

POSITION PAPER

EURO COOP POSITION ON THE EUROPEAN COMMISSION GREEN PAPER ON THE REFORM OF THE COMMON FISHERY POLICY

Euro Coop ID number in the EC's register of interest representatives: 3819438251-87

EURO COOP is the European Community of Consumer Co-operatives, whose members are the national organisations of consumer co-operatives in 19 European countries. Created in 1957, EURO COOP today represents over 3,200 local and regional co-operatives, the members of which amount to more than 25 million consumers across Europe.

Brussels, 18th December 2009

Preliminary remarks

Euro Coop welcomes the European Commission Consultation on the Green Paper on the Reform of the Common Fishery Policy (CFP) as it sees it as an important step in a field in which many of its members have been active since a long time. In this regard, it wishes to put forward some preliminary remarks.

Euro Coop firstly considers of the utmost importance that environmental concerns become the basis on which to build the new CFP due to the fact that fish stocks are depleting and biodiversity of oceans is at risk. Furthermore, consumers have become more and more aware of and concerned about these issues.

Secondly, the precautionary principle should play a key role in the reform of the CFP. Also, the protection of biodiversity of the maritime environment should be always safeguarded and the state of health of fish stocks in different areas constantly monitored. To this purpose, scientifically reliable data should be made available.

Thirdly, the new CFP has to be fully integrated in the Integrated Maritime Policy (IMP). The administration of the IMP should be delegated to a new body linked to the different marine regions of the EU.

That being stated, Euro Coop wishes to put forward its comments and remarks regarding some specific aspects of the Green Paper as detailed below.

Fleet overcapacity

Euro Coop deems that capacity should be limited through legislation based on input from different stakeholders. As illustrated in the Green Paper, a bottom-up approach in which industry is able to play an active role is essential. In addition to that, other actors among which consumer co-operatives and other private retailers shall be consulted on a regular basis. Nonetheless, EU regulations are necessary to create a common operative framework.

In this regard, limits on catches including all catches fished and not only those brought to the mainland should be applied. Those limits should be established according to a specific precautionary and

conservative approach and on the basis of scientific opinions. Besides that, peremptory time limits should be set to attain the objectives of fishing capacity reduction.

Priority access to fishing activities

Euro Coop believes that priority access to fishing activities should be allowed to fishermen who use:

- More selective fishing techniques with a low number of by-catches (selectivity);
- Methods and tools having a lower impact on the marine environment;
- Vessels and fishing techniques that use less energy for quantity of fish caught;
- Fishing techniques that allow better working conditions, greater equity of the system and quality.

These requirements are in line with the cross-compliance principle that is already present in the Common Agricultural Policy (CAP).

Euro Coop also calls the EU to put all possible measures in place to minimise the incidence of by-catches.

Small-scale coastal fleets

Euro Coop considers that large-scale fleets shall be expected to be economically self-sustained, whereas public funding may help small-scale ones to adapt to changing conditions, strengthen their economic viability and help them maintaining life in coastal communities.

In case public funding is employed to support small-scale fleets, Euro Coop considers that this should not be dealt with under the new CFP. There are in fact funding tools foreseen within the Rural and Regional development Programmes which could be suitably serve this purpose.

Traceability

Euro Coop deems that all decision-making processes require transparency and the equal participation of all involved stakeholders (fishermen but also importers, processors, consumer co-operatives and other private retailers). This is why Euro Coop supports the creation of a new administrative level similar to the one created under the Water Framework directive.

Traceability of fish products, included that of imported goods, should improve, thereby allowing consumers to make informed choices regarding the quality of products. In addition to that, legislation on labelling should report data which clearly indicate if the products are sourced from an overexploited stock or from one in good conditions. In fact, the ultimate goal should be that all available fish is supplied from sustainable sources and with sustainable methods and a lower level on ambition on such target would place all responsibility on the individual consumer.

Aquaculture

Euro Coop sees aquaculture as a sector with growing importance, especially taking into consideration the decrease of wild catches. It competes but at the same time co-operates with wild fishing. It is essential that fish farms are built in suitable areas, where there is a lower risk of spreading diseases or contaminating wild fishes from a genetic point of view. Therefore, fish farms should be installed far from migratory routes of wild species. In addition to that, polluting emissions deriving from fish farms and going to the marine environment should be eliminated and an evaluation on the impact of each farm should be carried out to establish the impact on biodiversity, on reserves and on the integrity of the seabed. Furthermore, sustainability of the supply of raw materials for aquaculture has to be constantly ensured.

In fact, as carnivorous species need marine protein as part of their feed, a growth in the aquaculture sector could result into a threat to the wild catch. Already at present a lot of fish is used to feed both in agriculture as well as in aquaculture and therefore it may be argued that aquaculture is linked both to CFP and to the CAP. There is a need to boost direct research both for the development of breeds of suitable species as well as for a continuous development of a sustainable aquaculture production. Furthermore, aquaculture should be an integrated part of future partnership agreements.

Illegal fishing

Euro Coop deems that illegal fishing still represents the main threat for maritime environment, especially when it regards some highly demanded species. Euro Coop firmly condemns these regrettable practices and calls on surveillance of control bodies to be further strengthened. In particular, Euro Coop considers that such task should be included in the mandate of the above-mentioned new administrative structure.

FOR FURTHER INFORMATION, PLEASE CONTACT:

Rosita Zilli – Euro Coop Policy Adviser

Email: rzilli@eurocoop.coop

Tel.: +32-2-285-00-72

Fax: +32-2-231-07-57