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RESPONSE BY EFARO TO THE COMMISSION GREEN PAPER ON REVISION OF THE COMMON FISHERIES POLICY

Summary of Recommendations

1. *EFARO recommends that changes in science required in support of the CFP are reflected in Community and Member State research priorities.*
2. *EFARO stresses the need to develop a scientific infrastructure that*
 - *promotes integration across disciplines*
 - *includes stakeholders at all stages of the process*
 - *addresses the practical implications of the commitments to MSY.*
3. *EFARO recommends that:*
 - *Fish stock monitoring programmes and surveys are broadened to embrace the wider ecosystem and MSFD requirements*
 - *The DCF is simplified to reduce overheads and that a strategic approach to regional data is developed*
 - *The DCF should be the institutional framework under which standardisation, quality control and publication of all data related to fisheries will be handled to fulfil the monitoring requirements for good environmental status*
4. *EFARO recommends that in a revised CFP the advisory structure needs to be developed which:*
 - *Simplifies the current structures into a single integrated system*
 - *is adequately resourced to satisfy the demand for advice*
 - *Ensures that any new institutional framework supports appropriate long term data collection and sustains essential expertise*

Introduction

1. The European Fisheries and Aquaculture Research Organization (EFARO) is an association of the leading marine research institutes involved in Fisheries and Aquaculture research within the European Research Area. It was formed to achieve greater cohesion of Community research and development in this sector. Today EFARO unites 3000 researchers and research assistants in 23 research institutes and 19 European countries covering capture fisheries, aquaculture, marine ecology, fish behaviour, oceanography, gear technology, marine environmental quality and economics.
2. A substantial part of the work of the EFARO members is devoted to supporting national governments and most institutes support the European Commission in the operation of the current CFP. EFARO institutes are therefore well placed to support any new scientific requirements in a revised CFP.
3. EFARO welcomes the Green Paper on the Reform of the CFP and supports the analyses of the current CFP presented in the Green Paper. EFARO considers the paper to form a sound basis for discussion on the future of the CFP.
4. The Green paper lists a large number of questions many of which are purely policy related which is beyond the remit of EFARO. In responding to the consultation EFARO has therefore focused on issues related to science required in support of the CFP and the way it is resourced. EFARO has focused on three issues:
 - a) integrating of science,
 - b) data collection and management and
 - c) delivery of advice in support of the CFP.
5. As a general observation EFARO notes that EU-funded Research in support of the CFP is presently not an integrated part of EU research policy. **We underline the need to ensure that changes in science required in support of the CFP are reflected in Community and Member State research priorities.** Operation of the CFP is particularly dependent on science and sustaining its capacity to deliver is essential.

Integration of Science

6. The CFP Green paper emphasizes the importance of a more holistic approach to managing human activities in the ecosystem. It is important that fisheries and aquaculture policies contribute to the objectives of the Marine Strategy Framework Directive. This will require science to focus not only on target species and fishery activities, but also on habitats, ecosystem functioning and marine activities. It means that science from a range of disciplines including biologists, social scientists and economists needs to be integrated throughout the process of preparing evidence, analysis and advice. Such a process should seek to benefit much more from stakeholder's input so that science is seen to be legitimate in using all available knowledge.
7. The Green Paper also highlights the use of fishery management measures, such as ITQs, effort limitation and management of fleet capacity, that are linked to longer term objectives. A greater emphasis on these measures will change the way advice is prepared and delivered due to the greater need to include socio-economic analyses. Present resourcing mechanisms, particularly in the socio-economic sciences, are not well designed to support routine advice or for integration between natural and socio-economic sciences.
8. Internationally agreed commitments to the MSY concept will require considerable work to make it operational given gaps in data and knowledge. There are related questions about the economic and social performance of the fisheries in the context of MSY. EFARO believes that there is some urgency to developing an operational definition of MSY that takes account of ecosystem effects and socio-economic issues.

