

Brussels, 25 May 2012

**To: The European Council
The EU Member States
The European Commission – DG MARE and DG ENVI
The European Parliament – Committees PECH and ENVI**

Please accept our latest position and amendments to the CFP reform, which we hope you will take into account.

Yours sincerely,

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EAA, the European Anglers Alliance is composed of key angling organisations from 14 European countries with about 3 mill members. Website: www.eaa-europe.eu



EFTTA, the European Fishing Tackle Trade Association is the leading European trade association for manufacturers and wholesalers of sportfishing equipment. Membership is open to manufacturers, wholesalers, agents and press in the tackle industry. The European tackle trade's annual turnover is about 2 billion euro supporting 100,000 jobs. Website: www.eftta.com

Joint EAA and EFTTA input to the reform of the CFP, May 2012

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PART 1

The case: The CFP needs to recognise the validity of, and explicitly mention Recreational Sea Fisheries

Introduction

The Commission's CFP reform package was published 13 July 2011.¹ This submission follows our CFP Reform Green Paper contribution of December 2009² but is shorter and narrower in scope. We wish to focus attention on the fact that recreational fisheries are not dealt with fairly and equitably under the CFP compared with other sectors such as commercial fisheries and aquaculture. The validity of recreational fisheries was stressed and justified at the last CFP reform 2001/2002, but the Commission's CFP reform proposals from July last year still fail to mention recreational fisheries.

Our case today is even stronger than it was in 2001 as a number of legislative acts, adopted since 2002, relate explicitly to recreational sea fisheries. We now have a situation where recreational fisheries are demonstrably included in CFP legislation, albeit on an ad-hoc, piece meal basis and almost exclusively in the context of the requirements and well-being of other fisheries sectors.

We believe the recreational sea fishing sector is of sufficient validity to warrant explicit recognition by the CFP alongside other sectors in a coherent way which results in the sector's requirements being fully taken into account and dealt with as those of other sectors. The CFP can, and should, provide a just and level playing field for all stakeholders without prejudicial or discriminatory treatment. In this regard the EU is decades behind the USA and other advanced nations³.

The Recreational Fisheries Sector^{4 5}

The term *Recreational Fisheries* covers various (sub)sectors, segments and disciplines. In most, if not all, countries recreational angling (rod and line fishing) is the largest of the recreational fisheries sectors measured by numbers of participants and economic impact and employment. Of Europe's 25+ million anglers some 8-10 million go sea angling. The annual socio-economic value of these sea anglers is estimated to be 8-10 billion euros. Tens of thousands of jobs depend on anglers' expenditure. Recreational angling (by rod and line) is the catching of fish for non-commercial purposes⁶. Recreational angling is an environmental low impact activity. Well managed it is a most sustainable way of catching fish. It does little to no harm to the aquatic environment and it frequently allows release of unwanted or illegal-to-keep fish with a very low mortality rate in general if handled well.



Activity tourism is one of the main growth areas of tourism globally and in some countries angling tourism is highly valued and attracts specific government attention in respect of development and marketing. The potential exists for most countries with a marine coast line to benefit from angling tourism.

The fish species sought by the three sectors, recreational sea angling, other recreational fisheries and commercial fisheries, are sometimes the same, but most are not. Recreational sea angling is dependent on relatively few fish species compared to commercial fishing. The fishing motivations differ much in and between the three sectors. However, the CFP is geared towards the commercial fisheries modality and needs solely (to provide high yield and maximising profit), which is not always to the benefit of the recreational sea angling sector and its needs for e.g. good catching opportunities and big fish.

The Common Fisheries Policy (CFP)

The CFP covers management of the fisheries and conservation of (exploited) fish stocks, or in the words of Commissioner Damanaki:

“The Commission’s main policy objectives are to provide for the conservation on fish stocks with a view to ensuring their long-term sustainability and for the fishing sector dependent on these stocks.”⁷

Additionally, the CFP provides funding and support to the development of new fisheries, aquaculture, processing and marketing as well as paying for access to some fisheries in non-EU waters.

