



The Common Fisheries Policy After 2012

A paper prepared by the NSRAC for consideration by the Commission before the Green Paper is finalised

1: Introduction

- 1.1 The European Commission has announced that it will produce proposals for a further major reform of the Common Fisheries Policy during 2011, for adoption by the end of that year and implementation from 1st January 2012.
- 1.2 As part of that process the Commission has initiated a debate on the content of the reforms through a working document entitled '*Reflections on further reform of the Common Fisheries Policy*'.
- 1.3 A Green Paper is in preparation by the Commission, to be issued around April 2009. That paper will inform the main strands of the debate on the future of the CFP, prior to the preparation of a formal Commission proposal.
- 1.4 The NSRAC wishes to ensure that its views on reform of the CFP are made known to the Commission at an early stage, before the Green Paper is issued.
- 1.5 This present paper is therefore an initial contribution from the NSRAC on the future of the CFP, reflecting a consensus of NSRAC participants on the way forward. Once the Green Paper is issued the NSRAC will wish to play a further part in the debate, especially in relation to issues which affect fisheries in the North Sea.

2: Present Position

- 2.1 There can be no doubt that the changes introduced during the 2002 review of the CFP have improved fisheries management within the EU. Many fish resources are now harvested under multiannual plans. Moves towards regionalisation of fisheries policy have taken place with the establishment of the Regional Advisory Councils (RACs). There has been some integration of fisheries management objectives with nature conservation objectives. Attempts have been made to improve control and compliance. Perhaps the most welcome of these developments, however, has been the stronger engagement of fishers and other interested stakeholders in the process of fisheries management through the setting up of the RACs.

- 2.2 The CFP is being measured against constantly changing criteria. Within the last decade the initial goal of avoiding the collapse of stocks has given way to the precautionary approach. That in turn has been replaced by a political commitment to achieve maximum sustainable yield by 2015 for those stocks that are currently depleted. These changes in the objectives for the CFP have had repercussions for both policy makers and stakeholders.
- 2.3 Since the last reforms to the CFP economic conditions have changed dramatically. The reforms proposed for 2012 must address those changes.
- 2.4 The NSRAC was the first of the RACs to be established, reflecting a strong interest by stakeholders in the North Sea in contributing towards better management of the North Sea fisheries. Since its inception in November 2004 the NSRAC has engaged fully with new fisheries management proposals coming from the Commission. It has also engaged in a number of important initiatives of its own.
- 2.5 In 2005 the NSRAC set out proposals for the adoption of long term management plans for the main North Sea fisheries, as a solution towards achieving maximum sustainable yield by 2015. At a workshop held in March 2006 the NSRAC then developed a series of alternative long-term management approaches for the North Sea Fisheries and concluded that there is now an opportunity in to adopt a different, more inclusive approach to fisheries management..
- 2.6 In 2007 the NSRAC, together with the North West Waters RAC took the concept of inclusiveness further by organising a Symposium on Cod Recovery, which brought together more than 190 of the world's scientists, environmentalists, senior officials, parliamentarians, fishermen and other stakeholders to discuss cod recovery in the North Sea and North Western Atlantic Waters. The output from that symposium significantly influenced the subsequent revision of the cod recovery plan, underlining the advantages of having the RACs at the very heart of the process for rebuilding fish stocks.
- 2.7 In 2008 the NSRAC joined with the Scottish Government and the new Community Fisheries Control Agency (CFCA) to discuss and debate control and compliance within the CFP. The meeting concluded that a full culture of compliance could only be nurtured through mutual trust. Discussion of measures to improve control and compliance had to involve the fishing industry and other stakeholders.
- 2.8 The RACs represent a move towards a more systematic involvement of stakeholders within the CFP. The RACs have shown that there is scope for the greater involvement of the fishing industry and other stakeholders in management and decision taking. The views of the RACs on further reforms to the CFP are therefore especially relevant.
- 2.9 The NSRAC's work has taken place against a background of improvements to North Sea stocks. The North Sea cod stock is recovering strongly on the basis of incoming recruitment and significant reductions in fishing mortality. Although the spawning stock biomass has not yet reached historical peak levels and may not do so because of oceanographic regime shifts, fishing mortality is now greatly reduced and biomass is increasing. Major stocks such as haddock, mackerel, *Nephrops* and saithe stocks are at, or close to desirable long term targets. Other stocks such as North Sea plaice are responding well to management measures and stocks are rebuilding. The NSRAC is optimistic about the future state of the North Sea fisheries and is seeking reforms to the CFP which will ensure sustainable and profitable fisheries, which take

account of the need for an ecosystem approach, and which operate within stable markets.

