

SHOAL *Shetland Oceans Alliance*

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

9th December 2009

Dear Sirs

Reform of the Common Fisheries Policy: Green Paper

On behalf of the Shetland Ocean's Alliance (SHOAL) I am writing in response to the Commission's Green Paper consultation on Reform of the Common Fisheries Policy.

SHOAL is a partnership between the Shetland Islands Council and the Shetland fishing industry to promote the industry's long-term sustainable future in this remote, fragile and highly fisheries dependent community.

SHOAL welcomes the opportunity to contribute to the development of European fisheries policy, and offers the attached comments and suggestions on the Commission's proposals for a future Common Fisheries Policy.

In particular, as is spelt out in more detail in the attached response, SHOAL strongly believes that the reformed Common Fisheries Policy should have as its central objective the maintenance and support of viable and sustainable fishing communities. The revised policy should also allow these communities to play an active and central role in the management of the fisheries on which they depend.

SHOAL would also extend an open invitation to any members of the Commission staff who might wish to visit this fisheries dependent community and learn at firsthand about the problems facing Shetland's fishing industry and the efforts being made by SHOAL to promote a long-term sustainable future for the industry.

The attached consultation response was approved by the Shetland Islands Council at a meeting on 9th December 2009.

Please do not hesitate to contact me if you have any queries, or require any further information on the points that SHOAL has raised in this response.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'J Simpson', with a long horizontal flourish extending to the right.

Councillor Josie Simpson

Chair - Shetland Oceans Alliance

Vice-Convener - Shetland Islands Council

Reform of the Common Fisheries Policy: Green Paper

Shetland Ocean's Alliance (SHOAL) offers the following responses to the questions raised in the Green Paper on the Reform of the Common Fisheries Policy.

SHOAL is a partnership between the Shetland Islands Council and the Shetland fishing industry to promote the industry's long-term sustainable future in this remote, fragile and highly fisheries dependent community.

4 Overcoming the Structural Failings of the Policy

4.1 Addressing the 'problem' of overcapacity

Whilst accepting that overcapacity may be a problem in some sectors of the EU fishing fleet, SHOAL has serious reservations about the generalised assertions of widespread overcapacity made in the Green Paper. Fleet capacity is a complex issue that involves questions of how, when and where fishing is carried out, as well as the state of target fish stocks. There are also significant questions about how capacity should be measured and related to stock abundance or fishing opportunities. It can also be argued that 'overcapacity' is a symptom rather than a cause of failures in EU fisheries management.

For these reasons, SHOAL believes that any discussion of 'overcapacity', or of means of addressing it, needs to be based on a less crude and simplistic basis than is the case in the Green Paper. In particular, more detailed analyses are required of capacity, and of the regions, fisheries and sectors where any overcapacity actually is, so that any measures to reduce it can be appropriately targeted.

However, SHOAL strongly believes that - provided fisheries are effectively managed in other ways - overcapacity is not necessarily a bad thing and may often have positive social benefits for fishing communities. There are examples in Europe of fleet sectors that only have to fish for part of the year to catch their full quota entitlements, yet are profitable, participate in sustainable fisheries, and support more jobs (both direct and indirect) than a smaller fleet that fished all year.

While perhaps technically 'overcapacity', such fleets provide substantial societal benefits that arguably outweigh the theoretical economic disadvantages of overcapacity.

In general, SHOAL is concerned that emphasis placed on 'overcapacity' in the Green Paper may be intended as a justification for proposals for greater use of Rights Based Management in European fisheries.

Should capacity be limited through legislation?

Further to its comments above, SHOAL believes that any attempt to limit capacity should be based on a much more detailed analysis of the 'problem' of overcapacity, to establish exactly where it is a problem, what the causes are, and how it could most effectively be addressed.

SHOAL would not be in favour of any attempt to implement crude, simplistic measures to reduce capacity across the EU fleet.

Is the solution a one-off scrapping fund?

SHOAL recognises that such scrapping funds may be appropriate where a specific problem of overcapacity can be demonstrated (see above). However, SHOAL believes that any such schemes should incorporate measures to protect the interests of fisheries dependent communities.

Could transferable rights (individual or collective) be used more to support capacity reduction for large-scale fleets and, if so, how could this transition be brought about? What safeguard clauses should be introduced if such a system is to be implemented?

