

GREEN PAPER

Reform of the Common Fisheries Policy

General Comments: An excellent fisheries vision document probably for the first time approaching fisheries problems from all angles in a holistic way. This is also the first attempt to integrate fisheries in a holistic European maritime Policy. Almost all fisheries problems are identified and toughed up. However the two many questions (30) and sub questions are dragging the reader away disrupting his/her eagerness to read this otherwise interesting document to the end.

Indeed the Green Paper for the Holistic European Maritime Policy indicated ways to provide additional income for fishermen and other activities such as for tourism where fishermen could be absorb. One such recommendation was the promotion of a new healthy relation between the fishermen and the sea anglers. However this effort was immediately shoot down by stating that responsible sports fishers are using same gear to professional fishermen. Responsible angling or sport fishing is an activity performed by associations whose membership follows strict regulations, anything else is Illegal Unregulated & Unreported (IUU) fishing in other words piracy.

Chapter 3.3: One important relationship in the context of leisure activities is that between angling and fisheries. The European Anglers alliance states that Europe has an estimated 8 – 10 million recreational anglers at sea with a related industry of €8 to 10 billion. There seems little doubt that the value to the coastal economy of a fish caught by an angler exceeds the value of the same fish caught for commercial purposes by a fishing boat. On the other hand it is understandable that fishermen demand that restrictions on the taking of certain fish for conservation purposes are also applied to sport fishers, particularly when latter use similar gear to professional fishermen. These issues require further study and consideration.

In summary the following are consider the top priority actions for reforming CFP:

1. To identify fisheries whole cluster. This cluster should include not just the fishermen but any other stakeholder involved in fisheries right down to the person who enjoys eating the fish.
2. To organize and streamline the fisheries cluster in order to maximize efficient operation of every actor of the cluster maximizing its sustainability.
3. Give the responsibility of ensuring cluster sustainability to the cluster stakeholders make use of the Advisory Committees for Fisheries (including aquaculture) (ACFA and also the

regional Advisory Councils (RACs). These two bodies must however include well known and recognized professionals representing all actors of the cluster.

4. Create continues awareness culture by transparently campaigning all fisheries problems from extinction of fish stocks to fishing piracy. In Effect developing a high Common Social responsibility for all problems in the cluster.
5. Revamp the existing Fishing vessels and provide fisheries with new high tech multy function vessels with capability not just for fishing but also for providing other services such as for marine tourism, cargo & passenger transportation, research etc ensuring in this way small fishing communities or small islands survivability.
6. New fishing vessel must be re-design in order to provide a much safer environment for fishermen to live & work and also having high tech technology, luxury accommodation in order to attract youth back to fishing and create conditions for them to pursue a seafarers career.
7. Reengineer the present fishing gear and develop new fishing methodology in order to eliminate overfishing and fish discard.
8. Develop technology providing new high tech fishing vessels to perform marine research and real time monitoring of fisheries grounds and fish stocks including fish predators & alien species.
9. Last but not least responsibility for creating day to day governance, legislation and regulation of the whole cluster should be passed to the Member States whilst developing general guidance should stay with the European Commission. This is because different fisheries clusters need different governance, regulation and legislation and this should be developed at the National level where all stakeholders of the cluster could be equally involved.

I am hoping that this time politicians and policy makers will find the courage to follow advice given to them by experts, scientific evidence and also by people who they really looking forward to a holistic solution to fisheries problem.

Chapter 4.1:

Q1. Should fleet capacity be limited through legislation? If so, how? *Legislation for reducing fishing fleet capacity is not the answer rather overcapacity could be reduce by firstly developing awareness and common social responsibility both within the fishermen and also the general society and then sustainable incentives for shifting fishermen into other activities such as aquaculture, sea angling or fish for sport tourism, education, research and seafaring employment on coastal vessels.*

Q2. Is the solution a one-off scrapping fund? *A one off scrapping fund could act as an incentive provided this is link with replacing scrapped vessels with new innovative multy purpose vessels which apart from fishing will serve all needs of a small fisheries or islands community.*

Q3. Could transferable rights (individual or collective) be used more to support capacity reduction for large-scale fleets and if so how this transition be brought about? Which safeguard clauses should be introduced if such a system is to be implemented? Could other measures be put in place to the same effect? *Developing larger co-operations by transferring*

rights could be a solution only if at the same time these co-operations take up the responsibility of managing the sustainability of fish stocks and fishing effort.

