



CONSEJO CONSULTIVO REGIONAL DE FLOTA DE LARGA DISTANCIA EN AGUAS NO COMUNITARIAS

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LDRAC POSITION REGARDING THE GREEN PAPER ON THE CFP REFORM

INTRODUCTION.

Under the analysis of the EC the current CFP hasn't been able to solve the main problems of the Fisheries Sector, such as overfishing, fleet overcapacity, heavy subsidises, or the decrease of the stock of different species.

However in the case of the EU LD Fleet the total fishing capacity and the number of vessels have been significantly reduced in the last ten years. . In the general context of the international fisheries, capacity management remains a challenge taking in consideration all the fleets participating in the fishery. The EC approach in reduction of number of vessels is not the right one to address the potential overcapacity and overfishing problems, but an case by case analysis considering all the players is needed to identify those issues.

The LDRAC does not fully agree with the analysis that EC has reflected in the Green Paper neither with the orientations that are proposed in that document. Under the following paragraphs the LDRAC is proposing the general orientations of the future CFP.

1. OBJECTIVES OF THE CFP ON THE EXTERNAL DIMENSION.

The global objective of the CFP, including its external dimension, should be to promote responsible and sustainable fisheries, (environmental and social and economic). Within this framework, and against what the green paper states, the objective should be to enable a competitive and profitable EU fishing sector with the aim to supply the EU market, with high quality products through the proper implementation of EU standards (sanitary, traceability, environmental,...).

This objective should be reached through an open dialogue, searching for consensus, between the European Commission, Member States, scientists, stakeholders and Third countries EU Partners.

Therefore, as the result of the implementation of those principles , the entire LD European fleet will be recognized as a sustainable and responsible fishing model. This model has to be promoted in the international fisheries management schemes.



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However, it is not possible to isolate CFP from other EC policies, so the objective above mentioned has to be coordinated with the other European Policies and coherent with the Development Policy Objective.

2. THE EXTERNAL DIMENSION OF THE CFP.

2.1 Regional Fisheries Management Organizations

The LDRAC considers, on the opposite of what is stated in the green paper, that the absence of fishing interest of the EU in the RFMO will severely affect the political influence of the EC in the promotion and application of the principles of sustainable fisheries in the RFMOs, (“the best way of influencing is to give a good example, promoting the application of the CFP principles to be applied in the EU fleet”).

The CFP should promote the sustainable management of the fishing activities in all the RFMOs, focusing in key issues such as compliance, the management of capacity with available resources, improve governance setting long term management plans and ecosystem conservation strategies.

It is necessary to find a balance between all the actors involved, and the access to fisheries should be analyzed through a system of transparent and non-discriminatory criteria taking into account the responsible aspirations of stakeholders, their capacity to control the fleets, history of compliance, employment created, working conditions, environmental impact, etc.

The LDRAC considers that it is fundamental that all RFMOs should establish a transparent and equitable capacity management system commensurated with the sustainable exploitation of fish population.

Compliance, in the framework of the RFMOs, would have to be considered high-priority, since its non-compliance alters the reliability of the scientific data and therefore, the scientific evaluations necessary to establish suitable management measures, and undermines conservation objectives. It is necessary to watch over the fulfillment of the management measures that there are currently in place, and for that reason, it should be important to establish a transparent control system, including effective sanctions. Transparent and non-discriminatory market measures can be used as tool to improve compliance.

It would be recommended the creation of common working groups on horizontal issues, of interest to all the RFMOs, which would not only spare human and material resources, but also contribute to the harmonization of RFMO orientations and performances, based on best practices.



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Considering the legal obligation the EU has as Contracting Party of the different RFMOs, the EC should ensure its full participation in every RFMO so it would be necessary to increase the human resources of the European Commission.

The LDRAC request the EC to lead the process in the RFMOs in order to reach the above mentioned objectives.

2.2 FISHERIES PARTNERSHIP AGREEMENTS

The evolution of the “old style” FA, replaced by the FPAs have shown some improvements, however the LDRAC considers that there is still margin for improvements.

The EC should promote that the EU economic contribution benefits the local and EU fisheries sector, through the following aspects:

- To improve technical conditions to implement the Agreements,
- To improve the level of stakeholders participation during the negotiations,
- To ensure well-based scientific advice,
- To ensure transparency and governance,
- To promote compliance culture.

Compliance, by both parties, with the terms of the agreements should be a priority in the framework of the FPAs in the future CFP.

Considering the legal obligation that the EU has with the Third countries and its own external fleet under a FPA currently in place, it would be necessary to increase the human resources of the European Commission, and complementary give to the Member States competences for managing the **procedural and administrative** work for implementing the FPA.

LDRAC considers that a regional approach could improve the governance in the relations between UE and Third Countries; however it could be only applicable in certain regions.

The LDRAC requests that there should be a distinction between the cost of access for the LD EU fleet (covered by ship-owners and representing a fair part⁽¹⁾ of the value of the catches) and the financial contribution of FPA for development aid. Such aid should recognize the importance of the fisheries sector in poverty alleviation.

