

The Key Points on the Common Fisheries Policy (CFP) Reform

This briefing is an attempt to concisely present comments on the CFP reform proposals. Considering the complexity of the many policies of the CFP and the current procedures with negotiation in European Council, The Parliament and the European Commission it is necessary to summarise our views. More detailed information and comments are available on CCB website. A link to policy briefings and papers on the CFP reform can be found here: <http://www.fishsec.org/publications/>

What we support in the Commission CFP proposal:

- **Rebuilding fish stocks** – The proposal has a clear target regarding the conservation of fish stocks, the CFP “shall aim to ensure, by 2015, that exploitation of living marine biological resources restores and maintains populations of harvested species above levels which can produce the maximum sustainable yield”.
- **Scientific advice** – The proposal says management should be “in accordance with the best available scientific advice”. This is stronger wording than the existing CFP’s “based on scientific advice”, and will provide a stronger basis for reaching the MSY by 2015 target.
- **Discards** – The landing obligation is a new development in the CFP and is a positive step in reducing the waste of fish, but it does not include selectivity targets and only includes fish which have quotas.
- **External dimension** – Improvements in transparency of the fleet operating in third country waters is a positive development.
- **Subsidies** – End to funds for engine modernisation. Vessels which commit serious infringements on regulations may have funding withheld. Simplification of the funding system, so there is only one financial instrument is also an improvement.

Key areas of the reform and our positions on these:

- **Prioritise environmental sustainability** – The CFP aims to give equal importance to environmental, social and economic aims, but with no fish there is no fishing.
- **Access to fisheries (access criteria vs TFCs)** – The most sustainable vessels should get more quota.
- **MSY and beyond** – Overfishing needs to be solved in many fisheries, we need to rebuild fish stocks. Quotas should be set according to scientific advice.
- **Overcapacity** – Capacity needs to be assessed in the EU then reduced where appropriate.
- **Regionalisation** – Council and Parliament set long-term objectives for European fisheries management. Technical decisions should be taken at a regional level or local level.
- **Discards** – a need to emphasise the selectivity issue. The discard ban/landing obligation should apply to all marine organisms, not just fish covered by quota.
- **Subsidies** – Connected to overfishing and overcapacity. Public aid should be used for the public good, not to enrich a handful of individual fishermen.

A green focus of the CFP is a healthy choice for both sea and people.

The sea is both the heart and lung of the planet earth, supporting all life also on land. A sea in balance including everything from algae to fish does not only affect one economic interest and food source, it affects all of them! The CFP has far reaching implications and it is our responsibility to get it right this time. We must respect the limits of the ecosystem and ensure that environmental ambitions in other directives and regulations align with the CFP.

Regionalized management

We support an ecosystem based fisheries management. We also believe that a key to improved management is to make it more regionalized. Both these objectives fit together or may actually be interdependent because of the more holistic and flexible needs of the ecosystem approach. Without a more locally adapted and faster decision making process it is difficult to see how the variation in different ecosystems and the specificities can be handled. We believe that the BALTFISH initiative is good and should be developed into a practical working model for management.

-We support an empowerment of the BSR region Member States to manage Baltic fisheries and we believe BALTFISH can be developed to become a practical solution to Baltic regionalization.

-Any regionalization must guarantee unanimous and equal enforcement and implementation in all MS of the rules and guidelines decided.

Low impact, and sustainable fishing does not need TFCs:

Our main focus is that the fishing that should be promoted is the fishing with lowest possible negative effect on the ecosystem. Fishing gear and fishing technique matter, not just vessel size, and we do not believe that small is always better:

-Give access to our common ocean resources via permits and licenses only to the fishermen with a history of compliance and the best fishing practices. Reward something good instead of trying to avoid something bad.

In the proposed new legislation the European Commission present TFCs or Transferable Fishing Concessions as a means to reduce the fishing fleets around Europe. TFCs are just a new name for Individual Transferable Quotas (ITQ). The idea is to give away TFCs to vessel owners, a fee might be charged, and they can then trade and sell these quotas to each other.