Q4. should this choice be left entirely to Member States or is there a need for common standards at the level of marine regions or at EU level? *This should be left to individual Member States or regions as different fisheries need different management. However some general guidelines could be made available by the EU which Member States could adapt to their own specific needs.*

Chapter 4.2:

Q5. How can the objectives regarding ecological, economic and social sustainability be defined in a clear, prioritized manner which gives guidance in the short term and ensures the long – term sustainability and viability of fisheries? *By far our first clear objective would be the ecological sustainability by developing awareness by using scientific evidence and research for developing new tools and concepts which would help create a sustainable society and consequentially economically viable.*

Q6. Should the future CFP aim to sustain jobs in the fishing industry or should the aim be to create alternative jobs in coastal communities through the IMP and other EU policies? *The aim should be to create a combination both depending on the size of the fisheries. In other words in a small fisheries community or small islands the effort should be to involve fishermen in multy activities enhancing their income and job satisfaction whilst at the same time ensuring the sustainability and survival of small communities.*

Q7. How can indicators and targets for implementation be defined to provide proper guidance for decision making and accountability? How should time frames be identified for achieving targets? *Indicators should be developed relying on scientific evidence for fish stocks improvement and also should relate to fishermen or coastal community improvements in quality of life. Time frames for achieving targets should be short 1 to 3 years.*

Chapter 4.3:

Q8. How can we clarify the current division of responsibilities between decision-making and implementation to encourage a long-term focus and a more effective achievement of objectives? What should be delegated to the Commission (in consultation with Member States), to Member States and to the industry? *The overall responsibility should be to the Commission who should be developing the guidelines but the specific responsibility should be with the Member States and the responsibility for the high seas should be with the regions.*

Q9. Do you think decentralized decisions on technical matters would be a good idea? What would be the best option to decentralize the adoption of technical or the implementing decisions? Would it be possible to devolve implementing decisions to national or regional authorities within Community legislation on principles? What are the risks implied for the control and enforcement of policy and how could they be remedied? *Yes it would be a good idea to decentralize decisions on technical matters. The best option would be this to be trusted to the Member States who in turn would have to report progress make to the E.C. Within Community legislation it should not be a problem devolving implementation of decision making to National or Regional level. The risk would be if the E.C. overall control is not set up on guidelines and indicators.*

Q10. How could the advisory role of stakeholders be enhanced in relation to decision-making? How would ACFA and the RACs adapt to a regionalized approach? *Only if they are allowed to offer their ideas and also to get involved in the development of policy making and planning.*

Chapter 4.4:

Q11. How can more responsibility be given to the industry so that it has greater flexibility while still contributing to the objectives of the CFP? *By organizing it into responsible groups and educating them continuously in order to develop awareness and Common Social responsibility. Then we should be giving them the tools to self manage a sustainable sea environment.*

Q12. How could the catching sector be best structured to take responsibility for self management? Should the Pos be turned into bodies through which the industry takes on management responsibilities? *By streamlining and organizing them into a proper Cluster. The POs should not undertake the management responsibility of the cluster because the cluster contains also other groups of stakeholders with different needs.*

Q13. What safeguards and supervisory mechanisms are needed to ensure self-management by the catching sector does not fail, and successfully implement the principles and objectives of the CFP? *By establishing a multy facet board of Directors. Enabling the management of fisheries by creating an efficient governing board and also involving all stakeholders as much as possible by educating continuously with seminars and other events.*

Q14. Should the catching sector take more financial responsibility by paying for rights or sharing management costs, e.g. control? Should this only apply to large-scale fishing? *This would most probably enable abuse of the system. The answer could be to apply heavy fines for any abuse of the system i.e. penalties or by completely removing rights. Any type of control involved should be applicable to any size of fisheries environment.*

Q15. When giving more responsibility to the industry, how can we implement the principles of better management and proportionality while at the same time contributing to competitiveness of the sector? *As we go along creating the awareness culture & C.S.R. quality of our fisheries would be improved which would increase our sustainable competitiveness.*

Q16. Are there examples of good practice in particular fisheries that should be promoted more widely? Should incentives be given for the application of good practices? If so, which? *Incentives should be given in the form of providing technology, methodology and continuous education of all stakeholders in the cluster.*

Chapter 4.5:

Q17. How can data collection systems be improved in the short and medium term to ensure coherent information for enforcement purposes? *In the short term by streamlining, organizing and networking the fishing ports, fish launching ports, fish markets and licensing authorities. In the long term by developing technology for real time information collection. These sensors could be attached to the fishing gear and on fishing boats or fishing vessels.*

Q18. Which enforcement mechanisms would be in your view best ensure a high level of compliance: centralized ones (e.g. direct Commission action, national or cross-national controls) or decentralized ones? *Mechanisms should be National allowing the all cluster stakeholders to develop and agree type of control.*