SHOAL has serious concerns about the effects that any (further) adoption of transferable fishing rights are likely to have on fisheries dependent communities. Experience (e.g. in Iceland) has shown that such schemes tend to result in a transfer of fishing rights from individual fishermen and fishing communities to a few large companies. The (largely theoretical) benefits of transferable fishing rights may thus be outweighed by their societal impacts.

In general, SHOAL would not be in favour of any further shift towards transferable fishing rights, but if they are to be implemented would wish to see strong safeguards included to protect the rights of fisheries dependent communities.

Should this choice be left entirely to Member States or is there a need for common standards at the level of marine regions or at EU level?

SHOAL believes that there is a need for common standards in any efforts to reduce fleet capacity to ensure 'fair play', and in particular to ensure that some sectors of the EU fishing fleet do not benefit unfairly from the sacrifices of others.

4.2 Focussing the policy objectives

How can the objectives regarding ecological, economic and social sustainability be defined in a clear, prioritised manner which gives guidance in the short term and ensures the long term sustainability and viability of fisheries?

SHOAL believes that objectives should be defined primarily in terms of achieving sustainable and viable fishing communities (which in turn require productive fish

stocks and healthy marine ecosystems). This will require social, economic and ecological objectives to be defined within a coherent, interlinked framework, rather than in isolation from each other. Implicit in this is that objectives should be tested against each other and modified as required to achieve the optimum outcomes.

The principal point is that ecological sustainability should not be seen as an end in its own right, but rather as a means to an end (sustainable fishing communities).

Should the future CFP aim to sustain jobs in the fishing industry or should the aim be to create alternative jobs in coastal communities through the IMP and other EU policies?

SHOAL believes very strongly that the CFP should aim to sustain jobs in the fishing industry, as a means of supporting fishing communities (see above). SHOAL does not see the creation of alternative jobs - and by implication the reduction of the fishing industry - as a role for the CFP.

There is also a need for realism about the true potential for creating alternative employment in many coastal communities. For example, the inference that the tourism industry could be a substitute for a reduced fish catching sector is simply not a feasible solution in many fisheries dependent communities. There is also a need to recognise the distinct cultural and social place of fishing in many coastal communities.

How can indicators and targets for implementation be defined to provide proper guidance for decision making and accountability? How should timeframes be identified for achieving targets?

As indicated above, SHOAL believes that indicators linked to the sustainability and viability of fishing communities should be prominent in any list of indicators that is developed. It is important that the timescales allowed for achieving desired outcomes are realistic (and substantially longer than is currently the case).

4.3 Focussing the decision-making framework on core long-term principles

SHOAL welcomes the suggestions in the Green Paper that management under the CFP could be delegated to regional bodies or Member States. SHOAL believes that such measures have substantial potential to make the management of European fisheries more effective. SHOAL also believes that such 'regionalisation' would be much preferred to the proposed alternative comitology procedure.

How can we clarify the division of responsibilities between decision-making and implementation to encourage a long-term focus and a more effective achievement of objectives? What should be delegated to the Commission (in consultation with Member States), to Member States and to the industry?

SHOAL strongly believes that the best way to improve the management of European fisheries would be to devolve as much as possible of the process to regional management bodies and/or to Member States. This would allow the development of mechanisms both to set management objectives and to implement management measures that reflect the regional and local variations in European fisheries, and would represent a significant shift away from the failed centrist, 'one-size-fits-all' approach.

SHOAL does not believe that this could be achieved under the suggested comitology procedure, which would appear to strengthen the centralised approach to fisheries management.

Do you think decentralised decisions on technical matters would be a good idea? What would be the best option to decentralise the adoption of technical or implementing decisions? Would it be possible to devolve implementing decisions to national or regional authorities within Community legislation on principles? What are the risks implied for the control and enforcement of the policy and how could they be remedied?

SHOAL would strongly support the decentralisation of all decisions relating to European fisheries management. SHOAL does not believe that this should be limited only to technical matters, but rather that it should also include the setting of objectives and other related issues.

SHOAL would not favour any system which delegated technical management decisions only, while retaining central control of policy and objectives, etc. SHOAL would be concerned that any such system would retain effective control of management with a distant and accountable central body, while leaving regional bodies with the 'dirty work' of implementing its decisions.

How could the advisory role of stakeholders be enhanced in relation to decision-making?

SHOAL believes that the most effective way of enhancing stakeholders' role in decision making would be the regionalisation of the management process.

