

# The Irish Fish Processors and Exporters Association

Tel: 01-833 7882 / 027-70249  
Fax: 01-8337882  
E-mail: tomg.ifpea@eircom.net



25 KINCORA AVENUE,  
CLONTARF,  
DUBLIN 3.

## Reform of the Common Fisheries Policy

### Irish Fish Processors and Exporters Association: Views on European Commission's Green Paper on the reform of the C.F.P

1. The I.F.P.E.A wishes to underline initially in its comments on the Green Paper that an essential core objective of a reformed Common Fisheries Policy should be the provision of a framework for the progressive development of seafishing and aquaculture industries, and supporting small scale and medium sized processing and ancillary industries, in coastal communities throughout the EU which are dependent on those industries for employment with limited potential for alternative employment. In the case of a coastal State such as Ireland this will call for increased fishing opportunities to redress the effects of historically low fishing quotas particularly for certain demersal fish species in the 200 mile Exclusive Economic Zone off our coasts

Some of the main issues raised in the Green Paper on which the I.F.P.E.A. wishes to comment are as follows:-

2. **Fish Stocks-Fishing regimes and improving management of EU Fisheries**
  - a) **The Fishing Resource**

There is a clear need for intensified Stock Research Programmes particularly by Coastal States, whether singly or co-operatively with other member States, to determine the scope for development of potentially exploitable stocks of fish which have not been scientifically researched and assessed to-date or have been insufficiently researched to yield optimum results. It is recommended that these expanded research programmes should be a key priority in the reformed CFP and financially assisted with EU finding. It is also recommended that the scientific bodies that are providing stock resource advices such as ICES and STECF would need to be critically assessed in relation to the provision of accurate scientific advice.

**b) Determination of fishing quotas/fishing effort for member States**

- In Ireland's case it is essential that the provisions of the Hague Resolution of 1976 in the determination of quotas for certain demersal fish species should continue to be given effect and should be enshrined in the reformed CFP
- Socio-Economic Considerations in coastal communities in the EU mainly dependent for employment on seafishing, and on processing and ancillary industries adding value to catches, should be taken fully into account in creating an extra dividend for coastal States in the annual share out of national quotas under TAC arrangements. This should necessitate the introduction in the new CFP of some necessary flexibility in the application of the Relative Stability principle in the annual share out of quotas. A similar extra dividend for coastal States should apply should the present TAC and quota system be replaced by an alternative system such, for example, as one based on fishing effort determinations. In Ireland's particular circumstances as a coastal State the degree of increase in certain demersal quotas needed to align the demersal fisheries with the real needs- current and into the future-of the Irish fishing fleet will require to be assessed against the background of the Hague Resolution and the need to complement its provisions to make for the sustainable development of that fleet. In addition to socio-economic considerations there are compelling reasons on environmental grounds for the new Common Fisheries Policy to place greater focus on reducing the impact of fossil fuel consumption and carbon emissions on the marine environment, by promoting and incentivising, where practicable, and with due regard to the ecological sustainability of fish stocks, fishing activities generally by Coastal States in waters contiguous to their shores.
- In the case of the main fisheries pursued by the pelagic fleet a coastal State dividend in increased quota provision should also be considered, particularly and substantially so, in the case of the North Atlantic Mackerel fishery recognising that Ireland's quota share of that fishery to-date has not reflected the fact that the spawning areas for this stock are in waters off the West and South of Ireland. It is of interest in this connection to refer to Norway's experience in international negotiations with the EU on share out of pelagic stocks, in consistently and successfully pressing home its advantage in gaining a major share of the TAC for a particular species (e.g. Atlanto Scandian Herring) on the claim that the spawning grounds for that stock are in Norwegian waters. It is also recommended that available research and scientific data relating to the particular spawning grounds for mackerel off the West and South coasts of Ireland might be assessed and extra research undertaken as necessary to provide as much scientific back up as possible in support of the case for increased mackerel quota allocation for Ireland related to proximity to the spawning grounds.
- The proposed dividend providing increased fishing opportunities for Coastal States should be supplemented in Ireland's case by increased funding from the EU to support more extensive surveillance and monitoring by Ireland of fishing activities of all member States fleets in the 200 mile Economic Zone off our coasts
- The I.F.P.E.A would favour the maintenance of a re-vamped TAC and Quota system over an alternative Effort Control system.

c) **Management of Fisheries**

The I.F.P.E.A would support Producer Organisations as an important instrument of self-management of members' quota allocations collectively and co-operatively in the fashion already being achieved by a number of Producer Organisations throughout the EU. This degree of decentralisation would make for optimal use of the quota uptake of members. Member States would, as foreseen in the Green Paper, set the broad limits within which the Producer Organisations would operate (such as a maximum catch or a maximum by-catch of young fish) giving industry the authority to best develop solutions economically and technically.