Q19. Would you support creating a link between effective compliance with control responsibilities and access to Community funding? *Yes, this should be the best way because responsible fishers would be rewarded further.*

Q20. Could increasing self-management by the industry contribute to this objective? Can management at the level of geographical regions contribute to the same end? What mechanisms could ensure a high level of compliance? *Yes, this principle would create quality and green culture fishers which would follow same principles we are using in other industries. Yes, management using geographical regions should be also contributing. Mechanisms which should be developing highly responsible fishers either for sport or profession and also mechanisms which would be developing other stakeholders' responsibility.*

Chapter 5.1:

Q21. How can overall fleet capacity be adapted while addressing the social concerns faced by coastal communities taking into account the particular situation of small- and medium-sized enterprises in this sector? *The concept here is that we should 1st developing technology for real time control of both our fisheries fishing stocks and also the predators. Then accordingly the fishing fleet and fishing effort would be adjusted. In areas where tourism is also available we should remember that may be more income is produced for the fishermen by taking out tourists fishing the same fish by fishing rods at the same time fishing licenses issuing should be control.*

Q22. How could a differentiated regime work in practices? *Only by using real time monitoring and control system and using this for regulating fishing fleet and fishing effort while at the same time taking parallel measures for improving fish stock and fisheries.*

Q23. How should small-scale fisheries be defined in terms of their links to coastal communities? *Linking them with tourism, research and education. This means providing them with high technology multy purpose vessels.*

Q24. What level of guidance and level-playing field would be required at EU level? *Guidance for developing International awareness and fisheries cluster control.*

Chapter 5.2:

Q24. How can long-term management plans for all European fisheries are developed under the future CFP? Should the future CFP move from management plans for stocks to fisheries management plans? *Only by cultivating honesty, C.S.R. and by developing tamper proof real time monitors and strict permit system. Yes, as a responsible fisheries cluster should develop sustainable fisheries.*

Q25. Should we consider reforming the CFP in two steps, with specific measures to move to MSY prior to 2015 followed by measures to maintain MSY as the upper exploitation level after that date? *Reforming C.F.P. should be a slow process by firstly indentifying and organizing our fisheries cluster and then developing fisheries sustainable culture.*

Q26. How could the MSY commitment be implemented in mixed fisheries while avoiding discards? *Discards could only be eliminated by changing fishing methodology and gear and also by applying heavy fines discouraging fisher from discarding whilst at the same time rewarding fishers who produce no discard.*

Q27. What should the main management system be for community fisheries and to which fisheries should it apply? Catch limitations? Fishing effort management? A combination of the two? Are there any other options? *Management should be that of the self sustainable fishing cluster.*

Q28. What measures should be taken to further eliminate discards in EU fisheries? Could management through transferable quotas be useful in this respect? *The quota system is one of the causes of discard what we need is new technology both for monitoring fish catch and also new type of fishing gear.*

Chapter 5.3:

Q29. How could relative stability be shaped to better contribute to the objectives of the CFP? Should it be dismantled or if not should it become more flexible and if so, how? How could such alternatives be set up? *This should be achieved by encouraging M.S. to manage all their fisheries grounds up to their E.E.Z. and to have the overall responsibility.*

Q30. Should access to the 12 nm zone be reserved for small-scale fishing vessels? *Yes*

Below I am describing a possible project which could revolutionaries fishing concept at least for the Mediterranean.

Fisheries Innovative gear for avoiding Subsea ecosystems Harming (FISH)

This is a very well debated topic where social partners are not prepared to make concessions causing irreparable destruction of the sea bottom & ecosystems and fish stocks' diminishing. Consequentially the harmony between the three attributes of the Mediterranean Sea i.e. the sea bottom; the sea water column and the sea surface is becoming fragile and although the havoc cause by trawl nets scraping the bottom of the sea is taking place far away from the sea surface, for certain this it would have direct impact on the condition of the sea water column which consequentially would affect the condition of the sea surface with direct impact on the safety of the waterborne surface transport.

1.1 Activities of this project should include:

- 1.1.1 An investigation into overfishing, fishing quotas, fish discard, IUU (Illegal Unreported & Unregulated fishing), destruction of the bottom of the sea & subsea ecosystems, desertification of the sea bottom considering methods for re-establishing natural fish habitats enriching fishing stocks.
- 1.1.2 An investigation of the present fishing gear, fishing methods, the fishing vessel and the possibility of considering self [floating](#) fishing nets and bottom up lifting fishing vessel's gear in order to avoid above mentioned fisheries problems.
- 1.1.3 An investigation into the possibility of creating extra income for the fishermen by enabling them to provide services to other stakeholders such as sea anglers, marine researchers, tourists, school children by promoting fishing national heritage and to general public by shifting passengers or cargo from the road onto the sea.
- 1.1.4 An investigation into completely revamping the fishing vessel's design focusing on developing a greener power plant, safer working conditions, better living

conditions, better navigational equipment, intelligent cargo loading/unloading and stacking equipment, high speed telecommunications and e-learning facilities.

