

EFRA submission on CFP Reform 08 Sept 11

Dear EFRA Committee,

This is the submission of MARINET, the Marine Network of Friends of the Earth, England Wales and Northern Ireland. This submission is made by Stephen Eades, MARINET co-ordinator, postal address: Allington House, Allington, Chippenham, Wiltshire SN14 6LN, tel. 01249 653972, email. stephen.marinet@btinternet.com. We appreciate that this is submission is made after the published deadline of the end of August, but we are making use of the extension granted to us by the Committee secretary, see email appended below from Ian Campbell, Ocean2012.

Our comments are in accordance with the format advertised on your website.

Executive summary.

CFP Reform must meet the following four key principles.

1. Reform of the CFP must comply with EU law. Specifically, the legal requirements of the Marine Strategy Framework Directive (MSFD), and Council Regulation 2371/2002 on the conservation and sustainable exploitation of commercial fisheries.

This means that all commercial fish populations must be within safe biological limits, and exhibit a population age and size distribution indicative of a healthy stock [MSFD requirement]. And, the management of these stocks must observe the precautionary principle, and employ the ecosystem-based approach to marine management [MSFD/Council Regulation 2371 requirements] For further details, see MARINET Briefing <http://www.marinet.org.uk/rocfp/ocean2012.pdf>

2. Fish stocks must be rebuilt from their current depleted levels (due to over-fishing), and must be restored to somewhere near their historic levels.

The use of Maximum Sustainable Yield (i.e. the amount that can be caught each year, year on year, without damaging the stock's ability to reproduce itself – effectively, the new name for “quotas”) must be referenced to these historic levels, and not the current, depleted levels. We have defined the concept of historic levels for the North Sea in our Briefing, see <http://www.marinet.org.uk/rocfp/northsea1880-2010.pdf>

We must rebuild fish stocks to somewhere approaching historic levels in order to achieve “food security” – see point 3 below - giving due allowance to changes in ecological and climatic conditions.

3. Food security is the ability of fish stocks to feed us throughout all 12 months of the year. Currently stocks are so depleted that they meet our requirements for only 6 months. For the remainder of the year we have to import fish caught from seas elsewhere.

Historically, fish stocks were sufficient to provide us with total food security. This is why we must reference the management of fish stocks to *historic* levels. If we do, we can re-establish food security.

It is essential that catches based on a stock's Maximum Sustainable Yield are referenced to the *historic* levels of those stocks, and not the current depleted levels. If this does not occur fish stocks will not be rebuilt, and if the stocks are not rebuilt we will be unable to re-establish food security.

Please see the graph on our website [<http://www.marinet.org.uk/rocfp/4keypoints.pdf>] based on peer-reviewed research undertaken by MARINET which illustrates the concept of food security in relation to North Sea fish stocks.

Also, we can only rebuild fish stocks if we use the right management tools i.e. fisheries-based marine reserves and, when necessary, the setting of catch levels at zero until historically referenced stock levels are restored – see point 4 below.

4. Fisheries-based marine reserves must be established, centred on the spawning and nursery grounds of commercial fish stocks. This is the only way to rebuild stocks to somewhere near their historic levels, and thus achieve food security.

And, most importantly, the fishermen who lose their rights to fish in these areas must be re-employed as the managers of these reserves so that they may undertake the patrolling of the reserves, and assist in their monitoring and scientific research. This ensures that these fishermen have a new income, and have a vested interest in the success of the reserves which, in the long run, will guarantee fishing for future generations of their families.

Has the Commission set the right general objectives for the future CFP? What additional tools are needed to deliver the CFP's objectives, for example measures to restrict fishing in certain areas such as spawning grounds?

5. The key objective for the future CFP must be the re-establishment of Food Security - the ability of EU seas to meet our needs for fish for all twelve months of the year, year after year. The manner in which the CFP has operated in the past has led to a serious loss of food security - EU seas can now only provide for our needs for six months of the year, ref. Ocean2012 publication, titled *Fish dependence* http://assets.ocean2012.eu/publication_documents/documents/120/original/Fish_Dependence_UK.pdf - and future CFP policy must rebuild stocks so that we regain our food security.

6. It is not clear at the present time whether the Commission has the restoration of the food security principle at the centre of its aims for CFP reform.

7. Food security requires that catch quotas, based on "maximum sustainable yield", are referenced **not** to the current depleted stock levels (due largely to over-fishing), but rather are referenced to the **historic** stock levels which delivered food security in the past, taking changes in ecological and climatic conditions of our seas into consideration in the process of this referencing. Thus if maximum sustainable yield is referenced to historic levels, we have the basis for the rebuilding of stocks. This will require the closure of the spawning and nursery grounds of certain commercial fish stocks whilst this new management regime achieves the aim of the future CFP and, most importantly, the fishermen who are displaced from these traditional fishing grounds must be re-employed under the CFP as the managers of these closed areas, monitoring them and assisting in the collection of scientific data.

Is a landing obligation the most appropriate way to address the problem of discards?

8. Discards can be addressed by a number of means, with a landing obligation being one such means. Other means involve the method of fishing i.e. hook and line fishing as opposed to trawling, thus ensuring a reduction in the capture of incidental species ref. Norway's cod and haddock fishery - see Mitch Tonks, *A sustainable source for Cod* <http://www.mitchtonks.co.uk/news/>; and, the use of net sizes and structure which sharpen the focus on the target species being fished.

What implications do the proposals have for the social and economic viability of UK fishers and coastal communities?

9. If fish stocks are not rebuilt, and referenced to historic levels in the implementation of this process, the economic viability of UK fishers and coastal communities will continue to decline, likely to the point of total collapse, because there will simply be no fish left to harvest on a viable commercial basis. This is the logical outcome of over-fishing permitted under past and present CFP policies.

