

Balance of Competence: Fisheries Team  
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Dear Sir, Review of the Balance of Competences : Fisheries.

These are the comments of Marinet, the Marine Network ([www.marinet.org.uk](http://www.marinet.org.uk)) with regard to the UK Government's public consultation on the fisheries aspect of the UK Government's review of the balance of competences between the UK and the EU.

Our understanding of this review, based on the advisory consultation papers, is that it is trying to try to arrive at an assessment of the balance of advantages and disadvantages between the UK's fisheries being managed by the EU under the Common Fisheries Policy (CFP) relative to their management entirely by the UK (e.g. as prior to the UK's entry into the EEC [EU] and the development of the CFP). Central to this determination are Defra's own criteria that fisheries need to be assessed in terms of healthy fish stocks, a prosperous fishing industry and a healthy marine environment. We offer the following observations.

#### Historical Perspective.

It is probably true, and certainly so statistically speaking, that UK fish stocks have declined during their period of time under EU (CFP) management, and that the size of the UK fleet has declined similarly and thus, by definition, the health of the seas has also declined because if a key order of marine animals in the ecological structure of the seas is in decline then the total ecological structure must also be under severe stress.

However, was the pattern in any way different prior to EU management e.g. pre-1973 when the UK entered the EU ?

The reality is that fish stocks in UK seas have been experiencing relentless decline, with associated consequences on the industry and the ecological structure of our seas, for at least the past 100 years, and probably since the advent of the introduction of steam-powered fishing vessels c. 1880.

Marinet's research into the data has recorded this decline, see Table below:

**Table: Estimated Total Stock in the North Sea in tonnes.**

Species	1880 stock size, tonnes *	2010 stock size, tonnes	% Decline between 1880 and 2010
<b>Haddock</b>	916,000	849,000	7%
<b>Whiting</b>	454,000	334,000	26%
<b>Plaice</b>	3,561,000	520,000	85%
<b>Mackerel</b>	148,000	20,000	86%
<b>Sole</b>	545,000	50,000	91%
<b>Cod</b>	2,427,000	212,000	91%
<b>Herring</b>	16,836,000	217,000	99%
<b>Bluefin tuna</b>	177,000	0	100%

Note to Table \* Maximum estimated stock level. Measuring stock sizes is an imprecise science, so there is a large measure of uncertainty around all estimates. The 1880 figures are extrapolations based on catch data recorded at the time. The extrapolations are calculated as a maximum, middle and minimum stock level, and thus cover a range in their estimation. The 1880 figures recorded above are the maximum figures in the range, and the middle and minimum figures are provided further on in this briefing. The scientific sources of the 1880 and 2010 figures are recorded on our website, see <http://www.marinet.org.uk/campaign-article/the-decline-in-north-sea-fish-stocks-between-1880-and-2010>

Whilst there have been significant developments relating to sovereignty and the management of fish stocks since 1880, not least the expansion of territorial waters to 200 nautical miles following the establishment of the United Nations Law of the Sea (UNCLOS) in 1994, it is clear from the above table concerning North Sea stocks that the UK's own record of management of its stocks has been far from reproach. Continuous over-fishing had been allowed to occur whilst the UK itself superintended the management of stocks prior to entry into the European Economic Community (EEC/EU).

This is not just a matter of declining stocks, and consequential decline in the fishing industry. If we take a species like herring, this species occupies a key position in the predator-prey relationship of the sea's ecological structure, and therefore a decline in the abundance of this species (once enormously abundant and fished to the point of commercial extinction) has huge consequences for the health of the seas.

A ban on the fishing of the herring stock following its near commercial extinction has led to its partial revival, and fishing has resumed. However the fishery is still a shadow of its former self.

This therefore raises the question of what constitutes a sensible fisheries management regime, not just for herring but for all species, and thus penetrates to the heart of this public consultation.

So, what are the features of a sensible fisheries management regime, leading to healthy stocks, a healthy industry and healthy seas overall? And, are these more or less likely to be achieved under EU management, or under UK sovereign management? We turn to these questions now.

### Sensible Fisheries Management Regime.

From a national perspective (i.e. genuine sustainability whereby economic, social and environmental needs are met and are regarded as interdependent and of equal importance) the minimum requirement of a sensible fisheries management regime is that it is able to meet the nation's need for food security - in this case, for fish. This is a minimum requirement, and one would expect to go beyond this in order to ensure that the fishery had plentiful reserve resources (stock size) in order to withstand unforeseen perturbations (e.g. the consequences of climate change and acidification), and in order to ensure a sizeable export potential in fish (thus supporting the national economy, the industry itself, and the robust health in the ecological structure of the sea which supports this abundance).