3: Constraints placed upon the CFP

3.1 At this point it is constructive to consider those constraints which act upon the CFP, and which need to be addressed in setting future objectives for the CFP.

3.2 The NSRAC has identified the following constraints affecting the application of the CFP within the North Sea:

- The overall objectives of the CFP need to be clearer, with strong recognition that fishing is an economic activity. Attention must be paid to ensuring that both fishing and the marketing of fish are profitable and that attention is paid to the impact of the CFP on rural (and sometimes remote) regions
- The CFP has to manage a very wide range of fisheries, some of them highly complex, ranged across 40 degrees of latitude. Each regional sea also needs to be viewed from its particular perspective
- The multi-gear, multi-species and multi-jurisdictional fisheries within the North Sea are among the most complex and therefore the most difficult in the world to manage
- The design and formulation of management measures across these varied fisheries cannot readily be undertaken by a small group of civil servants based in Brussels.
- Nor can they be managed through a centralised command and control approach
- The development of very large body of highly prescriptive and complex rules must be avoided
- A culture of compliance requires a minimum level of legitimacy; inappropriate management measures greatly undermine the legitimacy of the CFP and lead to poor compliance
- Rules must not be allowed to accumulate layer by layer. As new rules are adopted, so older redundant rules must be discarded.
- The system of management must take account of regional or fleet diversity. One size does not fit all
- There must be greater devolution of management to the appropriate level
- There must be greater participation in decision taking by those whose activities are being managed, whether directly or indirectly. For the North Sea, the creation of the NSRAC has been a first step in this direction.

3.3 The 2012 reforms present a fundamental choice over the future of the CFP. Either the current centralised approach will be deepened and intensified in ways spelled out in the Commission's 'Reflections' paper. Or new forms of governance will be put in place to give effect to greater participation by stakeholders in decision making, as advocated by the Commission's paper on good governance.

4: The NSRAC Perspective

The NSRAC has concluded that fundamental reform of the CFP is required. The reforms should include the following elements:

4.1 Stronger Fisheries Science

4.1.1 The NSRAC has been very supportive of the scientific role played by ICES and the national fisheries research institutions in the provision of high quality and impartial advice. Very heavy responsibilities have been placed by the Commission upon ICES scientists. Although ICES has been slow to change in the past it is now reforming itself. The recent introduction of Benchmark Working Groups for North Sea stocks, with participation by stakeholders, is an especially welcome development.

4.1.2 Major improvements should now be sought in relation to:

- The consultancy relationship and terms of reference between the European Commission and ICES, which must recognise fully the needs of the RACs for scientific advice.
- The provision of advice by ICES in a format which is more useful to fisheries managers and to stakeholders
- Ensuring that more fish stocks achieve analytical assessment status through improvements in the data available
- The need for a multi-species or fisheries-based approach, which recognises that many fish stocks are not independent entities but are components of a wider ecosystem
- Greater use of industry sources of information to supplement and complement current and new assessment techniques
- The need to assemble data, perform assessments and present advice on a shorter time scale

4.1.3 The Commission's Scientific Economic and Technical Committee (STECF) has also been engaging more closely with stakeholders. Its work is commissioned and guided by policy makers, but it increasingly involves representatives from the RACs in the work of its sub-groups. Although stakeholders are attending the meetings as observers they are in reality playing a more active role which is valued by all the participants. The value of this interaction has not always been recognised by the Commission itself, which has sought to put barriers in the way of closer cooperation.

4.1.4 The fishing industry and other stakeholders, fisheries scientists, and fisheries managers all have a vested interest in supporting a system that produces high quality, impartial, meaningful, scientific advice in an accessible form. Without confidence in the fish stock assessments and the scientific advice it will difficult to obtain the fishing industry's full commitment to management measures.

4.1.5 There are a number of ways in which the present shortcomings can be resolved:

- Stakeholders should have a more direct role in formulating requests for scientific advice
- A greater role for industry in the fisheries science process, including the industry/science partnerships pioneered in the North Sea, must be established to provide additional, scientifically valid sources of data
- The newly instituted ICES Benchmark Working Groups, in which stakeholders have direct involvement in in-depth discussions on assessment data, relevance and models, point the way forward towards a more inclusive approach to fish stock assessments
- Each RAC should provide a forum in which dialogue between scientists and stakeholders can take place on the limits and uncertainties of current scientific knowledge and outstanding issues can be resolved
- ICES and STECF should play a role together with the RACs in preparing management plans and defining management options. The Pelagic RAC already has experience of this happening.

