

# El Anzuelo

EUROPEAN NEWSLETTER ON FISHERIES AND THE ENVIRONMENT

## STRENGTHENING OUR COMMON FIGHT AGAINST ILLEGAL FISHING



Credit: European Community, 2006

### Joe Borg

European Commissioner for Fisheries and Maritime Affairs

As we all know, ensuring sustainable fisheries is a challenging task. This task is made particularly difficult by those who practice illegal, unreported and unregulated (IUU) fishing activities. Illegal fishing is a complex phenomenon but, essentially, it is a clandestine economic activity that illicitly competes with regulated activities thanks to a lack of monitoring or to marketing circuits that are difficult to control. Such fishing does not only have serious economic consequences but also jeopardises international efforts to manage fish stocks in a responsible and sustainable way.

There is an international consensus on the need to combat this phenomenon, as manifested in the adoption of the 2001 FAO IUU Plan of Action. Indeed, the EU adopted its own IUU Action Plan the following year and has since been taking measures set out in this Plan. Regional Fisheries Management Organisations (RFMOs), too, are reinforcing their rules on this front.

From this perspective, the initiative taken by the Ministerially-led Task Force on IUU fishing on the high seas (HSTF) must be welcomed. Three years after its launch, the Task Force proposes practical solutions to tackle the economic side of illegal fishing businesses.

The Commission has supported the work of the HSTF and is currently studying its proposals which should complement the 15 actions envisaged in the EU Plan. Of particular interest is the initiative regarding the reinforcement of the Monitoring, Control and Surveillance (MCS)

Network as a major exchange forum of intelligence and expertise in identifying, tracking and sanctioning illegal operators. Indeed, one of the key areas to reinforce is that of the day-to-day co-operation among enforcement authorities to track illegal vessels and assist each other in bringing the vessels' official or beneficial owners to justice. The MCS Network has the potential for facilitating such co-operation which would benefit both national authorities and RFMOs. The HSTF's proposal for a Global Information System of High Seas Fishing Vessels is also of interest in this respect.

Regarding RFMOs, the Task Force recognises the central role they play in ensuring governance of high seas fisheries and recommends a process to assess their performance. While sharing part of the rationale behind this proposal, it is only fair to recall that RFMOs have made considerable progress in the fight against IUU fishing in recent years.

Indeed, as the Task Force notes, IUU catches in the Southern Ocean, for instance, are now estimated at about 15 per cent of the legal catch when, only two years ago, they were reckoned to exceed it. I agree, RFMOs need to be reinforced and, where appropriate, modernised up to the standards set by the international legislation, in particular the 1995 UN Fish Stocks Agreement. But it would not be correct to suggest that these organisations are not doing their job. Reforms and reviews will only work if the RFMO members themselves take responsibility for this process and commit to ensuring their successful completion on the basis of their rights and obligations as port states, flag states and regulators of an important processing industry.

As a matter of principle, there is a pressing need to establish a level playing field on the high seas, whereby all flag States commit to the same standards of responsible fishing and co-operation with others. This objective relies on the universal acceptance of the 1995 UN Fish Stocks Agreement and the completion of global coverage of the world oceans by regional management regimes. The Task Force members have committed to encouraging all high seas fishing nations to join the UN Fish Stocks Agreement and the FAO Compliance Agreement. This is a commitment that the EU fully shares.

Additional details of the Commission's response to the HSTF report is available at [http://europa.eu.int/comm/fisheries/news\\_corner/press/inf06\\_13\\_en.htm](http://europa.eu.int/comm/fisheries/news_corner/press/inf06_13_en.htm)

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The paper for this document has been made from wood fibre from a sustainable forest

# Testing Time for the CFP

James Brown  
Editor, IEEP Brussels

In critiquing the Common Fisheries Policy (CFP) it is important to acknowledge that the management of EU fisheries is a complex and highly political process, with the interests of 25 Member States at play. In this sense, one cannot realistically expect progress as quickly as within a single nation State. However, several major developments in the implementation and

development of the CFP in the last six months make it very difficult to feel positive about the commitment of the EU, at all levels, to the CFP reform package and its international commitments.

## Money talks

Major differences in positions amongst Member States have continued to plague discussions on the European Fisheries Fund (EFF). The signs are that it is likely that some forms of environmentally harmful subsidies will be agreed as part of a compromise. The 'Friends of Fishing' coalition is now significant in weight following EU enlargement, including Estonia, France, Greece, Italy, Poland, Portugal and Spain. They are calling for *inter alia* a softening of modernisation aid and vessel entry/exit rules when using public aid for scrapping vessels. Such demands run counter to the CFP reform package, the EU's position within World Trade Organisation (WTO) discussions, and would further undermine the already poor grip that the EU has on managing its overcapacity fleets.

The Commission is not blameless in the shift in position on subsidies, coming forward with State aid guidelines that enable Member States to subsidise engine replacement over the next two years (see Box). These guidelines came from the highest level within DG Fish, drafted with Commissioner Borg's Cabinet. Such a response from the Commission to the so called fuel 'crisis' would not have been expected under Commissioner Fischler.

## December Council outcomes

The December Council discussions covered a particularly large number of issues in 2005, although the outcomes were not any more positive than usual, with some major deviations from scientific advice.

Cuts in deepsea fisheries effort limits for 2006 fell short of the proposals. A reduction of 10 per cent was agreed instead of the 20 per cent proposed. As only a 10 per cent reduction of the fishing effort was already in place for 2005 compared to 2003 levels, the EU will fail to meet the 30 per cent cut that it committed to within the North East Atlantic Fisheries Commission (NEAFC), let alone implement the closure advised by ICES. On a more positive note, deepwater gillnetting in these waters was banned (see page 7). The Commission is now considering under what conditions these fisheries could be reopened. Such reversing of burden of proof, from only closing fisheries in the face of supporting evidence to only opening fisheries when it can be demonstrated that fishing can be conducted sustainably, is perhaps something the EU should consider applying more widely.

In the case of the Baltic, adoption of the Baltic

## ● Commission green light for Member State aid schemes

The fishing industry has been increasingly voicing complaints over increases in fuel costs. Some forms of fuel doubled in price in 2005, affecting trawlers hardest. In response to this the Commission adopted a Communication in March on steps that Member States may take in improving the economic situation of the fisheries sector (COM (2006) 103).

