

WELSH GOVERNMENT WRITTEN EVIDENCE TO THE ENVIRONMENT AND SUSTAINABILITY COMMITTEE TASK AND FINISH GROUP ON THE REFORM OF THE COMMON FISHERIES POLICY

Executive Summary

The Welsh Government is responsible for fisheries management within the Welsh territorial sea (0-12nm) and implementing the Common Fisheries Policy (CFP) within the Welsh zone. The Welsh Government is in broad support of the headline issues under the proposed reform of the CFP, however, the detail is yet to be presented and it is here that there remain some areas of concern.

For example, we would all support measures to put an end to the practice of **discarding** but the proposals need to be both practical and enforceable. Further, the proposals to **commercialise fishing rights** as a way to reduce perceived over capacity in the sector also appear to be a common sense approach. However, there must be safeguards in place to protect the **small scale coastal fishing** jobs in rural communities, otherwise there is a risk these fishing rights could be bought out by a small number of large commercial enterprises or as an investment opportunity.

However, the proposals do not go as far, in some areas, as the Commission set out in its green paper. For example, there was a clear desire by the EC to seek to **decentralise decision making**. We will need to wait to see the detail of this proposal but it appears that the Commission would favour fishing opportunities to be determined by a regional long-term management plan approach rather than delegation to regional Member states.

The Welsh Government is fully engaged in the ongoing discussions at a UK level. The UK response to the Commissions proposals will be submitted in November this year. At this stage, I understand that the European Parliament is expected to be reporting back on the proposals in late summer 2012. I will continue throughout that time to work with my UK counterparts to ensure that the voice of Wales is heard in the talks to come.

Key Issues

- **Discards:** The practice of throwing away of dead or dying fish must end. More detail is needed from the commission but measures must be practical and enforceable.
- **Tradable Fishing Concessions:** We support the use to deal with any overcapacity in the larger commercial sector that catch the lions share of fish but safeguards must be in place to protect small scale coastal fisheries.
- **Regionalisation:** Disappointed that there seems to be little in the way of real regionalisation in the proposals.
- **Small scale coastal fishing** – The reform of the CFP should recognise the important role of the inshore sector, and ensure any changes are sensitive of the potential impacts to vulnerable coastal communities.

1. The Welsh Government welcomes the opportunity to reflect on the proposed Regulation of the European Parliament and of the Council on the Common Fisheries Policy (here after referred to as the 'CFP'). The Welsh Government has contributed to developing the UK position on the CFP with which we are in broad agreement. However there are some issues that are more acute in Wales and we appreciate the opportunity to raise those here.

Background

2. Fishing is regulated under the CFP, and by national Governments of the Member States. In the UK fisheries management is devolved with all fisheries administrations contributing to the UK position on European issues although it is the UK Government and more specifically the DEFRA Minister that retains overall say in European matters. The UK fishing fleet is split into 3 sectors. First 'the sector' which are in the main larger (over 10m) industrialised vessels that belong to Producer Organisations ("POs" were established under EU law and manage quota for their members), the second is the 'non-sector', these are vessels over 10m that do not belong to a PO, their quota is managed by Government via a pool system. The third and most important sector from a Welsh point of view is the 'under 10s'. The under 10m vessels which are not members of a PO, their quota is managed via monthly catch limits set by Government on a pooled basis.
3. There are approximately 460 registered fishing vessels in Wales, very few belong to Producer Organisations and the vast majority (over 90%) are below 10 metres. Therefore the fleet falls almost completely under the management and control of Government. These vessels are too small to travel very far and are not able to fish for any length of time or fish in difficult weather conditions. In comparison the larger vessels which dominate the sector can fish in most weather conditions, can stay out longer and can catch significantly more fish. Therefore a relatively small amount of fishing opportunity (e.g. quota) can sustain a disproportionately large amount of coastal jobs in small coastal communities where there are very few other work opportunities.
4. In 2010 £17.6 million of fish and shellfish was landed into Wales by UK vessels, higher than 2009 (£16.6million) but lower than 2008 (£18.6million) when there was a large scallop fishery worth £5.2million alone. While not all of this fish was caught in Wales or caught by Welsh vessels it gives an indication of the size of landings into Wales. In total £549million was landed into the UK by UK vessels the majority of which was landed in Scotland (£370million)¹.
5. Inshore fisheries are of prime importance to the Welsh fishing industry. These vessels have suffered at the hands of the larger commercial sector who are able to shout louder to maximise their opportunities. The Commission, in seeking to deal with perceived over capacity and discarding, must surely focus these actions more on the larger commercial catching sector and, at the same time, ensure that any measures do not put any further pressure on the small scale fishing businesses that are part of the fabric of our coastal communities.

