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Synthesis of the Consultation on the Reform of the Common Fisheries Policy

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**Commission Staff Working Document**

**Synthesis of the Consultation on the Reform of the Common Fisheries Policy**

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## 1. INTRODUCTION

The Common Fisheries Policy (CFP<sup>1</sup>) was reviewed in 2002. The new base regulation<sup>2</sup> entered into force on 1 January 2003, and includes a provision that the European Commission (EC) shall report to the Council and the European Parliament on the chapters on conservation and fishing capacity before the end of 2012. The EC has started this review by publishing a Green Paper<sup>3</sup> followed by a consultation period with a closure of written responses on 31 December 2009<sup>4</sup>.

A total of 382 contributions (plus a mass email of 1329 identical responses) were received during the consultation period. Contributions are available on the website<sup>5</sup>, and a list of contributions is provided in Annex 1.

Both during preparation of the Green Paper and during the consultation period meetings were held with stakeholders, administrations of all coastal MS, and other organisations and entities. A list of meetings with EC participation is provided in annex 2.

This Commission Staff Working Document (CSWD) presents an overview of the contributions to this consultation without drawing any conclusions regarding the options to be studied further in an impact assessment. The synthesis takes into account the resolution that the European Parliament (EP) adopted on the Green Paper at its session of 25 February 2010. The synthesis is organised along the lines of the contents of the Green Paper.

**Table 1 – Breakdown of contributions**

Type	Number	Examples
General public	114 + 1329 identical emails	A wide range of citizens
Industry/interest group stakeholder organizations	117	Mainly fishers associations; angler associations, processor organisations, retailers, tourist bodies
Civil society organisations	63	Mainly environmental NGOs; also animal welfare NGOs, consumer NGOs, development NGOs
Academia	16	University institutes, national research institutes, networks of researchers, research organizations
MS administrations/agencies	30	Ministries, government agencies, and parliaments

<sup>1</sup> Annex 3 contains a list of acronyms.

<sup>2</sup> COUNCIL REGULATION (EC) No 2371/2002 of 20 December 2002 on the conservation and sustainable exploitation of fisheries resources under the Common Fisheries Policy.

<sup>3</sup> Green Paper on the Reform of the Common Fisheries Policy (COM(2009) 163 final, 22 April 2009)

<sup>4</sup> The present working document reflects the contributions to the green paper received from outside the Commission.

<sup>5</sup> [http://ec.europa.eu/fisheries/reform/consultation/received/index\\_en.htm](http://ec.europa.eu/fisheries/reform/consultation/received/index_en.htm)

Regional or local government	35	Mainly coastal regions and communes with fisheries dependence, UK regional fisheries management bodies
Other institutions and EC advisory bodies	8	European Parliament, Committee of the Regions, European Economic and Social Committee, ACFA, RACs, individual Members of EP, intergovernmental bodies.
Third countries	11	Nordic Council, Norway (government and various organizations), Iceland, New Zealand, ACP group
	394 (+ 1329)	

## 2. OVERCOMING THE FIVE STRUCTURAL FAILINGS OF THE POLICY

### 2.1. Addressing the deep-rooted problem of fleet overcapacity

Contributions broadly confirm that the EU fishing capacity is larger than the resources would justify. But many contributors also contest generalizations and submit that the great variety of situations requires fleet or fishery-based detailed assessment. Many including some Member States (MS) and the EP call for such measurement, technically and environmentally, with the fishing industry emphasizing also the economic and social dimension. The EP points to (notably small-scale) fleet sections that need renewal or replacement (for safety or reduction of environmental impact) without increasing capacity.

A limited number of MS and stakeholders advocate continuation of the current capacity management approach. Some non-governmental organisations (NGO) propose mandatory fleet-based capacity reduction. Some link capacity reductions to fisheries management plans. Regional authorities of outermost regions (with their MS support) ask for continued separate capacity management for their fleets.

A publicly funded one-off scrapping scheme to replace the current decommissioning is not strongly supported, although the majority of contributors such as the EP consider it useful under certain conditions. Some MS question the effectiveness of permanent subsidized scrapping.

A majority of MS and stakeholders see rights-based management as useful in tackling overcapacity, with more hesitation to individual transferable rights (ITR) and a small number strongly opposing them. Most MS argue that MS should decide on rights-based management.

Many contributions point to the risk of concentration of fishing rights under ITR insisting this should be avoided. Respect for relative stability (RS) is mentioned in a number of contributions against ITR at EU level. An overwhelming majority of the contributions think ITR are not appropriate for small-scale fisheries.

### 2.2. Prioritisation of the policy objectives

It is generally agreed that ecological sustainability creates the basis for a viable fishing sector, with little long-term conflict between ecological, social and economic

objectives. For some the discussion on prioritisation is only temporal and relevant for decisions in a transition to sustainable fisheries.

The EP and others are against *a priori* prioritisation of objectives. Most catching industry (and some regional authorities) insist on a balance between the three pillars - with job creation as an objective in its own right, and trade unions additionally emphasize social aspects. MS opinions range from ecological sustainability at the core to equal weight on the three pillars of sustainability. Some MS focus on fisheries for food supply and food security (as a new objective), others on fisheries as a source of employment in coastal communities. Environmental NGO see ecological sustainability as the core of the policy, linking the CFP with the wider maritime policy and the Marine Strategy Framework Directive (MSFD, Directive 2008/56/EC). Traders, retailers and some processing industries prioritize ecological sustainability.

There is broad consensus that *maximum sustainable yield* (MSY) must be among the targets (as in EC Communication COM(2006)360 on the World Summit on Sustainable Development declaration). The EP and catching industry generally look for a flexible timeframe for implementation particularly in mixed fishery, considering MSY as a direction rather than a specific target, and they consider that social and economic aspects should also be included in 'sustainable'. Environmental NGO on the other hand worry that MSY may not be precautionary in all cases, claiming that wider impacts of fisheries on the ecosystem are part of 'sustainable' in MSY.

Many contributions insist on minimization or elimination of discards as an important aim for ecological sustainability, although some contributions maintain that discards are inherent to mixed fisheries.