The Commission invites Member States to submit for approval 'rescue and restructuring aid schemes' based on 'realistic economic assumptions' that cover changes to lower fuel consumption fishing gears, purchases of equipment that improve fuel efficiency or engine replacement. Within this context, the Commission will then consider approving national aid for vessel modernisation and equipment

Associated conditions include the reduction of national fleet reference levels and fleet capacity ceilings when engines are replaced with aid and a requirement for new some engines to be less powerful than originally. Joint schemes will also be accepted, whereby a company with several vessels or other groups of vessels can apply for such aid and the engine power reductions would be applied globally. On top of the fact that engine power is notoriously difficult to measure and regulate, this provision appears to make the system even more susceptible to abuse as vessels that may be leaving the fleet anyway can be used to justify engine replacement in remaining vessels.

Formally reiterating previous statements made by Commissioner Borg, the Communication rules out the use of direct aid to compensate for fuel price increases on the grounds that it is incompatible with The Treaty. So called 'guarantee schemes' that pay out during hard times on the basis of payments made by the industry during favourable times are also noted for not receiving Commission approval. In this respect there is a notable absence of any comment on existing guarantee schemes such as that in France.

Curiously, while the Commission is evidently careful to operate within EU state aid law, there is a distinct absence of any reference to broader EU policy initiatives. The Lisbon Strategy for example is not referred to, and despite the reference to further research and technology development, the opportunity to relate the plans to the Environmental Technologies Action Plan (ETAP) (COM(2004)38) is not taken. Indeed, the absence of any reference to Lisbon could be because a fundamentally different approach is needed to the continuation of such public financial support.

The Commission states that action 'must be taken to address the current economic difficulties of the fishing industry' [emphasis added]. While the Communication opens and closes by stressing the social and cultural importance of the fishing sector, there is no explicit justification for the use of public funds to support an industry facing the same economic pressures as most industries, and indeed individuals, across Europe.

technical Regulation was a positive step. The same cannot be said however for the Baltic Total Allowable Catch (TAC) package, this year separate from the main TAC Regulation. The Council adopted the Commission's proposal for an increase of more than 16 per cent in the eastern Baltic cod TAC from 2005. This was counter to ICES advice and the Commission's own objective of a gradual reduction of fishing pressure.

Commissioner Borg defended the outcomes, noting that 'The measures adopted ... confirm our gradual and sustained approach which allows for the recovery and protection of fish stocks.' He appears to be correct in that the EU is sustaining what has been a very gradual response to depleted fish stocks. Such poor outcomes can only look bad for the UK Presidency, which placed much emphasis on improving management by 'front loading' TAC negotiations. Nonetheless, the buzz word remains in the Commission's vocabulary so it can only be hoped that it is the bottom of a learning curve on agreeing TACs within an enlarged EU.

## Recovery plans

The December Council adopted a recovery plan for southern hake and Norway lobster and reached agreement on a multi-annual plan for Bay of Biscay sole. In the latter, the proposed measures relating to the western channel sole were dropped, to be decided upon at a later stage. In January the Commission came forward with a management plan for North Sea plaice and sole stocks. This is the first such plan to be proposed under the management plan provisions of the 2002 CFP basic Regulation (Article 6, Regulation 2371/2002). Nonetheless, the management plan takes a similar form to recovery plans, with harvest control rules and even an effort limitation component.

While these three developments may read as a flurry of progress, the details and processes behind them demonstrate that many Member States do not support the Commission's enthusiasm for multi-annual management plans. Both of the adopted plans were softened by the Council and a recovery plan for Baltic cod is still wanting. In discussing the North Sea plaice and sole plan within the April Council, some Member States objected to introducing a management plan setting long-term objectives in advance of the ongoing debate on a maximum sustainable yield (MSY) approach to fisheries management. Such political stalling tactics are again counter to the CFP basic Regulation (2371/2002), at least in spirit, which requires recovery and management plans to be adopted, and does not make any reference to the prior need for the strategic debate the Commission has rightly initiated.

## Implementation

While new policy is important in some areas, full implementation of existing requirements would no doubt bring the EU a long way. This is illustrated by the fines brought against France for implementation and enforcement failures (see Box). The Commission report on Member State management of fishing capacity during 2004 makes an interesting read, highlighting leading and lagging Member States. The UK is mentioned as one

Member State that has taken notable steps to reduce fleet capacity through decommissioning. In the Mediterranean, however, where there are very large numbers of vessels, its systems presently seem unworkable, with data being very unreliable and Greece appearing not to have complied with the entry/exit rules.

A gap in the report is that there is scant discussion of the link between fleet capacity levels/reductions and the state of fish stocks. Indeed, this is recognised by the Commission in its conclusions, noting that it should be given more attention in future Member State and Commission annual reports. The Commission's report on the shark finning Regulation, while highlighting some gaps, was much less frank about issues requiring improvement (see page 8).

At a time when many are looking to the Commission to drive the EU in meeting its many environmental commitments, DG Fish appear to be reducing the resources it allocates to environmental issues. The Environment and Health Unit (A3) within DG Fish is being carved up. Environmental issues will be subsumed within the Management of Stocks Unit (currently A1) while Health issues will be dealt with within the Aquaculture Unit (currently C4). Whether this leads to a lower profile of environmental issues, or greater consideration of the environment within stock management, remains to be seen. What is clear though is that EU is not in a position to push environmental issues onto the back burner, especially given the direction of the EU subsidy regime.

## ● France faces costs of non-compliance

The European Commission concluded in March 2006 that France had not taken all the necessary steps to comply fully with the obligations as laid out in the 12 July 2005 European Court of Justice (ECJ) ruling, which declared that France failed to carry out adequate fish conservation controls. France is therefore required to pay a penalty of €57.7 million, as decided by the ECJ in its ruling.

The penalty followed a landmark ruling on 12 July 2005 which found France guilty of consistently failing to enforce its fisheries obligations to control landing and marketing of undersized fish. France was subsequently fined €20 million in July with a periodic 6 month €57.7 million penalty until an adequate fisheries control system were in place.

Following the end of the first 6 month period, the Commission carried out an assessment on 12 January 2006 and found that while some measures have been introduced they have however not been sufficiently effective. In its evaluation the Commission noted that France had failed to strengthen its control system, particularly its co-ordination of inspections throughout the chain of fishing activities. Shortcomings were noted in the numbers, quality and thoroughness of inspections of the fishing, landing, transport and marketing activities. In addition, the assessments also found that no appropriate actions were taken to impose sanctions or penalties on fishing infringements.