4.4 Encouraging the industry to take more responsibility in implementing the CFP

How can more responsibility be given to the industry so that it has greater flexibility while still contributing to the objectives of the CFP?

As the Green Paper summarises, there are many ways in which the industry could be given more responsibility; the obstacles to doing so would appear to be more political than technical. In any such system it will be essential that the objectives, targets, or limits that are set by the managing body are realistic, i.e. that the industry is not set 'impossible' targets to achieve.

How could the catching sector be best structured to take responsibility for self-management?

SHOAL believes that Producer Organisations (POs) offer perhaps the best short-term mechanism for increasing the industry role in fisheries management. SHOAL would point out that POs in Scotland, and the UK, are already relatively advanced in this regard.

What safeguards and supervisory mechanisms are needed to ensure self-management by the catching sector does not fail, and successfully implements the principles and objectives of the CFP?

SHOAL has no specific suggestions to make on this point, but is concerned that it should not become an 'excuse' for the introduction of transferable fishing rights (see earlier comments).

Should the catching sector take more financial responsibility by paying for rights or sharing management costs, e.g. control?

The questions of industry financial responsibility for fisheries management is highly complex, but any such suggestion must be based on the industry's ability to pay. Furthermore, it seems unlikely that the industry would be willing to pay to support what it might see as excessive bureaucracy, unnecessary management, or ineffective science. It seems likely that if the industry is to be expected to contribute to the costs of fisheries management it will want more say in how that money is used.

When giving more responsibility to the industry, how can we implement the principles of better management and proportionality while at the same time contributing to the competitiveness of the sector?

No comment.

Are there examples of good practice in particular fisheries that should be promoted more widely?

No comment.

4.5 Developing a culture of compliance

How can data collection systems be improved in the short and medium term to ensure coherent information for enforcement purposes?

Detailed data for enforcement purposes is already collected in some sectors of EU fisheries, and SHOAL would question the need for further improvements in these. Rather, the priority should be to bring data collection in all European fisheries sectors up to the level already achieved in some. At present there are substantial inequalities in data collection, with detailed information available for some fleets and sectors, but much less for others.

Which enforcement mechanisms would in your view best ensure a high level of compliance: centralised (e.g. direct Commission action, national or cross national controls) or decentralised ones?

SHOAL believes that it is important to recognise that there have been substantial improvements in levels of compliance in recent years, in at least some sectors of the European fishing fleet. In general, SHOAL believes that high levels of compliance can best be achieved by working with the fishing industry, rather than by adopting a confrontational approach to enforcement.

There is a general need to shift the emphasis in compliance from coercion and punishment to cooperation and persuasion. SHOAL also believes that a regional approach would be more likely to ensure high levels of compliance. There is also a need to ensure transparency and equality in levels of enforcement and penalties across the EU.

However, the best way of improving levels of compliance would be to simplify the fisheries management system and regulations and enhance their credibility in the eyes of the fishing industry. Fishermen are more likely to comply with regulations that they understand, respect and see the need for.

Would you support creating a link between effective compliance with control responsibilities and access to Community funding?

This would appear to be appropriate. Ensuring that all Member States fulfil their enforcement responsibilities should be a high priority. Again transparency and equality of treatment across the EU fishing industry are essential.

Could increasing self-management by the industry contribute to this objective?

SHOAL believes that it could. However, as noted above, the single most effective step to improving compliance would be to simplify the management system and regulations and enhance their credibility.

5 Further Improving the Management of EU Fisheries

5.1 A differentiated fishing regime to protect small-scale coastal fleets?

How can overall fleet capacity be adapted while addressing the social concerns faced by coastal communities... ?

SHOAL believes that there are a number of ways in which the management of fleet capacity can be reconciled with the concerns of coastal and fishing communities:

Firstly, to ensure that fishing communities are not unfairly penalised, a less 'simplistic' approach is required to the assessment and management of European fishing fleet capacity. This needs to be able to identify where any over-capacity actually is, i.e. in which regions, fisheries, or sectors, so that measures to reduce over-capacity can be effectively targeted. This will require more sophisticated methods of measuring capacity that are in use at present. Furthermore, it will require more accurate and up to date information on fish stocks, to ensure that capacity is not being cut unnecessarily.

