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re: submission to the review of the Common Fisheries Policy (CFP)

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The Irish Wildlife Trust (IWT) is an Irish non-profit organisation concerned with the conservation of Ireland's biodiversity. As an island nation our marine and fisheries resources are a vital component of our natural and cultural heritage. Its sustainable use is therefore an essential element in preserving our rich biodiversity and economic well-being.

As acknowledged by the European Commission the CFP has been an abject failure resulting in the widespread destruction of Europe's marine habitat by over-fishing leading to the loss of once abundant fish stocks .

The EU has been a world leader in the development of policies for biodiversity conservation and in responding to the perils of climate change. Ireland has particularly benefited from this since our national government has never shown an interest in being pro-active with regard to environmental protection. Sadly the EU's leadership seems to end at the low water mark with short-term political opportunism taking over. As such the IWT welcomes this long overdue 'root and branch' reform of the CFP. Fishing represents a livelihood for many coastal communities and is a difficult and dangerous job. Harvesting wild fish stocks makes an important contribution to our economy, contributes to the well-being of communities and strengthens our society as an island nation. For these reasons we will support the reform of the CFP in ensuring:

- No species, either 'target' or 'non-target', is allowed to fall outside safe biological limits. At present the European Commission estimates that 30% of assessed European fish stocks are outside safe biological limits. The EU is using Maximum Sustainable Yield (MSY) as a management target for fisheries, in accordance with the Johannesburg Declaration of 2002. However, MSY should not be a management target, but interpreted as an upper limit to exploitation and as an intermediate step towards the restoration of fish stocks to abundant levels. Scientific advice must determine the amount of fishing resources available to be caught in any one period. Failure to follow scientific advice will further threaten valuable fish stocks and the communities upon which they rely.
- Fishing must not result in the destruction of marine habitats. Marine Protected Areas can play an important role in preserving marine habitat and creating havens where

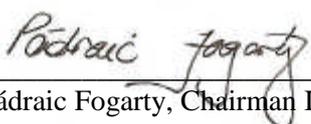
stocks can flourish providing greater abundance in surrounding areas. However, the designation and extent of MPAs must be carried out in dialogue with fishers.

- Waste and 'by catch' must be eliminated through stricter reporting and the advancement of appropriate technology. There have been significant advances in the development and use of highly selective gear. A reformed CFP must provide incentives, e.g. priority access, for more selective gear types.
- Overfishing can be further reduced by creating the conditions whereby high quality fish products receive favourable prices. At present local products are in competition with cheap imports, driving down costs and motivating overfishing.
- Fisheries can be made more sustainable by redirecting public aid away from fleet modernisation and support to individual enterprises, towards public goods which create environmental and social welfare, such as training, better control and monitoring of fishing activities and the collection of scientific advice.
- Every high tide in Ireland brings with it a fresh layer of plastic detritus that has been illegally dumped at sea. This is causing untold damage to worldwide ecosystems by killing animals that directly ingest it. It also results in an unceasing conveyor belt of litter that fouls our otherwise pristine beaches, salt marshes, estuaries and rocky coasts. EU waste legislation must be more strictly enforced while new technologies should be developed so that the use of synthetic plastic in fishing lines is phased out in favour of biodegradable materials.
- The Council of Ministers must heed scientific advice. It is neither realistic nor appropriate to use scientific data as a starting point for compromise or negotiation. In this regard the ecological objectives must be prioritised and seen as a prerequisite to fulfilling social and economic objectives: if we do not rebuild stocks in Irish waters there will be no fishing.
- The EU is already bound into significant conservation legislation i.e. the Birds; Habitats; Environmental Impact Assessment; Strategic Environmental Assessment; Water Framework; Environmental Liability; Marine Strategy Framework; and Shellfish Directives as well as the Convention on Biological Diversity. The CFP must support these arrangements.

To-date, the CFP has made the EU a basket case among countries concerned with marine conservation (e.g. Iceland or Norway). Lessons have not been learned, scientists ignored and all the while the oceans have been depleted of their diversity and communities of their livelihoods.

This review of the CFP is an opportunity to change all that but only if we reach out to all stakeholders and look beyond the blinkered political short-termism that has ruined our seas and communities. For our part, the IWT will campaign to ensure that this dialogue is productive and this opportunity is seized.

Yours sincerely,


Pádraic Fogarty, Chairman IWT