### **2.3. Focusing the decision-making framework on core long-term principles**

Contributions express generalized support for decision making where politicians (Council and EP) adopt the overarching principle and policy objectives (called differently in different contributions). Decision making should have a long-term perspective in an ecosystems approach with mechanisms for monitoring and auditing of policy development and decisions by either the EC and/or at regional level. Massive reference is made to elimination of short-term focus, top-down and micro management, and to move detailed negotiations away from Council. Some call on Council to respect scientific advice as binding when adopting total allowable catches (TAC).

Many contributors, particularly NGO and a limited number of MS support delegation/ implementing powers for the EC in specific fields (such as technical measures). Many also believe that regionally developed long-term management plans should be adopted by the EC. To avoid a 'free license' for the EC, a significant number of contributors propose a procedure with a Regulatory Committee, or involvement of the Regional Advisory Councils (RAC) or the industry. A limited group (notably some regional authorities) opposes this delegation one MS argues that many 'technical' decisions may have clear political or social impact.

Support for a move to some form of increased regionalization is generalised. A mix of terminology is used – e.g. some refer to regionalization at the sea-basin level, others to regions within the MS. Some insist on subsidiarity where MS create regional committees for management and a high level of self-regulation. Others propose simple co-operation between MS on issues of implementation and control, and some see room for delegated decision powers on e.g. access, resource or fleet management.

A significant number identifies the need for a separate regional body, with varying degrees of powers and responsibilities. Most, including the EP, envisage a mainly advisory body to discuss and prepare proposals for policy and legislation adoption by the EU institutions. Associating the stakeholders and others involved, the regional body would then be used for dialogue and discussion. The Baltic region is sometimes mentioned as a possible pilot of a MS organization that develops and decides on applied regulations (e.g. discards, national quota management). Others envisage a regional body as the implementing entity for long-term plans with some room for operative regulating powers and implementation decisions. Some advocate devolution of powers (e.g. technical details and effort regulation). Some contributions suggest a combination of functions.

On the composition most see the regional body as a MS-led entity, in a number of cases membership of industry and stakeholders is advocated, while in other contributions the stakeholders keep an advisory function through the RAC. The EC is envisaged as a member in some contributions while in others as an active observer/collaborator. Some propose a transformation of the RAC into a regional advisory body with both MS and stakeholders.

On the RAC there are some clear messages: their success should be expanded through strengthening them, and (according to the RAC themselves) by giving more weight to their advice, particularly in cases of unanimity of the advice. The EP explicitly requests adequate funding. Some propose a change of composition to better balance the industry with the other interests and non-represented stakeholders.

#### **2.4. Encouraging the industry to take more responsibility in implementing the CFP**

Several MS consider that Producers Organisations (PO) and other fishermen's organizations should receive more implementing responsibility on conservation and control, leaving best technical solutions to these organizations. But self-management should only develop after an assessment of risks and benefits, and taking into account national specificities (i.e. legal framework). The industry cautiously supports self-management, this should not pass responsibility for the failure of fisheries management to the fishermen. They are ready to move towards self-management if it gives the fishermen the possibility to decide the best technical solutions to achieve agreed targets, thereby moving away from micromanagement and intricate rules. Certain preconditions and criteria need to be met in line with standards and principles set at EU level. Most environmental NGO are reluctant to the idea of self-management any devolution of greater responsibility would require rigorous control and enforcement. They prefer concepts of participatory governance or co-management.

Environmental NGO, but also some MS, industry and the EP generally support results-based management under clear objectives and measurable targets. The EU should develop mechanisms to ensure industry responsibility and compliance through documentation. In return incentives should be created to reward positive initiatives together with capacity building. Increased industry responsibility is only possible with sufficient horizontal and vertical integration of the fishing sector. All stakeholders consider that the EU should promote the organization of fishermen (most agree on the key role of PO), especially where the industry is fragmented. Some contributors insist here on a differentiated approach, as not all fisheries will be able to move at the same speed in this process.

Most stakeholders but also the EP and a number of MS consider that increased industry responsibility goes hand-in-hand with better involvement in the decision making. Interestingly fishermen, MS and environmental NGO refer to the same best practices in term of increased responsibility and sustainable management. All point to the importance of sharing best practice (and failures), through RAC and further regional management bodies.

Some MS and environmental NGO consider that (some) costs for fisheries management should be borne by the user of the resources but they diverge on the best option (access fees versus taxes on landings/revenue). Many industry contributions argue that the industry already makes significant payments for fishery management.

## **2.5. Developing a culture of compliance**

Fleet overcapacity, complexity of rules, problems with data collection and inadequate and varied sanctions are widely mentioned as the main drivers for non compliance and lack of level playing field.

Most MS and NGO are positive about the new control regulation (1224/2009), but the industry also voices concerns about better implementation of the rules. Many MS and industry contributions advocate simple CFP rules and multi-annual approaches to enhance compliance, while NGO also point to the need for extension of control techniques (Vessel Monitoring Systems, closed-caption tv camera's). Opinions are divided on more EC powers and a larger role for the Community Fisheries Control Agency, even though in general this Agency is evaluated positively e.g. by the EP. Several industry contributions consider increased self-management as helpful.

NGO and some MS support a stronger link between financial assistance and compliance of the CFP rules and control obligations, while the industry is generally opposed particularly at the level of individual operators. NGO see room for incentives to enable more respect for the rules.

## **3. FURTHER IMPROVING THE MANAGEMENT OF EU FISHERIES**

### **3.1. A differentiated fishing regime to protect small-scale coastal fleets?**

There is general agreement on the importance of the small-scale coastal fleets for the European fishery. Among MS some support the idea of a differentiated regime, while



a number does not favour a specific approach. Quite a number point to the need for leaving MS the choice of implementing specific measures – frequently connecting this to the 12 nautical miles regime. The EP supports differentiation and calls for specific programmes for the small-scale coastal fleets.