Secondly, it needs to be accepted that - provided fisheries are effectively managed in other ways - over-capacity is not necessarily a bad thing and may often have positive social benefits for fishing communities. A fleet of vessels that only has to fish for part of the year to catch its full quota might technically be classed as 'over-capacity', but it will support more jobs (both direct and indirect) in a fishing community than a smaller fleet that fishes all year. Provided that overfishing can be prevented (for example through limitations on effort or catches), the social benefits of a larger fleet may outweigh the theoretical economic disadvantages of over-capacity.

Thirdly, and perhaps most importantly, SHOAL believes that sustaining fishing communities should be a core objective of the Common Fisheries Policy, rather than an afterthought. Fisheries policy should also be aimed at achieving social, rather than purely biological objectives. Sustainable fishing communities require sustainable fish stocks, but sustainable fish stocks do not require sustainable fishing communities. Sustainable fish stocks should be regarded as a means to an end (to sustain fishing communities), rather than as an end in their own right. The CFP should explicitly aim to manage fisheries in such a way as to sustain fishing communities. This will require trade-offs between social and biological objectives,

but need not be inconsistent with achieving sustainable fish stocks or other biological objectives.

How could a differentiated regime work in practice?

SHOAL does not believe that the proposed division between 'large-scale' and 'small-scale' fleets is practicable or appropriate in northern European fisheries, certainly not in Scotland or Shetland. In this area there is no clear division between small-scale/local and large-scale/offshore fisheries or fishing vessels. In particular, the larger vessels based in Shetland are also owned and operated by local, shareholding fishermen and operate both inshore and offshore at different times of year (as is the case with many Scottish vessels). Such vessels cannot simply be classified as either 'large-scale' or 'small-scale'.

A further risk of the proposed division is that it could divide fishermen into two classes: the owner-operators of small vessels, and simple employees on large company-owned vessels. Traditionally, many new young fishermen start out owning a small vessel and progress to larger vessels as their experience develops. Not only does this progression provide a 'career path' for fishermen it creates vacancies at the bottom allowing the entry of further new, young fishermen (the 'new blood' on which the industry ultimately depends). Dividing fisheries into small-scale and large-scale could create an obstacle to this progression.

How should small-scale fisheries be defined in terms of their links to coastal communities?

As noted above, SHOAL has grave reservations about the proposed division of fisheries into 'small-scale' and 'large-scale' sectors. While a small-scale sector may be relatively easy to define, the major difficulty is that (at least in this area) many larger vessels also have very strong links to coastal communities.

The only practicable division that SHOAL could envisage would have to be based explicitly on social and economic links to fishing communities rather than on criteria such as vessel size or operating area.

SHOAL suggests that any system of categorisation should distinguish vessels that are owned and operated by shareholding crewmen living in a fishing community, from company-owned fleets employing crew from anywhere, regardless of the size or operating area of the vessels.

What level of guidance and level-playing field would be required at EU level?

Whilst it would be essential that any system provides a level playing field, SHOAL also believes that it is essential that it is tailored to reflect the substantial regional variations within Europe in the nature of fisheries, fishing fleets and fishing industries. Above all, we must avoid any attempt to impose a standard 'one-size-fits-all' approach across the whole EU.

5.2 Making the most of our fisheries

How can long-term management plans for all European fisheries be developed under the future CFP? Should the future CFP move from management plans for stocks to fisheries management plans?

SHOAL would support a move away from single-stock management plans to fisheries management plans. However, it is important that any such plans set

realistic goals and timescales, take full account of economic and social (as well as biological) circumstances and are developed in full consultation with the fishing industry.

Should we consider reforming the CFP in two steps... ?

No comment.

How could the MSY commitment be implemented in mixed fisheries while avoiding discards?

A much greater awareness is needed by managers of the particular circumstances of mixed fisheries, and acceptance of the limitations these inevitably impose on management. Some of the problems of managing mixed fisheries might be reduced by moving to multi-species quotas, or by ensuring that the fishing opportunities for individual species in a mixed fishery are in line with their relative abundances on the fishing grounds. However, it needs to be recognised that in a mixed fishery it will probably never be practical to eliminate discards completely, nor to achieve MSY for all species simultaneously.

What should the main management system be for Community fisheries and to which fisheries should it apply?

Whilst the existing system of TACs has proven to be sub-optimal in some ways, SHOAL would favour the incremental improvement of existing systems rather than their wholesale replacement with some new system, that may turn out to be equally flawed. It is important to remember that, despite the frequent criticisms of the CFP, much of it does work fairly well most of the time. There are certainly problems with the existing system of setting TACs but on balance it would probably be better to retain and improve this system.

