
From: Sharon Bowles Office [info@sharonbowles.org.uk]
Sent: mercredi 23 décembre 2009 15:58
To: MARE OLD CFP CONSULTATION
Subject: Response to Consultation on the reform of the Common Fisheries Policy

Re: Consultation on the Commission Green Paper on the Reform of the Common Fisheries Policy

The aim of CFP reform should be as follows:

- The preservation of a sustainable resource
- Preservation of fishing as a viable industry in the long-term
- Continued high quality and affordability of European fish as a food source
- Reinvigoration of historic fishing communities as economically dynamic areas, with fishing retained as an attractive profession
- Balance between large-scale and small-scale fishing.

I am encouraged that the Green Paper includes at its heart the recognition of the importance to the future of the sector of small fleets and environmentally friendly boats.

Important and innovative proposals were made in the Green Paper regarding the future relationship between large-scale and small-scale fishing. These proposals, including a strong level of differentiation between fishing regimes large and small, deserve encouragement. Specifically it was recognised that small-scale fleets in coastal communities should not be expected to meet the demands, of capacity adjustment and economic efficiency, which large-scale fleets must inevitably meet.

There was a very welcome emphasis in the Green Paper upon the desirability of small-scale fishing, and the communities that are focused around that activity, being maintained for the purpose of their social good. It was additionally recognised that small-scale fishing is not on the whole impactful upon the marine environment except in areas of high ecological sensitivity.

Essential to the functioning of a regime for small fishing communities must be a regionalised management structure with only minimal involvement at the central European level. The defining feature of these small-scale fishing communities is their idiosyncratic nature, both in terms of local traditions and geographical issues. These can best be understood at the local or regional level. The principle of subsidiarity must apply, incorporating local knowledge and experience that has been developed over many generations.

Certain elements of central policy must apply to the management of a small fishing regime. This includes the promotion of collaboration and information-sharing at the European level. The fulfilment of the social aspect of any differentiated policy must also include strong financial and administrative support for tourism related to fishing activities, and the provision of educational opportunities for those wishing to take up fishing as a way of life.

The definitions of small-scale fishing must also be applied at the most appropriate level; regional particularities and geography, technical aspects and political/economic conditions all mean that the conditions of a small-scale fishing community in one part of the European Union will not necessarily meet the conditions of another.

One especially sensitive issue for small fishing communities over the past few decades has been the

perverse use of quota allocations at the national level based upon fishing track records. This was not directly addressed in the Green Paper to any satisfactory degree. It would be highly desirable that where appropriate, community-based measures should replace national-level individual track record based quota systems. This is especially the case for fisheries where historical data for landings is incomplete.

Small-scale fishing activities rely upon a collective approach that contrasts sharply with the individualistic approaches of large-scale commercial fisheries. This must be recognised in any differentiated management regime. In particular any adoption of individual interest-based tools such as individual transferable quotas, while a tool with much potential benefit for the management of the large-scale commercial fleet, cannot reasonably be applied to small-scale fishing.

The 12 nautical mile zone of derogation to the principle of equal access should be maintained and safeguarded for small-scale, environmentally benign fishing activities. These are important areas for the replenishment of fish stocks and their reservation for the kind of minimal-impact fishing practiced by the under-10 metre fleet will be of benefit both to fish populations and coastal communities.

Financial support will also be needed through subsidies and other support measures on a flexible basis to encourage the renewal of old vessels and investment in environmentally-friendly technology.

Sincerely,

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