The Recreational Fisheries Sectors and the CFP

Recreational fisheries were not considered at the inception of the CFP in the early 80s. Over the years very little has changed in this regard. The case we put forward before the last CFP reform in 2001 is for the most part as valid today as it was then e.g. that:

“The CFP review provides the opportunity to include amongst its priorities...: “to ensure the recreational angling industry is a fully recognised user stakeholder of fish stocks within the CFP and must be referred to specifically by name in order to maintain and develop the competence to deal with the needs of the sport [read “sector”] and its dependent industries.”⁸

Other Fisheries Sectors and the CFP

Today, the commercial fisheries sector, the aquaculture sector and the processing sector continue to enjoy priority status and benefit from the support and protection given by the CFP over and above, sometimes against, other exploiters of the fish stocks e.g. our sector, recreational sea angling. The CFP is widely acknowledged as having failed to protect our public fishery resources and very many stocks are far less abundant than they used to be and are represented by mainly small immature individuals. The recreational fisheries sector, a sector that is every bit as dependent on our fishery resources as any other, has been negatively impacted by the failure to manage stocks sustainably. That the entirely legitimate right of EU citizens to access public fishery resources for personal use has been degraded is bad enough but that the recreational sector remains disadvantaged compared to other sectors who are explicitly main players in the CFP, is neither fair nor equitable and it doesn't add-up from an economic perspective either.

The multi-billion value of recreational fishing and its growth potential are often overlooked, or neglected, as the fish caught are not priced or marketed and the total socio-economic value doesn't get mentioned in national or EU statistics but has to be extracted from across various business activities.⁹ However, recreational sea angling generates economic activities worth billions of euros and supports tens of thousands of jobs, most often to the benefit of rural communities. This money and these jobs are as real as the money and jobs generated by other fisheries activities.¹⁰¹¹

As stated in the CFP reform proposal “marine biological resources are a common good.”¹² Logically, and for reasons of fairness and achieving best/better outcome to society from the publicly owned fishery resources the recreational angling sector should, of course, be paid as much attention, protection and support as other fisheries sectors. Nevertheless, the Commission's proposal for a CFP reform has absolutely nothing on offer to recreational fisheries. Recreational fisheries are effectively neglected (again) with no mention at all, despite being mentioned in the CFP Reform Green Paper of April 2009¹³.

The CFP of 2002 does not mention recreational fisheries explicitly - but legislation adopted under the CFP since the 2002 reform does

Former Commissioner Borg said in “The Common Fisheries Policy - A users Guide”:

“The Common Fisheries Policy (therefore) does not represent a fixed body of rules. It is rather a work in progress that has to adapt to changing biological and political circumstances”¹⁴

Since 2002 under the present CFP, indeed, we have seen new legislation and other acts come into force specifically aimed at recreational fisheries. Below we show six such examples. We find that these examples alone could be regarded as justification for an explicit mention of recreational fisheries in the new CFP. The basic CFP text ought to be adapted to and be a reflection of reality.

Examples: Four Regulations and two Decisions with recreational fisheries provisions

1) - COUNCIL DECISION of 19 July 2004 establishing Regional Advisory Councils under the Common Fisheries Policy¹⁵

This Decision contains an explicit mention of “recreational or sport fishermen” (Art 1(3))

Note: EAA is represented on all seven Regional Advisory Councils presently in existence.

2) - COUNCIL REGULATION of 25 February 2008 concerning the establishment of a Community framework for the collection, management and use of data in the fisheries sector and support for scientific advice regarding the Common Fisheries Policy¹⁶

This Regulation defines “recreational fisheries” and “fisheries sector”. Noteworthy is the inclusion of recreational fisheries in the definition of “fisheries sector”. Article 2:

(a) ‘fisheries sector’ means activities related to commercial fisheries, recreational fisheries, aquaculture and industries processing fisheries products;

(c) ‘recreational fisheries’ means non-commercial fishing activities exploiting living aquatic resources for recreation or sport;

Note: This definition of “fisheries sector” is a most welcome one. We suggest it should be copied into the CFP and all accompanying legislation such as the new European Maritime and Fisheries Fund.

