

Consultation on the reform of the Common Fisheries Policy – December 2009

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The focus on fisheries management should be:

- a) Harvest Control Rule¹
- b) Stakeholder involvement in the fishery decision-making

Both these policies have been implemented in some fisheries through agreed management plans and RACs with great success. This approach, adapted as appropriate, should be extended to all fisheries.

Harvest control rule should have the following properties in relation to indicators for the fishery:

- Defines a target which encapsulates the desired state for the fishery;
- A decreasing harvest as the stock declines to promote recovery of the stock back to the target level should it fall for any reason;
- The point where fishing is minimized (closed) when the risk of recruitment overfishing becomes unacceptable.

Each fishery should apply feedback-control rule, which consists of an indicator of the state of the stock linked to the application of a control. The main controls on fishing, to be decided upon by the stakeholders, should be:

- Total allowable catch
- Days at sea
- Area fished

The control should be allocated by catch quota, effort quota or area. The management system should seek to promote ownership of the quota by individuals or co-operative groups. Quotas may or may not be transferable dependent on social requirements.

The EU should consider a “deemed value” system similar to that used in New Zealand to reduce landings over the TAC (Total Allowable Catch) while also discouraging discarding. The deemed value applies a tax to catches that exceed the quota. The tax is set at a level which gives an economic incentive to avoid a catch, but also discourages discarding once the fish is caught. This approach might be limited to TAC managed industrial fisheries, but may provide a useful alternative

¹ Predetermined quantitative decision rule which defines how the harvest rate will be reduced, as risks to the ability of the stock to recruit increases.

to managing discarding in a multispecies fishery.

Fishing Gear

Another important control will be the gear used. Fishing gears have not been controlled properly with reference to their social and environmental impact and their implications for management. Increasing gear efficiency will reduce the number of livelihoods a fishery can support. More efficient gears may have a higher environmental impact not taken into account in their costs.² Without a control on the gear efficiency, days-at-sea cannot be used as the main control on fishing mortality. Unmonitored and/or uncontrolled changes in gear efficiency prevent catch-per-unit-effort (CPUE) being used as a monitoring indicator of stock size. A stock size monitoring indicator is required for all fisheries and their harvest control rule. Fishery independent surveys will only be possible for larger industrial fisheries due to their cost, and currently CPUE provides the only cost-effective alternative which could be applied to all fleets³.

Designated Management Authority

Each stock should have a designated management authority which would be tasked with developing the harvest control rule and managing access, as well as the whole feedback control system, including the data collection and system of quotas. The system will need to be simple and low cost for small scale fisheries. It can be made up of small numbers of stakeholders, but should include all nationalities accessing a resource.

Ecosystem Management

The fisheries management system needs to address ecosystem requirements through:

- *Area management*, which should include no-take zones and zones limited to particular fisheries, as appropriate.
- *Gear controls*: new gears should be assessed for ecosystem impact before being generally available and research should be conducted on gears known to cause impact, in order to develop adaptations on the gear or new techniques for catching the stock with less impact.
- The *harvest control rule* should take account of ecosystem considerations in increased levels of precaution.
- *Code of conduct*: Vessel owners and operators should adopt a code of conduct on their operations at sea. The EU should supply a minimum standard template for vessels of the main types to promote good practice at sea.

Certification

The EU should undertake to get all fisheries certified by the MSC (www.msc.org). The MSC certification process encourages stakeholders to participate and decide for themselves on management issues, by rewarding stakeholders for implementing sustainable management.

The MSC certification is implemented through an independent 3rd party with an initial rigorous

2 A new gear, which was more efficient for catching flatfish, but had a high environmental impact is beam trawl. The development of this gear was never assessed for the impact it would have on the marine habitat and ecosystem.

3 CPUE is not necessarily a simple index to develop and standard data may not be adequate. For example, the current CPUE data are not considered a valid index for pelagic fleets, even if gear efficiency is accounted for. Different types of data might need to be collected and reported from each fishery to make the index work.

certification process repeated every five years and annual surveillance audits, which give it greater credibility. Importantly, the fishery is not required to meet the entire MSC standard at one time, but must meet the criteria over time through conditions. This provides a framework for developing the management while giving a direct and immediate reward to fishers for implementing sustainable management.