The Commission requires that France take further steps to ensure all shortcomings, notably in control and sanctions systems as identified in the assessments, be rectified accordingly. The situation is due to be reviewed again in July 2006 and further penalties are likely to be incurred unless the Commission is satisfied that France has met all its obligations.



# Closing the Net on Illegal Fishing

**The UK chaired the HSTF and has established an international co-ordination unit to see through the implementation of its conclusions. The HSTF's work provides significant opportunities for EU Member States. Ben Bradshaw, the UK Minister for Nature Conservation and Fisheries, discusses how the HSTF conclusions will be taken forward and invites others to contribute to efforts in tackling IUU fishing.**

The High Seas Task Force (HSTF) has published proposals to help expose Illegal, Unregulated and Unreported (IUU) fishing. These are now being turned into action and will assist considerably in the fight against IUU fishing over the next few years. They will be an enormous help in combating poaching on the world's oceans and improve enforcement against those responsible.

IUU fishing damages the sustainability of the world's fishery resources and marine ecosystems, particularly in developing countries. It undermines fisheries management and labour markets and thereby places unsustainable pressure on fish stocks, marine wildlife and habitats. Recent studies put the worldwide cost value of IUU catches at between \$4-9bn.

We created the HSTF in 2003 when a small group of fisheries Ministers<sup>1</sup> and directors-general of international NGOs<sup>2</sup> decided to take the lead in actively promoting practical solutions to the global problem of IUU fishing. Our aim was to provide practical solutions that would add additional impetus to existing initiatives. After two years' work by a wide range of international experts, the Task Force launched its report<sup>3</sup>

containing nine proposals to combat IUU fishing on 3 March 2006. Proposals include:

- expanding the capabilities of the existing US-based MCS Network;
- developing a global information system on high seas fishing vessels;
- encouraging better high seas governance by Regional Fisheries Management Organisations and encouraging broader participation in the United Nations Fish Stocks Agreement;
- bringing together different sources of information on IUU fishing to get a clearer picture of its scale and impact.

Initial commitments to the proposals from Task Force members mean we will work together to implement them immediately where possible e.g. in strengthening the MCS network. However, it is clearly beyond Task Force members alone to address IUU fishing. We therefore welcome participation and assistance from others in the implementation of the proposals and we will actively seek to engage an ever-widening group of like-minded countries and organisations.

Indeed the attendance at the launch on 3 March

demonstrated the strong interest in tackling IUU fishing globally with representatives from Africa, Europe (Commissioner Joe Borg represented the Commission), the Pacific and America.

To carry forward this momentum from the launch, the UK, as part of its commitment to the HSTF work, has established an international coordination unit to:

- encourage and promote broader acceptance and participation in the adoption of the task force proposals;
- seek agreement on implementation arrangements through regular consultation with Task Force members and like-minded partners; and
- establish a monitoring unit to review and evaluate progress.

Competence for management of fisheries in the EU of course lies with the European Community. Member states have a shared responsibility on monitoring and control issues and already play a crucial role in ensuring effective compliance.

In particular, Article 24 of the CFP basic Regulation (2371/2002) obliges member states to take enforcement measures relating to fishing

activities outside Community waters, both with regard to Community fishing vessels flying their flag and their nationals. These measures are already helpful in the fight against IUU fishing.

The HSTF report builds on these and other existing measures and provides a plan for action, describing the proposals and the impact they will have on IUU fishing. The Task Force has also ensured that its recommendations are fully compatible with existing multilateral processes and we will adopt a common advocacy position wherever possible.

I would encourage you to join us in taking action to tackle the scourge of IUU fishing.

For further information:  
[www.illegal-fishing.info](http://www.illegal-fishing.info)

- 1 Fisheries Ministers from Australia, Canada, Chile, Namibia, New Zealand and the UK
- 2 The Earth Institute, IUCN-World Conservation Union, WWF International
- 3 Closing the net. Stopping illegal fishing on the high seas Final report of the Ministerially-led Task Force on IUU fishing on the High Seas. March 2006. Available from <http://www.high-seas.org/>

# Tackling IUU at Sea and at Land

**Niels Wichmann, President of Europêche, highlights some of the immediate measures that the European industry consider should be brought in by RFMOs and States to address IUU fishing**

The problems associated with illegal fishing or IUU on a Community and international scale are complex and varied. The work done by the HSTF fishing on the high seas sets out the different components of the problem. In particular, it highlighted the reforms needed within RFMOs and the lack of political will to move forward in the eradication of IUU fishing.

Fishing professionals represented in Europêche believe that it is no longer possible to continue the legal void surrounding fishing on the high seas. It is inconceivable that even today certain States grant their flags to fishing vessels without fulfilling their obligations of control. It is therefore right to insist on the need to adopt obligations linking States to the vessels

flying their flags in order to stamp out these so called 'flags of convenience'.

It is equally urgent, in Europêche's opinion, to insist on the rights and duties of port States with regard to access by fishing vessels to port installations for commercial operations, either in transit or for placing onto the market their catch. This idea seems to us essential in order to eliminate 'ports of convenience' and promote the emergence of responsible ports.

Responses need not be limited to at sea or the port side activities. Solutions need to be introduced at the level of marketing and markets. RFMO catch declaration forms need to be improved to avoid fraud and falsification of documents. The development of responsible marketing is equally

as important as responsible fishing. In this context customs controls need to be reinforced. Additional efforts could also be made with regard to traceability.

Market controls need to go further than chasing after pirates. Given that the main markets are in developed countries such as Japan, China, Canada, the USA and the EU, it should be possible to bar market access to operators contravening the regulations in the form of 'whitelists' of ships respecting legislation. States need to establish and maintain registers of fishing vessels authorized to operate on the high seas as a basic tool here. 'Blacklists' are also necessary, where by known offenders are publicly identified. However they do not constitute an end in themselves. Actions and

sanctions must be taken against these vessels and the investigations should be done as quickly as possible. The simple fact of having its name on a black list is not dissuasive.

While technological developments have played a large role in increasing high seas fishing, technology also has a lot to offer the control of these operations. In particular, satellite Vessel Monitoring Systems (VMS) should be applied to all vessels operating on the high seas without exception, which is not the case today. Finally, as RFMOs are central to managing high sea fish stocks it is essential that their capacities and will to combat IUU fishing be strengthened as matter of priority.

In conclusion, the fight against illegal fishing calls for urgent legal and political efforts, accompanied by adequate human and financial resources. Concentrating solely on applying more restrictive measures to fishermen already operating legally and under control systems would be a mistake.