3) – COUNCIL REGULATION of 20 November 2009 establishing a Community control system for ensuring compliance with the rules of the common fisheries policy,¹⁷

This Regulation has:

- A recreational fisheries chapter: “Chapter V - Control of recreational fisheries”

- A definition on “recreational fisheries, Article 4(28): “recreational fisheries’ means non-commercial fishing activities exploiting marine living aquatic resources for recreation, Tourism or sport;”

Note: “tourism” is included (“tourism” is not included in the recreational fisheries definition from the data collection framework - see example 2 above).

- A sales ban of fish caught in recreation fisheries, Article 55(2): “The marketing of catches from recreational fisheries shall be prohibited.”

Note: During the drafting process we welcomed such a sales ban, which we have promoted since the year 2000¹⁸. The ban helps to clearly separate the recreational sector from the commercial sector.

The Commission originally proposed to include recreational fisheries in the TACs & Quota system¹⁹. We were, and remain, opposed to this as it is not needed and socio-economic and catch data is missing for the recreational sector and the “relative stability” scheme would have to be taken into account and maybe renegotiated if recreational fisheries should be allocated a fair share of the quotas. The very small tuna quotas offered to recreational anglers in France, Spain and Italy (ca. 1%) are classic examples of how badly affected recreational anglers could be if included within the TACs and Quota system without transparent consideration of the socio-economic data.

There is a better solution as advised by the North Sea RAC “...that the revised CFP [...] makes it clear that recreational catches should not be entered into the quota system but should be incorporated the stock assessment.”²⁰

4) – COMMISSION DECISION of 18 December 2009 adopting a multiannual Community programme for the collection, management and use of data in the fisheries sector for the period 2011-2013.²¹

This Decision contains detailed specifications for data to be collected with regard to recreational marine fisheries for a number of species (eels, cod, sea-bass, salmon, sharks, Bluefin tuna).

5) – PROPOSAL for a REGULATION of the European Parliament and of the Council establishing a multiannual plan for the Baltic salmon stock and the fisheries exploiting that stock (2011)²²

Recreational fishing charter boats are defined for the first time in EU legislation (named “service vessels”). Fish catches by these boats shall be counted against the national quota. The Member States shall also report (Article 23.2) “development of the national fishery including the share of catches between offshore waters, coastal waters and rivers and between commercial fishermen, undertakings of service vessels and other recreational fishermen.” It is worth noticing the data analysis conducted to

support the development of this plan.²³ The analysis has extensive chapters on recreational fisheries not only about catches but the economics as well.²⁴ This is unusual but very welcome as “political decision-making needs information about the costs and the benefits of the proposed changes in policy programmes”.²⁵

6) - COUNCIL REGULATION of 21 December 2006 concerning management measures for the sustainable exploitation of fishery resources in the Mediterranean Sea,²⁶

This Regulation has a recreational fisheries definition in Article 2(8): “leisure fisheries” means fishing activities exploiting living aquatic resources for recreation or sport.” Article 17 with the subtitle “Leisure fisheries” prohibits the use of a range of gears within recreational fisheries: “The use of towed nets, surrounding nets, purse seines, boat dredges, mechanised dredges, gillnets, trammel nets and combined bottom-set nets shall be prohibited for leisure fisheries. The use of longlines for highly migratory species shall also be prohibited for leisure fisheries.” Some underwater recreational fishing is regulated by Article 8(4): “Spear-guns shall be prohibited if used in conjunction with underwater breathing apparatus (aqualung) or at night from sunset to dawn.”

Comment: The six examples above show clearly that recreational fisheries are dealt with and increasingly legislated for under the CFP. This should be reflected in the new CFP by giving explicit recognition to the recreational fishing sector alongside the other fisheries sectors.