What measures should be taken to further eliminate discards in EU fisheries? Could management through transferable quotas be useful in this regard?

There needs to be a greater understanding - and acceptance - of the causes of discarding. Following increases in mesh-sizes and other technical conservation measures in recent years there is now very little discarding of undersized fish in the waters around Shetland. Discards in this area are now predominantly of marketable fish, and arise primarily because of mismatches between the apparent relative abundances of different species on the fishing grounds and the relative sizes of the quotas for those species. This has been exacerbated by the lack of scientific information and advice on some important stocks which has resulted in 'precautionary' cuts in quotas at a time when their abundances appear to be increasing (e.g. megrims).

In a mixed fishery there needs to be a more holistic approach to setting quotas, i.e. there is a need to set a 'package' of quotas for the species taken in that fishery that reflects their relative abundances on the fishing grounds. This will, in turn, require much more detailed and up to date information and advice on the state of these stocks than is currently available. Information from fishermen could make a significant contribution to this information.

However, especially in a mixed fishery, it is probably not realistic to expect that the catching of over-quota fish can ever be completely eliminated. Rather than simply trying to prevent fishermen from ever catching 'too much' fish, there is probably a

need to accept that fact and ensure that such fish is at least not wasted (e.g. by allowing all fish caught to be landed).

Overall, there is a need to clarify what the problem with discards is believed to be, i.e. to define why we want to eliminate discards, before we can identify a solution. Estimates of the quantity of fish discarded are already included in stock assessments, so arguably discards do not threaten the sustainability of fish stocks. If the concern is primarily about waste then the simplest solution would be to allow (or require) fishermen to land all they catch, while ensuring that they do not benefit from landing over-quota fish.

5.3 Relative stability and access to coastal fisheries

How could relative stability be shaped to better contribute to the objectives of the CFP?

Despite any shortcomings, SHOAL is strongly in favour of retaining the current system of relative stability. SHOAL is not convinced by the arguments advanced in favour of replacing or revising the current system. In particular, it is not convinced that there is any significant 'discrepancy between the quotas allocated to Member States and the actual needs and uses of their fleets'. No evidence of any such discrepancies has been provided.

The bottom line is that any change to the current system of relative stability - including any increase in 'flexibility' - will essentially involve taking fishing opportunities away from some Member States in order to give them to others. Contrary to the statement made in the Green Paper, SHOAL's view is that relative stability provides one of the very few guarantees within the CFP that fishing rights do remain with their fishing communities.

Overall, SHOAL strongly believes that any shortcomings of the current system of relative stability are far outweighed by its advantages and it would not be in favour of any substantial changes to, or renegotiation of, the system.

Should access to the 12 nm zone be reserved for small-scale fishing vessels?

SHOAL is strongly in favour of retaining the current system of restricted access to the 12 nm zone. While it would welcome measures to support coastal communities and local fisheries, as outlined above it has reservations about any simplistic division of large-scale and small-scale fishing vessels.

Rather than any system simply linked to vessel size, SHOAL suggests that there would be merit in exploring a system that provides enhanced rights within the 12 nm zone to local fishermen and to local fishing communities.

5.4 Trade and markets - from catch to consumer

How could market mechanisms be used to encourage the development of fisheries that are market efficient as well as sustainably exploited?

It is difficult to see how market mechanisms can achieve these aims so long as the European seafood market is dominated by relatively cheap imports. This inevitably has the effect of depressing prices for European seafood.

How can the future CFP best support initiatives for certification and labelling?

Initiatives for certification and labelling must be based on transparent and rational criteria. At present consumers are faced with a plethora of 'advice' on which fish to eat or not eat, but much of it is inaccurate, out of date or based more on emotive factors than facts. Such advice often encourages consumers to choose imported seafood over European produced seafood, often with little real evidence that they actually come from better managed fisheries.

There is a need to develop clear definitions for what constitutes a 'sustainable' fishery, and to ensure that the same standards apply to all fisheries and seafood products (including imports).

How can traceability and transparency in the production chain be best supported?

Probably by demonstrating the value of such measures to the seafood industry. At present it is far from clear that measures such as certification, traceability, etc., actually increase the value of seafood, especially for the fishermen at the start of the production chain.

How could the EU promote that fisheries products come from sustainably managed fisheries, providing a level playing field for all?

