



Association des
Organisations Nationales
d'Entreprises de Pêche de l'UE



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THE REFORM OF THE CFP: THE ESSENTIAL DEMANDS OF THE SECTOR

1. *Our global vision for the reform of the CFP*

- The future of the fisheries and aquaculture sector in Europe can be assured by a combination of two vital elements:
 - guaranteeing the competitiveness of the sector
 - sustainably exploiting resources
- Economic, social and environmental sustainability must be combined and we must strive to obtain a balance in order to ensure that fishery resources are maintained and that the industry is viable, profitable and competitive and can guarantee the supply of marine products for current and future generations without increasing Europe's dependence on third countries. It is also vital that the policy includes a social element regarding job quality, job income and working conditions that are competitive in the labour market and that encourage young people to become fishermen/fish farmers.
- Employment levels in the fishery sector are the outcome of the competitiveness of the regional/local fisheries industry and of the structural characteristics of that industry. It cannot be a condition a priori as this may be in conflict with competitiveness and sustainable exploitation.

2. *Involving stakeholders in the policy*

- It is vital that stakeholders are involved at every stage of the policy process, from design to implementation, if we want to create a culture of respecting the rules. In order for the policy to have concrete results, greater responsibilities in fisheries management and in the implementation of the CFP must be given to professionals working in the sector.
- Today, ACFA is the only European formal advisory body for stakeholders in the fisheries and aquaculture sector for all issues related to the CFP and to other matters concerning maritime policy, consumer health, trade, environment, etc. The sector believes that ACFA should be maintained, even if it has to be part of a new dynamic that, in any event, preserves the identity of the European organisations of the sector. The opinions it adopts are only of interest if they are duly taken into account by the Commission and if the Commission at least systematically responds to them as it is required to do with the RACs.

- The activities carried out by the two complementary advisory structures, ACFA and the RACs, should be coordinated. The RACs have the essential task of providing opinions on the management and conservation of fisheries per basin while ACFA should, in future, rather concentrate on horizontal issues mentioned above as well as matters relating to the market and aquaculture. In addition to this, Europêche and Copa-Cogeca insist that the Commission examines the possibility of ACFA becoming a European forum for advice and opinions, not only for the Commission but also for Members of the European Parliament, this in analogy with the RACs.
- On 26th March 2009, ACFA gave a unanimous opinion on its external interim evaluation. The situation was then evaluated by the Commission's services which proposed a series of measures for the short, medium and long term. Generally speaking, the sector agreed with these proposed measures but also expected additional steps to be taken, still awaited today.

3. Discards

- A maximum progressive reduction in discards must be a priority for the future CFP. This must lead to a change in Community legislation because discards go against some of the EU's objectives and specific commitments which it agreed to within the United Nations Convention on Biodiversity and the World Summit on Sustainable Development held in Johannesburg.
- The fishing sector in Europe, represented by Europêche/Cogeca, takes a fishery-by-fishery approach in all maritime regions of the EU using pilot projects involving the sector to be able to proactively implement those technical, regulatory or trade measures which are best adapted in terms of efficacy and acceptance by professionals.
- Unlike the Commission, which in a recent non-paper proposed a radical, very short-term ban on discards, the sector recommends a gradual approach, working in close collaboration with scientists and the sector. Professionals from the sector have already shown that they are anxious to use more selective fishing gear in order to preserve resources. In any case, any proposed piece of Community legislation aiming to reduce discards should be accompanied by an assessment of its socio-economic impact.
- In order to elaborate its discard policy, the EU should take into account the international recommendations regarding the management of by-catches and the reduction of discards, drawn up by FAO following a technical consultation held in Rome from 6 to 10 December 2010.

4. The reform of the market policy

- The sector shares the Commission's wish to focus the reform of the market policy on the following four points: organisation of the sector; price and intervention mechanisms; marketing standards and consumer information; management of external supply sources. Producers' position on the market must be strengthened by encouraging and strengthening PO's. In this way, fishermen will be able to gain greater profits from their products and be more competitive on today's globalised market.
- In the interests of traceability and food safety for consumers, it is important to improve the labelling of fisheries and aquaculture products along the chain. Labelling should effectively cover origin, nutritional value and the production method used for the product (wild fish, fish from ocean farming, rivers, lagoons, etc.). Moreover, given the fact that it is difficult, not to say impossible, to determine when, how and where a fishery or aquaculture product was defrosted, the sector requests that the display of defrosted products takes place on counters separated from those where fresh fish is sold, in order to avoid leading the customers astray.
- Action to shorten the chain by reducing the number of intermediaries is also necessary. This can be achieved by encouraging direct contact with producers, particularly for small-scale fishing which is often hardest hit by major retailers' policies. Here it is important that fisheries products are sold at auction at the first point of sale, through a similar transparent process, or in accredited establishments in order to avoid sanitary problems and to improve landing checks.
- The sector regards the promotion of less well-known species of fish to consumers as a very important way of possibly rebalancing the consumer market which at the moment is focused on a few species of fish which are considered to be more marketable.
- The EU should guarantee fair rules for all (level playing field), and request third countries to apply the equivalent common standards to those required from the European fishermen regarding health and food safety, but also at the level of socio-economic and environmental production requirements.

