

RURAL AFFAIRS AND ENVIRONMENT COMMITTEE

WRITTEN SUBMISSION FROM WWF FOR EVIDENCE SESSION ON THE DECEMBER FISHERIES COUNCIL

Please find to follow a summary of what WWF view to be the key requirements for the reform of the Common Fisheries Policy (CFP).

Background

Excessive pressure on fish stocks has degraded the marine environment and made European waters an increasingly difficult place to run sustainable and profitable fisheries.

Europe is reforming its Common Fisheries Policy (CFP). This is a once in a decade opportunity to set things straight, and we have no time to lose. Successful reform can deliver healthy oceans, abundant fish stocks and a sustainable livelihood for the fishing industry and fishing communities. WWF looks forward to working with decision-makers, fishermen and other industry partners to jointly safeguard our oceans.

Three quarters of fish stocks in European waters are fished to their maximum potential or over-fished. This is bad news for marine biodiversity, bad news for the fishermen, businesses and communities who rely on seafood as a source of income and bad news for European consumers who want to enjoy healthy, fresh, sustainable seafood.

More effective management of fisheries is needed to reduce pressure on the marine environment. Reform of the CFP needs to deliver better strategy; enhanced stakeholder engagement and appropriate scope.

Three key elements that WWF believes the reform must deliver include:

- **Mandatory Long Term Management Plans (LTMPs)** for all EU fisheries, to be in place by 2015. These plans must meet clear minimum standards set out in the new Regulation and aim to achieve centrally agreed targets; they must assess capacity and environmental impact because sound fisheries management decisions will be based on these assessments. These ecosystem based plans will move Europe away from the politically motivated annual quota negotiations and set fisheries on a more stable track towards rapid recovery.
- **Effective Regionalisation.** Stakeholders must be at the heart of the decision-making process. This can be accomplished with a new management regime which has Regional or Member State stakeholder development of the LTMPs, and co-management of the fisheries once the plans are in place. By involving stakeholders more directly, we will be able to design workable and effective management strategies to ensure that the EU meets its environmental commitments.
- **Scope.** The CFP principles should apply to all fisheries in EU waters, including the Mediterranean, and to European vessels wherever the fish in the world's oceans.

WWF believes that the CFP reform needs to:

1. Improve Governance

The current CFP is unsustainable as it fails to create adequate incentives for long-term conservation. A new governance system is needed to tackle the global fisheries crisis and deliver long term health for the oceans and security for all who are dependent on them for their livelihoods and for food.

Mandatory LTMPs with fishermen and other key stakeholders engaged in the decision-making process are the way forward for all European fisheries.

The CFP should set high level objectives but the plans will have the flexibility for each fishery to tailor the way in which they meet these, including how to limit access and assure compliance against measurable objectives and indicators. The Regulation needs to set out clear standards that each LTMP must address such as environmental impact and capacity assessments of the fishery which will guide measures to address overcapacity and ecosystem impacts. The plans should cover the whole fishery rather than a particular species and will provide a framework for the most appropriate management tools for each fishery.

2. Commit to an ecosystems approach

LTMPs need to be ecosystem based. They should assess – and then limit -- the impact of the fishing operation on both the target species and on non target species (including mammals, turtles and birds). Critical habitat and predator/prey relations should also be considered. Effective management tools to address wider ecosystem impacts including time and/or area closures and catch selectivity improvements, should be identified.

3. Pave the way for Regionalisation

The CFP needs to set clear high level objectives whilst providing greater freedom on how to meet them - where, when and how to fish will better reflect local and regional circumstances. Effective CFP Regionalisation means adopting LTMPs at the level of the fisheries. By placing more responsibility in the hands of those who know the fishery best, unproductive EU micromanagement can be avoided. Regional co-ordination will be needed to oversee all LTMPs in an area, to ensure that the plans are compatible and to avoid over-exploitation. Such structures can be designed to fit within the current Lisbon Treaty. Ideally, EU level approval would hopefully become a formality in this context.

4. Address overcapacity and improve profit margins

Overfishing of key stocks has resulted in dwindling catches. Many fisheries are today running close to or at a loss. LTMPs should legally oblige each fishery to assess capacity and put in place a reduction strategy when overcapacity is identified. Solutions can include prioritising the removal of more destructive fishing methods or the retention of higher employment-generating vessels, depending upon the priorities of the fishery and its community. Delivering a system where the fishing capacity of the fleet is aligned with the available seafood resources in a sustainable manner will secure the long-term profitability of the industry.

5. Embrace Rights Based Management (RBM)

The adoption of effective rights based management systems can provide incentives which can be successful in addressing overcapacity, rebuilding fish stocks and improving the overall environmental performance of fisheries. RBM can also help strengthen the economic efficiency of fisheries and phase out dependency on subsidies. When designed appropriately RBM can engender improved stewardship. Any system of

RBM should be individually tailored and carried out within the framework of the LTMP; well-designed ones can preserve important principles such as community linkage or accessibility to new entrants.

6. Place the environment at the heart of fisheries management

The CFP currently gives equal weight to ecological, economic and social considerations. However, without a healthy marine ecosystem, a thriving and sustainable fishing industry cannot exist. The ecological pillar needs to be given top priority to enable the recovery of marine species and habitats. The new CFP also needs to establish a means of delivering Member States' commitments under the Marine Strategy Framework Directive (MSFD) to achieve good environmental status for fish stocks and marine habitats by 2020. For this to happen management systems must be built into LTMPs that will identify and prevent significant threats both to marine species and to habitats, in line with the requirements of the MSFD.