From a biological perspective (i.e. the health of the stocks and the ecological condition of the seas in which they are living) the minimum requirement is an abundance of stock (not just for the economic health of the fishing industry and the obligation to deliver food security, but also so that the predator-prey relationship in the wider ecological structure is in a sound condition), and also an age profile in the stocks which is in accord with natural characteristics (thus ensuring that the fecundity of the stock and its adaptability to changing ecological conditions is secure). Both of the foregoing objectives require management actions which will deliver these results e.g. in-depth and ongoing scientific assessment of the health of the stocks, the use of closed areas to fishing in order to protect the reproductive capability and age profile of the stock, and catch levels that are sufficiently restrained (i.e. total fleet size, use of selective gear, monitoring and recording of catch levels) to allow a stock to

live at or near the maximum level of abundance that ecological conditions will permit. When stocks are maintained at or near maximum levels of potential abundance, then catch levels (the harvesting of the wild stock) can be assured at genuinely sustainable levels over a very long period of time.

Let us now consider whether the foregoing requirements pertain in the fisheries management regime at the present time, and how the balance in EU/UK competences affects this matter.

### The National Perspective.

The need and obligation to meet food security, in this case in fish, appears to have slipped of the agenda of both the UK and the EU.

The principle of food security as a primary, indeed over-arching objective of the Common Fisheries Policy was not evident before the current 2012 reform process, and has not been evident in the 2012 reform process either. Indeed, the new CFP agreed in mid-2013 makes no reference to food security as a fundamental objective of fisheries management.

This principle was not only not advanced by the EU (and other Member States), it was also not advanced by the UK either. Thus both parties (UK and EU) are culpable for its absence.

As mentioned above, significant consequences follow from the adoption of the principle of food security as a cardinal principle of fisheries management – it results in the restoration of secure and abundant stocks which re-invigorate the fishing industry, the economic and social fabric of the national population, and the health of the ecological structure of our seas.

In Marinet's opinion, the disregard (perhaps ignorance) of this fundamental fisheries management objective by the both the UK and the EU is a dereliction of duty in the service owed to the people of the Members States and the well-being of our seas. In terms of the balance of competence, we can see no evidence that either the EU or the UK is more competent. All we perceive is a failure to perform their duty (incompetence) by both parties, in equal measure.

Food security has existed in the past, when stocks still retained to a large degree their natural characteristics of abundance. This level of abundance notably increased as a consequence of the cessation of fishing activity during the periods 1914-1918 and 1939-1945 (World War I and II), and is an important indicator how closure of fisheries, used selectively as an instrument of management policy, can sustain abundant stocks and deliver a fisheries management policy predicated on the delivery of food security.

### The Biological Perspective.

The restoration of fish food security – the cornerstone of sensible fisheries management – can be delivered by a number of management tools.

Foremost amongst these is the protection of the spawning and nursery grounds of fish stocks.

Reproductive success is essential if fish stocks are to be rebuilt. It is therefore logical and imperative that the breeding areas of species are protected. The principal instrument for this is the closed area (marine reserve).

Under the present fisheries regime spawning and nursery grounds are the centres of fishing activity due to the fact that fish aggregate in these sites to breed – although in some cases action has been taken to close these areas because a stock is approaching commercial extinction (e.g. cod, herring). The view of the present fisheries regime is that the economic return of fishing is maximised when open, unrestrained fishing of these sites is permitted. However the consequence is over-fishing,

with enormous adverse effects both for the industry, the stocks themselves, and the wider ecological structure of the seas.

Equally important, this form of unrestrained exploitation of stocks has destroyed the age profile of nearly all commercial stocks. The age profile is key to the abundance and reproductive health of all stocks.

The older the fish, the more fecund it is in terms of reproductivity (the general rule is that when an adult fish doubles in size then its capacity to deliver eggs/sperm also doubles). Thus the presence of older fish, and the presence of fish in a stock which are capable of living their full natural life span, is essential for the reproductive health of the stock.