The Green Paper has posed the question- how can more responsibility be given to the industry in self-management of members' quota allocations while at the same time contributing to the competitiveness of the sector?

Firstly, self-management by the catching sector would be enhanced where there is effective co-operation with local or regional processors or distributive trade handling their landings for home and export markets to match fishing to processing needs. Catches can be marketed in that manner to best advantage of catchers and processors alike taking advantage of the best available market intelligence to meet the competitive requirements of the market place at home and abroad. The increased responsibility of self-management should also be backed by a commitment by Producer Organisations to promote best practices in fishing operations and maintain their sustainability and to improve competitiveness particularly through the marketability of the fish catches on the vessel and up to first point of sale. An example in Ireland of successful co-operation between fishermen and the processors they supply towards achieving sustainability in fishing operations and competitiveness in marketing their catches has been the recent certification of the Irish refrigerated seawater pelagic fishing fleet for its extensive mackerel fishing operations by the Marine Stewardship Council working in tandem with the pelagic processing industry in a joint Sustainability Assurance process in the best interests of both catching and processing sectors.

3. **Trade and Markets**

a) A better correlation between the market and the catching sector is a recommended core principle to inform the overall priorities of the new Common Fisheries Policy. Close co-operation between the fishing sector and the processing and distributive sectors in resource management in Ireland and other EU member States will ensure best utilisation of catches with an emphasis on quality assurance particularly to enhance fish product competitiveness on home and export markets against increasing inroads of imports for Third Countries into EU markets as a whole.

b) **Third Country Exports of fish Products to EU Markets**

The very substantial degree of penetration of EU markets by imports of fresh or frozen fish products from Third Countries world-wide has also been characterised in recent years by ever increasing imports of semi-processed and processed fish products. This has led to a continuing decline in the number of primary and secondary processing firms throughout the EU and to a greater concentration of imports by larger processing and distributing companies supplying to multiples and other bulk outlets in the EU.

It is recommended that synergies might need to be re-enforced throughout the various Directorate-Generals in the Commission (e.g. DG Mare; DG Trade; DG Taxud) so that inroads of cheap fish imports from Third Countries are not facilitated further by reducing or eliminating EU customs tariffs on their products against the interests of Community fishermen and processors producing similar products in substantial volume for European Markets. Third Countries do press for tariff concessions from the EU in these circumstances in the course of bilateral general trade negotiations between the EU and individual Third Countries and also on occasion they seek and gain concessions from the EU under its Scheme of Autonomous Tariff Quota determinations or through EU Generalised Special Preference Schemes.

From a food security aspect it is important that over-reliance on importing fish from Third Countries particularly in semi- processed and processed forms should not militate against the imperative for the longer term of maintaining strategically the viability and sustainability of EU fishing activities and the processing infrastructure to add value to EU caught fish. The Food and Agriculture Organisation has, in this connection, already underscored the increasing relevance which food security considerations will have in planning to meet future world food requirements against the background of population growth, global warming effects, etc.

**c) Implications of EU Maritime Ecosystem Approach for the Fish Processing Sector**

As indicated in Chapter 5.5 of the Green Paper the future CFP must provide the right instruments to support the ecosystem approach to Marine Management. Crucial challenges such as climate change, emission policies and energy efficiency must, the Green Paper has stressed, be "factored in when defining the future CFP and its role in shaping the future of the fisheries and aquaculture sector". These issues will affect the fish processing industry throughout the EU in a major way in the very near future and, against the background of likely carbon taxes etc, the need for all processors to adapt their plants with leading edge technology to give maximum energy efficiencies will become an urgent one. It is recommended that the new CFP should hasten the progress to achieve these efficiencies through provision of specific funding support in the reformed CFP to allow the processing sector to adapt to the new laws and taxes certain to be brought into effect in enforcement of the EU Maritime Ecosystem policy.

