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For the attention of : Paul Little, Sustainable Fisheries Team, Defra,
Area 2C, Nobel House, London SW1P 2AL.

Dear Mr. Little, European Maritime and Fisheries Fund : Defra Consultation.

I am responding on the behalf of MARINET, the Friends of the Earth Marine Network, in connection with the Defra public consultation on the draft proposals of the European Commission's new European Maritime and Fisheries Fund.

We note that the primary purpose of the European Maritime and Fisheries Fund (EMFF) is to support the European Union's Common Fisheries Policy (CFP).

In this regard, the European Commission has stated in its consultative document:

*The current proposal for the Regulation on **European Maritime and Fisheries Fund (EMFF)** aims at achieving the objectives of the reformed CFP and of IMP. It is based on these objectives, re-defined in terms of funding:*

- (1) promotion of sustainable and competitive fisheries and aquaculture;*
- (2) fostering the development and implementation of the Union's Integrated Maritime Policy (IMP), in a complementary manner to cohesion policy and to CFP;*
- (3) promotion of balanced and inclusive territorial development of fisheries areas (including aquaculture and inland fishing);*
- (4) contribution to the implementation of the CFP.*

In addition, the European Commission has stated:

It is proposed that most of the current CFP and IMP financial instruments are integrated into one fund, with the exception of Sustainable Fisheries Agreements (SFAs) and the compulsory contribution to RFMOs. The EMFF is structured around 4 pillars:

Smart, Green Fisheries (shared management) to foster the transition to sustainable fishing

which is more selective, produces no discards, does less damage to marine ecosystems and thus contributes to the sustainable management of marine ecosystems; and to provide support focused on innovation and value added, making the fisheries sector economically viable and resilient to external shocks and to competition from third countries.

*□ **Smart, Green Aquaculture** (shared management) - to achieve economically viable, competitive and green aquaculture, capable of facing global competition and providing EU consumers with healthy and high nutrition value products.*

*□ **Sustainable and Inclusive Territorial Development** (shared management) - to reverse the decline of many coastal and inland communities dependent on fishing, through adding more value to fishing and fishing related activities and through diversification to other sectors of the maritime economy.*

*□ **Integrated Maritime Policy (IMP)** (direct centralised management) to support those cross cutting priorities which generate savings and growth but which the Member States will not take forward on their own – such as marine knowledge, maritime spatial planning, integrated coastal zone management and integrated maritime surveillance, the protection of the marine environment, in particular its biodiversity, and adaptation to the adverse effects of climate change on coastal areas.*

In addition to the four pillars, the EMFF will include accompanying measures: data collection and scientific advice, control, governance, fisheries markets (including outermost regions), voluntary payments to RFMOs and technical assistance.

*The proposal **complies with the principle of subsidiarity**. The general objective of the EMFF is to **support the objectives of the CFP**, a policy on which the EU has exclusive competence, and to further develop the EU Integrated Maritime Policy. Acting on their own, the Member States are not in a position to achieve these objectives which will be better achieved at EU level by multi-annual financing focussed on the relevant priorities.*

MARINET's Observations.

1. Marinet believes, and supports the statement of the Commission, that the primary purpose of the European Maritime and Fisheries Fund (EMFF) is to support the objectives of the Common Fisheries Policy. We believe Defra too should support this as the primary objective of the EMFF .

2. Marinet believes that the primary objective of the reformed Common Fisheries Policy (CFP) is to re-establish **food security** in EU seas – namely, the ability of EU seas to meet the needs of the EU population for fish for all 12 months of the year, year after year. Currently, this provision of supply to meet the objective of food security can only function for the equivalent of six months, with supply for the remaining six months having to be sourced from non-EU seas and stocks.

Therefore, the primary purpose of the EMFF must be to support measures within the context of the CFP, both in terms of its reform and future management, which will lead to the re-establishment of food security for the EU based solely on the harvesting of its own seas. We believe Defra should support this objective.

3. Marinet believes that the level of fishing should be determined with reference to a definition where the harvesting of the maximum sustainable yield from fish stocks observes the following definition of principle: ‘maximum sustainable yield’ means the maximum catch that may be taken

from a fish stock indefinitely *and that provides for the restoration of stocks to maximum levels of abundance that current ecological conditions will permit.*