Intensive fishing of spawning grounds has destroyed the age profile of stocks. For example, cod (*Gadus morhua*) in the North Sea will live to the age of 25 years, and becomes sexually mature at around 6 years. Present management policy, endorsed by both the EU and the UK, is to allow an age profile for this stock where adults are allowed to live for just one year of adulthood (i.e. sexually reproductive for just one year) before being fished from the stock. Thus the cod stock contains virtually no adults beyond the age of 6 years, and the reproductive capability of this stock is fundamentally compromised.

This pattern of the destruction of the age profile of the adult stock is virtually universal throughout all commercial stocks in UK and EU seas.

Marinet has likened this policy to asking the human population to survive on the reproductive capability of its teenagers, with all adults over 20 years being culled. This appears absurd, but is in fact the nature of the regime in use for the management of fish stocks throughout UK and EU seas.

It might just be possible to fish spawning grounds – although this is not our recommendation given the current condition of commercial stocks throughout most of UK and EU seas – if the fishing gear which is used allows older fish to escape capture and so allows the age profile of the stock to re-establish around a natural profile.

However given the present reality, it is imperative that nearly all spawning grounds are closed until two fundamental conditions are met. Firstly, the natural age profile of the stock is restored. Secondly, the stock is rebuilt so that it approaches its maximum levels of abundance under current ecological conditions. Only by this means can fish food security, the rebuilding of the fishing industry and the ecological structure be achieved. Viewed in terms of a sensible fisheries management regime, there is no alternative.

Is there any evidence that either the UK or the EU is adopting such policies ?

In the first instance, this could be achieved – indeed, in theory legally is required to be achieved – under the terms of the EU Marine Strategy Framework Directive (MSFD). The Directive requires the restoration of all EU seas to a sound and healthy condition by 2020, and in respect of commercial fish and shellfish stocks (MSFD Descriptor 3) it is a requirement that all stocks display the age profile of a healthy stock e.g. display the age profile of a stock in natural conditions, with older fish being an essential feature of that age profile.

However both the UK and the EU (all its Member States, excepting perhaps Germany) have sought an interpretation (a re-definition) of the legal requirements in respect of Descriptor 3 which ignores the obligation to secure a natural age profile in all stocks. In short, this new definition has corrupted MSFD Descriptor 3.

Marinet can verify this assertion because it has attended meetings of Defra, OSPAR and the EU where we have presented proposals that the natural age profile of a stock be endorsed – as the legislation itself specifies - as a fundamental component of the definition of MSFD Descriptor 3, and at all of these meetings Marinet’s proposal has been rejected.

Therefore, in terms of the balance of competence between the UK and the EU in this fundamental aspect of fisheries management of commercial fish stocks (and the attainment of other management objectives that are linked to and dependent upon it) there is no difference. The UK and EU display an equal absence of competence.

With regard to the use of closed areas (marine reserves) to protect spawning and nursery grounds, this provision exists within the 2012 version of the CFP (and existed also in the 2002 version), but does not do so in any mandatory form. Thus the use of closed areas as an essential tool of fisheries management policy remains wholly discretionary. This is not a plus in terms of EU competence (except in terms that the provision exists) because there is no coherent strategy within the CFP for the use of this management instrument to return stocks to a level of abundance which present natural conditions will permit.

Nor is it a plus in terms of UK competence because the UK did not earnestly seek the adoption of this management provision within the reformed CFP; and, in terms of the UK Marine and Coastal Access Act 2009, the UK has proved to be extraordinarily reluctant to advance the use of Marine Conservation Zones (marine reserves), establishing in 2013 only 27 out of the 131 recommended to it by its statutory nature conservation agencies and appointed scientific advisors.

Other key management features show an equally dismal performance by both the UK and EU.

In respect of the collection of scientific data about the health of commercial fish stocks, the EU states that it does not know the true status of around 50% of these stocks because of a lack of adequate scientific data needed to be able to draw up a management plan. The provision of this scientific data is the responsibility of the Member States in whose seas the stock is to be found. Thus the overall competence of the CFP to manage commercial fish stocks, and thus the wider health of the EU’s seas, is seriously flawed. Moreover the EU has taken no enforcement action to ensure that this absence of scientific data is remedied.

The extent to which the UK is blameworthy with regard to its provision of data to the EU about UK stocks is not specifically known by Marinet, but Defra’s publication *Charting Progress 2* (2010) which reported on the health of UK fish stocks within the context of the EU’s Marine Strategy Framework Directive (MSFD) advised that no or inadequate scientific data also existed in around 50% of UK stocks thus preventing a proper assessment of the health of the stocks to be determined.