4.2 Long Term Management Plans

4.2.1 There is much merit in moving towards long term management plans for each of the principal fisheries in the North Sea, not least for the stability and predictability that such plans can offer. The need to achieve MSY for Community stocks by 2015 has to be a major steer for the reform of the CFP, demanding more rapid progress towards the implementation of such plans. However it is important that these long term plans are well founded in both biological and economic terms and are introduced in a transparent way, with full stakeholder engagement. Their objectives must also be clearly stated. There is a real risk that management plans introduced in any other way will discredit both the process and the objectives. It is also important that long-term management plans should consider impacts of fisheries on the wider ecosystem as well as on exploited stocks. They must take account of species interactions, and it is desirable that in the future they should be prepared for fisheries rather than for single stocks. This broader approach will place pressure on fisheries scientists to adopt a more holistic approach towards assessment of the impact of fisheries.

4.7.6 In recent years the Ministers have often departed from scientific advice in setting catch levels. The approach in the USA is for fishery management councils to be constrained not to set annual catch limits above scientifically advised levels. In reforming the CFP, the NSRAC recommends an acceleration of the adoption and implementation of long term management plans for key commercial stocks, thereby 'locking' the Fisheries Council into harvesting rules and preventing deviation from the advice.

4.3 Rights Based Management

- 4.3.1 On the basis of its paper, the Commission's advocacy in favour of rights based management appears to be primarily because ministers defend their "national" interests enshrined in their relative stability shares. The political system which the current CFP perpetuates often results in the rejection or amendment to the Commission's proposals by the Council of ministers. This is the wrong basis from which to advocate rights based management. Clarity is required in defining what is meant by rights based management, and how it is intended to meet the main objectives of the CFP. That clarity is missing from the debate so far.
- 4.3.2 Member states already have systems which allocate fishing rights to individuals on specific terms and conditions. The delicate position in the North Sea does not need any intervention that creates uncertainty where there is currently certainty. Relative stability has shown itself to be a flexible instrument through swaps and transfer arrangements. Whether this aspect of the CFP could be further developed, or whether there should be a move away from relative stability to a system of rights based management is a difficult decision, which should not be taken lightly or for the wrong reasons. The internationalisation of fleets has already proceeded in many member states and what is not required now is a heavy handed and disruptive policy.
- 4.3.3 Although there may be excess capacity in some regional seas and in some fisheries the NSRAC draws attention to the major reduction in the size of the North Sea fleet which has taken place in recent years.

4.4 Results Based Management: Self-Regulation

- 4.4.1 If the characterisation of the CFP as a system that has delivered a highly prescriptive, yet largely ineffective, set of rules is broadly correct, then it is necessary to conceive an alternative. One possibility is that the Commission, Council of Ministers and European Parliament are placed at arms' length from micro-management of fisheries; with fishing organisations and other stakeholders taking more direct responsibility through specifically tailored management plans.
- 4.4.2 The NSRAC favours a CFP where the Commission, and Council along with the European Parliament, and in conjunction with the Regional Advisory Councils, sets a broad framework for management, with over-arching standards and principles for sustainable fishing set out for the various fisheries. Fishing industry bodies along with other stakeholders would then submit (say 5 or 8 yearly) management plans, with clear objectives, in line with the CFP, stating how that body would fish sustainably in conformity with the standards and principles laid down for that fishery. Plans would be developed in partnership with scientists and with the participation of a full range of stakeholders, and would be subject to audit. This arrangement (reversing the burden of proof in fisheries) would radically change fisheries management. The Commission's role would be one of auditing and refereeing rather than carrying out the detailed management for which it is ill equipped. There would be no detailed prescriptive rules. Instead, the plans submitted by industry in conjunction with other stakeholders would take responsibility for defining the objectives and delivery mechanisms which would enable the fishery to be managed in a sustainable manner. Such a radical departure would require much thought and discussion before implementation but the concept is one that the NSRAC considers sound and one that should be explored further in conjunction with the other RACs, ACFA and industry organisations.
- 4.4.3 In the coming months the NSRAC intends, with assistance from others, to refine the concept of self-management, specifically in a North Sea context. The NSRAC

intends to return to the Commission with proposals for taking such a system forward for the North Sea as part of the reform to the CFP.