5. Support for aquaculture

- Bearing in mind the increasing importance of aquaculture, particular attention should be paid to it in the future CFP, especially in terms of funding for supporting its development and mechanisms which are adapted to respond to its needs within the market policy (the rules for PO's are not in line with the real situation in the aquaculture sector for example).
- It is important that the new Fund, which will replace the current EFF in 2013, continues to receive specific funding for aquaculture, aiming in particular to strengthen communication to consumers about the product's image, quality and traceability. Encouraging traditional forms of aquaculture based on protecting and promoting the environment, the natural resources as well as managing the landscape, is also significant in terms of multifunctional results for biodiversity, provided by continental aquaculture.
- Sustainable aquaculture also depends on the availability of veterinary medicine, strict controls on products imported from third countries (often linked to economic, social, environmental and sanitary dumping) and an integrated management policy for coastal areas, wetlands and rural zones which fully takes the sector's role into consideration.

6. Structural Policy

- The manifest intention of the Commission to do away with any system of fleet support of any kind, and in particular the contributions for the withdrawal (scrapping) or modernization of vessels, will, if included as part of the reform of the CFP, have a strongly negative impact on the sector which, for years now, has been unable in any way to increase fishing capacity with Community incentives.
- While the elimination of subsidies for scrapping vessels will constitute a barrier to reducing the fleet, ending support for their modernization will condemn them to a process of ageing, with a negative impact on the safety of persons on board, with fisheries enterprises hard put to invest autonomously in the improvement and adaptation of vessels in a period of severe economic crisis. It is worth noting in this context that the average age of vessels varies greatly from one Community basin to another, and that a 'one size fits all' community structural policy is unable to take account of the various specific situations.

7. Research

- The management measures of the CFP must be founded on clear and regularly updated scientific evidence. Community institutions cannot systematically apply the precautionary principle and then leave the onus on Member States or economic agents to come up with proof to the contrary, in order to correct inappropriate or excessive measures, the socio-economic impact of which can be substantial.
- It is essential that the new CFP actively enables the fishing industry to collect data from their commercial vessels and that these collected data will be inserted in the process of stock assessment and management advice.

8. Individual transferable rights

- The individual transferable rights may be inappropriate for coastal small-scale fisheries and are in any case not suitable for the fisheries in the Mediterranean Sea.
- It is important to examine the impact of the different options existing in terms of transfer of fishing rights (transfer between enterprises in the same Member State, between Community operators in different Member States or with non-EU countries) on the criteria of relative stability. This analysis must be carried out taking account of the effects of these options on the principle of the internal market.

9. *The international dimension*

- The Commission is requested to ensure that the interests of the Community fishing fleet continue to be taken into account in third countries. This can be done by encouraging their access to available excess resources in these waters through reciprocity agreements or partnerships and by enabling them to develop economic activity which is oriented towards establishing responsible and sustainable fishing practices in partner countries and also fighting poverty.
- The EU should continue to strengthen its international role by assuring that it participates actively in international bodies (UN, FAO) and all RFMOs. This would encourage good governance of international fisheries and help in the fight against IUU fishing. In order to achieve this it is vital that adequate human resources and funding are made available.

10. *The Integrated Maritime Policy (IMP)*

- The sector advocates an integrated approach to the management and governance of the seas and oceans and encourages the creation of synergies between the various sea-related policies in the EU. The development of the IMP should enable the industry to have a greater influence on the activities of other economic players and on policy decisions that affect the fishing industry. Its implementation should continue to be on a regional basis (basin by basin approach).
- Regarding maritime spatial planning, integrated management of coastal areas and the creation of a knowledge base of the marine environment, the sector needs to be consulted in any Community forum dedicated to discussion on these cross-sectoral tools, in order to express there its views whenever legislation is proposed which could affect fishing activities.
- To be effective, the IMP must have sufficient financial means placed at its disposal.