(1) For example, the FFA is fixing 5 – 6% of the value of the catches as a fair reference price for the tuna license in the Western and Central Pacific.



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Considering therefore that FPAs provide a legal framework for the fishing operations in Third Countries under the principles of sustainable and responsible fisheries, additional “FAs” (Good Governance Fisheries Agreements) without fishing possibilities could be envisaged to promote cooperation, investment or joint ventures in Third Countries.

LDRAC considers that the improved FPAs applying the above mentioned principles should be maintained and expanded.

2.3 Trade, markets and processing Industry.

LDRAC considers that the analysis done by the EC on the green paper about fish products trade, market and processing industry is inconsistent and simplistic and does not take care of the crucial role that those elements play on the final objective of the CFP, the promotion of sustainable and responsible fisheries.

The importance of the European fish processing industry is understated in the analysis of the future of the CFP and the LDRAC requests the adequate consideration for this important part of the fishing industry.

LDRAC underlines that market access trade agreements are an important element of Northern agreements.

There are several important aspects to be looked into in the process of reform of the CFP on those issues:

- ***TRADE POLICY.***

EU should promote sustainable and responsible fisheries through an efficient trade policy that will ensure a balanced supply to the EU market.

EC has to ensure that there is a level playing field for all fisheries and aquaculture products - European or imported regarding the implementation of the international conventions both in the production, processing and in the final product.

Conditions of access to EU markets should play an important role to contribute to sustainable fisheries both in Europe and in third countries.

- **IMPROVE COMPETITIVENESS OF ALL STAGES OF THE FISHERIES CHAIN, BY ENSURING A FAIR PRICE FOR THE PRODUCERS**



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Strengthening POs and Interbranch Organizations (IOs) tools for acting on the markets.

Developing appropriate and necessary controls so that the market rules are obeyed. Furthermore, regarding the fisheries products imported by the EU from Third countries, it is necessary to control its correct identification to avoid consumer's confusions.

To promote and improve the quality of the fishery and aquaculture products through adequate control methods.

To raise the importance of the fishery and aquaculture products under the R+D+i.

To create a transparent mechanism to document the differences between first sale price and final price for consumers.

To improve transparency and information in the whole chain. Tools such as origin labels, ecolabelling, traceability, should be potentiated for giving to fishing products an added value.

Finally, the importance of these aspects (traceability, transparency and information) requires that in view of any new regulation, the EC has to take into account the opinion of all stakeholders involved in the market chain, independent of the origin of the product.

Emphasis must be put not only on prizes but also on cost of the fishing production and processing.

It is important to enhance promotion campaigns for the sustainable fisheries products to stimulate a responsible consumption in the EU.

3. GOVERNANCE AND RESPONSABILITY.

The new CFP should be based on a new "bottom-up" decision-making model, and not on the current "top-down" model, which means to go away from centralized and micromanaged decision making, towards fisheries co-management.

The LDRAC believes that a balanced representation of the RAC stakeholders in the negotiations of the EU with the Member States and Third Countries can improve and enrich the negotiation, and therefore obtain a better result for the benefit of the CFP main objective of promoting the principles of responsible and sustainable fisheries in minimizing the impact of the political interests.



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Therefore on the frame of the reform of the CFP, the EC should find the adequate mechanism that will take into consideration the LDRAC stakeholders opinion and reactions during the negotiation process.

4. STRUCTURAL POLICY

The priorities should be set in terms of the objectives of the future CFP, and this is a sustainable and responsible fisheries. And in that context, ensure an internal and external EU fisheries sector, competitive, profitable, and strong enough to supply the European market.

Consequently, the future CFP should be equipped with the appropriate mechanisms so that the fish catching sector gradually stops depending on external factors that condition its future and, in this manner, no longer resorts to public financing.

While the sector is not owner of the live resource and is subject to a management system in which it does not take decisions, only being consulted and not always with sufficient time available, where the catch parameters can change drastically and where political decisions override all else, financial compensations cannot be eliminated if these serious drawbacks continue to be in place.

Therefore, a policy is needed that makes the sector more responsible by allowing it to actively participate in drafting the various strategies that should be integrated into the future CFP in order to attain the objectives of economic, social and ecological sustainability

Furthermore, it should also stimulate aspects such as the innovation, which is very important for the future development of the sector and its competitiveness.

CAPACITY MANAGEMENT.

In the case of tuna and tuna-like species, LDRAC recommends the EC to design a new capacity management system for the EC external fleet, independent from the current capacity system in EC waters, based on the capacity management systems implemented where a tuna RFMO has adopted a capacity plan in line with sustainable fisheries principles.

5. SCIENCE

The basis of any reform in any sector should be based on the best independent scientific and technical advice. It is not appropriate to take any decision without



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scientific reports. In this way, problems such as overcapacity should be focused through in-depth studies, area by area, fleet by fleet and looking to the state of the resources.

Actions should be taken having a good scientific knowledge, and a permanent contact and collaboration between scientists and stakeholders can improve the quality of the information and, consequently the assessment would be optimized.

Scientific participation to RFMO's work should be improved by better incentives for the scientists and the EC should be an active promoter of the fisheries science in RFMOs.