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## Update on EU Ratification of the UN Fish Stocks Agreement

In December 2003, the European Community and the then 15 Member States finally ratified the 1995 United Nations Agreement on the conservation and management of straddling fish stocks and highly migratory fish stocks. The Agreement entered into force at the end of 2001. Both the EU and Member States participate as contracting parties since this is a mixed competence agreement.

Of the ten new Member States that joined the EU on 1 May 2004, only Cyprus and Malta had ratified the UN Fish Stocks Agreement when last

reported in 2004 (El Anzuolo, Vol 13). For the remaining Member States, ratification was required before their accession to the EU under the Treaties of Accession. Seven of the new Member States are still yet to ratify the Agreement, with Poland acceding to the Agreement earlier this year.

A letter was sent to the outstanding Member States in June 2005 by Commissioner Borg, reminding them to complete internal ratification formalities as soon as possible. Lithuania estimates completion during the first quarter of

2006, and Slovenia and Slovakia (and Bulgaria) indicate that they will do their utmost to complete formalities by May 2006, in time for their full participation to the Agreement's Review Conference at the UN Headquarters in New York on 22-26 May 2006. Hungary, Estonia and the Czech Republic have indicated procedures are underway but they are unable to provide an estimate for completion. Only Latvia has so far failed to provide feedback, and a reminder was to be sent by the Council secretariat. Finally,

Candidate Country Romania also indicated that procedures had been launch with a view to ensure its accession by the time it joins the EU on 1 January 2007 with Bulgaria.

For further details contact: Mr Serge Beslier, Head of Unit, Directorate B, Fisheries DG, European Commission, Brussels, Belgium. Tel: +32 2 2991111; email: [serge.beslier@cec.eu.int](mailto:serge.beslier@cec.eu.int). Fish Stocks Agreement's Review Conference [http://www.un.org/Depts/los/convention\\_agreements/review\\_conf\\_fish\\_stocks.htm](http://www.un.org/Depts/los/convention_agreements/review_conf_fish_stocks.htm)

# Hauling in the net on Europe's high seas bottom trawl fleet

**Greenpeace present evidence that an international moratorium on high seas bottom trawling should be adopted to protect our high seas in line with the HSTF conclusion that swift and concerted action is needed to tackle the worst IUU abuses**

In 2002, the International Council for the Exploration of the Sea (ICES) reported that photographic and acoustic surveys show trawl marks on the sea floor at 200–1,400 m depth all along the Northeast Atlantic shelf break<sup>1</sup>. These trawl scars off the coasts of Ireland, Scotland and Norway are symptomatic of a much more widespread destruction of one of the most diverse, ancient and fragile ecosystems on this planet – the deep sea. Heavy nets are dragged across an estimated 1,500 km<sup>2</sup> of deep sea each day. This is equivalent to an area the size of 148 football fields per minute or 10 football fields every four seconds. If trawling continues at this rate, we will have destroyed the entire area of vulnerable cold water coral in just 16 years from today. The vast majority of this type of fishing is carried out by European countries.

A review of available information on flag state and ownership of vessels involved in or capable of high seas bottom trawling in the North Atlantic, published by Greenpeace in March 2006, concludes that high seas bottom trawling is carried out by relatively few vessels flagged to just a small number of

European countries. Lloyd's register identified 318 vessels equipped to engage in high seas bottom trawling as flagged in Europe in 2005. Eighty were flagged to other countries but were linked to European coastal states through the nationality of their owners or operators. The vast majority (80 per cent) were flagged in Spain, Denmark, or France<sup>2</sup>.

High seas bottom trawling takes place in areas where there are few if any rules. The FAO Committee on Fisheries in March 2005 stated 'few Regional Fisheries Management Organisations (RFMOs) have a mandate to manage deepwater species [...]. Given that usually these fisheries take place in the high seas, they may be commonly characterized as unregulated and unreported.'<sup>3</sup> In other words, high seas bottom trawling often classifies as illegal, unreported and unregulated (IUU) fishing.

A number of trawlers observed fishing in the high seas of the North Atlantic by Greenpeace in 2004/2005 have had citations for IUU fishing issued against them, notably by the North East Atlantic Fisheries Commission (NEAFC) and the Northwest Atlantic Fisheries Organisation (NAFO), or are associated with vessels



**Bottom trawler dumps a large piece of 'Paragorgia' coral dredged from the deep sea in their net**

Credit: Greenpeace/Malcolm Pulliman

or companies owned or operated in Europe that have been cited for breaking conservation measures and regulations. Many more vessels also appear to fish the world's oceans without a traceable identity. This lack of transparency is consistent with experience in other high seas fisheries – and appears typical of IUU fisheries.

The High Seas Task Force states that 'IUU fishing respects neither national boundaries nor international attempts to manage high seas resources. It thrives where weak governance arrangements prevail and is further encouraged by the failure of countries to meet their international responsibilities'. It concludes that '[a]s a priority, swift and concerted action is required to stem the worst abuses'<sup>4</sup>.

Greenpeace contests that the swiftest and most effective action countries can take to protect vulnerable deep sea biodiversity from unregulated and at times illegal high seas bottom trawling is to adopt and implement – this year – a UN General Assembly Resolution in support of an

immediate moratorium on high seas bottom trawling. European governments hold the key to the protection of deep sea life. They must act now to prohibit high seas bottom trawling until rules are set in place to protect the deep sea.

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- 1 Report of the Study Group on Mapping the Occurrence of Cold Water Corals. Advisory Committee on Ecosystems, International Council for the Exploration of the Sea. ICES CM 2002/ACE:05 Ref: E, WGECO May 2002
- 2 Greenpeace report (2006): Murky Waters – Hauling in the net on Europe's high seas bottom trawling fleet <http://oceans.greenpeace.org/ra/w/content/en/documents-reports/murky-waters.pdf>
- 3 COFI/2005/6, paragraph 6
- 4 High Seas Task Force (2006): Closing the net: Stopping illegal fishing on the high seas. Governments of Australia, Canada, Chile, Namibia, New Zealand, and the United Kingdom, WWF, IUCN and the Earth Institute at Columbia University

# Making Deepwater Netting Sustainable



Credit: Nils-Roar Hareide

Gear dumping in the deepwater net fishery is estimated at around 1,254km of sheet netting per year

**Nils-Roar Hareide**  
Independent Consultant

Last Spring an international project to collect and review information on the deepwater set net fisheries in the north east Atlantic concluded with the publication of the Deepnet report<sup>1</sup>. The report highlighted a host of problems in the offshore gillnet fisheries in the slopes north and west of the British Isles, west of Ireland, around Rockall and Hatton Bank. The three main gillnet fisheries in this area are a hake fishery (100 - 700 m); a monk fish fishery (200 - 800 m); and a deepwater shark fishery (800 - 1200 m). There are also gillnet and pot fisheries for deepwater crabs in these areas.