**4. Reforming the Control Policy**

The recent approval by Council of the New Control Regulation will enable its implementation to come into effect from January 2010. The Regulation seeks to ensure, inter alia, that there is a level playing field in the application and enforcement of fishery control regulations throughout all member States of the Community. In addition to seeking to ensure the attainment of this objective affecting the operations of Community fishing fleets serious consideration will also have to be given to establishing a level playing field in the application and enforcement of the relevant regulations applying mainly to fish processing operations ashore. An anomaly in the level playing field aspect has existed in this connection since the implementation of EC Regulation 1542/2007 of December 2007 in that the scope of the regulation setting procedures for landing and weighing of fish ashore was limited to fish stocks which were subject to co-operation with Norway and the Faroes. The zones

corresponding to the southern component of mackerel and horse mackerel as well as other zones subject to catch limitations were not covered. This needs to be addressed immediately without waiting for the outcome of the CFP Review in order to extend the scope of Regulation 1542/2007 to all zones where catch limitations are established. The necessary Commission Regulation to give effect to this should at the same time amend Article 9 paragraph 3(b) of that regulation so as to avoid undue delay in the discharge of cargo into processing plants experienced in the procedures for in-plant weighing of cargoes.

## **5. Discards**

Initiatives will be intensified at Commission level during the time leading up to the overall reform of the CFP to seek to eliminate the very serious problem of Discards by EU fishing fleets which has caused severe damage to fish stocks over the years and also has caused substantial loss of marketable fish by vessels through throwing overboard, before going ashore, of supply of particular variety or varieties of fish surplus to quota allocations and particularly in the case of mixed fisheries.

In the case of pelagic fisheries high grading activities have caused substantial discard volumes and damage to stocks where practised by freezer trawlers. It is understood that arising out of negotiations between the EU and Coastal States of Norway and the Faroes a ban on high grading will come into effect on 1<sup>st</sup> Jan 2010. In its role of encouraging cooperation between the Inspectorates of Member States in targeting specific fisheries, the Community Fisheries Protection Agency of the EU, based in Vigo, Spain should be in a good position to assist in tackling any shortcomings in enforcement of the high- grading ban by seeking to promote joint Deployment Programmes among member States' fleets engaged in the particular fisheries involved to ensure compliance.

## **6. Fishing Limits**

- Without prejudice to the I.F.P.E.A recommendation in paragraph 2(b) for some necessary flexibility in the operation of the Relativity Principle, to allow for increases in share out of quotas on socio-economic and environmental grounds to ensure the future of communities in Coastal States mainly dependant for employment on fishing and supporting processing and ancillary industries, the issue of possible extension of existing 0-12 mile Coastal States fishing zone limits will need to be addressed. This issue will require detailed examination industry wide before determining the scope of any extension which might be sought. The Association will revert with further comment on the matter as soon as possible.
- The Irish Box : The Association recommends that the Irish Box, which is a conservation zone regulating Spanish fishing activity mainly to the South and West of Ireland, should be retained and its retention should be provided for in the new CFP

**7. Other Recommendations**

- a) There is a need for simplification of rules under the Common Fisheries Policy as well as the necessity to encourage the industry to take responsibility for implementing these rules on a Regional decentralised approach
- b) Co-operative arrangements where possible between member states at Regional level should be encouraged to assist in fair all round application and enforcement of rules in the sea areas jointly fished by their fleets as well as in on-shore compliance affecting their fish processing and distributive sectors with relevant technical control measures
- c) The I.F.P.E.A would not be in favour of a system of privatised transferable quotas which would lead to concentration of ownership in a small number of mobile multi-national fleet owners

**T.F.Geoghegan**  
20 November 2009



Iasc Mara Teo.,  
Rossaveal, Co. Galway,  
Republic of Ireland.  
Telephone: + 353 - 91 - 572136  
Fax: + 353 - 91 - 572271  
+ 353 - 91 - 572334  
Website: [www.iascmara.ie](http://www.iascmara.ie)  
Email: [sales@iascmara.ie](mailto:sales@iascmara.ie)

Mr. Tom Geoghegan  
I.F.P.E.A.  
25 Kincora Ave,  
Clontarf,  
Dublin 3.

19-11-2009,

Dear Tom,

I refer to the I.F.P.E.A. submission with regard to "Reform of the Common Fisheries Policy". The document deals with all of the issues discussed at our meeting with Minister Tony Killeen T.D., Mr Noel Cawley and the D.A.F.F. officials on November 4<sup>th</sup> 2009.

With regard to Section 2(c) Management of Fisheries, I believe that the members of the association based in the South of Ireland would require a more detailed discussion of the role of Producer Organisations, in quota allocation. The quota allocation system should ensure that the majority of Irish Quotas are landed to processors in Ireland. In this way the Irish coastal communities will benefit from the jobs and revenue generated in processing and in other service industries.

Yours sincerely,

Cathal Groomell