

# Common Fisheries Policy Task and Finish Group

## CFP(4)-04-11 Paper 2

### Task & Finish Group Inquiry into the Proposed Reforms to the Common Fisheries Policy:

Thank you for your kind invitation, firstly to contribute to the inquiry by providing a paper and secondly to give oral evidence to the Task & Finish Group regarding the reform of the Common Fisheries Policy.

I represent a recently formed organisation namely the Welsh Fisherman's Association – Cwmdeithas Pysgotwr Cymru Ltd (WFA-CPC Ltd) which has been established by six of the seven fisherman's associations in Wales expressly to represent national fishing industry opinion from a Welsh perspective at the highest possible level.

The WFA consists of the following associations:-

- Cardigan Bay Fisherman's Association Ltd
- Llyn Fisherman's Association
- Llyn Pot Fisherman's Association
- North Wales Fisherman's Cooperative Ltd
- Welsh Inshore Scalloper's Association
- West Wales Shellfisherman's Association Ltd

The Board of directors consists of one director from each of the member associations, with each association holding one vote regardless of the size of their individual membership, ensuring equality within the organisation. Should a situation arise where voting is tied the Chairman holds the casting vote.

You will notice that our membership base is distributed throughout Wales and encompasses a wide variety of fishing activities from within the under and over 10m sectors. For this reason the WFA-CPC Ltd is well placed to represent an inclusive response from the Welsh fishing industry. There will no doubt be similar themes provided by other interested parties in respect of this subject, however, we aim to focus our attention on the potential threats and possible opportunities to inform and ensure an equitable and sustainable future for the Welsh fishing industry in a UK context.

## **Q1**

In respect of the Welsh fisheries zone, decentralisation as a proposal makes sense; however in practice there is little if any enforcement legislation that exists between 6 nautical miles to the median line and similarly Wales does not, as I understand, have any environmental powers outside 12 nautical miles which creates fisheries enforcement issues between 12nm and 25nm (the Welsh fisheries zone)

One of the main issues would be to address the historical injustice and imbalance of total allowable catches (TAC's) to ensure sufficient opportunity (quota species) to encourage Welsh fishers to invest and secure long term profitable and sustainable fisheries for future generations either managed by Welsh Government or by an industry producer organisation.

Unfortunately the proposed concordat is not publicly available and therefore the detail is not yet clear in respect of Welsh interests, however it is understood that introducing Transferable Fishing Concessions without addressing the TAC for Wales would be wholly inappropriate as Wales does not have sufficient entitlement to pressure stocks to generate sufficient investment to secure fishing opportunities and improve future track record for quota species.

Regional management can only be truly effective when the following fundamentals are established

- 1 Species stock assessments (in the Welsh Fishing Zone)
- 2 Fishing effort by sector
- 3 Capacity (vessels active in Welsh waters) and latent effort

Without first establishing 1,2 and 3 above no feasible long term proposals for fisheries management could be suggested.

## **Q2**

The EC proposals as mentioned above could have significant implication for the social and economic viability of coast communities in Wales if sufficient provision was not secured to provide the opportunities necessary for the fishing industry in Wales.

Sustainability cannot be achieved in Wales, or anywhere else for that matter, if opportunity is limited and profitability cannot be maintained. It is essential in Wales to have access to a mixed fishery as in the majority of the Welsh fleet (90% of which are under 10m vessels) this issue is key to a sustainable future which would afford further benefits through the potential to diversify and reduce pressure on traditionally targeted species.

Only through incentives and appropriate opportunity can investment be secured on behalf of the fishing industry in Wales to ensure current levels of employment are secured on board vessels with wider social, cultural, and economic benefits to the local communities.

## **Q2 continued**

The industry is particularly concerned about the proposed introduction of Transferable Fishing Concessions (TFC's) and the potential for the international trade of a public resource, which could significantly disadvantage the small scale coastal fishers (within the 12nm coastal zone), as this proposal would be more beneficial to the management of the larger commercial fleets. If this approach is unchecked this valuable Welsh resource could end up in the hands of large scale operators and powerful companies based in other member states with no beneficial contribution to the Welsh economy for the exploitation of a Welsh resource.

An example of this is the continued access enjoyed by Belgian, French and Irish historic rights fishers to operate within the 6nm to the median line fisheries zone. Historic rights fishers pose a serious risk to the long term sustainability of Welsh fisheries; additionally fisheries managers have no authority to regulate the activities of other member state fleets within territorial waters. This example is clearly inequitable and undermines the conservation initiatives of the domestic fleet to enhance and maintain healthy fish stocks, whilst at the same time provides no benefits to the local economy of Welsh coastal communities and threatens the future viability of small scale inshore fishers.

## **Q3**

Providing the opportunities are appropriate to the present and future requirements of the fishing industry in Wales, regionalisation would provide a framework for Wales to secure and manage its fisheries resources more effectively consistent with a holistic and ecosystem based approach, conducive to the aspirations of the 'Wales Fisheries Strategy' and industry best practice.

The fishing industry in Wales (mainly small scale, inshore fisheries and aquaculture) are hugely disadvantaged in terms of resources. Representation in Wales is essentially undertaken by a small number of concerned fishermen on a voluntary basis. The fear is that Welsh efforts and interests will be diluted by the well-resourced and influential large scale operators with the ability to lobby at the highest level on an on-going basis. The industry and the Welsh Government must be clear, consistent, and robust in defence of our resources to ensure that we have sufficient opportunity to encourage appropriate investment to develop and realise the potential of low impact, low discard capture fisheries in Wales alongside aquaculture producers, processors and an effective infrastructure to facilitate appropriate marketing and supply of sustainable, high quality Welsh produce. For Wales to avoid the possibility of negative impacts resulting from possible changes by Europe, Welsh Government and industry must clearly identify and outline the opportunities necessary to support and maintain a healthy, vibrant, sustainable and profitable fishing industry.

#### **Q4**

Welsh Priorities in the Reform of the CFP:

- 1: Wales must not proceed with the proposed Transferable Fishing Concessions (TFCs).
- 2: Welsh Government must have enforcement and management powers over all member state vessels active within Welsh territorial waters.
- 3: Due to the nature and composition of the Welsh fleet we believe that from the Welsh coastline to the 12nm zone should be reserved for fisheries that are small in scale, environmentally benign and socially equitable, which provides important cultural and economic contributions to the local communities.
- 4: Welsh Government must successfully negotiate sufficient fishing opportunities for pressure stocks that will accommodate the present and future aims and objectives of the fishing industry, to ensure a diversity of fishing opportunities, in doing so provide the platform for sustainability and the future growth of the domestic fleet.
- 5: A review of historic fishing rights within 6-12nm, as the current agreement ends in 2012.
- 6: A financial instrument /structural funds that support the principles and objectives of the 'Wales Fisheries Strategy', encourages new entrants and delivers the longer term aspirations of the Welsh fishing industry, promoting sustainability and best practice.

#### **Q5**

We believe that Welsh interests would be best represented by establishing a working group consisting of industry representatives, aquaculture producers, the Sea Fish Industry Authority, and Welsh Government Fisheries Unit, whereby negotiations in respect of the reform of the CFP would be appropriately informed and relevant to the wider industry expectations.

To conclude I would advise the members that our evidence is not by any means exhaustive and is largely limited to the issues that we believe represent the concerns of Welsh fishing interests framed within the context of the members' points for consideration.

The WFA-CPC is grateful for the opportunity to present evidence to the inquiry and would be pleased to provide further assistance should the members require.

Yours sincerely  
for and on behalf of  
WFA-CPC Ltd

Jim Evans  
Chair