Discards

¹ Statistics taken from UK Sea Fisheries Statistics 2010, The UK Fishing Industry in 2010: Landings, published by the Marine Management Organisation.

6. The Welsh Government supports the desire to end discards. Throwing away fish which is already dead or dying can not be justified. However the discarding or throwing back of live fish and shellfish which will survive and be allowed to continue to form part of the fishery is a different matter. For that reason we are glad the Commission is not looking to introduce a blanket ban on all discarding of all species.
7. However the Welsh Government has concerns about the practicality of simply banning discards especially in a mixed fishery. Without changes to the quota regime for mixed fisheries many fisheries are likely to run out of quota for one species and be left with an abundance of another. It is difficult to comment further without seeing the detail of the proposals that will begin to emerge later this year.

Tradable Fishing Concessions

8. We are concerned that the proposed 'tradable fishing concessions' does not currently have enough detail for purposeful discussion. If the safeguards are not sufficient, it may lead to a collection of fishing rights in the hands of a small number of large fishing businesses to the detriment of small scale fleets that are important to the coastal villages around Wales.
9. The Commission believes that there are too many vessels chasing too few fish. This is mainly an issue with the larger commercial vessels. Smaller scale vessels are limited in operation by weather, etc and have been disadvantaged by the Common Fisheries Policy in the UK to such an extent that the levels of fishing opportunity available to this sector is disproportionately small. There is a case for the industry to seek to fund its own decommissioning of vessels. However it is important that these measures are sufficiently broad to allow countries within Member States to safeguard small scale fisheries. We believe it should remain the responsibility of the Member State to manage this public resource to best effect.
10. Under the proposals Member States would be responsible for setting fishing opportunities for stocks for which the Council does not fix fishing opportunities. This is a concern as these non quota species (Bass, lobster, crabs and scallops) have traditionally been a lifeline for the Welsh industry. It seems that these proposals would add a heavy burden on Government and also on the fishermen targeting current non-quota stocks. These stocks tend to be localised and dynamic and therefore do not lend themselves to management approaches that the EC currently applies to quota stocks – this would add a significant additional scientific burden for very little benefit as significant sampling would need to take place to seek to remove localised variances in the stocks.

Regionalisation

11. In responding to the EC green paper on CFP reform, the Welsh Government advocated regionalisation based on small scale coastal fisheries. This included consideration for the Member State to further develop autonomy to regulate and manage the fisheries within their territorial sea.
12. A regional approach should allow for better management at both the ecosystem scale and to adapt to local conditions. The current proposals on the reform of the CFP do not appear to go far enough. Instead it seems the Commission are seeking to promote long-term management plans for species as a way to achieve regionalisation. Unless this model is broken down to a true regional scale it would still remain challenging for Member States to agree plans of this nature. This would

result in a model where the Commission would be the ultimate arbiter of fishing opportunities. This would not result in achieving the aim decentralising decision making, and does not offer anything different than the current CFP approach.

Small scale coastal fisheries

13. The Welsh Government recognises the difficulty to design a two tier system to reflect the different nature of the sector and inshore fisheries. At the same time there needs to be recognition of the differing natures of these parts of the fleet and that a one size fits all approach also cannot work effectively.
14. In Wales, the inshore fleet has an increasingly important role to play within coastal communities. There is a risk that the reform of the CFP will focus on difficult issues in relation to the sector without any sensitivity to the nature of the inshore fleet. The stocks targeted by the inshore fleet tend to be localised and dynamic. These stocks do not lend themselves to management approaches that the EC currently applies to quota stocks. Therefore, the reform proposals need to recognise the differing natures of the offshore sector, and the inshore fleets.

Conclusion

15. The discussions on the CFP reform paper and the UK response focus primarily on large scale commercial fishing where known problems exist. At the same time there is recognition of the need to pursue an ecosystem approach. A major contributor to the ecosystem is the inshore region, but this is a complex area and requires a specific approach and management measures. Therefore, it is our view that it is not appropriate to introduce one policy unilaterally for both the offshore and inshore sectors.
16. The Welsh Government recognises the importance of the inshore region. The majority of the Welsh fleet operate in this area and are limited to the area of activity and the species which they can catch. We therefore advocate the need to develop a complementary approach to inshore fisheries as part of the CFP Reform proposals.

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