The Deepnet project focused on the monk and shark fishery as the two deepest fisheries. The project revealed that the vessels fishing for monk fish are using 130 - 250 km of gear with long soak times (4-10 days). The primary problem with this practice is that it results in considerable discarding, as over 50 per cent of the fish landed is unfit for human consumption. The size and number of nets is so high even, that it is not possible for the vessels to carry them when returning ashore to land their catch. Vessels therefore leave nets unattended on the fishing grounds for weeks – even months – and in some cases dump netting after stripping out the headlines and footropes. Gear dumping was estimated at around 1,254km of sheet netting per year.

Since the Deepnet project concluded, two retrieval surveys for lost nets were by Ireland and the UK. Three fleets of unattended nets where retrieved (31.5 km) containing a total of 14.4 tonnes of fish and crustacean, of which more than 50 per cent of monkfish and 70 per cent of leafscale gulper shark were unfit for human consumption.

High soak times and leaving or dumping nets means that there is an unknown background level of fishing mortality, making it difficult or impossible to assess the exploited stocks. Management is therefore seriously undermined. This is in addition to the fact that there are almost no catch composition data available from these fisheries. This is particularly concerning for the sensitive

deepwater shark species, which are recognised by the International Council for the Exploration of the Sea (ICES) to be among the most vulnerable fish species known in the North Atlantic, with a biomass decline of 80 per cent in less than ten years in some cases.

The EU took the initiative in December to prohibit gillnetting below 200m in the areas as part of the 2006 Total Allowable Catch (TAC) Regulation. There is now a discussion between scientists and stakeholders within the recently established north western waters Regional Advisory Council on whether the net fisheries in the area, notably that targeting hake, can be reopened on a sustainable basis.

While the hake fishery was not described within the Deepnet report, there were still relevant lessons. The most important Deepnet recommendation was to reduce the amount of nets that may be used, together with a requirement that nets always be attended. If enforced, these two measures should together effectively reduce soak times and thereby spoilage of fish. Reopening of the fishery should be accompanied with steps to drastically improve landings data and to implement observer programs. Finally, while preventing gear loss and dumping should be a first priority, gear retrieval surveys and other mitigating measure to reduce the effect of ghost fishing should be implemented. Who pays for observer and retrieval programmes and how economically viable the fisheries would be with these necessary measures remains to be seen. In any event, the development and enforcement of all of these measures will require cooperation between the industry and managers.

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<sup>1</sup> Hareide, N-R., Garnes G., Rihan D., Mulligan M., Tyndall P, Clark M., Connolly P., Misund R., McMullen P., Furevik D. M., Humborstad O-B, Høydal K. and Blasdale T., (2005) A preliminary Investigation on Shelf Edge and Deepwater Fixed Net Fisheries to the West and North of Great Britain, Ireland, around Rockall and Hatton Bank. [http://www.bim.ie/uploads/text\\_content/docs/DEEPNET%20Report.pdf](http://www.bim.ie/uploads/text_content/docs/DEEPNET%20Report.pdf)

# EU Finning: A Case for Better Regulation

**Boris Frentzel-Beyme**

Secretary of the German Elasmobranch Society and President of the European Elasmobranch Association

'Finning' is the removal of shark fins accompanied by the discarding of the rest of the fish – which may still be alive – back into the sea. It is practiced worldwide largely to satisfy the lucrative shark fin soup market in the Far East. The full extent of finning is not clearly known because of poor monitoring, but conservative estimates from FAO data and Asian markets indicate that the fins of tens of millions of sharks, their weight totalling around 1,000,000 tonnes per annum<sup>1</sup> enter these markets, with a large part killed solely for their fins. The EU is not a small player in the finning industry, with a study in 2000 revealing that Spain was the largest single supplier of shark fins to the Hong Kong market<sup>2</sup>.

Finning is very profitable, requiring less storage space on board than when carcasses are also retained; but it is also highly wasteful and increases pressure on shark populations since more fins can be landed per fishing trip because effort and mortality are not limited by hold capacity. Sharks are, of course, also targeted for their meat; not all shark fin soup is made from finned sharks. The high numbers of sharks killed worldwide is of concern not only because some species are threatened, but also because these top predators play an important ecological role in the marine environment<sup>2</sup>. The USA, Australia, Brazil, South Africa, Oman and others have responded to these concerns by banning shark finning. Some Regional Fisheries Management Organisations also followed suit, including ICCAT, IOTC, IATTC, and NAFO<sup>3</sup>.

The EU reacted in 2003 with the adoption of a finning Regulation (1185/2003). It is a timely moment to comment on this Regulation, as the European Commission published a report reviewing the Regulation at the end of 2005 (COM(2005)700). Many conservation-oriented NGOs and EU member states welcomed the development of this Regulation in expectation that it would ensure transparency in shark fisheries and prevent shark finning by EU vessels and in EU waters. However, the Regulation fails to meet both of these expectations, as has been confirmed by the Commission's recent report.

The simplest and most effective way to ban finning is to allow only the landing of sharks with all fins still attached. Despite this simple concept, the process of creating the EU finning Regulation was long and controversially debated, with many counter arguments and alternatives were suggested by some Member States. The result was that EU Member States are allowed to issue their fishing vessels with 'special fishing permits' that not only allow fins to be removed from carcasses on board, but permit them to be landed in different ports or transhipped separately at sea. The specified fin:carcass weight ratio is also far higher than in other countries<sup>4</sup>, following current poor processing practices rather than the more effective techniques used in other shark fisheries. While perhaps legitimate from some fishermen's perspectives, there were concerns that these conditions would effectively allow a level of 'legal' finning, lead to untransparent monitoring and



Credit: Courtesy of Jeff Roman/jeffroman.com

Shark fins may be removed from carcasses on board EU vessels if holding a 'special fishing permit'.

documentation, and so create loopholes and hinder effective enforcement.