In respect of setting annual catch levels (Total Allowable Catch/TAC, also known as “fishing quotas”) the EU and Members States have sought to use - since early on in the life of the Common Fisheries Policy - this management tool as a means of restraining fishing within levels that will not damage the reproductive capability of the stocks. In more recent time, this has also been supplemented by restricting the number of days that vessels may be at sea, and regulations regarding catch gear (e.g. type of net and mesh size). However EU Members States, the UK included, have serially ignored scientific advice concerning the annual level at which TACs for specific stocks should be set, with the result that over-fishing has continually undermined the management regime proposed by the CFP.

In terms of the balance of competence between the EU and the UK, there is little distinction to be made. Both have been complicit in this, neither attempting to restrain the other.

Under the 2012 reform of the CFP, it is now asserted that the setting of annual catch levels will accord with the “maximum sustainable yield” (MSY) of the stock, and that a MSY figure must be set

for all commercial stocks and be in force by 2020. However the 2012 CFP definition of MSY is not simple. It is a complicated mathematical and statistical tool, dependent for its accuracy on sound data, and uses an approach which claims to be able to lift a stock from remaining at its current baseline level to one where the stock's baseline level will rise over time. This is not a strong definition of sustainable fishing, and yet the UK appears content with it. Indeed, it is to be noted that stocks which have been closed due to excessive fishing pressure have been reopened to fishing (under CFP rules) once the "safe baseline" is deemed to have been restored. Such action is permitted under the reformed CFP's definition of MSY, is endorsed by both the EU and UK and, alas, repeats all the old mistakes.

For MSY to mean anything – to be a serious component of a sensible management regime – the annual level of a stock that can be sustainably fished must, in Marinet's belief, be referenced to the maximum, or near maximum, levels of abundance of the stock which current ecological conditions will permit. The requirement to define MSY in this way is fundamental to restoring food security in fish, to rebuilding the fishing industry not just in the UK but also throughout the EU, and to restoring the damaged ecological structure of both UK and EU seas.

We see no evidence of such a definition of MSY in either UK or EU fisheries management policy. Once again we have to observe that, in terms of this specific absence of competence, both are equally blameworthy.

Also of importance is the use of monitoring and data collection systems on fishing vessels, both to ensure that vessels are fishing legally (i.e. that all Member States are observing the law) and to ensure that good data exists to inform the development of future management policy. The current reform of the European Maritime and Fisheries Fund (EMFF, and formerly the European Fisheries Fund) is expected to make funds (tax-based subsidies) available to the fleets of Member States to ensure that this data collection and monitoring system is effectively installed and made operational.

However such EMFF disbursements do require match-funding from national governments and, to be effective in an operational sense, do require the collation of the data and review of monitoring information by staff onshore. In addition, this data is required to be transmitted by the governments of Member States to the EU for centralised tabulation.

At the present time, this system is not working well. The EU is failing to satisfactorily record an overall picture of fishing practices and data in EU seas because, firstly, not all Member States are submitting this data (although in theory they are legally required to do so), and secondly, there is no common format throughout Member States for the collection of the data with the result that data and experience is not readily comparable.

In short the system has been failing and, unless seriously reformed, will continue to fail. EU competence in this matter is poor. The measure of UK compliance is unknown. However, there is no evidence known to Marinet that the UK has challenged this deficiency in EU competence, or that the UK would perform better if competence rested solely with the UK for its sovereign seas.

Marinet regards this as a depressing state of affairs. Governments, of whatever jurisdiction, can pass laws; but if the enforcement of laws is not made a matter of paramount importance then their existence just become meaningless.

The preceding comments have been made, for the most part, with regard to fish stocks under CFP management. However we turn, in conclusion, to European Sea Bass (*Dicentrarchus Labrax*). This stock lives primarily in the North Sea, English Channel, Celtic and Irish Seas and also is to be found in more southerly waters including the Bay of Biscay. For present purposes, we consider its management in all the above areas, save Biscay (ref. ICES WGCSE Report 2013). It is a test case for our purposes – the competence between UK and EU, and the delivery of a healthy stock, industry and marine ecological structure – because the species has remained outside CFP management and is an

important catch within UK territorial waters (12 nm), largely to recreational anglers. However because there are no restrictions on its harvesting, it has been targeted by fishermen seeking a commercial catch when quotas for other species are exhausted. Hence the stock now urgently needs active management and so the question arises, is this best undertaken under UK or EU competence ?