Data collection and surveys: ICES, Member States and angling organisations

The new legislation obliges more and better data to be provided on (some) recreational fisheries. Consequently ICES has established a Working Group on Recreational Fisheries Surveys (WGRFS).²⁷

In the proposed CFP reform²⁸ it is stressed that “reliable and complete data, both for scientific advice and for implementation and control purposes are central to well-functioning fisheries management”. This is evident but data is lacking in particular for the recreational sector.

We urge to avoid “low budget” data collection. Data of poor quality often leads to strange conclusions, which may trigger unnecessary and unwelcome management measures. Such outcomes nourish mistrust of the data collection system by the angling community and individual anglers resulting in unnecessary difficulties for future data collections.

We also urge the Member States to invite national angling organisations to be involved directly with the data collection work at the earliest stages e.g. by inviting them to be member of steering groups. We also urge Member States to seek and make use of data produced by the angling organisations. Some organisations have the capacity to do large scale surveys themselves and have done so in the past.

Since 2002 a number of Member States have published socio-economic studies on recreational fisheries²⁹. These are useful and much needed but there is a need for all Member States to undertake such studies. In particular more needs be done with regard to data on the economic side of things. Surveys need to be repeated regularly to provide time-series and trend figures. Ideally, this should be co-ordinated at the EU level and/or regionally, with a pan-European study conducted e.g. every four or five years, as it happens in the USA and Canada. In Europe Finland and Sweden are the only countries to conduct surveys on a regular basis.

Request for a recreational fisheries platform to be established under the CFP

The CFP reform proposal includes a proposal to create an Advisory Council for Aquaculture “for stakeholder consultation on elements of Union policies which could affect aquaculture.” In our Green Paper response we suggested something similar to be established for recreational fisheries and its dependant businesses (tackle trade, boating, tourism, local communities etc.) in the form of a working group on ACFA, Advisory Committee on Fisheries and Aquaculture. We also proposed that a dedicated recreational fisheries unit should be established within the Commission. Both suggestions are given “careful consideration” by the Commission according a letter of 11 April 2011 from Director Montesi on behalf of Commissioner Damanaki: “..I fully agree that the importance and impact of recreational fisheries has tended to be neglected in the past, and that this should be rectified. I have taken note of your suggestions that in the context of the CFP reform recreational fisheries should be better presented on ACFA and that the Commission should establish a recreational fisheries unit. I will give both suggestions careful consideration.”³⁰

We haven't heard if the Commission's consideration has or will lead to something tangible. So here we repeat our suggestions. We are aware that our ACFA suggestion might be made redundant by the reform of ACFA but still there is a strong need for a recreational sea fisheries platform “of some kind” to be established under the CFP.

PART 2

Some potential threats to Recreational Fisheries in the CFP proposal: - Growth of aquaculture, small-scale fisheries, TFCs, discards, salmon

The Commission's CFP reform proposal aims at, among other things, to grow considerably the aquaculture sector and to introduce positive discrimination in favour of small-scale fisheries. Both aims are admirable, however, they do carry potential threats to recreational sea fisheries, which should not be overlooked. An increase in the aquaculture production could result in more escapes of genetically modified fish and increase the spread of diseases from farms to the detriment of some wild fish stocks of importance to the recreational sector e.g. salmon. Small scale commercial fisheries are frequently carried out in inshore waters where most recreational fishing takes place and competition for increasingly scarce fishery resources is a likely outcome.

Furthermore, the proposed "transferable fishing concessions" (TFCs) could mean that vast amount of fishery resources - termed "common good" in the CFP reform proposal - effectively become privatized assets. This would undermine and contradict the very notion of "common good". Some fish exploiters may see limits put on their access to fish stocks and catch quantities for this reason alone. Any TFC scheme requires the most scrupulous consideration to ensure 'ownership' remains firmly in the public domain and that 'access' is based upon informed assessment of which exploiters generate the best socio-economic return. If these criteria are not strictly adhered to the CFP may well deliver more unfairness and inequitable treatment amongst fisheries stakeholders in particular to the detriment of small-scale fishers and recreational fishers³¹.