In the proposals all vessels over 12 metres and all vessels which use active gears (trawls) are to be included in the TFC system. Small boats which use passive gears (nets) can be included or excluded – this is decided by the Member State.

The Commission thinks that overcapacity is one of the biggest problems facing EU fisheries management, and that TFCs will magically solve the problem as the market will naturally balance capacity to fishing opportunities.

Problems with the TFC system: It is likely that quota will be concentrated in the hands of a few vessels owners, those that have the most money, regardless of whether they are sustainable or are examples of good fishing practice.

TFCs don't encourage environmental sustainability. A system of access criteria, giving extra quota to the most sustainable vessels would do this, and would also reduce capacity without cost to the taxpayer by forcing those boats that are the most unsustainable to leave the industry as they would have no quota.

Examples of access criteria are: low bycatch rates, good selectivity, impact on the marine environment, pollution, benefit to local communities, good quality employment, energy efficiency...and so on.

TFCs might not actually reduce capacity, in terms of how much fish could be caught. It is likely that TFCs will lead to fewer fishing boats which employ less people, but these remaining vessels will concentrate fishing effort by having bigger and more powerful engines, to catch more fish.

There has never been an assessment of the capacity of the EU fleet, so Member States do not know which fisheries have existing overcapacities. Mandatory TFCs are a blunt single instrument which we are told will reduce capacity, but there will be many fisheries where it is an inappropriate management tool. Member States should retain the flexibility to choose which method of quota distribution is most appropriate for different fisheries.

Discard ban and selectivity:

We support a ban on throwing unwanted fish over board and instead land the whole catch. Discarding however is a result of poor selectivity and this must improve as the first priority. We will never accept to simply reduce the minimum marketing size (MMS) of legally sellable fish size as a solution to poor gear selectivity that catch the wrong fish or too small fish that has never had the chance to reproduce.

Today the proposed discard ban does not include all species and we think this is a mistake; it currently only covers most fish that have a quota. Combining better selectivity in a low negative impact fishery is the future fisheries for the Baltic Sea.

-we support a selective fishery guided by a discard ban that does not target fish that has never spawned.

-we want all fish species in the Baltic Sea to be included in a discard ban and all forms of bycatch must be minimized. Having a landing obligation for all catches would also lead to more accurate scientific advice.

Subsidies and the EMFF

Subsidies or financial support is a big part of the fisheries policies in the EU. Financial support, direct or indirect, is a subsidy.

-Public aid should no longer be part of the problem, but it should be a part of the solution. If any taxpayer funds are to be used, let it be used for common good. The Commission European Maritime and Fisheries Fund (EMFF) proposals outline 6.6 billion euros of subsidies.

A new element in the proposals from the Commission is to give more support to sustainable aquaculture. We doubt that such support is more positive than negative and we see a clear risk of creating a new sector heavily dependent on subsidies that are almost impossible to remove once established.

- A growing aquaculture industry should not be given large amounts of subsidies but rather start acting on the open market from the beginning to form viable sustainable businesses. These subsidies are likely to lead to the same overcapacities in fish farming that we currently see in the catching industry.

Aquaculture

The Commission has proposed to give aquaculture a boost in Europe with the pretext of sustainable aquaculture. Key issues to improve in aquaculture are the content of the feeders used and the link to the fishery, and also problems with pollution, parasites and diseases. Continuing to sweep the oceans for fish protein for aquaculture is not acceptable and the fish feed must be composed by other protein sources than fish. The part that does come from fish should only come from the BSR to hinder the import of nutrients to the Baltic Sea.

Aquaculture does have potential to grow but more importantly to improve its performance. We cannot accept poorly operated aquaculture here or imported fish coming from bad aquaculture operations anywhere else.

-we demand a nutrient balanced aquaculture in the BSR meaning that inputs must come from the BSR only and that input and output are in balance

-we demand that the fodders used in aquaculture must be based on other sources of protein than from fish.

-we believe that the expansion of aquaculture should be land based to minimize risks of spreading diseases and parasites as well as reducing the risk of escaped fish.

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