As outlined above, probably one of the most important steps would be to establish clear definitions and criteria for 'sustainable' fisheries, and ensure that these are equably applied to all seafood products (including imports).

Above all there is an urgent need for a greater self-confidence about, and promotion of, the sustainability of European fisheries. Rather than constantly 'doing down' European fisheries, managers (and politicians) should be much more actively promoting their merits.

How can the POs better work to match production with market needs...?

POs' ability to manage production again appear likely to be undermined by the domination of European seafood markets by relatively cheap imports. So long as this situation persists the position of POs, and producers, within Europe will be weak.

What is the role of trade policy in balancing the interests of producers, consumers and our relations with exporting countries?

As outlined above, it would appear important to ensure that efforts to develop European seafood markets are not undermined by cheap imports. There is a need to ensure that there is a level playing field in terms of quality, sustainability, etc. Amongst other things, the carbon footprint of imports should be factored into definitions of sustainability, etc.

5.5 Integrating the CFP in the broader maritime policy context

In which areas does the fishing industry interact closely with other sectors? Where specifically is integration within the IMP required?

It is self-obvious that fishing interacts with many other users of the marine space. However, it is important that the extent of conflict or competition is not over-exaggerated. Marine spatial planning and other similar initiatives should be seen

as means to an end, i.e. to addressing specific demonstrable problems, rather than as an end in their own right.

How can the future CFP contribute to the continued access of fisheries, including both fishing fleets and aquaculture, to marine space, within an integrated spatial planning framework?

There is a need for strong political backing for the EU fishing industry to support its claim to a 'share' of the EU marine space.

How can the future CFP best ensure consistency with the Marine Strategy Framework and its implementation?

No comment.

How can the future CFP support adaptations to climate change and ensure that fisheries do not undermine the resilience of marine ecosystems?

No comment.

5.6 The knowledge base for the policy

How can conditions be put in place to produce high-quality scientific research regarding fisheries in the future, including in regions where it is currently lacking? How can we best ensure that research programmes are well coordinated within the EU? How can we ensure that the resources available and that young researchers are educated in this area?

Arguably the two most important contributors to high-quality science are: making available the necessary funding; and ensuring that the funding is appropriately used. There are already major fisheries research programmes within the EU, funded by both the EU and Member States.

Shortcomings in current scientific systems include: data intensive methodologies (requiring long time series); delays between the collection of data and publication of results (meaning that they are often out of date); inflexibility (difficulty in responding to new or rapidly changing circumstances); and focus on 'traditional' fisheries (with no information available for newer, but sometimes commercially very important, fisheries). These shortcomings contribute to a number of problems that are eroding industry confidence in the fisheries science process, and consequently in fisheries management measures based on scientific results.

With the many challenges facing fisheries research programmes, including those outlined in the Green Paper and above, there is arguably a need to consider adopting novel scientific methods that can provide necessary information in a more timely and cost-effective manner.

There is also a pressing need to rebuild industry confidence in the scientific results. This should include greater involvement of the fishing industry in the process and greater 'ground truthing' of scientific results against the real world situation. There are substantial opportunities to make much greater use of fishing industry knowledge and data in the scientific process.

As the 'customers' of the fisheries science programme, there is a need for a much clearer statement from the European Commission and Member States of what they require from the programme. Ideally, the customers should specify what information they expect and the timescale within which it is required, rather than

allowing the fisheries scientists to decide what they will provide. It is important also that the fishing industry is closely involved in specifying what scientific information is required.

One way of promoting fisheries science within the EU, including enhancing opportunities for young researchers, would be to diversify the scientific base, i.e. to involve a much greater variety of institutes, including universities, in fisheries science programmes. At present fisheries science in the EU is largely dominated by a relatively small number of Government laboratories. Local and regional marine research centres could play a significant role in providing detailed and up-to-date information to feed into the research process. As an example, the NAFC Marine Centre in Shetland has an established research programme and currently undertakes a variety of research on behalf of the local fisheries industry.

There is also a need to recognise that much fisheries science, especially related to stock assessment, etc., is not particularly innovative or cutting edge, but needs to be continued over long periods of time. Traditional scientific funding models, which typically emphasise novelty and innovation, and have fairly limited durations, are thus ill-suited to the needs of fisheries science programmes.

How can the resources available best be secured and utilised to provide relevant and timely advice?

