



European Commission – Directorate-  
General for Maritime Affairs and Fisheries  
"CFP Reform"  
B-1049 Brussels  
Belgium

31 December 2009

**WELSH ASSEMBLY GOVERNMENT RESPONSE TO EUROPEAN COMMISSION  
GREEN PAPER ON THE REFORM OF THE COMMON FISHERIES POLICY  
(COM(2009)163)**

1. The Welsh Assembly Government welcomes the opportunity presented by the EU Commission's Green Paper to discuss and consider opportunities to reform the Common Fisheries Policy for the future management of European fisheries. The complexity and diversity of our fisheries means that management measures need to be flexible enough to adapt to the different challenges presented by each fishery.
2. The United Kingdom Permanent Representation to the European Union has submitted a response to reflect the UK position on the Green Paper, to which the Welsh Assembly Government is in agreement.
3. The purpose of the Welsh Assembly Government response is to explore further the discussion on the issue of 'small scale coastal fishing'. Inshore fisheries are of prime importance to the Welsh Assembly Government and we welcome the opportunity to consider the issue of 'small scale coastal fishing'. The green paper highlights the idea of a differentiated regime for the management of these fisheries but also the difficulties of defining these fleets or how such a regime could work. There are risks associated with creating a differentiated management regime, which would need to be managed carefully to minimise impact on local inshore fisheries.
4. This response reflects the summary of our position in relation to inshore fisheries and taking forward the concept of 'small scale coastal fishing'. The discussion is based around the Welsh Assembly Government experience of its inshore fisheries as an example to illustrate the drivers of these fisheries.

## Policy Drivers for Inshore Fisheries

5. The following are the policy drivers for fisheries in Wales but could be typical of those which define inshore fisheries:
  - i) **Local sourcing** – A local sourcing action plan encourages the development of channels for the local sourcing, production and sale of food products such as fish. This is particularly important to develop sustainable local supply, indigenous industries, maintain food security and to reduce food miles.
  - ii) **Food tourism** – A food tourism action plan recognises the importance of food to sustainable tourism and seeks to increase visitor numbers by developing the identity of regions and their food. Almost the entire Welsh coastline is within the convergence area and local fish is an important part of attracting visitors to the rural coastlines of Wales.
  - iii) **Sustainable development** – Welsh Ministers are required to develop a sustainable development plan. A revised version of the plan was launched in early 2009 and signals Welsh Minister's commitment to manage Welsh Fisheries sustainably. Such an approach is an important pre-requisite of a small scale coastal fishery especially as retailers are more in tune with the need for sustainable sourcing.
  - iv) **Wales Fisheries Strategy** – This outlines the vision for Welsh Fisheries to achieve by 2020, and an important part of the strategy is to develop sustainable fisheries through an ecosystem-based approach to fisheries management.
  - v) **Marine and Coastal Access Act** – This new UK Act has recently achieved royal assent and provides new marine and fisheries management powers to Welsh Ministers and a greater expectation of the delivery of these powers.
  - vi) **Approach to fisheries management** – From 1 April 2010, the Welsh Assembly Government will take over the work of the Sea Fisheries Committees. This will require a change in emphasis, from one where the role is to make legislation from a distance and enforce it to become more of a “hands on” fisheries manager. This will require the gathering and analysis of scientific data and a much closer working relationship with stakeholders.
  - vii) **Site Designation** – Wales has proportionately more environmental designation in the Marine environment than other UK Administrations (70% of the Welsh Coastline and 40% of the territorial sea (within 12 nautical miles) is within a Special Area of Conservation, a marine nature reserve plus other important designations). This requires an integrated approach to fisheries management and needs a local approach to ensure that fishing and environmental designations can comfortably co-exist.

## Operational Drivers for Inshore Fisheries

6. The following are the operational drivers for fisheries in Wales but could also be typical of those which define inshore fisheries:
  - i) **Day boats that operate within rural communities** – There are around 500 vessels that fish out of Wales, and around 450 of these are less than 10m and are equipped for day fishing only. They are also greatly influenced by the

weather and usually fish seasonally. However, they have an important role within their rural community and, it is argued, tend to fish more sustainably. These type of vessels are limited in their operations, and usually are not able to travel any great extent to fish other grounds and are therefore solely dependent on the sustainability of the local fishery for their future prosperity.

- ii) **Over reliance on single species** – Inshore fisheries have been disadvantaged by the quota system in place to manage large scale commercial fishing. For example, Welsh fishers have seen their fishing opportunities reduced by a lack of availability of quota in a way that would enable planning to take place and changes in the availability of fish. This has led to Welsh fishers targeting non-quota species and now the vast majority of fish landed is shellfish (around 90% of Welsh fleet landings), the largest of which is Brown Crab. In Wales the majority of the fleet that fish tend to catch a single species of fish. The more worrying aspect is that these species are beginning to show indications that there may be a decline in stock numbers. Local sourcing and retail sector wish to see a variety of fish and to reduce pressure on single species (and to deliver sustainable fisheries), it is therefore important to seek opportunities for fishers to diversify. There are fish present in the inshore grounds, however, due to the quota system these inshore vessels are unable to fish for them because the quota is not necessarily available to the non-sector (non-sector quota is shared amongst all under 10m vessels and those over 10m that do not belong to a producer group).
- iii) **Reliance on single export markets** – within the UK market, the demand for live shellfish is relatively small, but is significant for good quality processed shell fish. However, the export market is keen to obtain quality live shell fish and as a result, most of the shellfish (around 95%) are exported. The Welsh Assembly Government is working with fishers through a number of programmes to develop opportunities for local processing and local supply. This approach is necessary to seek to reduce a dependence on export markets that are subject to exchange rates, fuel price rises and other variables.