The Commission's Report shows that the concerns of environmental NGOs and some Member States were justified. The report includes information on the number of special fishing permits issued by Member States and highlights the poor information included in the Member States' national annual reports. However, there are a number of glaring gaps in the Commission's report that make a full evaluation of the Regulation difficult, including information on:

- Member State criteria for issuing special finning permits;
- quantities of sharks caught and shark fins landed;
- the status of the targeted shark stocks and the impact of the associated fisheries; and
- the different landing ports or transhipment activities.

Without this information, there is no reasonable foundation on which to support the Commission's conclusion that the Regulation in its present form is working effectively and so needs no further alteration. Alternatively, the lack of information in the Commission's report indicates that there is no need to permit separate landings or transhipments of fins and carcasses, since none are apparently being undertaken.

*continued opposite*



EU Finning: A Case for Better Regulation  
*continued*

These provisions should be removed from all 'special finning permits'.

The Commission's report is disappointing. Sadly, however, this is symptomatic of the way shark (and ray) fisheries are handled, both within the EU and other regions. So it is time again to remind the responsible authorities that more attention and commitment is needed to put an end to the inadequate attention that sharks and rays largely face. Many experts have consulted the Commission on the urgency of this problem, with an emphasis also on the finning issue. As one of the highest developed regions of the world the EU has an obligation to serve as a role model in regard to responsible fisheries and the CFP. The call is therefore clear. The finning Regulation needs to be made more transparent, not least through future reporting on the Regulation, which at present is not a requirement. The EU should also develop a Shark Action Plan in accordance with the FAO International

**Plan of Action for Sharks, to which the EU has itself signed up. The lack of regulation of these fisheries issues still remains to be one of the EU's major omissions.**

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- 1 Anon. 2004 Report of the 2004 Inter-Sessional Meeting of the ICCAT Subcommittee on By-Catches: Shark Stock Assessment (Tokyo, Japan, 14-18 June 2004) SCRS/2004/014 Col. Vol. Sci. Pap. ICCAT, 58(3): 799-890 (2005) [http://www.iccat.es/Documents/CVSP/CV058\\_2005/no\\_3%5CCV058030799.pdf](http://www.iccat.es/Documents/CVSP/CV058_2005/no_3%5CCV058030799.pdf)
- 2 Fowler, S.L., Cavanagh, R.D., Camhi, M., Burgess, G.H., Caillet, G.M., Fordham, S.V., Simpfendorfer, C.A. and Musick, J.A. (comp. and ed.) 2005: *Sharks, Rays and Chimaeras: The Status of Chondrichthyan Fishes. Status Survey*. IUCN/SSC Shark Specialist Group. IUCN, Gland, Switzerland and Cambridge, UK x+461 pp. And references made therein.
- 3 COM(2005)700 Report from the Commission to the Council and the European Parliament on the operation of Council Regulation (EC) No 1185/2003 on the removal of fins of sharks on board vessels.
- 4 Anon. 2003: Conversion Factors for Shark Fin to Shark Body Weight IUCN / SSG Website on Shark Finning <http://www.flmnh.ufl.edu/fish/organizations/ssg/finconversion.html>

## Allocating fisheries – what lessons for Europe?

An international conference, *Sharing the Fish 06*, was held in Australia from 26 February - 2 March 2006. The conference addressed the difficult question of how fisheries managers and policy makers can consider, undertake and implement the allocation of fish resources to ensure their sustainability. This was considered across jurisdictions, and across and within sectors.

Discussions covered more

than just national commercial fisheries, but also considered recreational and indigenous fisheries and strengthening RFMOs to promote better high seas fisheries management. There were therefore important lessons for fisheries policy makers and managers at all levels, including those in the EU and those tackling IUU fishing.

The conference was dominated by New Zealand, Australia and other developed

countries, where the institutional and cultural contexts are often much simpler than in the EU. Nonetheless, the European Commission was represented at the conference, reflecting the growing interest in rights based fisheries management in the EU. While it was recognised that that solutions are case specific, it was also stressed that there is a need to share lessons and draw on case studies.

The *Sharing the Fish 06* Conference was hosted by the Western Australian Department of Fisheries in cooperation with the Food and Agriculture Organization of the United Nations and supported by the Australian Government Department of Agriculture, Fisheries and Forestry and New Zealand Ministry of Fisheries. Papers and proceedings can be accessed at <http://www.fishallocation.com/>

## State and Outlook of Europe's Fisheries

The third 'State of the Environment' report, published in November 2005 by the European Environment Agency (EEA), concludes that while some improvements in fisheries in Europe have been observed since its previous report in 1999, the overall condition remains grim. The comprehensive examination of Europe's environment concludes that fishing continues to be the main threat to the marine environment, with Europe's fish stocks unsustainably depleted, leaving many commercially important species at risk and ecosystem structures under threat.

The majority of the

commercial stocks in European waters remain unassessed, and of those which are assessed, 22-53 per cent are outside safe biological limits, depending on the region. This compares with the 1999 situation of 33-60 per cent. Positive observations included signs of recovery of herring and swordfish stocks as well as improved conditions in the pelagic and industrial species. Conversely, almost all round fish have declined and bluefin tuna catches remain unsustainable.

Despite a fall in size and capacity of the EU fishing fleet, 19 per cent reductions in power and 11 per cent in tonnage, new technology and

government subsidies have continued to undermine conservation efforts. The effectiveness of the new vessel entry/exit rules under the CFP reform in place of the multi-annual guidance plans (MAGPs) scheme remains to be seen.

The rapid growth in aquaculture in the past decade, rising from 1 million tonnes to 1.8 million tonnes (1990 to 2001), has increased pressure on the adjacent water bodies and associated ecosystems, primarily as a result of nutrients, antibiotics and fungicides discharge. However, published data on nutrient loadings to coastal waters remains poor, making it difficult

to accurately determine the environmental impacts. Policies governing aquaculture are also considered particularly weak with no clear guidelines addressing production levels or discharge. The EEA points to the CFP and the water framework Directive as a basis of improving the management of the industry.