#### Test Case : Sea Bass.

European Sea Bass has a life span of 28 years. Sexual maturity for females is around 6 years old, and at a length of 41cm 50% are mature and at 44cm 75% are mature. In the case of males, sexual maturity is around 4 years, and at a length of 35cm 50% are mature and at 36cm 75% are mature.

The current minimum legal landing size is 36 cm. Thus female fish can be landed in nearly all instances before they are sexually mature, and amongst males around one-quarter are landed before being sexually mature. This minimum legal landing standard is accepted by both the UK and the EU.

Fishing pressure on the stock has been intense. In 1985 ICES estimated the Spawning Stock Biomass at 9822 tonnes, and in 2012 at 5716 tonnes. In 2012 ICES estimated the total catch – commercial and recreational - in the North Sea, English Channel, Celtic Sea and Irish Sea at 4060 tonnes, and noted that French commercial trawling of the spawning grounds in the English Channel accounted for 65% of this total catch figure. The recreational catch (largely UK sea anglers) is estimated at 20% of the total catch, and this catch is largely taken within UK territorial waters (12nm) and outside spawning grounds.

As a result of this fishing pressure, the age profile of the stock has altered.

In 1985 the number of 15 year olds was measured at 20% of the stock, but only 1% in 2011.

In 1985 the number of 20 year olds was measured at 8% of the stock, but 0% in 2011.

There is now pressure to conserve the stock under CFP rules. It is understood that France wants to set a total allowable catch (TAC) for fishing the spawning grounds, and that other countries including the UK prefer a different management strategy. A deadlock has resulted at EU level on the kind of regime to adopt, so existing fishing practices remain in force whilst further scientific surveys and assessment are conducted.

Would this stock, which has great value to UK sea anglers and inshore fishermen, best be managed under UK or EU competence ?

At present, failure at EU level to agree an appropriate management regime is allowing fishing pressure on a declining stock to continue unabated, in full knowledge that the spawning stock is now under very severe pressure.

At the same time, both the UK and the EU are allowing a minimum legal landing size which is clearly damaging the stock's ability to reproduce (see data above on females), and both the UK and EU have allowed the natural age profile of the stock to disintegrate.

Both of these foregoing facts are characteristic hallmarks of failure in the management of other commercial stocks supervised by the EU under the CFP; and, equally importantly, they are facts in the mis-management of European Sea Bass to which both the UK and EU have acquiesced.

Therefore in terms of the balance of competence, it once again appears that both the EU and UK are displaying inertia and an inability to manage. Neither appears capable of managing this stock sustainably, or to possess sufficient resolve to halt the decline towards commercial extinction of

another economically valuable species - a species and stock which is also a potential mainstay of a sustainable fishing industry and an important element in the overall ecological structure of the seas.

And so, we turn to our conclusion concerning this public consultation.

### The Balance of Competence : The UK or EU/CFP ?

From a historical standpoint, we can see no evidence that either the UK or the EU has displayed action and thinking which displays a greater competence.

With regard to the need to observe the framework of law under International and European Treaties (including legal responsibilities to fish sustainably under UNCLOS) and the manner in which the UK and EU have responded, there is little to differentiate between the UK and the EU. Both the UK and EU have allowed the situation to deteriorate, and have avoided appropriate remedial management (such as reduction in the over-capacity of the fishing fleets) whilst asserting that they are acting effectively and responsibly.

Indeed in this respect the EU fishing fleet has throughout recent years continually remained over-sized relative to stocks and yet, via fishing subsidies (European Fisheries Fund and other nation-based subsidies with respect to fuel costs), the action to reduce fishing capacity has continually fallen short of the imperative requirements (viz. objective facts about fleet size relative to the size of stocks). Moreover it is estimated by commentators that around 80% of the EU fleet is only able to put to sea because of subsidy support. In other words, without this support the industry would be bankrupt and over-fishing (excessive fleet size) has been sustained by subsidies.

Much has been promised over the years by both the UK and EU in terms of fisheries management. However the truth is different, and the reality delivered by both parties has been one of relentless decline in stocks, the industry and the ecological structure of our seas.

Turning to the future perspective, we now have a new Common Fisheries Policy.