As outlined above, there is arguably a need to move towards novel methods that can provide the information that is needed by fisheries managers and the fishing industry in a more timely and cost effective manner. As the primary customers of the science process, the European Commission and Member States are in a strong position to much more actively specify their (and the industry's) requirements than is currently the case.

How can we better promote stakeholder involvement in research projects, and incorporate stakeholder knowledge in research-based advice?

The single most effective measure would be to increase the use of stakeholder knowledge. At present, there is typically no way of incorporating such knowledge into 'traditional' scientific systems, even where it is available. As well as wasting a potential knowledge resource, this creates frustration amongst stakeholders who feel that their knowledge is not valued. This is exacerbated by the low respect in which stakeholder knowledge appears to be held by some fisheries scientists.

There is a need to make the scientific systems more flexible and adaptable, and capable of making more effective use of stakeholder knowledge.

5.7 Structural policy and public financial support

What should be the top priorities for future public financial support and why? What changes can the sector not manage to bring about on its own and therefore require public financial support?

Priorities for public financial support should reflect the needs of individual fisheries areas and fisheries dependent communities with the objective of ensuring a sustainable and viable fishing industry and fishing communities. The recently adopted Lisbon Treaty takes account of territorial diversity and recognises that particular attention should be given to areas with specific circumstances. Therefore, a framework of public financial support needs to be flexible enough to

be tailored to specific circumstances of fisheries areas and to respond quickly to changing circumstances.

How can we change the focus of EU financial resources to promote innovation and adaptation to new policies and circumstances? Does any new policy area require funding? Should public financial support be focussed on specific transitions such as eliminating discards in the fishing industry?

The recently adopted Lisbon Treaty recognises the diversity of territories within the EU and that some areas - such as the northernmost regions with very low population density and islands - require particular attention. Therefore, EU financial instruments need to be flexible enough to be able to be adapted to particular circumstances.

The principle of subsidiarity which is strengthened within the Lisbon Treaty will allow for an increased role and greater involvement of national governments in the policy making process.

How can synergy and coherence of possible CFP funds with other EU and national instruments be ensured?

There is scope for greater coordination between EU funding streams to enable a simplified approach for accessing funding. SHOAL is keen to see that post-2013 there will be at least the same level of funding available for the fishing industry.

How can synergy between the pillars of a future CFP be achieved? Should public assistance be conditional on Member States' achieving policy objectives?

As with any public assistance, there needs to be overall objectives to be achieved however SHOAL would be wary of the impacts at local and regional level of the potential for assistance to be removed because of a Member State's failure to achieve objectives.

How can EU financial resources be developed to provide the flexibility needed to respond swiftly when a crisis occurs?

Flexibility in instruments is essential to enable Member States to respond quickly and intervene in crisis situations. It should be clearly demonstrated that there would be negative impacts on industry without that financial support during a crisis situation.

Should public financial support apply equally to all sectors (small and large scale)? Should the European Fisheries Fund continue to distinguish between convergence and non-convergence regions?

As noted earlier, in northern Europe, there is no clear division between small and large scale fisheries. As with any financial support, applicants must be able to demonstrate need and the impacts such funding can bring.

Should indirect support such as services related to fisheries management (access, research and control) continue to be provided free to all sectors of the industry?

SHOAL is not currently aware of any justification for moving away from this approach.

Should permanent fisheries subsidies be phased out, maintaining, on a temporary basis, only those aimed at alleviating the social impacts of the restructuring of the sector?

SHOAL believes that appropriate support should continue to be available to those communities which are dependent on fisheries.

5.8 The external dimension

SHOAL has no specific comments to make on the external dimension of the Common Fisheries Policy.

5.9 Aquaculture

What role should aquaculture have in the future CFP... ?

SHOAL is not convinced that aquaculture should have any role in the future CFP. It is a fundamentally different industry, separate from fishing, and there seems to be no greater reason to include it in the CFP than many other industries that might have some form of link to fishing.

The purpose of the CFP is the management of the fishing industry and it is important that attention is not distracted from that, or that focus diluted, by broadening the scope of the CFP to include other industries.

Conclusion

As stated earlier, SHOAL is keen to contribute to the development of European fisheries policy and believes that it is well-placed to do so. SHOAL would welcome the opportunity to engage in a meaningful and constructive dialogue with the Commission on the issues raised in this response, and on the development of European fisheries policy in general.

SHOAL - Shetland Ocean's Alliance

9th December 2009