4.5 Regional Advisory Councils

- 4.5.1 Regional Advisory Councils are still in their infancy but despite quite wide variations in performance, generally reflecting different material conditions, it is quite clear that they have been capable of producing serious and worthwhile advice, often through consensus. The RACs now play a central role as stakeholder groups within the CFP. They are consulted extensively by the Commission and Council of Ministers, and are collaborating closely with ICES, the Commission and others in the development of new arrangements for providing advice on the operation of the CFP. The RACs have established their own working groups to assemble information and draft options for advice on a wide range of issues. They have produced reports on a range of topics and have promoted focus groups and symposia on critical issues.
- 4.5.2 The structure chosen for the RACs has proved satisfactory. The mix of representatives from the fishing sector and other interests has worked well. Although the dominance of industry representation has been questioned by the minority group it has not been possible in the NSRAC to fill all the seats in the minority group with representative organisations. The pressure to reach a consensus view has ensured that all views are taken into account. Some participants have contributed less than others, and there has been a lack of continuity of attendance from some representatives, but these have been minor problems.
- 4.5.3 The central question now is how the RACs can be further developed to fulfil their full potential. Currently, interaction with scientists is limited by the financial resources of the RACs. The RACs have no budget to pay for scientists to attend RAC meetings. Requirements for scientific assistance have to be sent to ICES well in advance and relayed by the Commission. As a result there is less interaction with scientists than is required.
- 4.5.4 The NSRAC suggests that a small research and policy support unit should be attached to each RAC, either funded by the Commission or able to apply for outside funding for its work. That unit would prepare policy papers for discussion and adoption by the RAC Executive Committees. Neither the RAC secretariat nor the members of the RACs, who generally have other duties in representative or commercial organisations, have the time to undertake this essential work. The quality and quantity of RAC advice could be expected to increase directly as a result of such a change particularly in the area of the development of long term management plans.
- 4.5.5 This relatively small but important change would equip RACs to play a more significant role within the CFP.

4.6 Regional Decisions

- 4.6.1 Where policy decisions in fisheries for a given area have no ramifications for other parties we cannot see why they have to be the subject of decision by the Council of Ministers. A clear argument can be made for devolving decision-making authority, in these circumstances, to a sub-committee of relevant regional ministers that would agree an approach for formal ratification at Council.

4.6.2 Measures agreed in this way could be tailored more closely to local requirements and would reduce the workload and complexity of Council negotiations.

4.7 The Fisheries Management Jigsaw

4.7.1 It has been suggested that effective fisheries management is comprised of four interlinked and mutually dependent elements. These are:

- A fleet capacity in broad balance with available resources
- A level of profitability that allows the fleet to absorb external shocks and renew itself without subsidy
- A high degree of compliance with the management rules. Absence of a high degree of compliance denotes a broken system
- A broad consensus that the information on which management decisions are based, including fish stock assessments, is unbiased and relevant.

4.7.2 All the component parts of the jigsaw must be linked and mutually dependent. The CFP to date has not had clear objectives, and has not progressed in an integrated manner. Control, technical conservation, fleet structures, dialogue with the industry, industry economics are not addressed as an integrated whole. Given the geographic scale of the CFP and the centralised governance model it has been based on perhaps this is unsurprising.

4.7.3 The Commission's discussion paper gives primacy to biological and environmental factors. The NSRAC is very aware of the importance of such factors. Without functioning ecosystems the exploited fish stocks are at risk. However, to be effective fisheries policies must take into account the three pillars of sustainability – biological/environmental, social/institutional and economic. Fish stocks are public resources which must be exploited in an equitable and sustainable manner, with benefits for society at large. If the CFP reforms after 2012 do not take this critically important aspect of fisheries management into account they will simply replicate shortcomings that have affected the CFP to date. Taking economic and social factors into account is not (as they are often characterised) merely a tactic to defer and delay necessary and sometimes tough measures - it is a prerequisite for achieving effective policy.

4.7.4 The economic success of the fishing fleets and commercial and recreational fishery businesses in general is a yardstick against which success of the new CFP will be measured. Measures which hinder economic activity unnecessarily, or impose an additional and unjustifiable regulatory burden must be avoided.

4.7.5 An important driver for the success of fisheries enterprises is the efficient functioning of the markets for fish. Market mechanisms should be reflected upon in detail, as they are an important part of the CFP. A thorough analysis of the market should be an important part of the Green Paper. Fish landed from the North Sea now form only part of the produce on sale, together with aquaculture products and imports from a wide range of sources. This diversity of supply affects producers, fishing communities and fishing industry infrastructure.