We welcome a discard ban "in principle", however, the CFP reform proposal's narrow phrasing of the ban and the accompanying "land everything" obligation is a cause for worry. Fisheries and catching techniques with proven low mortality from discards should be exempted from these provisions. There is no need to bring to land unwanted catches if the species can survive being discarded. For the same reason recreational sea angling should be exempted as well due to the low release mortality from this kind of rod and line fishing. In fact we urge using the term "release" for "discard" with regard to recreational sea angling. Last year EAA delivered two inputs on that issue³².

If the CFP reform proposal doesn't lead to less by-catch (via more selective gear and catching methods) then a discard ban may be worth less than nothing seen from a fish stock conservation point of view. In this regard we welcome Article 7(d), which reads: "...establishing incentives, including those of an economic nature, to promote more selective or low impact fishing;"

Salmon conservation and management.

We find, that the CFP text is in need of amending with regard to management of salmon fisheries. Salmon is a very important species for the recreational angling sector. However, the CFP is not very well suited to provide efficient management of salmon fisheries. Some rivers have lost their original salmon and many stocks are in trouble today. Specific attention and measures need be devoted salmon fisheries, in particular mixed stock fisheries.



Here we modestly suggest (amendment 5) that the CFP includes the definition of mixed stock (salmon) fisheries from the NASCO Guidelines³³ as adopted by EU and the other NASCO Parties in 2009³⁴ and that a multiannual plan shall include specific measures for mixed stock salmon fisheries, to ensure that no salmon stock is exploited unsustainably.

Endnotes with web-links to documentation

¹ http://ec.europa.eu/fisheries/reform/proposals/index_en.htm

² http://ec.europa.eu/fisheries/reform/docs/eea_en.pdf

³ The US "CFP" – the Magnuson Stevenson Act – is a good example for EU to learn from. In the US recreational fisheries are treated as a sector as important as commercial fisheries. One out of many examples can be found in the section 104-297(28), which defines the term "optimum", with respect to the yield from a fishery, as: "the amount of fish which (A) will provide the greatest overall benefit to the Nation, particularly with respect to food production and recreational opportunities, and taking into account the protection of marine ecosystems;; (B) is prescribed as such on the basis of the maximum sustainable yield from the fishery, as reduced by any relevant economic, social, or ecological factor; and (C) in the case of an overfished fishery, provides for rebuilding to a level consistent with producing the maximum sustainable yield in such fishery..."; www.nmfs.noaa.gov/sfa/magact/magword.doc

⁴ Definition of "recreational fisheries sector" from "EIFAC Code of Practice for Recreational Fisheries", FAO (2008): **"Recreational fisheries sector:** the entire network of stakeholders involved in or fully or partly dependent on recreational fisheries including amongst others fisheries ministries and agencies, managers, non-governmental organizations (e.g., umbrella angling associations and clubs), anglers, non-angling recreational fishers, tackle shops and tackle manufacturers, bait suppliers, charter-boating industry, recreational boat builders and chandlery suppliers, marina operators and specialised angling and fishing media, recreational fishing tourism and other related business and organisations as well as all other enterprises supporting recreational fisheries including aquaculture operations that produce stocking material or commercial fishing enterprises that sell angling tickets on their waters. A range of other stakeholders and managerial regimes are not included in this definition though they may run or advocate activities and developments that have a direct impact on the recreational fishing quality and the recreational fisheries sector, the sector's viability and growth potential (e.g., hydropower generation, water management, irrigation)." www.fao.org/docrep/012/i0363e/i0363e00.htm

⁵ Three different European recreational fisheries definition approaches, which don't contradict but complement each other:
a) the recreational angling definition by EAA (2004) www.eaa-europe.eu/index.php?id=21 ;
b) EIFAC Code of Practice for Recreational Fisheries (2008), p. 20-21; <ftp://ftp.fao.org/docrep/fao/011/i0363e/i0363e00.pdf>
c) "FINAL REPORT, EU contract FISH/2004/011 on "Sport Fisheries" (or Marine Recreational Fisheries) in the EU For The European Commission Directorate-General for Fisheries"; (2006) M. G. Pawson, D. Tingley, G. Padda1, and H. Glenn http://ec.europa.eu/fisheries/publications/studies/sportfishing_2006.pdf