EFARO stresses the need to develop a scientific infrastructure that:

- **promotes integration across disciplines**
- **includes stakeholders at all stages of the process**
- **addresses the practical implications of the commitments to MSY.**

Data Collection and Management

9. Monitoring and data collection under Data Collection Framework (DCF) are designed to satisfy today's advisory needs which in turn follow present policy requirements. A reformed CFP, embedded in Maritime Policy, means that "Good Environmental Status" as defined in the Marine Strategy Framework Directive will require significant revision of the DCF in order to provide integrated advice. It is important to first of all identify the needs of future integrated ecosystem advice and reform the DCF based on these needs, (what are the questions that advisory services will be asked in future and what data is needed for that purpose?).
10. At present most Member States, while recognising the great value of the financial support from the DCF, find the heavy administrative burden results in less data being collected for the available funding than could be obtained. Consideration needs to be given to a Framework that reduces unnecessary administration and takes a more strategic approach to rationalising data collection between Member States. EFARO believes there is much greater scope for full collaboration at regional sea level to avoid duplication and overlap.
11. Whereas the integration of fisheries and fisheries economic and stock specific biological data appears to have progressed, integration ecosystem information and ecosystem impacts of fisheries has yet to be achieved (impact of other human activity on fish). In order to come to an operational MSY approach in a multi-species and mixed fisheries context broader data will be required, thus intensifying monitoring requirements on other ecosystem components indirectly affected by fisheries.
12. In the MSFD four descriptors of good environmental status are of relevance for the fisheries sector pertaining to biodiversity, status of commercial fish stocks, marine food web as well as contaminant level in sea food. To provide advice on all of these, new surveys and monitoring programmes need to be established and existing survey and data collection programmes need to be adjusted.

EFARO recommends that:

- **Fish stock monitoring programmes and surveys are broadened to embrace the wider ecosystem and MSFD requirements**
- **The DCF is simplified to reduce overheads and that a strategic approach to regional data is developed**
- **The DCF should be the institutional framework under which standardisation, quality control and publication of all data related to fisheries will be handled to fulfil the monitoring requirements for good environmental status**

Advice Structure

13. Currently most advice that supports fishery management is provided through ICES, STECF, GFCM and RACs. While there is some economic advice forming part of the process, it is limited in extent and tends to be added sequentially after biologically based advice is prepared. The change to fisheries management within broader Marine Management policies such as the MSFD, EU Maritime policy and developments in Marine Spatial Planning means that new structures will be required to deliver appropriate advice. Crucially it is important that disciplines beyond traditional natural science such as economics and social science must be part of the evidence base as it is developed, not something prepared in isolation as separate exercise. Evidence needs to be integrated at all stages.
14. The proposal to move to greater regional management might add to this complexity. It is important that as new management systems are put in place consideration is given to adapt the advisory system in a way that reduces unnecessary complexity and duplication.
15. As fisheries management has developed over the years, there has been a stronger demand for scientific advice. To some degree this demand has itself been fuelled by weaknesses in management systems that require ever more detailed information to support increasingly complex management measures. Moving to a system that requires more and integrated science risks placing an unsustainable demand on the expert human resources that are likely to be available. In revising the CFP it is important that the anticipated demand for advice is consistent with the available expert resource base.
16. Changes to the way science is funded, such as requiring stakeholders to pay for science or placing the burden of proof on the fishing industry so that they are required to provide evidence of the impact of their activity have implications for the quality of the data and the way science is commissioned and delivered. This may lead to changes to the institutional structures currently in existence. It is important that where new responsibilities are placed that change the resourcing systems and institutional structure, measures are put in place to ensure adequate data collection systems are maintained and that the expertise needed to support management systems is sustainable.

Overall EFARO recommends that in a revised CFP the advisory structure needs to be developed which:

- **Simplifies the current structures into a single integrated system**
- **is adequately resourced to satisfy the demand for advice**
- **Ensures that any new institutional framework supports appropriate long term data collection and sustains essential expertise**