4.8 Comitology

4.8.1 In the context of co-decision making with the European Parliament, the Commission proposes an expansion of the role of 'comitology'. Comitology is EU jargon for the delegation of decision-making authority to working groups comprised of member state officials, working under the chairmanship of the current EU Presidency and operating on the basis of Commission proposals. Comitology is presented as a pragmatic solution to:

- the expansion of the European Union and Council of Ministers to 27
- Co-decision-making with the European Parliament that will require a much longer time scale for turning legislative proposals into regulations
- The sheer detailed complexity of much fisheries legislation that is not compatible with the Council workload or format

4.8.2 Whilst all of these are very real considerations, there are, equally, problems associated with the adoption of comitology. The management committees are effectively sealed, offering very little transparency and opportunity for stakeholder scrutiny and none for participation. Despite their cumbersome features both the Council of Ministers and the European Parliament have a democratic legitimacy that comitology lacks. Comitology provides little protection for the rights of fishers and other stakeholders. If comitology is to be expanded then consideration must be given to involving stakeholders in the management committees.

4.9 6 and 12 Mile Limits

4.9.1 Inshore fishing zones are sensitive for both biological and socio-economic reasons. They harbour nursery and spawning areas for a range of commercially and recreationally important fish stocks, as well as providing fishing opportunities for a very wide range of small to medium sized vessels and recreational angling from small boats and from the shore. The 2002 review and reform of the CFP saw a rollover of the standing arrangements. Each member state understood the need for protection of their respective inshore zones and the status quo was retained.

4.9.2 The NSRAC believes that there remains an overwhelming case for retaining the present limits. The loss of the 6 and 12 mile derogations would severely constrain the ability of member states to manage inshore fisheries and protected areas within their own coastal waters. However, there may be a case for reviewing the issue of historic rights in these areas in recognition of the requirement to balance those rights with the need to provide additional protection for vulnerable fish stocks within inshore limits.

4.10 Fishing Capacity

4.10.1 A balance between fleet capacity and available resources is an essential part of the fisheries management jigsaw. The picture of fleet overcapacity across the European Union is very mixed, with some member states having undertaken much more decommissioning than others.

4.10.2 As the Report of the Court of Auditors has pointed out, capacity reduction objectives have been replaced by the concept of reference ceilings which are expressed in capacity units and constitute maximum levels which national fleets may not exceed. Ceilings have been set on the basis of historic levels and will only reduce in cases where vessels are decommissioned from the fleet with Community aid. This system does not oblige or encourage member states to reduce their overcapacity.

4.10.3 The NSRAC is in favour of publically funded, voluntary decommissioning schemes, or buy-back schemes, where there is a demonstrable need for them. What is not acceptable is indirect reduction in fishing capacity through an effort control regime that increases industry costs, reduces profits and places the fleets in a bureaucratic straightjacket, with no demonstrable benefit in term of a reduction in fishing mortality or improved exploitation pattern.

4.11 The Scientific Economic and Technical Committee

4.11.1 The role and significance of advice from STECF has increased considerably since the last round of reforms in 2002. The Committee is now more open to stakeholder involvement and the quality of the advice produced is high. Given their increasing significance it is entirely appropriate that STECF is reviewed in the same way that ACFA and the RACs have been recently, either through an internal but explicit process or by an external body. The Committee's terms of reference, composition and balance of areas of expertise between biological, economic, practical management and enforcement are obvious themes to consider. The significant progress towards openness and transparency that has been made so far should be continued.

4.12 Regulatory Impact Assessments

4.12.1 One area in which the CFP has made considerable progress since 2002 has been the accompaniment of Commission proposals by impact assessments. Rational policy making requires that assessments are prepared that make explicit not just objectives, how they are to be achieved and at what cost, but also consideration of different options for achieving the same end.

4.12.2 Although the content of some impact assessments undertaken to date can be criticised for being a little thin, the principle of impact assessments is a sound one and should continue to be developed and strengthened.

4.13 Control and Enforcement

4.13.1 One of the arguments within the previous Green Paper was that poor enforcement of regulations had contributed to over-fishing. A major problem it identified was that member states had retained responsibility for monitoring fishing fleets and ports and imposing sanctions, and many of them had not taken these responsibilities seriously. The arrangement had not ensured a level-playing field across the Union. The Green Paper recommended that further progress was needed on the co-ordination of national policies, the harmonisation of sanctions, the follow-up of infringements and on the definition of the respective responsibilities of member states and Commission in the implementation of control schemes. The setting-up of a new Community agency was suggested to coordinate national and Community inspection policies and activities.