## Market Drivers

- 7. In a sustainable inshore fishery, it is important that fishers lever maximum opportunity from their catch. In part, this means attracting premium prices for the fish they land. Our market research shows that retailers are prepared to pay more for fish with a sustainable or local identity. This should offset any required reduction in catch that may be required to maintain a sustainable fishery.

## Concerns of Inshore Fisheries

- 8. The main areas of concerns for inshore fisheries in Wales, which could be typical of inshore fisheries:
  - i) **opening quota to the market.** We see the benefit for this approach in using market forces to manage effective fishing effort in the larger commercial fleet. However, the experiences we see from elsewhere is that if this approach is unchecked that much of the fishing opportunity ends up in the hands of large commercial operators and smaller producers are priced out of the market. This will prevent diversification and, as current fishers generally are less able to fish for quota species, there will be much greater pressure on non-quota stocks.

- ii) **Small scale coastal fishing** – it is probably impossible to design a two tier system which could enable policy to be applied to larger commercial vessels and a different set of requirements applied to smaller vessels. However, it is also true that policy applied unilaterally also caused different results within different sectors. Smaller fishing vessels have an increasingly important role to play which is core to Welsh Assembly Government policy and there is a risk that CFP reform will focus on where there is most difficulty (e.g. Commercial sector fishing cod) and would not be sensitive enough to the different needs of small scale coastal fishing. It can be argued that these fishers have a vested interest in seeing their fishery being sustainable as they are not able to fish elsewhere.
- iii) **Inshore region** – The inshore region (within 12nm) does not feature in the green paper to any extent. However, we feel that this region is of primary importance as it provides a key nursery area for species and provides important parts of the food chain to support healthy fish stocks. The inshore ecosystem is complex as there are many contributors to it (the ecosystem consists of the conditions to enable species to flourish which includes salinity, nutrient levels, sediment (light), biomass of species, etc and there are a number of man made contribution which affect this balance – fisheries is one but agricultural run off, sewage outfalls, etc can also have a major effect. To achieve a maximum sustainable yield for fish within the inshore region, it is important to understand the dynamic relationship between these players and to understand its impact on the availability of fish. To achieve sustainable fisheries, fishing opportunity will need to be effectively managed and it is difficult to achieve this if the CFP is also seeking to provide fishing opportunity within the same zone.

### **Small Scale Coastal Fisheries – Wales, a proposed model**

9. The following offers the basis of principles under which ‘small scale coastal fisheries’ could be developed.
  - i) **Regional approach** - The UK response suggests that regional management can be considered at a range of levels but focuses on the RAC scale as an effective model. However, within Wales, given the high level of environmental designation, the complex ecosystem (which yields results for both inshore and offshore species), the policy desire to develop sustainable fisheries and the importance of the local supply of fresh fish to food security and food tourism, we believe that a regional model could be constructed within 12nm. An ecosystem plan would be established for the region which would be agreed by the Commission and countries that fish within the region.
  - ii) **Fisheries management** – An ecosystem approach would require careful consideration of fish stocks, methods of fishing and temporal restrictions to enable stocks or habitats to recover. All vessels that fish within the area would need to meet the requirements to maintain the ecosystem. It is not clear how this could work with a separate quota management system that is not seeking to develop the local ecosystem. Further consideration will be required for fishers who are predominantly delivering to meet local supply only and whether or not, these could operate outside of any larger quota system but within the confines of the local ecosystem plan.
  - iii) **Stakeholder engagement** – There is a requirement to develop local and national input into Fisheries Management and in Wales we are about to consult on a

model for the delivery of this. We would see these groups actively involved in viewing the science and being involved in the decision making to maintain a healthy ecosystem and sustainable fisheries.

## **Conclusion**

10. The Green Paper and the UK response both focus primarily on large scale commercial fishing, where current problems exist. However, it also signals the importance of pursuing an ecosystem based approach to ensure that Europe has healthy and productive seas. A major contributor to this is the inshore region but this region has a complex ecosystem and requires its own plan and local stakeholder involvement. This is especially important in Wales given that fishers are not able to fish elsewhere and are limited to what they can catch and where they can land it.
11. However, whilst the UK response generally covers the need to manage fisheries in this way, we feel that the inshore region has an important role to play and requires just as much consideration in the future. This region is of high importance to Wales and merits a separate complementary response to bring this point out.
12. In addition it is not clear how a distinctive EU ecosystem approach can work with a remote quota allocation system that cannot be tuned sufficiently to meet the requirements of an ecosystem plan and therefore consideration needs to be given that, under certain conditions, small scale coastal fishing vessels might be able to operate outside of the quota regime.
13. This response is not meant to offer a working model for 'small scale coastal fishing' but to explore the points raised in the Green Paper and explore some of the drivers and concerns which define such fisheries. The Welsh Assembly Government would be more than happy to participate in further discussions (or workshops) to explore further the concept of 'small scale coastal fishing' as a way of recognising the importance of inshore fisheries and the opportunity presented by the reform of the CFP to manage them effectively for the future.

Yours Sincerely

**Stuart M A Evans**

*Head of Fisheries Policy*