

Peterhead



PORT AUTHORITY

JEW/CB/C17

25 August 2009

European Commission –
Directorate-General for Maritime Affairs & Fisheries
“CFP Reform”
B-1049 Brussels
Belgium

MARE "Arrivée"
N° 11236
Date: 31 OR 2009

Dear Sir

GREEN PAPER – REFORM OF THE CFP - RESPONSE

I am contacting you to formally state the position of Peterhead Port Authority, one of Europe's premier fresh fish port for both pelagic and demersal species, in regard to the measures being considered in the CFP Green Paper.

Much of the over capacity issues (and statements relative thereto) will be adequately responded to by the Scottish Fishermen's Federation, however, the matter of Individual Transferrable Quota (ITQs) rights gives us great concern. The Green Paper refers to ITQs as 'an efficient and less expensive way to reduce overcapacity' which is entirely correct but it is also the biggest threat to market stability, social cohesion and general fishing community sustainability. If stocks migrate or deviate from normal patterns, the mobility of fleets allows them to prosecute such stocks across a wide and varied spectrum of opportunities. If the rights to those stocks and opportunities migrate or deviate, i.e. are effectively sold off to the highest bidder, then the 'markets' dependant upon that resource are left unsupplied and unsustainable. There is no recourse to other fishing opportunities given the existence of the CFP. We therefore draw this perilous consideration of ITQs to your immediate attention and seek assurance that it will not feature in any reform of the CFP or that it will be left to each member state to decide.

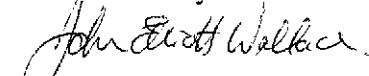
Although it is acknowledged within the Green Paper that any system of ITQs could be "complemented with proper safeguard clauses to avoid excessive concentration of ownership or negative effects on smaller-scale fisheries and coastal communities", we very much doubt whether any such safeguard clauses could be operated effectively and we are concerned that the introduction of ITQs will inevitably lead to these consequences i.e. fishing rights being held by a small number of large operators with smaller-scale fisheries and coastal communities becoming unsustainable.

Scotland's position is relatively straightforward on ITQs hence their effort to ensure that fishing rights remain for the use of Scottish vessels and that the bulk of this material is landed in Scotland. Any move or derogation away from a complete ban on ITQs, at least for this member state, can only serve to threaten the infrastructure

investment, viability and sustainability of UK fishing ports. UK fishing ports, in the main, are significant employers and contributors to their local coastal economic social well being – which in short translates to survival. We seek to be assured that our position on ITQs is considered at the highest level. Also, that the potential damaging consequences of pursuing the ITQ 'option' are fully understood, financially transparent and renegotiable should they be instilled subsequent to this plea and found to be wanting – although I fear we would be attempting to 'close the stable door after the horse has bolted!'

If you wish further dialogue on this matter or a delegate would wish to visit Peterhead, please contact me.

Yours sincerely



JOHN E WALLACE
CHIEF EXECUTIVE

cc R Lochhead, Cabinet Secretary for Rural Affairs and Environment, Scottish Government
M Neilson, Director, Marine Scotland