*The European environment - State and outlook 2005*, published by: EEA (European Environment Agency) OPOCE (Office for Official Publications of the European Communities) Available from: [http://reports.eea.eu.int/state\\_of\\_environment\\_report\\_2005\\_1/en](http://reports.eea.eu.int/state_of_environment_report_2005_1/en)

# Participation in Practice

Heather Squires  
Invest in Fish South West

*Invest in Fish South West, a project based in the south west of England, is working to sustain fish stocks for all interest groups – local communities, the regional economy and the environment. At a time when many are grappling with what stakeholder participation means in practice, the project offers many lessons.*

Through the *Invest in Fish South West* initiative, launched in April 2004, commercial and recreational fishermen, environmental NGOs, statutory agencies, fish merchants, fish processors, and restaurateurs are working together to establish the best way forward in the region's fisheries management. Abundant fish stocks, thriving communities, and healthy seas – with this overall goal the steering group has devised a process, culminating in late 2006 with a strategy for fisheries management for the Southwest of the UK, to be endorsed by all major interest groups.

This creative process includes developing a credible mechanism for participation by interest groups and the wider public, while integrating scientific, practical, and other sources of knowledge.

The project is designed around three phases: listening and gathering information, evaluation of fisheries management options, and establishing the best ways forward. This has been broken out into five key areas of work:

- Technical data on the socioeconomics, biology, and ecology of the Cornish and South West England fisheries. This includes technical collaboration with Ireland, Spain, and France;
- Development of a transparent, integrated assessment tool – the bio-economic model – to evaluate the costs and benefits of the options generated through the consultations and based on the data collected.
- Development of fisheries management options through extensive consultations. A community liaison officer works as a bridge between interest groups and technical experts, and assists stakeholders with their articulation of preferred options.
- Evaluation of the fisheries management options and agreement on the preferred options for the region. This involves not only a technical discussion, but an overall consultative process for dealing with uncertainty, risk, and disagreement. Options generated may have social and cultural implications for the wider community, and these implications must be considered and discussed.
- Communications within and between interest groups. This is essential as understanding and trust must be built and maintained if the project is to develop meaningful solutions. It is also essential for building support in the local community and beyond. This will enhance the prospect for subsequent implementation.

## Progress, Challenges and Outlook

*Invest in Fish* has made some notable achievements. In terms of gathering information, a liaison officer has articulated with commercial fishermen their perspectives on the state of fisheries and management options. Studies have been done into the contribution of



Credit: Malcolm MacGarvin

The fishing industry is worth £165 million a year to the south west of England and directly employs 1,800 people.

recreational angling to the region's economy; into the realities of current EU fisheries policies and their implications for *Invest in Fish*; and into sea mammal by-catch.

The steering group, and their representative organisations, have engaged in a process to articulate their shared values which will underpin decisions made in the project, and have designed a process for reaching consensus. Public consultations, and meetings with specific interest groups, have taken place to highlight concerns as well as possible management options. The bio-economic model is currently being ground-truthed through verification meetings and through an international advisory panel, and will soon be used in first level scenario and trend discussions with groups to test out their recommendations.

Project learning which incorporates changing internal and external realities is important to the overall success of the project. Emerging fisheries policy at the domestic and international level requires sensitivity and awareness to ensure a fit for the project's recommendations. Ongoing dialogue with diverse stakeholder groups, including the general public and with representatives in neighbouring fishing nations is also critical if workable options are to be taken up and supported broadly. Final decisions will need to be fair, transparent, and sensitive.

If this pilot project is successful, it will provide an example for similar regional initiatives elsewhere in the UK and in other parts of Europe, including the emerging Regional Advisory Councils (RACs). It is expected that the bio-economic model will assist the RAC for this region in its technical discussions.

I The steering group consists of representatives from CFPO, SWFPO (both fishermen's organisations), WWF, English Nature, Cornwall and Devon Wildlife Trusts, National Federation of Sea Anglers, Marks & Spencer (UK retailer), Moshi Moshi (sushi bars), Falfish (processors).

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## Advice on marine ecosystems: keeping up with demand



*Gerd Hubold took over from David Griffith as General Secretary of ICES on 1 February 2006. Here he outlines how ICES is evolving to face the growing challenges of proving advice on marine ecosystems. Transparency, stakeholder involvement and the maintenance of ICES's scientific integrity are top of the agenda.*

Marine ecosystems are increasingly affected by human activities. Limiting possible damage and making human activities more sustainable is the complex task of policy makers and managers who, in turn, rely on scientists for advice on which to base their decisions. In the Northeast Atlantic Ocean, the main international organisation providing advice on the status of the marine ecosystem is ICES, the International Council for the Exploration of the Sea. ICES advice covers virtually everything in the sea, from identifying closed areas to protect coldwater corals, to advice on how to reduce the number of marine mammals that are caught in fishing nets. Advice is also produced on contaminant levels in the sea such as mercury and PCBs (polychlorinated biphenyls). One of the big yearly tasks is determining the status of Northeast Atlantic commercial fish stocks and producing advice on the management of the associated fisheries.

Translating science into advice is a difficult job. This has become even more challenging with the shift in focus towards an ecosystem based approach to management of fisheries, as now set out under the Common Fisheries Policy (CFP) for example. This means, for example, that managers now want to know not just how many fish there are but what impact fishing is going to have on the wider marine ecosystem. In response, ICES has restructured its Advisory Committee system to be able to provide ecosystem advice. It is also currently reviewing the structure of its Expert Groups - there are more than 100 Expert Groups which pull together knowledge from 19 ICES member countries on themes which range from physical and chemical oceanography, phyto- and zooplankton, fish ecology, marine mammals, and seabirds

to habitat mapping, effects of sediment extraction, introduction of alien species and the regular assessment of commercially targeted fish stocks. The scientific results of these expert groups are then translated into practical advice. This advice passes through a system of peer review and quality checking to guarantee the highest possible integrity. ICES has also introduced a fast-track advice system to respond to urgent requests for advice - again something the European Commission and EU Member States increasingly call for following CFP reform.

As well as restructuring itself to respond to the rising demands for advice, ICES is also opening up its doors to the outside world in a push for greater transparency and credibility. As one example, the ICES website is now a huge, virtual library. It includes information on the latest developments in marine science, filed as pdfs under the different Expert Groups and Committees. ICES has also opened up access to the Advisory Committee meetings to observers from client commissions, such as the European Commission, and accredited non-government organizations (NGOs) and Regional Advisory Councils (RACs).

ICES is constantly improving the quality assurance and transparency of data, assessment methods, and internal and external review processes to guarantee the high quality and independence of ICES advice for the future. In a world where lobbying organisations are in a constant state of competition to sway public opinion, the real value of ICES is that it is independent, non-political, and sticks to the scientific facts.