⁶ See "RECREATIONAL ANGLING – DEFINITION" - A definition on Recreational Angling agreed by the European Anglers Alliance at the General Assembly 2004.
www.eaa-europe.eu/fileadmin/templates/eea/docs/DEFINITION-EAA_Angling_Def_long_FINAL_EN.pdf

⁷ http://ec.europa.eu/commission_2010-2014/damanaki/headlines/press-releases/2012/04/20120411_en.htm

⁸ EAA's 2001 CFP reform response:
www.eaa-europe.eu/fileadmin/templates/uploads/Positions/EAA_contribution_to_CFP_Greenpaper_2001.pdf

⁹ This report produced (2006) for the DG MARE "Employment trends in all sectors related to the sea or using sea resources" can serve as a typical example. In spite of its all-inclusive title the report has chapters only on recreational boating, commercial fisheries, aquaculture and processing and more but nothing on recreational fishing.
http://ec.europa.eu/maritimeaffairs/documentation/studies/documents/main_report_en.pdf

¹⁰ Report (2009), "The Sunken Billions: The Economic Justification for Fisheries Reform", The International Bank for Reconstruction and Development / The World Bank, p. 44:
"For example, in the United States, the total national economic impact from commercial finfish fisheries is 28.5 per cent of the impact created by marine recreational fisheries (Southwick Associates 2006), and in the case of the striped bass resources, which are shared between the commercial and recreational sectors, anglers harvest 1.28 times more fish, yet produce over 12 times more economic activity as a result (Southwick Associates 2005)."
<http://siteresources.worldbank.org/EXTARD/Resources/336681-1224775570533/SunkenBillionsFinal.pdf>

¹¹ "The Relative Economic Contributions of U.S. Recreational and Commercial Fisheries" (2006); SA Southwick Associates for the Theodore Roosevelt Conservation Partnership. Page iv:
'In 2004, approximately 82 million marine recreational fishing trips were taken by 14 million anglers. These anglers spent over \$16 billion, which in turn generated over \$34 billion in total economic activity, supporting nearly 360,000 full and part time jobs, and billions in tax revenues and income (salaries, wages and business profits).'
www.angling4oceans.org/pdf/Economics_of_Fisheries_Harvests.pdf

¹² Recital 29 (page 15) <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:52011PC0425:EN:NOT>

¹³ The Green Paper (p.15): "Many coastal communities remain dependent on fisheries for their income, some of them with limited potential for economic diversification. It is therefore essential to secure a future for coastal, small-scale, and recreational fishermen taking fully into account the particular situation of the small- and medium-sized enterprises."
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:52009DC0163:EN:NOT>
www.eaa-europe.eu/fileadmin/templates/uploads/news/Commission_Regulation_Control_ver_EN_final_revised_7_March.pdf

¹⁴ http://ec.europa.eu/fisheries/documentation/publications/pcp2008_en.pdf

¹⁵ 2004/585/EC <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2004:256:0017:0022:EN:PDF>