The majority of stakeholders (both industry and NGO, regional and local authorities) are positive on small-scale coastal fishing because of, inter alia, its link to local communities, use of passive and selective gear, and lower fuel consumptions. Some contributions point to potential problems if different fleets target the same stocks on one fishing grounds. Many contributions underline however that small-scale coastal fisheries have a (sometimes considerable) impact on the resources so they should not be exempted from conservation and control measures.

A large number of contributions (including the EP) points to the variety of situations across the EU calling for a flexible approach - adapting the definition to the specificities of regions and/or fisheries. Most supporters advocate a mix of selection criteria, including vessel length, action radius of the fishery, trip duration, catch volumes, type of gear. Several NGO and fishing industry contributions want to consider social criteria and the link to the local/regional community. Some propose fishery-based ring fencing and a few suggest inclusion of recreational fisheries in the specific regime.

The decision making is frequently linked to the regionalized approach, setting overall criteria at the EU level with management at either the national level (MS support this option) or regional/local level. Part of the industry calls for management at the level of the fishery or fishermen (co- or self-management).

There is general agreement that introduction of rights-based management and ITR should not jeopardize the continued existence of the small-scale coastal fleet. Hence no ITR, or safeguards are considered necessary (to avoid excessive concentration or buy-out of fishing rights). Specific financial assistance for actions such as safety improvement (through modernization aid), training in fisheries management, certification of fisheries is proposed frequently with some also defending public support for construction of new vessels for these fleets. Others believe that reserving quota or exclusive area access should be part of the regime.

### **3.2. Making the most of our fisheries**

Most contributions share the objective to gradually reach exploitation rates matching with MSY in 2015. Some differences may be underlined when considering if FMSY will have to be taken as the ultimate target or as an intermediate one, opening avenues to address economic considerations (some contributors suggest replacing it by FMEY) or by designing new targets in line with the specificity of mixed fisheries or with an eco-systemic approach compatible with objectives of the MSFD. Such new targets should be associated to clear time schedules and deadlines. Nevertheless, some comments state that the MSY strategy will not be relevant for stocks and fisheries where data are unavailable or unreliable.

On management tools to limit fishing mortality rates (the ratio for the share of the stock killed by fishing activities) most of the contributions consider catch and effort

limits as relevant, depending mainly on the types of fisheries they will be applied to. Several contributors express the usefulness of managing single pelagic fisheries through catch limits and of having effort limits in place in multi-specific and multi-*métiers* fisheries. In addition, very few contributors request a subordination of fishing effort regimes to TAC management systems. Even fewer push for no use of either effort tools or tools based on catch limits. Many comment on weaknesses related to both tools: catch limits management currently based on landings and effort limits quite badly adapt to passive gears. Few contributors also insist in managing complementary fleet capacity (or fishing powers) and fishing effort. Others advocate eliminating paper-fish or paper-effort (fishing possibilities that are structurally not utilised). Some also support the possibility to manage temporal and spatial components of the fishing effort or fishing catches through geographical closures, marine protected areas, integrated coastal zone management.

Contributors are overwhelmingly in favour of the implementation of multi-annual plans supporting a fisheries approach, some contributions requesting even for eco-systemic multi-annual plans. In some cases, it is specified that Harvest Control Rules in these multi-annual plans should reflect strictly results made available through the scientific advisory process for major stocks, group of stocks or fisheries. And few comments underline that political pressure would consequently decrease when calculating fishing opportunities. In addition, some comments underline that multi-annual plans should address other issues, like discards, structure and composition of catches, but also economic and social considerations. Some contributors express that the capacity management policy should suit the development of these multi-annual plans. On their adoption and implementation a more flexible process is advocated and to entrust RAC with a greater responsibility.

On technical measures and ITR trends in contributions appear less clear; several comments highlight no single solutions could be considered, some others point to better trust improvements on technical measures of conservation than on development of ITR. Nevertheless, several comments insist on the need to address problems linked to discards (a discard ban appears still controversial) and by-catches.

Other ideas, more or less directly linked to conservations issues, appear in several contributions, like the need to restrict access in the 12 miles to small-scale fleets or a possible update of relative stability.

### **3.3. Relative stability (RS) and access to coastal fisheries**

A large majority of contributions (including most MS) supports retaining the principle of RS, considered by them as a cornerstone of the CFP, providing security and stability. A limited number of contributions is ready to reconsider the principle, in favour of more market-based models for fishing rights or transition to effort in mixed fisheries, and/or a radical change to access/allocation based on environmental or equity criteria (mainly a number of environmental NGO). The EP calls for exploring the need for change to the principle, but insists that the benefits of RS for coastal communities should be retained.

There is broad support for reviewing the allocation keys and to update them to current realities, notably taking account of the annually returning quota swaps. Others advocate adjustment to the real fishing capacity.

The system of quota transfers and swaps is widely accepted, some suggest a further development of quota transfers (through industry swaps and swapping possibilities with third countries).

An overwhelming majority supports continuation of the 12 nautical mile regime, the EP calls for a permanent nature for the regime. A large group envisages linking it to protection of the small-scale fleets. Some contributions advocate a regime with access limited to vessels meeting certain sustainability conditions, or limiting access to specific fisheries, or integrating fisheries with marine protected areas. A limited number of contributions suggests that rules imposed by MS within the 12 nautical miles zone should be applicable to all vessels active in those waters. Sporadically a return to territorial waters or cancellation of reciprocal access arrangements between Member States is advocated.

### **3.4. Trade and markets – from catch to consumer**

Generally the Common Market Organisation (CMO, Reg. 104/2000) is considered a fundamental pillar of the CFP. Focus should be on the market as a whole, taking the specific needs of aquaculture into account.

MS, EP and industry contributions emphasize the role of PO, they are to be strengthened and given more responsibility both in production and resource management, better market planning and response, innovation and concentration of supply, including a stronger role for (transnational) inter-branch organisations. A number of MS recommend more funding for PO, to support increased responsibilities but also marketing planning.

The need for revision and simplification of price and intervention mechanisms is widely acknowledged, most contributions believe that withdrawals (of fish under the intervention mechanisms of the CMO) should be eliminated, but carry-over aid should be retained. Some support direct aid to production and marketing activities. The system of guide prices is appreciated by the industry but should be more adequate to the (regional) realities, with aquaculture requesting its own price system.