- 4.13.2 In the event, Regulation 768/2005 of 26 April 2005 established a Community Fisheries Control Agency to reinforce the control system for the CFP. The Agency is intended to coordinate controls and inspections by Member States; pool resources through joint deployment plans; promote harmonised application of rules; develop control and inspection techniques; support the training of inspectors and facilitate the exchange of information. The Commission will continue to formulate policy; provide funding and verify the implementation of Community rules. Member states retain responsibility for control and enforcement. The new Agency does not have the power to impose additional obligations or to sanction member states, although the inequality of application of sanctions across member states has been identified as a problem
- 4.13.3 Although the Agency represents a considerable financial investment, it has few teeth. It cannot police and enforce the regulations; only inspect and report. It does not have any strong new instruments or powers. It can only offer advice. It is member states which have general responsibility for ensuring effective control, inspection and enforcement. The European Court of Auditors has pointed out that the current inspection systems do not provide assurance that infringements are effectively prevented and detected, or that this is done in an equitable manner. Although the work of the Community Fisheries Control Agency has only just begun, it will be necessary as part of the review of the CFP to consider whether it has resulted in any improvement to the control, inspection and sanction systems. Has it achieved the 'culture of compliance' which is its chief aim?

4.14 The Environmental Dimension

- 4.14.1 There has been increasing pressure to achieve greater integration of marine environmental management with fisheries management. One feature of the 2002 review was a clear commitment to the ecosystem approach, although mechanisms to achieve this have been slow to appear, with little sense of a clear strategy, not least at a Regional Seas level. While the Integrated Maritime Policy and its environmental pillar - the Marine Strategy Framework Directive (MSFD) – are seen and accepted by the NSRAC as the framework for regionalisation of an ecosystem-based approach, the operational implementation of this needs much more work. The MSFD aims to achieve good environmental status of the EU's marine waters by 2021 and to protect the resource base upon which marine-related economic and social activities depend. Under the Directive, marine strategies have to be developed by each member state. The NSRAC recognises that the MSFD requires the reform of the CFP to take its provisions into account. Until now, the main impact of this commitment upon the CFP has been the placing of obligations upon member states to implement by 2012 a coherent network of well-managed MPAs (Natura 2000 sites) by protecting marine species and habitats under existing Directives, with priority so far having been given to establishing marine Special Areas of Conservation (SACs).
- 4.14.2 The application of these Directives to offshore sites has proved more challenging than originally expected. Consultation with stakeholders has varied from one member state to another and it is evident that even where there has been consultation there is a prohibition upon the promoters of these SACs considering economic impacts when designating sites. The legal text of the Directives seeks to protect sites based only on scientific evidence in relation to conservation criteria; other factors must not be allowed to prevail over this objective.
- 4.14.3 There is a need for the designation of sites to be synchronised and coherent across member states. There is also concern over the lack of coordination in the way

different Member States are interpreting the Directives, designating sites and proposing to manage sites. Often, there has been a lack of objective data to aid in site selection and fishers have not been consulted at an early enough stage to bring in their own expertise.

- 4.14.4 The RACs have a special role to play in establishing offshore marine protected areas, as they provide a regional and international forum where stakeholders can be consulted. The knowledge of the fisheries sector is also vitally important in determining how best to manage fishing in and around designated sites.
- 4.14.5 There will be pressures in the future to make all European fisheries subject to full Strategic Environmental Assessment (SEA). The RACs must be consulted on the constructive application of the SEA Directive to fisheries.
- 4.14.6 The revision of the CFP will be much influenced by the requirement to integrate environmental and fisheries interests.

5: Conclusion

- 5.1 The NSRAC welcomes the Commission's early instigation of a debate on the future of the CFP and is pleased to be able to contribute to the discussion at this early stage. The NSRAC also acknowledges that the Commission's stance reflects concerns about sustainability across the breadth of the regional fisheries under the CFP, and not specifically the North Sea where significant progress is being made.
- 5.2 The 2012 reforms provide an opportunity to move the CFP towards a set of institutional arrangements that deliver more sustainable and profitable exploitation of fish and shellfish resources. This will not be achieved by an intensification of the centralised command and control model that has characterised the CFP to date and which underpins most of its shortcomings. A different model that encourages and incentivises the fishing industry and other stakeholders to take responsibility for their own activities within a broad management framework incorporating the new environmental legislation offers the most productive way forward.



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