisheries Association; Highlands and Islands Fishermen's Association; Scottish White Fish Producer's Association; Scottish Pelagic Fishermen's Association; The Fishermen's Association Ltd; West of Scotland Fish Producers Organisation, North East Scotland Fishermen's Organisation and also - Observer organisations including Highland & Islands local authorities and the Enterprise Network.

Response to CFP

The West of Four group is a collective of diverse fishermen's associations and local government observers. Views from the smallest single manned creel vessel to some of Scotland's largest and finest vessels are expressed at regular meetings and very often a consensus of opinion is reached on fishing issues from local to international. We consider ourselves to represent a cross section of the Scottish fishing industry in a way no other group does. Whilst many of our constituent organizations have individually responded to the above consultation the group recognize the necessity to reinforce some of their most salient concerns related to the proposals.

In the Scottish Government response to the CFP reform green paper Richard Lochhead stated that;
"The Scottish Government favours scrapping the entire policy in favour of restoring national control of fisheries"

Given that opinion is divided with one constituent member stating;
The real reform that requires to be considered and implemented is a scrapping of the EU fisheries policy and returning to national Governments control of fishing in national waters up to the limits of the 200 mile exclusive economic zones or median lines

another states;

Whilst reform of the CFP is necessary we would counsel that future reform should be a continuous process that looks to amend specific areas of the CFP as and when required

it is not possible to have unanimously agreed positions on all points but those listed below are of the utmost importance to all our members.

4.1 Fleet over capacity

- The CFP should restrict its concerns to over capacity leading to stock deprivation. It should be the responsibility of the member state to manage over capacity relating to economic resilience and social sustainability.
- The introduction of ITQ's would be detrimental to Scottish Industry and we do not support it.
- The development of national measures which align themselves to the needs of the domestic catching sector within each member state is paramount.

4.2 Policy objectives

- The CFP should not determine national employment levels or any other state competency. Investment in the catching sector has been discouraged by the present micro management system and it is important that the reformed CFP develops industry led, market favourable policies.

- If CFP policy is determined to treat every fisherman like a would-be criminal, some will start to behave as one and there will always be ways to circumvent strict monitoring. It would be better to work with them and coastal communities as partners and treat them with a measure of respect and trust, with joint management rights and responsibilities.

4.4 Encouraging industry to take more responsibility in implementing the CFP

- A weakness in the current style of management is its reliance on a system of punishment without incentive!
- Scotland's Conservation Credits Steering Group has delivered tangible gains for North Sea cod stocks by delivering lower mortality rate through real time closures, seasonal closures and cod selective gear measures. These measures are proven highly successful and are largely based on an incentive and reward system with fishermen receiving additional opportunities in return for avoiding cod.
- Regulation of the industry is an expensive burden but fishermen's contribution through association fees and lost fishing time in representation through national and international level has become unbearable due to the many layers of management. Quotas are recognised as national assets and national governments must take more financial responsibility in their management and regulatory costs.

4.5 Developing a culture of compliance

- It is essential that industry be incorporated into new structures of governance resulting in high compliance levels in coherent, bottom up, industry respected policies.
- Member States should be rewarded for achieving objectives and penalties for failure. Where there are obvious instances of low compliance in certain Member State fleets urgent remedial action must take place. Failure of this principle results in a disincentive to those Member States who already comply.

5.2 Making the most of our fisheries

- It is widely accepted that single species catch quotas in multi species fisheries is a flawed approach. Introducing multi species fisheries plans such as haddock and whiting and megrim and monkfish could be the first move in an approach to resolve this flaw but it is inappropriate to have both input measures such as effort control and output measures such as TAC's in the same control mechanism. Output controls remain appropriate for single species pelagic fisheries.
- RAC's are well positioned to incorporate these broader dimensions of fisheries management into Long Term Management Plans and they should be given the support including funding to develop them further.
- A system of catch quotas instead of landing quotas would significantly reduce current discarding given that the scheme could deal with multi species complexities. This would reinforce current scientific data through more detailed information and would better inform the debate on a multi species management regime
- There should be no change to the current UK ITQ system.

5.3 Relative stability and access to coastal fisheries

- Both 6 and 12 mile limits should be retained affording protection to small scale artisanal fisheries. Safeguarding vulnerable coastal communities and infrastructures should remain a priority of any future fisheries policy.
- The allocation of opportunity rights to member states on the principle of Relative Stability keys must remain a feature of the reformed CFP.

5.4 Trade and markets

- The current financial cost of certification is paid by industry and, with ongoing costs of annual audit, the number of fisheries entering schemes is limited. CFP reform must counter this restrictive cost and supply a funding possibility or develop a cost neutral EU certification standard.

Signed,



Peter Davidson
Secretary WOFFMG

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