Most contributions believe that labelling and certification are promising strategies where a regulatory framework could contribute to transparency and to build consumer confidence. Support for promotion of consumption appears more controversial.

As for trade policy particularly importers and processors insist on liberalized imports to ensure supply of raw materials. Several MS want to retain the tariff regime, retailers and importers favour more tariff suspensions. The EP and many other contributors comment on non-tariff issues, asking for level playing field for both EU and imported products, including through safeguards, anti-dumping and strict import controls.

### **3.5. Integrating the Common Fisheries Policy in the broader maritime policy context**

Integrated Maritime Policy (IMP, COM(2007)575) is generally considered important in that it should encompass the CFP as integral part and that holistic approaches are needed. Today's situation is widely criticized because of inconsistent policies lacking a level playing field. The EP calls for sufficient financial resources for the IMP.

The various stakeholders (particularly the industry) see the development of the IMP as a possibility to have an enhanced say on the activities of other economic operators or to have a greater influence on political decisions with impact on fishery. Mirrored, other contributors and environmental NGO envisage a greater say on decisions on fisheries. There is wide support for regional implementation of the IMP including fisheries at sea-basin level with a regional forum where all aspects are being discussed. The Baltic Sea strategy was mentioned as a good example.

A large majority favours a CFP aligned with the MSFD and other environmental legislation, as well as the ecosystem approach. Views differ on how the integration should be implemented. The industry generally argues that fishing activities should be regarded as a (historically justified) prioritized activity. Environmental NGO prefer fisheries to be integrated in the environmental standards.

On maritime spatial planning the industry claims priority access, and it should be better consulted, while many MS and NGO believe IMP should pursue mechanisms to consult all sectors.

The industry insists it can support adaptation to the effects of climate change and help ensure that fisheries do not undermine the resilience of marine ecosystems. Many NGOs believe that reduced fishing pressure, marine protected areas and reduced fuel-consuming practices are the best tools to increase ecosystem resilience to climate change. MS mention the need for enhanced research on climate change and the application of the ecosystem approach.

Impact assessment and better knowledge of the functioning of the ecosystem are broadly considered important. The industry stresses it has very good knowledge of the marine environment and therefore can be very helpful in this area (e.g. identification of vulnerable areas).

### **3.6. The knowledge base for the policy**

There is consensus that the CFP must be based on the best available scientific knowledge. Some (particularly environmental NGO and retailers) claim that scientific advice should always be followed. The EP stresses that lack of knowledge should not hinder adoption of precautionary measures.

Most contributors emphasize inclusive and participatory approaches to research and scientific advice, with involvement and good communication with scientists of all stakeholders (some see only need to engage the industry). Many call for multi-disciplinary research and advice in an ecosystem context, integrating it with the MSFD. Some contributions indicate the need to adapt the scientific advisory process to a regional management framework.

Most contributions, across all groups, are concerned about data availability and quality (e.g. social and economic data, discards data, etc). According to different groups the lack of data or knowledge is related to too restrictive regulations (the catching sector), the implementation of an ecosystem approach (some MS, the EP, NGO) or consumer confidence (traders and retailers).

Specific suggestions call for more investment in research, data collection and advice with some contributions (EP and some MS) advocating better use of information technology and automated recording. Some think fishermen should receive incentives to provide good data. Some contributions propose a new EU structure (e.g. agency, knowledge cluster) to ensure independence, transparency and better coordination and use of resources.

### **3.7. Structural policy and public financial support**

Many contributions express a need for continuation of public funding for the fishery sector. The EP requests increased financial resources for the fisheries policy. A group of MS support modifications to the modalities. A few MS and most NGO insist on elimination or phasing out of subsidies - they preserve unviable structures and maintain industry dependence on public support.

There is agreement that any future support should accompany the transition under the reform process and ease adjustment of the industry, aiming at long-term economic and social sustainability, or to alleviate consequences of major policy developments (e.g. move to MSY, the EP proposes financial compensation for fishermen affected by multi-annual plans). EU support should be better defined and targeted focusing on research and innovation, enhancing marine protection, and supporting fishermen's organisations and local development (axis 4, sustainable development of fisheries areas). There is significant support (some MS and industry) for the establishment of an industry support mechanisms for crisis or emergencies, but never running counter to the long-term objectives. Aquaculture is also mentioned frequently as a potential beneficiary of public support

Generally fleet restructuring is considered as one of the main challenges. There is a tendency to maintain vessel decommissioning but with stricter application, for some through one-off scrapping schemes. Others take an alternative approach and insist on a wider use of market approaches such as ITR. Public funding to modernize the fleet (selectivity, innovative technologies and the like) is supported by many contributors, and a limited number advocates public support for fleet renewal (including the EP and some MS). Some regions and stakeholders underline the social dimension of the restructuring. However, support for temporary cessation is not explicitly supported if an alternative instrument (e.g. an emergency mechanism) is available.

More conditionality between EU financing and reaching CFP objectives receives broad support. Some (including some industry organisations) believe compliance with rules/targets should have a bearing on fund availability. A more sectoral approach not based on convergence criteria is strongly supported but a group of MS and the EP oppose this. A limited number of contributions advocates phasing out of national support (including tax exemption and state aid regimes, e.g. *de minimis*). An

overwhelming majority of both industry and MS consider that common services (such as control and data collection) should be funded under future EU funding.

### **3.8. The external dimension**

Most contributions affirm the importance of the external dimension and emphasize that the CFP objectives should apply equally internally and externally to ensure policy coherence. The EP and some others see the defence of Community interests as a guiding objective. An overwhelming majority of stakeholders agree to the need of a more prominent involvement of the EU in Regional Fisheries Management Organisations (RFMO) which play a very important role in global fisheries governance. This should also include improved scientific information and advice, greater involvement of all stakeholders, and more transparent decision making processes. The majority of stakeholders advocate a continuation of the policy of free access to international waters under RFMO. However, some insist that beneficiaries (industry or countries) should contribute to management costs, research and surveillance, or pay for the right to fish in high seas, and the EP insists on access only where there is a resource surplus.