7. Operate on a level playing field

The European fleet, from small scale coastal fisheries to large scale industrial operations, should operate on a level playing field. No one sector should be overly represented and all voices need to be present in the fishery decision-making process. Balanced capacity, economic efficiency, social aspects and ecological sustainability, should all underpin the management of any European fishery.

LTMPs need to use the right tools to keep fishing capacity within sustainable limits. If a rights based system is adopted, fishing access rights can be subject to trading restrictions – for example to ensure that 'fishing community vital' vessels participate in the fishery - as long as these conditions don't undermine the objectives of the LTMP.

8. Cut the waste

The discard problem generated by the single stock quota system is a symptom of many of the things that are wrong with the current CFP. Reform must make it a thing of the past by introducing a system that limits catches rather than landings.

Under a new management system more selective removal and improved links with markets should also reduce the amount of fish discarded. LTMP discard strategies should encourage operators to minimise the removal of non-target or less desirable species by setting reduction targets and timelines together with effective monitoring and enforcement. The Scottish, UK and Danish governments are to be applauded for their commitment to moving towards a system of total removals (catch quotas) in an effort to minimise discard levels.

9. Develop a culture of compliance

For LTMPs to work, the right people need to be at the table: Member States, control agencies, scientists, conservation organisations, seafood processors together with the catching sector. CFP reform should see fishermen jointly agreeing targets and strategies as co-managers of their fisheries and a similar approach could be used for securing access rights. Improved compliance should flow from industry's greater sense of ownership in the decision-making process.

10. Tackle Relative Stability

Given some of the negative environmental consequences of relative stability to date, there needs to be some way of limiting its influence on fisheries policy making, especially if there is to be a move towards rights based management. Much of the industry supports relative stability because it gives the fleet long-term security in the proportion of resource available to it. It is possible that this security could be better

served by the allocation of formal fishing rights within mandatory ecosystem-based LTMPs. Meanwhile, rights based management schemes can be designed to address a range of issues such as controls to prevent the monopolising or overconcentration of fishing rights, to protect cultural links with the fishery or to ensure access to new entrants.

11. Take less, earn more

Taking less and earning more should be the goal of the reformed CFP. With improved marketing and better liaison with processors and buyers, supply can better match demand and the returns from each catch can be maximised.

Another key step is allowing consumers to make sustainable choices. The blue tick box of the Marine Stewardship Council (MSC) is presently the only eco-label which utilises an independent, third party certification process allowing the traceability of the fish from net to plate. The establishment of an EU minimum set of criteria, based on FAO standards, would help ensure only trustworthy eco-labels exist in the European marketplace.

12. Fish in a sustainable way, both home and away

Regardless of whether a European vessel fishes in EU waters or beyond, it should be subject to the principles and objectives of the CFP. This includes fishing according to the removal targets and clear sustainability objectives set by a LTMP.

The reformed CFP should provide a basis for the EU to demonstrate leadership on sustainable fishing practices in Regional Fisheries Management Organisations (RFMOs). Fisheries Partnership Agreements (FPAs) should be subject to continuous assessment, including the examination of alternative arrangements with third countries to better meet the needs of industry and partner countries as well as the marine environment they exploit.

Case study 1: Scottish Conservation Credits Scheme

Set up in 2008, the Scheme credits fishermen for adopting conservation measures which are most suitable to the fisheries covered by the Scheme (mixed whitefish and Nephrops trawl fleets) and to the objectives of the Scheme (cod conservation). It brings together decision makers, scientists, industry and NGO representatives for monthly steering group meetings. The Scheme is a prime example of co-management that could easily be replicated: the better understanding and high compliance generated demonstrate the value of granting all stakeholders a degree of ownership in the management process.

Case study 2: Danish fully documented fishery trials - total allowable catches rather than landings

Remote Electronic Monitoring (REM) is now a cost-effective and relatively simple way to record catches rather than landings. Boats are fitted with a set of cameras that record images of catches and discards. This information, combined with data from associated GPS units, means that fishermen can prove they are adopting best practices onboard. A Danish trial rewarded trawlers by allocating TACs up to 30% higher to account for the fish which was no longer being discarded. Adopting this approach more broadly would help manage discard reduction.

It's time for a change in fisheries: we need to manage our community resources better, and we need to behave more responsibly wherever we fish. The reform of the European Common Fisheries Policy gives us the opportunity to make this

change. WWF's approach of putting fishermen at the heart of the decision-making process through stakeholder-led Long Term Management Plans, alongside improved control, compliance and standardisation of procedures, should set us on a firmer footing towards the more economically desirable prospect of sustainable European fisheries. Take less, earn more.

Further Reading:

WWF full response to the Green Paper:

http://assets.panda.org/downloads/wwf_response_to_the_2009_cfp_green_paper.pdf

WWF elaboration of LTMPs: http://assets.panda.org/downloads/ltmp_full_final.pdf

WWF elaboration of Regionalisation:

http://www.panda.org/what_we_do/how_we_work/policy/wwf_europe_environment/initiatives/fis

[heries/publications/?179101/2012-Common-Fisheries-Policy-Reform-Long-Term-Management-](http://www.panda.org/what_we_do/how_we_work/policy/wwf_europe_environment/initiatives/fis/publications/?179101/2012-Common-Fisheries-Policy-Reform-Long-Term-Management-Plans-and-Regionalisation-of-EU-Fisheries)

[Plans-and-Regionalisation-of-EU-Fisheries](http://www.panda.org/what_we_do/how_we_work/policy/wwf_europe_environment/initiatives/fis/publications/?179101/2012-Common-Fisheries-Policy-Reform-Long-Term-Management-Plans-and-Regionalisation-of-EU-Fisheries)

WWF and Scottish Conservation Credits Scheme:

http://assets.wwf.org.uk/downloads/scottish_conservation_credits_scheme.pdf