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- ¹⁶ 2008/199/EC <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32008R0199:EN:NOT>
- ¹⁷ 2009/1224/EC <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32009R1224:EN:NOT>
- ¹⁸ EAA Resolution on the sale of fish (2000), and included the EAA Definition on Recreational Angling (2004) www.eaa-europe.eu/index.php?id=22
- ¹⁹ COM/2008/0721 final – see article 47. <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:52008PC0721:EN:NOT>
See also EAA release of 7 January 2009 <http://www.eaa-europe.org/index.php?id=105>
- ²⁰ Page 12, NSRAC-1112-5 2012 03 13 CFP Position Paper FINAL
www.nsrac.org/wp-content/uploads/2012/03/NSRAC-1112-5-2012-03-13-CFP-Position-Paper-FINAL.pdf
- ²¹ 2010/93/EU <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32010D0093:EN:NOT>
- ²² “Proposal for a Regulation of the European Parliament and of the Council establishing a multiannual plan for the Baltic salmon stock and the fisheries exploiting that stock” COM(2011) 470 final, 12 Aug 2011:
http://ec.europa.eu/fisheries/cfp/fishing_rules/multi_annual_plans/list_of_plans/com_2011_470_en.pdf
Background: http://ec.europa.eu/fisheries/partners/consultations/baltic_salmon/index_en.htm
EAA and EFTTA position and amendments to the plan: <http://www.eaa-europe.eu/index.php?id=22>
- ²³ “Annexes 1 -7 to the report of DATA ANALYSIS to Support the Development of a Baltic Sea Salmon Action Plan”
http://ec.europa.eu/fisheries/partners/consultations/baltic_salmon/baltic_sea_salmon_annex_en.pdf
- ²⁴ Ibid. See chapter 4, page 34 onwards: “Economic value of the recreational salmon fisheries”.
- ²⁵ Ibid. page 35: “Why economic valuation? Political decision-making needs information about the costs and the benefits of the proposed changes in policy programmes. Usually, monetary measures are available about the costs and about some benefits that have market effects. But there are also benefits, and sometimes costs, that do not have markets, and thus information about them is not directly available. The purpose of valuation studies is to make a part of these benefits explicit and comparable with other monetary measures.”
- ²⁶ 2006/1967/EC <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32006R1967:en:NOT>
- ²⁷ www.ices.dk/workinggroups/ViewWorkingGroup.aspx?ID=608
- ²⁸ P. 8, chapter “Science base for fisheries management”
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:52011PC0425:EN:NOT>
- ²⁹ Some of these studies are uploaded to the EAA website: www.eaa-europe.eu/index.php?id=19
- ³⁰ Written answer to Mr Markku Markkula, president of the Finnish Federation for Recreational Fishing from Carla MONTESI, Director on behalf of Commissioner DAMANKI, 11 April 2011,
http://www.eaa-europe.eu/fileadmin/templates/uploads/CFP/Damanaki_reply_to_EAA_Finland.pdf.pdf :
- ³¹ - “Rights Based Management in Fisheries”, workshop report, Sept 2007; p. 7:
Dr Bjørn Hersoug: “...Strong rights for one group (fishers) may imply weak or unclear rights for other stakeholders, such as aboriginals, recreational fishers, aquaculture farmers and environmentalists. It is difficult or impossible to foresee that these groups can handle their concerns on the market.”
http://ec.europa.eu/fisheries/partners/consultations/rbm/contributions/european_parliament_en.pdf
- Rights-Based Fisheries Management - EU Consultation (2007) – cutting from response by EAA:
“For us as anglers we have a problem with the basic principle in Right Based Management (RBM) that some stakeholders are given 'ownership' or 'quasi rights' to parts of our common resource, the fish stocks, if this means that we as anglers are losing rights.” http://ec.europa.eu/fisheries/partners/consultations/rbm/contributions/european_anglers_alliance_en.pdf
- ³² EAA input to the 2011 STECF Spring plenary meeting; April 2011:
www.racmed.eu/images/stories/reunions/2011/RECR_FISH/Release_EAA_to_STECF_EN_final.pdf
„Secret” EU Fisheries Committee will make Recreational Angling suffer, 7 March 2011
- ³³ NASCO Guidelines for the Management of Salmon Fisheries; p. 4: “Mixed-stock fisheries (MSFs) - NASCO has defined MSFs as fisheries exploiting a significant number of salmon from two or more river stocks;”
http://www.nasco.int/pdf/far_fisheries/Fisheries%20Guidelines%20Brochure.pdf
- ³⁴ “In 2009, the Council adopted Guidelines for the Management of Salmon Fisheries to assist jurisdictions in making further progress in implementing NASCO's agreements.” <http://www.nasco.int/fisheries.html>

PART 3

Six amendments* to the Commission's CFP proposal of July 2011

* These amendments concern the "basic regulation" COM (2011) 425 final, 13 July 2011¹

Amendment 1 - Underlined words are inserted:

Article 2

General Objectives

1. The Common Fisheries Policy shall ensure that fishing and aquaculture activities provide long-term sustainable environmental, economic and social conditions and contribute to the availability of food supplies and recreational opportunities.