Most contributions focus on Fisheries Partnership Agreements (FPA). The majority of industry stakeholders present the case for maintaining the current FPA structure to ensure legal protection and responsible fishery, providing a platform for compliance, transparency, and third country support. Two MS prefer reinforcing FPA on a regional basis conducive to more effective research, control and surveillance and regional cooperation in general. Several stakeholders, especially NGO, propose replacing FPA by a fisheries governance framework or sustainable sourcing agreements.

Many see the importance of aligning the principles of the CFP and work on FPA closer with other policies, to ensure coherence and synergies with Economic Partnership Agreements (EPA), trade agreements, development aid and support to local development. Joint ventures are seen by industry as a vehicle for investment in third countries. Trade unions and some environmental NGO advocate respect for local communities and the rights of local workers. Some stakeholders also underline the importance of the Northern agreements.

A large number of industry stakeholders prefer maintenance of the current way of funding the FPA, while another significant number states that FPA should be financed privately or in public-private partnership. NGOs insist on payment for access to third country waters by the industry, who should prove compliance with sustainability criteria.

Some NGO support EU investment to transfer know-how and foster development, but inhibiting transfer of fishing capacity. Aquaculture under FPA is supported by some stakeholders but many NGO oppose it.

### **3.9. Aquaculture**

Aquaculture is generally considered important, and there is a call for maintaining the financing instrument to support its development and to integrate aquaculture needs in the market policy review. Most contributions refer to the socio-economic

importance, the market dimension, the link with capture fisheries, the problems of imported products, and access to space. Some industry stakeholders stress that aquaculture should be left to MS leaving aquaculture out of the CFP. Some MS support this, but they favour financial support from the EU.

Some MS and NGO insist on the need for environmental sustainability and development within the ecosystem approach as an alternative food supplier. Other MS see aquaculture as a fundamental and strategic pillar of the CFP advocating a coherent EU policy growth. While some NGO support sustainable aquaculture the majority of environmental NGO and consumer representatives express concerns on negative impacts of aquaculture practices on the environment.

The EP, some MS and others sees aquaculture as an integral part of the CFP; a number of environmental NGO see integration of aquaculture in the CFP primarily as a way to promote environmentally sustainable (and socially responsible) fish production. They, and some animal welfare associations, see integrating aquaculture in the CFP as a means to reduce impacts on the environment (e.g. restricting the use of carnivorous fish species, limiting feed sources, etc). However, another important group of environmental NGO consider that aquaculture should not form an integral part of the revised CFP, but this sector should be specifically managed under a separate European instrument or by MS themselves.

#### 4. OTHER TOPICS RAISED

A number of contributions, notably the EP, calls for attention to the *social dimension*, including attractiveness of the profession, recognition of the role of women and vulnerable groups in fisheries. Although the limited room for action is acknowledged, there is e.g. a call for support to social dialogue, for training and mutual recognition of qualifications, for attention to the working conditions and safety on board, for the salaries of crew. Among the concrete suggestions are mechanisms to protect employment and the development of a long-term strategy.

Authorities representing the *Outermost Regions (OR)* and the EP insist on the importance of fisheries but also point to the specific problems which require special solutions (including separate fleet management). A regional approach is proposed in some contributions, others emphasize the problems with the delimitation of access to the waters surrounding the OR. One contributor suggests specific impact assessment of the policies for the OR.

*Recreational fishery* would like to be seen as a full stakeholder in the CFP with a significant value to sustainable economy and job creation. Others consider that recreational fishery and its impact on the stocks needs to be considered in the context of the CFP, with data collection and where needed specific technical measures.

Finally the EP points to *ports* as important facilitators for fisheries.

## **5. CITIZENS' CONTRIBUTIONS**

Although some individual contributions are very detailed and embark on virtually all issues of the CFP, most limit themselves when tackling the issues. Many citizens want a stop to overfishing (some propose a moratorium), elimination of subsidies and prohibition of destructive gears. A discard ban is advocated in a significant number of contributions, and some call for strictly following scientific advice when setting TAC. Others mention the need for fleet reduction, more control, saving of the reefs and safeguarding artisanal fisheries. At the other side of the spectrum a few contributions call for elimination of the CFP, a return to 200-miles zones under MS competence, and/or renationalisation of the fisheries policy. Two types of mass e-mails were received: a limited number which pleads for permanent marine reserves of up to 40 % of the Community waters combined with a call to ban destructive trawling and to eliminate discards and by-catch. A second mass e-mail insists that too many fishermen are catching too much fish, with the following policy proposals: fleet reduction by at least 50 %, respect of scientific advice, creation of a network of MPA, prohibition of destructive fishing methods, a discards ban, and obligation to extensive product and production information for the consumer. Finally, one contribution should be highlighted both because of its presentation (a comic strip) and the way this contribution tackles the topic (the title says it all: 'Contribution tendre, naïve et insolente à la Poétique Commune de la Pêche').

## **6. THE NEXT STEPS**

This CSWD will be published on the EC website and it will be presented as the basis for an exchange of views to the Council of Fisheries Ministers on 19-20 April 2010. During 2010 the EC is developing and preparing the policy options for the Impact Assessment that will accompany the proposals for the reform. Intensive consultation of both stakeholders and Member States is foreseen for this stage, after which the reform proposals will be drafted. Adoption by the College of Commissioners of the reform proposals is envisaged for early 2011.



