

# **Common Fisheries Policy Task and Finish Group Consultation on Common Fisheries CFP1 - Welsh Federation of Sea Anglers**

Welsh Federation of Sea Anglers Reform of the CFP Evidence to NAW ES Committee



## **Proposed Reforms to the Common Fisheries Policy**

### **Draft Evidence to National Assembly of Wales' Environment and Sustainability Committee**

#### **WFSA**

The Welsh Federation of Sea Anglers (WFSA) is the national governing body of the sport of sea angling in Wales. Many sea angling clubs and associations in Wales, and some from England, representing thousands of anglers, are affiliated to WFSA, which also has several hundred individual members.

WFSA has a governing structure consisting of regional sections, and a National Executive Committee meeting quarterly: all officers and members are volunteers. WFSA organizes national teams of anglers for international competitions from shore and in boats and team managers are members of the NEC.

As a Federation, we represent the interests of recreational sea anglers on the Federation of Welsh Anglers and on international angling associations, with observer status at the European Anglers' Alliance. We have NEC members on the stakeholder committees of the new Welsh Fisheries Management and Enforcement regimes. WFSA members played an active part in developing the Welsh Fishery Strategy. We have representation at the Wales Coastal and Maritime Partnership, and on their Stakeholder and Citizen Engagement Group for the Welsh Government Highly Protected Marine Conservation Zones project.

WFSA promotes a conservation approach to angling and has rules and a code of conduct to support this approach in all forms of sea angling. Further details are available via our website at <http://www.wfsa.org.uk/>.

#### **Common Fisheries Policy Reform**

WFSA is preparing a response to the Department for Environment, Food and Rural Affairs consultation on proposals relating to the Common Fisheries Policy and the Common Organisation of the Markets in Fishery and Aquaculture Products. This response will be completed for Defra by 10 November 2011. The draft version of that response has been amended by members of the NEC, and forms the basis for this evidence to the ES committee task group.

The CFP does not apply to recreational sea angling from the shore but does affect stocks targeted from there. Moreover it does apply to angling from boats.

We welcome the opportunity to present written evidence to NAW and will be happy to amplify or explain further if requested. If invited, we would make every effort to provide oral evidence but cannot guarantee the availability of representatives during the working day.

### **The five questions to be considered by the ES task group**

What the European Commission's proposals could mean for Wales and the management of Welsh Fisheries Zone and in particular whether the Commission's proposals to decentralise the management of fisheries will be of benefit to Wales?

What the European Commission's proposals could mean for social and economic viability of coastal communities in Wales?

What impacts changes made in the wider fisheries sector in Europe could have on Wales?

What should the Welsh Government prioritise in its negotiations on CFP Reform to ensure a beneficial outcome for Wales?

How can Wales ensure that its views inform the negotiation process?

### **Fin fish : under-utilised species**

WFSA is principally concerned with fin fish and the impacts of the CFP on these, whereas much of the Welsh commercial catching sector is dependent upon crustacea.

Diversification of commercial targets to include presently under-utilised species threatens more of the species we catch: we have seen this recently with flounder, dab and smoothhound whose market prices have all risen indicating successful diversification. Worryingly, there is little relevant, reliable population information and no stock management plans for these species, so their exploitation may not be sustainable.

Nonetheless, we believe there are commercial opportunities for increased income for Welsh commercials from fin fish. WFSA is keen that for such opportunities to be developed there must be regard both to stock sustainability and to the access of anglers to more and bigger fish of the wide range of species we target.

But to achieve any potential benefits, it is essential that there is emphasis on stock management and on enforcement in Wales. The reform proposals are likely to encourage self enforcement but it would be naïve to expect all fishers to comply with long term sustainability obligations at the expense of short term personal gain. Therefore, WFSA emphasise that increased levels of enforcement in Wales coastal and inshore fisheries will be essential. It is evident that current activities are constrained by lack of funding.

We believe that the proposed reforms to CFP together with the new Welsh Marine Fisheries and Enforcement regime and its associated stakeholder groups could

make it possible for such commercial developments to be introduced and managed sustainably but to do this needs proper consultation and acceptance of the precautionary principle in the absence of sound data.

### **Stock management**

The proposed reform of the CFP strikes a balance between environmental, social and economic objectives and appears to target sustainability of fish stocks and to integrate the management of stocks with sustainability of coastal communities as apart of the ecosystem.

Much of the CFP reform deals with the few major species subject to quota and uses multi-annual plans and processes to deliver management measures under these plans. We think that the proposed stock management based on planning over several years, within the context of the ecosystem approach and with regard to the precautionary principle, is likely to be better for fish stocks. Therefore, we welcome this approach as one likely to leave more and bigger fish in the inshore and, particularly coastal zones, which are available for recreational rod and line angling.

Improved investment in the science is essential for this approach to work. For it to be adopted successfully, it seems to us that scientists and fishers should work together: this has the potential advantages of increasing data quality and relevance but more importantly also of enhancing the industry's willingness to recognise and abide by the scientific evidence.