Justification: *To mention recreational fisheries explicitly as it happens in e.g. USA².*

Amendment 2 - One word deleted ("commercial"); underlined words are inserted:

Article 3

Specific objectives

For the purpose of achieving the general objectives set out in Article 2, the Common Fisheries Policy shall in particular:

(a) eliminate unwanted catches of stocks with catch limit and gradually ensure that all catches of such stocks are landed, or released if possible with no or low mortality incurred;...

Justifications:

- "stocks with catch limit" is more precise and appropriate than "commercial stocks", which is not defined in this regulation. "Stocks with catch limit" makes consistency with the definition given in Article 5: "catch limit" means a quantitative limit on landings of a fish stock or group of fish stocks over a given period;"

- There is no need to bring to land unwanted catches if the species can survive being discarded.

Amendment 3 – NEW:

Article 5

- 'fisheries sector' means activities related to commercial fisheries, recreational fisheries, aquaculture and industries processing fisheries products;

Justification: *To give "recreational fisheries" an explicit mention. This definition is copied from the Data Collection Framework³*

Amendment 4 - underlined words are inserted:

Article 5

- 'fishery products' means the aquatic organisms destined for processing or sale resulting from any fishing activity;

Justification: *For reason of precision as recreational fisheries don't provide "products". ('Aquaculture products' is defined separately in the same Article 5: "...mean the aquatic organisms at any stage of their life cycle resulting from any aquaculture activity;").*

¹ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:52011PC0425:EN:NOT>

² The USA's Magnuson-Stevenson Act - an equivalent to the EU's CFP - puts recreational fisheries on an equal footing with other fisheries as shown by this quote: "**104-297** (28) - The term "optimum", with respect to the yield from a fishery, means the amount of fish which (A) will provide the greatest overall benefit to the Nation, particularly with respect to food production and recreational opportunities, and taking into account the protection of marine ecosystems; (B) is prescribed as such on the basis of the maximum sustainable yield from the fishery, as reduced by any relevant economic, social, or ecological factor; and (C) in the case of an overfished fishery, provides for rebuilding to a level consistent with producing the maximum sustainable yield in such fishery." www.nmfs.noaa.gov/sfa/magact/magword.doc

³ 2008/199/EC <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32008R0199:EN:NOT>

"Article 2 (a) 'fisheries sector' means activities related to commercial fisheries, recreational fisheries, aquaculture and industries processing fisheries products;"

Amendment 5 – NEW:

Article 5

Concerning salmon:

- 'Mixed stock salmon fishery' means a fishery exploiting a significant number of salmon from two or more river stocks.

Justification: To comply with the definition from the “NASCO Guidelines for the Management of Salmon Fisheries - CNL(09)43”⁴ as adopted in 2009 by the EU and the other five NASCO Parties⁵; to provide a more consistent approach to the management of exploitation of salmon in all EU waters.

Amendment 6 - underlined words are inserted:

Article 11

Content of multiannual plans

A multiannual plan shall include:

(..)

(new) - specific measures for mixed stock salmon fisheries to ensure that no salmon stock is exploited unsustainably. Measures shall include closure, until stock recovery, of those mixed stock fisheries, which impact, intentionally or unintentionally, weak salmon stocks in an unsustainable manner.

Justification: To provide effective management of salmon exploitation to achieve healthy salmon stocks in all EU waters.



⁴ NASCO Guidelines for the Management of Salmon Fisheries; p. 4: “**Mixed-stock fisheries (MSFs)** - NASCO has defined MSFs as fisheries exploiting a significant number of salmon from two or more river stocks;” http://www.nasco.int/pdf/far_fisheries/Fisheries%20Guidelines%20Brochure.pdf

⁵ “In 2009, the Council adopted Guidelines for the Management of Salmon Fisheries to assist jurisdictions in making further progress in implementing NASCO’s agreements.” <http://www.nasco.int/fisheries.html>