**Annex 1 List of contributions received 12 January 2010**

**Citizens**

114 individual contributions + 1329 with identical text

**Member States administrations/parliaments/government agencies**

- Deutscher Bundestag
- Fiskeriverket (SE)
- Miljö- och jordbruksutskottets utlåtande (SE)
- Regeringskansliet (SE)
- SRU - German Advisory Council on the Environment (DE)
- Bundesrat (DE)
- Wirtschaftsrat der CDU(DE)
- UK House of Lords
- UK Joint Nature Conservation Committee
- UK English Heritage
- UK Government
- George MP - UK
- Finnish Ministry for Agriculture and Forestry
- Bundesministerium für Ernährung, Landwirtschaft und Verbraucherschutz (DE)
- Bundesamt für Naturschutz (DE)
- Comhairle nan Eilean Siar (IE)
- Folketingets Udvalg for Fødevarer, Landbrug og Fiskeri (DK)
- Ministry of Food, Agriculture and Fisheries (DK)
- Marine Environment Unit – Federal Public Service Health, Food Chain Safety and Environment (BE)
- Rząd Rzeczypospolitej Polskiej (PL) – à vérifier par un/une PL de ton unité
- Ministerio de Medio Ambiente, Medio Rural y Marino – Secretaría General del Mar (ES)
- Assembleia da República – Comissão de Agricultura, Desenvolvimento Rural e Pescas (PT)
- Latvija uzskata – à vérifier
- Vlaamse Overheid (BE)
- Ministry of Agriculture, Nature and Food Quality (NL)
- République française
- Ministry of Agriculture, Forestry and Food (SI)
- Estonia



**Regions and local government**

- Scottish Government
- Xunta de Galicia
- Junta de Andalucía
- Kent & Essex Sea Fisheries Committee
- Eastern Sea Fisheries Joint Committee
- South Wales Sea Fisheries Committee
- Région Bretagne
- DE - Aktivregion Ostseeküste e.V.
- Poitou-Charentes, Pays de la Loire, Brittany and Lower-Normandy
- Gobierno de Canarias
- Generalitat de Catalunya
- East of England
- IE - South West Regional Authority
- SE - Fiskekommunerna
- CONFERENCE DES REGIONS PERIPHERIQUES MARITIMES D'EUROPE – CONFERENCE OF PERIPHERAL MARITIME REGIONS OF EUROPE
- Västra Götalandsregionen
- Conseil général Morbihan
- Unioncamere Calabria
- COSLA - Convention of Scottish Local Authorities
- Scottish Government
- Comhairle nan Eilean Siar
- Conseil général Finistère
- Région Réunion
- Région Haute Normandie
- Camara Municipal de Sesimbra
- Highland Council
- Gobierno Vasco
- Southern Sea Fisheries District
- Northumberland Sea Fisheries Committee
- UK - Environment Agency
- Seafish
- Aberdeen Council North East Scotland Fisheries Development Partnership
- Cornwall Sea Fisheries District
- Association of Sea Fisheries Committees England
- Département de l'Hérault
- Régions Ultrapériphériques
- Região Autónoma dos Açores
- Welsh Assembly Government
- Région Guadeloupe

## **Other Institutions**

- Committee of the Regions
- European Parliament (not received but under preparation)
- European Economic and Social Committee (not received but under preparation)
- UNEP/CMS/ASCOBANS
- HELCOM
- MEP for Munster
- Fianna Fail MEPs
- Bowles MEP
- D. Dodds MEP

### **Advisory bodies**

- ACFA
- Baltic RAC
- NSRAC
- PelRAC
- NWWRAC
- SWWRAC
- North Sea RAC
- LDRAC

**Stakeholders – industry, anglers, tourism etc.**



- Grupo Regal
- Sea Fishery Advisory Group of the Irish Seal Sanctuary
- Pedro Fernández
- Vianapesca
- CPMR North Sea Commission
- ACOPE
- ARVI
- L'Encre de Mer
- OPP48
- Peterhead Port Authority
- AETINAPE
- Promovis Nieuwpoort
- Confederación Española de Pesca Marítima de Recreo Responsable
- UNACOMAR
- Cap l'Orient Agglomération
- Europêche/Cogeca
- OPAGAC
- Associação de Armadores Pesca Artesanal Barlavento Algarvio
- Dutch Fish Product Board
- Mission de la Mer France
- Cornish Fed. Sea Anglers
- AIPCE-CEP
- Visveiling (Marcel Madou)
- Syndicat national des Chefs d'Entreprise à la Pêche maritime
- Danske Havne
- Landesfischereiverband Weser-Ems
- FR - Comité national des Pêches - CNPMM
- Cornish Fish Producers Organisation
- Scottish Pelagic Fishermen's Association
- Ilhas em Rede
- ANACEP & ANEPAT
- Greenore Cooley Fisherman's Association
- EAFPA
- Hellenic Fishermen Confederation
- DE - Landesvereinigung für Nordseekrabben und Küstenfischer
- Puerto Celeiro
- Fischereischutzverband Schleswig-Holstein
- ACV Transcom Visserij
- AKTEA
- Fédération des Femmes du Milieu Maritime
- Federación Gallega de Cofradías de Pescadores
- The Fishermen's Association Limited
- National Federation Fishermen's Organisations
- Shetland Oceans Alliance
- Shellfish Association of Great Britain
- EuroCommerce

- Eurothon
- Edeka Zentrale
- IHK Nord
- DK-LAG Development North West Sealand
- Finnish NGDO
- Scottish Fishermen's Federation
- Unioncamere Calabria
- BG - Civil Association "Regional Future"
- Rederscentrale
- Unione Italiana Lavoratori Pesca e Acquacoltura
- Fishmongers Company
- ETF
- CDSS
- Scottish Salmon Producers' Organisation
- Handelsverband Deutschland
- National Association of the Fish Farmers
- Federació Territorial de Cofradías de Pescadores de Barcelona
- Árainn Mhór Island Fishing Committee
- Federation of Irish Fishermen
- PTEPA
- UK - Food and Drink Federation
- CEPPT
- Coastlsig - LGA
- EPF - Entrepreneurs et Pêcheurs de France
- EAPO
- Federación Nacional de Cofradías de Pescadores
- Collectif Pêche et Développement et Encre de Mer
- Cepesca
- Danish Fisheries Sector Organisations
- Dutch Anglers Organisation - Sportvisserij
- Angling Trust
- Irish Fishermen's Organisation
- APC - Advance Planning-Consulting
- ASOAR-ARMEGA
- SESIBAL
- ANFACO-CECOPESCA
- CONXEMAR
- Swedish Fishermen Federation
- EPF- ORTHONGEL
- ADAPI
- SWFPA
- MARGov
- Centrale Economic Council & Consultative Commission for Fisheries
- SWFPO
- South West Handline Fishermen Association
- Fédération française d'Aquaculture