Much is claimed by the EU for the new terms and principles embodied in the reformed CFP. The restoration of stocks to health by 2020 is a principal feature, along with other management measures, including near-zero levels for the discarding of by-catch under the quota system.

Is delivery of this a realistic expectation ? In 1992, and again in 2002, the CFP was reformed and conservation was installed as a central management feature. However, in practice, the actual delivery and implementation of the CFP during these years failed - despite the legal framework - to deliver this result. In fact the reverse occurred and many stocks have descended to historically low levels, with some in a worse predicament and facing commercial extinction.

One must therefore view the promise of a brighter future with a strong degree of scepticism.

It is doubtful that restoration of stocks, along with the fishing industry and the ecological structure of the seas - as promised in various statements by the EU during 2013 – can actually be delivered. This is because the legal commitment to healthy commercial fish and shellfish stocks by 2020 under the Marine Strategy Framework Directive (MSFD Descriptor 3) has been traduced and corrupted by the EU with the consent of the Member States, including the UK.

It is also doubtful that a better future can be delivered because the agenda for the delivery of a real regeneration in stocks, the industry and the ecological structure as advanced by Marinet has been largely rejected by the CFP reform process. Neither the UK nor EU in its tripartite form (Parliament, Council and Commission) has shown a serious commitment to such a fisheries management agenda<sup>1</sup> [see endnote].

Without the principles advanced by Marinet being installed in law (CFP), it must be very doubtful that the claims by the EU for restoration of stocks, the industry and ecological structure can be delivered. Any analysis based on logic and informed by experience leads to this conclusion.

Would the restoration of sovereignty in these matters to the UK offer a different conclusion ?

Evidence has shown that the UK has often been an active partner of the EU in the historic decline of fish stocks, the industry and ecological structure. The wilful abuse of the legal requirement under international and trust law by the UK to implement fishing quotas in accordance with scientific advice is testimony to this. The integrity of the UK in these matters – sensible fisheries management – is therefore very questionable.

When Marinet has put it to the UK Government that it should pursue a CFP reform agenda based on the restoration of food security via the maximisation of stocks and the protection of spawning and nursery grounds, the UK has replied that it needs to be pragmatic and pursue a solution for which it can get majority agreement – the implication being that the reform agenda Marinet has advanced is too radical and therefore unrealistic.

However the Marinet reform agenda is one that is based on science, experience and, in all truth, common sense.

The UK plea that it could not deliver this agenda under existing EU rules, and therefore that UK fish stocks/industry/seas would improve under UK competence rather than EU competence, would have greater strength and credibility if the UK had **actually argued** for this agenda during the CFP/EMFF reform process. It could then assert the claim that the UK had been thwarted by the EU, and that a better future for our fish stocks could and would be delivered under UK competence.

However, the UK did not pursue this course. It pursued a course of compromise without flagging up these principles. As a result the outcome is a result with which the UK appears to be content, and towards which it has shown little evidence of dissent.

So yes, the EU looks unlikely to deliver real restoration of health to our fish stocks and seas, and hence its competence remains in serious question.

So yes, there is an alternative whereby the UK could seek to reassert sovereignty in these matters and thus offer the prospect of a new management regime and a better standard of competence.

However, is the UK's record of competence such that the delivery of this outcome is likely? Alas, the evidence says no.

This is a dismal conclusion. However, it is the truth as Marinet perceives it.

It is to be profoundly hoped that both the UK and the EU will reflect deeply on these matters and, in this spirit, acquire the determination and integrity which has been hitherto absent in order to secure the healthy, prosperous and sustainable future for our fish stocks, industry and seas which so urgently requires to be delivered. Continued failure, regardless of where the balance of competence lies, is a grim prospect. Most regrettably, this grim and dismal prospect continues to confront us.

Yours faithfully

S. D. Eades  
On behalf of Marinet.



<sup>i</sup>Endnote : Namely, the restoration of food security based on the restoration of fish stocks to maximum levels of abundance and delivered, in large part, by protection of spawning and nursery grounds; and, with EU subsidies (EMFF) being redirected from sustaining over-capacity in the fishing fleet to a new conservation-based priority centred on the funding of displaced fishermen as managers of the closed areas, along with significant (not just token) investment in data and monitoring of fishing practices which are, in turn, supported very actively by an adequately funded enforcement agency (European Fisheries Control Agency).