It is particularly important to apply the precautionary principle in respect of fish species not subject to stock management plans: in the search for economic sustainability of the commercial catchers and, following campaigns to diversify the species we eat, it is essential to safeguard species for which population data etc is weak or absent. These may be species currently of significance to recreational angling where commercial targeting can have dramatic impacts on stocks.

The devolution of management of inshore stocks and the engagement of all stakeholders is key to ensuring that minor commercial species are managed sustainably.

### **Discards**

WFSAs have been concerned for years about the impact on commercial and other fish stocks of commercial boats discarding unwanted fish. We therefore welcome the proposed phasing out of discarding: but we do not think it goes far enough.

The proposal is to oblige fishermen (sic) to land all the commercial species they catch. We consider it is essential that all species caught are landed, if they will not survive being discarded. That is the only way we shall know what is taken and the only way to develop technical solutions to allow sustainable, ecosystem aware catching.

It is necessary that ending discards is accompanied by measures on minimum selling sizes as these will contribute to sustainability of stocks. For some scarcer species it is clearly necessary to set minimum sizes that allow fish to breed, for others, it may be possible to harvest immature fish.

Marketing proposals that allow too small fish to be sold for human consumption will work against sustainability.

### **Decentralisation**

We welcome decentralisation of fisheries management: it is essential that localised management engages all stakeholders, not only commercial catchers but including recreational anglers, hobby fishermen, and others with a stake in the marine environment, if genuine ecosystem based management approaches are to be developed. We consider that, in Wales, we are well placed and structured to develop sustainable fishing with particular benefit to recreational sea angling, including the development of angling-linked tourism.

The structures of the new management and enforcement regimes, with their stakeholder engagement, and with the strategic framework of the Welsh Fishery Strategy, are in place to ensure that effective stock management plans can be introduced. This does require continuing political commitment to ensure that adequate financial support is available for professionals.

WFSA would also point out that the expertise and experience contributed to stakeholder involvement is contributed free of charge and at the expense of the members themselves.

It is important that structures that depend partially on this volunteer input recognize the importance of providing support for the volunteer input through attention to services such as up-to-date information provision and administrative support of stakeholder groups.

In this context, we are disappointed that the Welsh Government web pages are slow to update and, still at the time of writing, have no reference to the Welsh Marine Fisheries Management Advisory Group or to its constituent three regional Inshore Fishery Groups. That simply makes it harder for volunteers to become engaged and retain commitment to these structures and undermines the potential of these novel structures.

### **Transferable fishing concessions**

The reform proposes to introduce “transferable fishing concessions” (tfc) for vessels over 12m and those which used towed gear and for Member States to decide on allocations and set safeguards on trading. We consider that Wales’ interests will require a different approach from that which will suit the commercial catching industries of Scotland and England. This is because of the substantial differences in the structure of the Welsh fleet, accurately presented by WAG in its 2010 response to the CFP Green paper in December 2010.

Generally, WFSA is not comfortable with the potential trading of these tfc among the industry, as exemplified by the proposal that tfc may serve to provide retiring fishermen with a pension pot. We do not fully understand the likely consequences for stock management nor the likely impacts on the Welsh commercial fleet and individual fishers, but would press for Welsh Government to have the power to tailor the rights to fit sustainability of Welsh stocks and of the Welsh commercial fleet.

## **Aquaculture**

There are proposals to help develop the aquaculture industry: we think these could be valuable contributors to coastal communities but that Wales should take the opportunity to look beyond aquaculture only of marine species if it is to be environmentally sustainable.

Marine fin fish all require high protein diets with the associated pollutant risks and the need for animal protein inputs. It may be better to focus on species which can be fed with plant products in contained systems rather than sea pens. This has the potential advantage of developing a land-based fish food production industry which could have economic benefits wider than those accruing to current aquaculture systems.

Another potential beneficiary of land-based fish food production could be to provide a source of bait for commercial pot fishing for crustaceans. This has often depended upon “under-utilised” fin fish species, notably flounder which has impacted upon stocks and anglers catches. Reliable alternative baits would make a real contribution to enhancing the true sustainability of potting.

## **Marketing**

There are a number of proposed reforms to fish marketing. WFSA considers that better prices for catches are essential for the economic and sustainable success of the commercial sector. Marketing to achieve this requires better informed consumers with information available relevant to sustainability at all outlets for fish consumption. Of course, recreational anglers do not sell fish but some do eat some of the fish they catch. Other unlicensed fishers catch and sell fish through local contacts (so-called ‘black fish’). Improvements in marketing commercial catches should go hand in hand with stopping the sale of black fish. Decentralised management of fisheries, including all sales, may be the best way forward.

## **Government support**

The best use of these proposals requires Welsh Government to be active in supporting commercial fishery associations so that their members can benefit from collaboration rather than competition in the marketing of their catches.

It also requires innovation to capture the higher value of that the Welsh catch should have through sustainable management, local provenance, etc. This needs to be connected with the prohibition of illegal sales through revision of the provisions of the buyers and sellers legislation to reduce exemptions and increase traceability of fish.

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