- SeFF Fiskeriturism
- EAA EFTTA FIPS
- HU - Hartobagy
- WOFFMG
- Finnish Federation for Recreational Fishing
- Estonian Fisheries Organisation
- "WFFA
- NUTFA"
- EE - Maritime Cultural Society of Saaremaa
- EE - Saarte Kalandus
- Greek Union of Trawlers'owners
- Mexillón de Galicia
- ArtesanalPesca
- Angling-school

**NGOs**

- Nederlandse Vegetariërs Bond
- Baltic Sea 2020
- Fishcount.org.uk
- CFFA - CAPE
- 7 French NGOs
- ClientEarth-MCS
- Western Sahara Resource Watch
- Green Budget Germany
- WWF European Policy Office
- Irish Wildlife Trust
- Ocean Sentry
- EUCC Marine Team
- Marine Conservation Society
- ProWildlife
- Legambiente
- Seas at Risk
- Food and Water Europe
- COAST - UWE - Hebridean - SSACN - FIMETI
- PEW
- Ocean2012
- Eurogroup for Animals
- CFFA
- Environmental Pillar of Social Partnership
- Compassion in World Farming
- German Church Development Service
- Finnish Association for Nature Conservation
- Seas at Risk position
- Royal Society of Edinburgh
- Birdlife
- Ecologistas en Acción
- Greenpeace
- ClientEarth
- Dutch society for the Protection of Animals
- Oceana
- ICSF
- National Heart Forum
- DE - Society for the Dolphin Conservation
- Kenna Eco Diving
- Pro-Sea Foundation
- Project Blue Sea
- Swedish Society for Nature Conservation
- Coalition Clean Baltic
- Deepwave
- New Economics Foundation
- Saharawi NGOs
- PONG Pesca
- EKO-UNIA
- PUGAD
- Fisheries Secretariat

- WWF Mediterranean
- Humane Society International
- DE - IBG (J. Gessner)
- EuroCoop
- IFAW
- Fair-fish

## **Research organisations and institutes**

- IIEA - Institute of International and European Affairs
- Instituto Español de Oceanografía
- FI - Fisheries and Environmental Management Group
- EFARO
- University of York
- Università di Bologna
- APECE
- Marine Laboratories of the Natural Environment Research Council
- Instituto Español de Oceanografía - Canarias
- Proyecto PRESPO
- German Elasmobranch Society
- Presentation Justice Network, Ireland
- Centro de Biodiversidad y Gestión ambiental
- JRC Ispra
- MARINET

### **Contributions from third countries**

- Norwegian Government
- Nordic Council of Ministers
- Nordic Council
- North Norway region
- Western Norway region
- ACP group
- New Zealand Government
- Norwegian Seafood Federation
- Norwegian R&D project
- S. Gudmundsson



## Annex 2. Consultation meetings on the CFP reform

	When?	Where?
	(all dates in 2009)	
<b>MS Fisheries Administrations</b>		
DK - All-purpose meeting	11 May	Copenhagen
ES - Specific mission	26 May	Madrid
DK - EFF Monitoring Committee	28 May	
IE - EFF Monitoring Committee	28 May	
DK - Annual Fisheries Policy Meeting	4 June	Kolding, Denmark
SK - EFF Monitoring Committee	12 June	
ES - Multi-purpose meeting	18-19 June	
CZ - EFF Monitoring Committee	19 June	
NL - EFF Monitoring Committee	19 June	Netherlands
ES - EFF Monitoring Committee	23-24 June	
PT - EFF Monitoring Committee	26 June	
FR - Multi-purpose meeting	29-30 June	
All Members States (DGs)	2-3 July	Ronneby
BE - Specific meeting	6 July	Ostende
PT - Ad-hoc meeting	7 July	Lisbon
BE - EFF Monitoring Committee	8 July	
FR - Specific mission	8 July	Paris
UK - Multi-purpose meeting	13-14 July	
GR - Conference on the Green Paper	30 Aug-1 Sept.	Thessalonique
AT - EFF Monitoring Committee	17-18 September	Illmitz
PL - Multi-purpose meeting	22-23 September	Warsaw, Gdynia
RO - Conference on the CFP Reform	3 October	Bucharest
IE - Ad-hoc meeting + The Marine Institute	7-8 October	Dublin
DK - Danfish Conference " A new Fisheries Policy for fishers"	8 October	Ålborg, Denmark
IT - Ad-hoc meeting (Adm. + Stakeholders)	12 October	Sardegna

SV - EFF Monitoring Committee	15 October	Gothenburg	
EE - EFF OP Annual Examination	18 November	Brussels	
SV - EFF OP Annual Examination	24 November	Brussels	
DE - EFF OP Annual Examination	25 November	Brussels	
DK - EFF OP Annual Examination	26 November	Brussels	
PL - EFF OP Annual Examination	1 December	Brussels	
NL - EFF OP Annual Examination	3 December	Brussels	
GR - Conference on the Green Paper	4 December	Kamena Greece	Vourla,
BG - Multi-purpose meeting	7-8 December	Sofia	
IT - Special event	10 December	Italy	

### **MS Administrations other than fisheries, regions and other events**

Chambre de Commerce de Granville, Basse Normandie	14 May	Brussels	
AG Commission Arc Atlantique	15 May	Santander	
Devon Maritime Forum	20 May	Brixham	
EFARO Annual directors meeting	26 May	Göteborg	
Fundación Galicia Europa - Presentation to all ES regions	3 June	Brussels	
EFF Axis 4 seminar with Baltic MS	4-5 June	Parnü - Estonia	
Lower Normandy	4 June	Caen	
CRPM - Adonis A4719	9 June	Brussels	
"Inquiry into Future Fisheries Management" - Scottish Government	15/16 June	Edimburg	Videoconference
CPMR Working Group "Aquamarina"	18 June	Brussels	
5th meeting with MS experts on Maritime Policy	23 June	Brussels	
Biolfish	25 June	Monopoli	
Coastal Management for Sustainability	30 June	London	
ES - Specific mission	9-10 July	Granada	
EU Fisheries Advisor meeting	17-18 September	Göteborg	
Five French major maritime regions	29 September	Brussels	
CPMR - General Assembly	30 Sept. 1-2 Oct.	Göteborg	