### About ICES

*ICES was set up in 1902 by a group of foresighted scientists who wanted to create an organization that would bring international scientists together. The founding members, which included the explorer Fridtjof Nansen, were concerned about the state of fish stocks and the amount of research duplication going on in different countries - and they felt that they were missing the big picture of what was going on in the sea. So ICES was set up, and now more than a century later, it is a modern, intergovernmental organization, based in Denmark, with 19 member countries and a community of more than 1600 marine scientists. ICES' main roles are to coordinate and promote marine science and produce unbiased advice to governments and commissions.*

Contact: Dr. Gerd Hubold, General Secretary International Council for the Exploration of the Sea, H. C. Andersens Boulevard 44-46, DK-1553, Copenhagen V, Denmark. Tel: +45 33386701; Fax: +45 33934215; e-mail: Gerd@ices.dk; <http://www.ices.dk/aboutus/ghubold.asp> , Dr. Hubold is fisheries scientist and marine ecologist and has worked in the North Sea, in the South Atlantic, and in polar ecosystems of the Arctic and Antarctic. He was formerly the director of the German Federal Research Centre for Fisheries in Hamburg.

## IIEP Fisheries Programme Developments

IIEP is continuing to contribute to Europe's marine and fisheries policy developments. Indrani Lutchman joined IIEP as a Senior Fellow to Head the Sustainable Fisheries Programme. She is a marine biologist and fisheries scientist with 18 years of experience in designing and managing European, Caribbean, Antarctic

and the United Kingdom projects and has contributed to policies, international treaties and multilateral environmental agreements. She has extensive knowledge and experience of working at a diplomatic level, within RFMOs, NGO networks and with the fishing industry.

We have secured funding from the Esmée Fairbairn

Foundation, a UK foundation. This will cofund our Sustainable Fisheries Programme for the next two years, including the production of El Anzuelo. We will focus on building consensus around the use of marine protected areas (MPAs) for both fisheries and environmental management purposes in the EU. This will include an

evaluation of the use of MPAs and the development of a toolkit with and for European practitioners.

We look forward to working with our partners in industry, government and the non-government sectors and welcome comments or contributions. Further details are available at the IIEP website [www.iiep.org.uk](http://www.iiep.org.uk)



Apart from acting as a source of independent information on fisheries and the environment, *El Anzuelo* aims to present different perspectives on the issues, and thereby encourage discussion and debate among the various players. If you wish to respond to material included in this or the previous issue, we would be happy to hear from you.

## Implementing rules for the EFF: will they deliver for sustainable fisheries and the environment?

Tatiana Sutiakova and Euan Dunn  
BirdLife International

■ While the Council has been failing to reach an agreement on the final text of the European Fisheries Fund (EFF), the Commission services have already been working on Implementing rules for the Regulation. The preparation of these rules falls under the Management procedure (Article 4 of Decision 1999/468/EC) which means that a Commission proposal is being discussed and will be adopted by a committee composed of representatives of the Member States.

This guidance takes on special significance given that, while the amount of money in the EFF programme has still to be formally agreed, early indications are that available funding outside convergence areas will be approximately half of that available through Financial Instrument for Fisheries Guidance (FIFG). Member States are likely, therefore, to be highly selective in how they target their EFF allocation to projects. In turn, this raises concerns that the innovative EFF Priority Axes (especially 3 and 4), as reflected in the proposed impetus towards environmental integration and supporting small-scale fisheries, will not be expressed in how EFF funds are deployed nationally, presenting a serious risk of 'business as usual'. It is vital that due consideration is given to Axis 3 covering measures of common interest as this can deliver initiatives to protect and develop the marine environment.

Against this background, the Implementing rules – through the established criteria and detailed

provisions – should seek to make the EFF support better-focused and targeted and hence contribute more effectively to sustainable fisheries, environmental protection and quality of life in fisheries areas. As there is no public consultation envisaged, BirdLife International would make the following key recommendations. In our view, the Implementing rules should:

- make clear reference to the need to interpret sustainable development in its widest sense of ensuring that environmental as well as social and economic considerations are taken into account, and that all these are underpinned by a sound system of governance. Interpretations of sustainable development that deviate from this and prioritise the profitability of the sector should be challenged.
- include a provision requiring Member States to indicate in their Operational Programme how they are going to use the EFF to contribute to managing fisheries in relation to maintaining the Natura 2000 network as required by the Communication from the Commission to the Council and the European Parliament: Financing Natura 2000 (COM(2004)431).
- make clear reference to the need for all funded measures in Natura 2000 sites to be subject to mandatory impact assessment, as per the habitats Directive (92/43/EC) and introduce 'Cross-compliance' with environmental Directives, with explicit linkage between access to EFF funding and compliance with the habitats Directive, birds Directive, water framework Directive and EIA Directive.

- specifically recognise environmental NGOs as an appropriate body to be consulted and involved and set clear guidance as to the fair representation of stakeholders, and to incorporation of their inputs into the programming process.
- state that any support for development of tourism activities is conditional on respecting Community standards and other relevant mandatory requirements established at national level (especially on environmental protection), applicable to the infrastructure concerned. In Natura 2000 areas, how tourism activities would affect the achievement of biodiversity conservation objectives should also be assessed according to Art 6(3) of the habitats Directive.

In conclusion, the EFF has the potential to make a major contribution to the sustainable development of Community fisheries and sustainable management of Natura 2000 sites. The Implementing rules should ensure that EFF funds are used in a truly sustainable way and do not compromise the objectives of the environment policy, indeed they should seek to positively enhance them. A robust system of involving civil society in the drafting of Operational Programmes and their implementation is needed to deliver on these goals at national level.

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IEEP is an independent body for the analysis and advancement of environmental policies in Europe. While a major focus of work is on the development, implementation and evaluation of the EU's environmental policy, IEEP has also been at the forefront of research and policy development in relation to the integration of environmental considerations into other policy sectors.

This newsletter is part of IEEP's sustainable fisheries programme, which aims to identify, develop and build a consensus around alternative approaches to fisheries management. It is sent free of charge to key practitioners in the Member States of the EU and in acceding countries. If you would like to subscribe to *El Anzuelo* please send your details by mail, fax or email to: Annie Glynn, IEEP, 28 Queen Anne's Gate, London SW1H 9AB, UK. Fax: +44 (0)207 799 2600; email: [fisheriesupdates@ieeplondon.org.uk](mailto:fisheriesupdates@ieeplondon.org.uk). While production is moving towards an electronic publication, please specify whether you wish to receive *El Anzuelo* by post.

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