In order to deliver food security, it is essential that all commercial fish stocks are restored to the maximum levels of abundance which current ecological conditions will permit – and *not* simply sustained at the current depleted levels (due largely to over-fishing) – and that these restored stocks also contain a population with an age and size profile consistent with that of a healthy stock i.e. contain older fish who are able to provide a strong reproductive base for the regeneration of the stock. For example, reproductive capacity in adult fish doubles every time the length of the fish doubles and, therefore, if we take North Sea cod as an example (cod can live to an age of 25 years) the North Sea spawning stock currently only contains adults up to the age of 6 years (i.e. just one year of adult sexual maturity, with all older fish absent due to harvesting). This situation where fish stocks, all across all species, are managed without a proper age profile consistent with that of a healthy stock is *not* acceptable – in order to deliver food security and to rebuild stock levels to maximum levels of abundance that current ecological conditions will permit, it is essential that all stock contains a proportion (%) of older fish who are more reproductively fecund, as is consistent with a healthy stock (ref. cod stock profiles in Icelandic and Norwegian seas). We believe Defra should support this objective.

Note: Failure to observe the principle stated above is akin to asking the human population to survive based solely on the reproductive capabilities of teenagers. A situation that is clearly unsustainable, and both morally and practically absurd.

4. Marinet believes that closed areas (also known as marine reserves) should be extensively used as a management tool in order to deliver food security based on a rebuilding of stocks to the maximum levels of abundance that current ecological conditions will permit, and that **these closed areas should be centred, as a central part of this management action, upon the spawning and nursery grounds of commercial fish stocks which are in need of restoration and protection.** Only by providing such protection can stocks be rebuilt and food security re-established.

The use of closed areas requires that displaced fishermen are given economic support and that they are offered re-employment under the CFP as the managers of these closed areas, thus assisting in the patrolling of these areas in order to prevent illegal harvesting and assisting in the collection of the scientific data necessary to monitor the management and rebuilding of the stock. By this means not only is the CFP shifted onto a conservation-based rather than an extraction-based set of management principles (essential in order to re-establish food security), but also the fishermen themselves and their vessels are given an economic role within this new framework, thus guaranteeing an economic future for the industry and fishing families in the long-term. We believe that Defra should support this objective.

5. The key problem for EU fish stocks and their management at the present time is **over-fishing, and this means over-capacity in the size of EU fleets.** Very simply, there are too many vessels with too large a capacity (in terms of extraction of fish) in relation to the size of stocks. Hence, there is continual pressure and a relentless decline in the size and health of stocks.

This problem of over-capacity is long known, strongly documented (EU Court of Auditors), and funds from the CFP have been voted by the EU Parliament over many years in order to reduce capacity in the fleet, but the deployment of these funds has consistently failed to achieve this objective – the size of the fleet has been reduced, but at a rate inadequate to match the decline in stocks. It is therefore essential that the new EMFF actually **gets ahead of the curve** i.e. brings about a contraction in the size of the fleet and fishing capacity in line with stock size, and removes the relentless pressure due to overcapacity on fish stocks. This contraction must then be **further**

extended in order to be in line with the new priority management principle : re-establishment of food security. In short, fleet capacity must be reduced using directed economic support from the EMFF, via fishing restrictions and other management tools (closed areas) which will enable stocks to be rebuilt to their maximum levels of abundance which current ecological conditions will permit, thus delivering food security. We believe that Defra should support this objective.

MARINET's Recommendations:

We believe that the European Maritime and Fisheries Fund should be used to achieve the economic and ecological objectives of the Common Fisheries Policy, and that these funds should be used specifically to re-establish EU fisheries and their management on a sustainable basis.

We have defined this sustainable basis – food security based on a rebuilding of stocks to the maximum levels of abundance that current ecological conditions will permit, with closed areas centred on spawning and nursery ground being used as a key management tool and fishermen and their vessels given a new economic role as the managers of these closed areas and this new conservation-based fisheries management regime.

Thus, how and where EMFF finance is spent is determined by the above set of principles.

If future EMFF expenditure will bring about, verifiably, the accomplishment of these principles then that expenditure is justified. If EMFF expenditure will not, verifiably, lead directly to the accomplishment of these principles, then it is not justified.

The new EMFF must support CFP management principles that are conservation-based rather than extraction-based, as a matter of priority, because this new management regime and philosophy is the only way in which to re-establish food security.

If food security is not re-established then the CFP is worthless, and the commercial fishing dimension of our seas will collapse and disappear. Such an outcome would not only be disastrous, it would be a dereliction of duty by government.

Therefore it is imperative that EMFF support is focused directly and primarily on the re-establishment of food security and those management measures which will deliver this result. Nothing else makes sense.

It is our clear **recommendation** to Defra that it supports a European Maritime and Fisheries Fund built and administered in accord with this principle. Any other use of these EMFF funds is not acceptable.

Yours sincerely

S. D. Eades
On behalf of MARINET,
Friends of the Earth Marine Network.