Assises de la pêche - ouverture	5 October	Paris
The East of England Regional Assembly's (EERA)	5 October	Brussels
DE - Presentation at the EU representation	7 October	Berlin
Bretagne - Journée d'échange sur la réforme de la PCP	20 October	La Forêt Fouesnant
Environment Policy Review Group	26 October	Brussels
Assises de la pêche - PACA	3 November	France
Galicia - Meeting between Galician Minister for Fisheries and Commissioner Borg	5 November	Brussels
Scotland	4-5 November	Scotland
EFARO workshop on CFP Reform	24 November	Ostende
DE - COM representation with Land Schleswig-Holstein	26 November	Buesum
ES - Specific mission	26-27 November	Canary Islands
ES - Specific mission	27 November	Bilbao
Assises de l'économie de la mer	1 December	Brest
PT - Meeting with Azores Government	4 December	Ponta Delgada
ES - Specific mission	18 December	Santiago

### **European Institutions**

Committee of the Regions	30 June	Brussels
European Economic and Social Committee	15 July	Brussels
European Parliament - Fisheries Committee	1 September	Brussels
European Parliament - Fisheries Committee	30 Sept/1 Oct	Brussels
European Economic and Social Committee - Specialised section	8 October	Brussels
European Parliament - Working lunch with the Rapporteur	15 October	Brussels
European Parliament - Workshop "Reforma da Política Comum de Pesca: O Futuro da Pesca em Portugal"	21 November	Porto
European Parliament - Fisheries Committee	1 December	Brussels
Committee of the Regions	4 December	Brussels
European Economic and Social Committee	10 December	Brussels
European Economic and Social Committee	8 February	Brussels
European Parliament - Study visit by national parliaments' officials to PECH	25 February	Brussels

## Stakeholders, including NGOs

BSRAC - General Assembly	8 May	Gdynia, Poland
PelRAC working groups	14-15 May	Leiden
MedRAC	3-4 June	Marseille
BSRAC Demersal & Pelagic WK	9 June	Denmark
IEEP	8 June	Brussels
WWFEPO	10 June	Brussels
Green Party	15 June	Berlin
ACFA - Plenary Session	17 June	Brussels
BSRAC ExCom	22-23 June	Finland
PelRAC working group I on reform	23 June	Schiphol
EAP0 Seminar on the Green Paper	26 June	Bénodet - France
NSRAC ExCom	29-30 June	Netherlands
SWWRAC - General Assembly	6-7 July	Paris
NWWRAC	10 July	Paris
ACFA - Ad-hoc Group on the Reform + Danish Administration	8 September	Copenhagen
NWWRAC ExCom	8 September	Madrid
Natural England	11 September	Brussels
PelRAC GA and ExCom	16-17 September	Amsterdam
ICSF - Small-scale fisheries, coastal communities and CFP Reform	28 September	Brussels
PEW - WWF - Fisheries Secretariat - Ocean2012 - Dinner on US regional fisheries management	28 September	Brussels
PEW - WWF - Fisheries Secretariat - Ocean2012 - Regional Fisheries Management Conference	29 September	Brussels
AGLIA - La pêche et les institutions européennes	29 September	Brussels
ClientEarth and Marine Conservation Society	30 September	Brussels
BSRAC Conference on best practices	1 October	Sweden
Federation of Irish Fishermen	9 October	Dublin
ACFA - Groups 2 & 3 (Aquaculture & Markets)	13 October	Brussels
PELRAC WGs	14 October	Leiden,

		Netherlands
Eurocommerce	21 October	Brussels
Seas at Risk	21 October	Brussels
NWWRAC - AG	28 October	Dublin
Inter-RACs Seminar	3-4 November	Edimburg
Social Dialogue + Harvesting sector	5-6 November	Split
Federación Nacional de Cofradías de Pescadores	7 November	Madrid
ACFA - Ad-hoc Group	10 November	Brussels
Trade Unions	12-13 November	Málaga
Oceans Symposium	13 November	Oxford
LPN (= ONG)	16 November	Lisbon
XIV Jornadas de Pesca Celeiro	21 November	Celeiro, Spain
WWFEPO	24 November	Brussels
ADAPI	3 December	Lisbon
Natural England	8-9 December	London
ACFA Plenary Session	9 December	Brussels
Conférence Coopération regionale de l'océan Indien	10 December	St Denis, Réunion

### **External events**

Nordic Council of Ministers	1-3 July	Isafjorden - Iceland
XIXth meeting of the European Association of Fisheries Economists (EAFE)	6-8 July	Malta
Conference "Efficient Fisheries Management - Fishing rights and flexibility"	27/28 August	Reykjavik
ESIN - General Assembly	9 September	Elba, Italy
World Fishing Exhibition	16-19 September	Vigo
Nordic Council of Ministers	13 October	Copenhagen
Northern Norway	10 December	Brussels

### **Annex 3. Acronyms**

ACFA	Advisory Committee for Fisheries and Aquaculture
CFP	Common Fisheries Policy
CMO	Common Markets Organisation
EC	European Commission
CSWD	Commission Staff Working Document
EP	European Parliament
EPA	Economic Partnership Agreement
EU	European Union
FMEY	Fishing Mortality at level of Maximum Economic Yield
FMSY	Fishing Mortality at level of Maximum Sustainable Yield
FPA	Fisheries Partnership Agreements
IMP	Integrated Maritime Policy
ITR	Individual Transferable Quota
MPA	Marine Protected Area
MS	Member State
MSFD	Marine Strategy Framework Directive
MSY	Maximum Sustainable Yield
NGO	Non-Governmental Organisation
OR	Outermost Region
PO	Producers Organisation
RAC	Regional Advisory Council
RFMO	Regional Fisheries Management Organisation
RS	Relative Stability
TAC	Total Allowable Catches