- 1.1.5 An investigation into the possibility of using Remotely Operated Vehicles (ROV) such as the green [Thermal gliders](#) for guiding the self floating fishing nets, keeping them off the sea bottom and other obstacles.
- 1.1.6 An investigation into configuring thermal gliders so that except for collecting and transmitting oceanographic data to be able to disturb fish lying at the bottom of the sea, keep fish predators away from the fish nets and to be able to report IUU fishing, fish stocks', invasive alien species presence and sea water condition to the controlling authorities.
- 1.1.7 An investigation into creating man made subsea fish natural habitats by sinking structures and other suitable materials which would help re-establishing subsea vegetation in desertificated coastal areas enriching fish stocks.

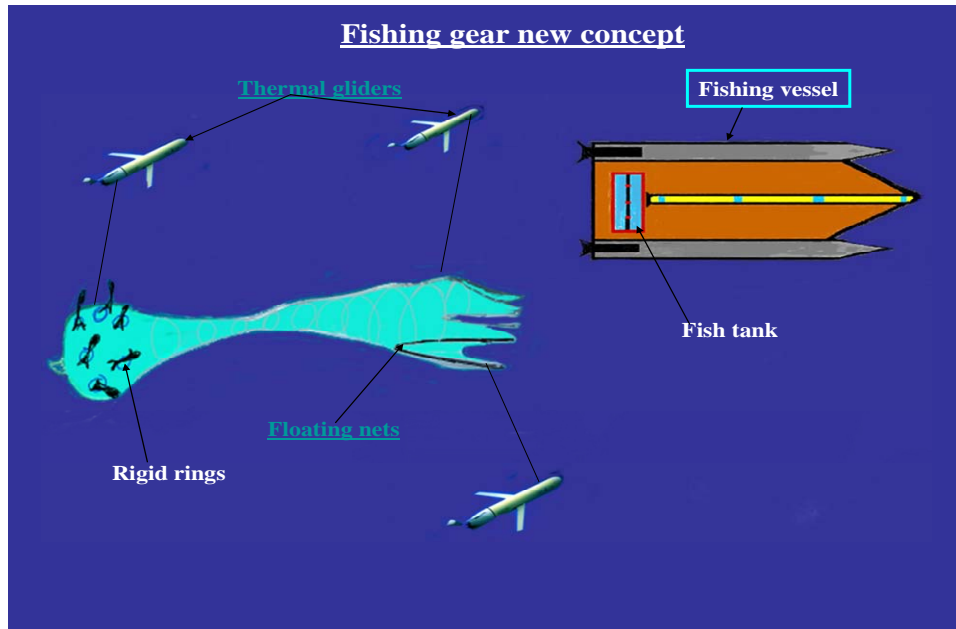
1.2 Major deliverables should be:

- 1.2.1 The development of new self floating fishing nets incorporating sensors for keeping them away from the bottom of the sea & any other obstacles.
- 1.2.2 The development of new fishing methodology so that fishing nets are pulled towards the fishing vessel at a control speed enabling fishing net meshes to stay unchanged, allowing juvenile fish the chance to escape.
- 1.2.3 The development of the green thermal gliders technology in order to enable them to provide new services.
- 1.2.4 The development of innovative fishing vessel gear able to upload the fish catch on to the deck by means of a tank lowered into the sea water and then directly lifted onto the main deck. In contrast to present overtop fishing gear with the new gear fish would remain always submersed in the water. This would enable the fishermen to manually select the correct size of the fish and then discharge back to the sea juvenile fish or fish with no commercial value.
- 1.2.5 The development of a greener, faster, more stable, robust, safer vessel provided with high quality facilities and equipment.
- 1.2.6 The development of technology for re-establishing natural fish habitats enriching fishing stocks and facilitating the creation of aquatic parks.

1.3 Added value:

- 1.3.1 By providing a high tech fishing vessel, high quality living conditions, a safe accident free working environment completely protected from all weather elements, e-learning facilities enabling career progression opportunities is expected that youth would be attracted back to the fishermen profession.
- 1.3.2 By providing a high tech multy purpose coastal vessel to a small island or a coastal community, capable of providing except for fishing, other services such as for ferrying passengers and cargo is expected that this would provide the

means for sustaining such communities and to facilitate the concept of short sea shipping.



Below is what the new vessel would look like