10. A reformed CFP operating on the basis of the restoration of fish stocks to historically referenced levels (taking ecological and climatic changes into account in this referencing) means that the fish stocks and the industry have an assured long-term future. If we do not follow this course, the reality in EU seas will be like that in the Newfoundland fishery in the NW Atlantic where not only has the fishing industry collapsed, but so also has the ecological structure of the fishery making its restoration very problematic indeed.

What measures should be used to manage over-capacity in the fishing fleet? Does the proposed system of transferable fishing concessions contain sufficient safeguards?

11. Capacity should be directly linked to annual catch limits i.e. the size of the fishing fleet linked directly to the size of the annual catch available, with the size of the annual available catch being properly scientifically established and implemented. Where there is no longer a catch available, the fishing fleet must either be decommissioned, or re-employed in the active management procedures concerned with the establishment, supervision and long-term monitoring of closed areas centred on the spawning and nursery grounds of stocks requiring such management for their long-term restoration.

12. Transferable fishing concessions could assist in the slimming of the fishing fleet to enable those vessels, actually harvesting on a commercial basis, to have a sufficiently broad, economically viable basis for doing so i.e. a large enough annual quota to meet their economic needs.

Will the Commission's proposals to decentralise decision-making improve the governance of the EU's fisheries?

13. The Commission's proposals require member countries to produce technical frameworks for the management of the fisheries in their areas i.e. plans, with appropriate management tools (these management tools are specified in the new draft CFP Regulation [COM(2011) 425 http://ec.europa.eu/fisheries/reform/com_2011_425_en.pdf] to replace Regulation 2371/2002) to ensure that fish stocks are rebuilt. If these technical frameworks prepared by the members countries are inadequate - the technical frameworks have to be submitted by the member countries to the Commission - the Commission has powers to require their revision in order to ensure their adequacy. Therefore, if the new Regulation to replace Regulation 2371/2002 is implemented as currently formulated, the Commission's proposals to decentralise decision-making should improve the governance of the EU's fisheries.

Do the proposals set the right framework for implementing an ecosystem based approach, including improving the availability of scientific data?

14. Generally speaking, the answer is yes. The powers and procedures in the new Regulation [COM(2011) 425] are strong and should be adequate - provided that the central aim of the restoration of food security is established and held to firmly by the EU governmental institutions [Commission, Parliament and Council of Ministers] . If there is any equivocation on this basic principle of the re-establishment of food security, and the management tools necessary to achieve it, then matters become uncertain.

15. Scientific data as to the status of fish stocks is the responsibility of the member country where that stock exists. The Commission is currently reporting that in the case of approximately two-thirds of the EU's fish stocks member countries are not submitting this scientific data, with the result that the size and conservation status of the stock is unknown. This situation is clearly prejudicial to the establishment of good management practices. The Commission is proposing that in the case of stocks where the scientific data remains unsubmitted by member countries, the annual quota for the harvesting of that stock should be reduced by 25%. We recommend a stronger approach. If the size and conservation status of the stock remains unknown because scientific data is not submitted, then the annual quota should be reduced to zero until such time as that data is submitted, and the true scientific status of the stock is known. This, we submit, is entirely consistent with the precautionary principle - a legal requirement the CFP is obligated to comply with - and it is a strong incentive to member countries to put their house in order.

16. The Commission should, as part of the scientific background for determining the correct and most appropriate technical frameworks for the management of individual fish stocks, commission its scientific committee (or another scientific body, such as the International Council for the Exploration of the Sea [ICES]) to evaluate the various fishing methods and practices, with particular reference to bottom trawling and the alternative methods of catching fish. It is widely held that the various forms of bottom trawling are highly injurious to the marine environment and seabed habitats, and contribute substantially to the unwanted catch problem (discards). Therefore it would be of great assistance if scientific advice could be assembled on the most appropriate fishing methods and practices, thus informing the definition of good practice and appropriate management procedures in the technical frameworks for the management of individual stocks.

What actions could the UK Government take to encourage ambitious reform of the CFP?

17. The UK could, and should, state that it is committed to the re-establishment of **food security** as the central aim of the future CFP and its reform, and that it is wholly committed to the observance and implementation of the **four key principles of reform** set out in our executive summary to this submission. In doing so, it should work tirelessly to persuade all other member countries to do the same.

This, therefore, is the submission of MARINET, the Friends of the Earth Marine Network. We thank you for the opportunity to contribute, and would be pleased to assist the Committee further at any time.

Sincere regards,
Stephen Eades.
On behalf of MARINET.
www.marinet.org.uk

----- Original Message -----

From: [Ian Campbell](#)

To: 'stephen eades' ; 'levy@dr52.fsnet.co.uk'

Sent: Wednesday, September 07, 2011 10:10 AM

Subject: Environment Food & Rural Affairs select committee

Dear Stephen & David.

I hope this email finds you well. I would like to inform you that the Environment, Food & Rural Affairs select committee have been taking written evidence on the CFP reform process to give MPs more information on the reform process and potential solutions. Yesterday, I contacted the committee secretary to speak to her about a few things, and I asked whether Marinet had submitted anything. She told me that you had not. The deadline for submission was the end of August, but I managed to persuade her to extend the deadline to the end of this week to allow you to get something into the committee. The link to the enquiry is here <http://www.parliament.uk/business/committees/committees-a-z/commons-select/environment-food-and-rural-affairs-committee/inquiries/common-fisheries-policy/>

I will be out of communication for a while now as I will be on paternity leave from this week.

Regards

Ian Campbell

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