Environmental Pillar
OF SOCIAL PARTNERSHIP

Environmental Pillar of Social Partnership
Ireland

Submission on the European Commission Green Paper COM(2009)163 final, on the Reform of the Common Fisheries Policy

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1.0 Introduction

This submission looks at each of the five structural failings of the current Common Fisheries Policy (CFP), as identified in the European Commission's Green Paper on the CFP Reform, and provides recommendations as to how to address these failings. The Environmental Pillar has also identified three additional areas that must be fully integrated into the future CFP, being the establishment and protection of Marine Protected Areas, integration of climate change considerations and the full integration of aquaculture into the 2012 CFP.

The Environmental Pillar Vision of the future CFP

The Pillar Vision of the future CFP has as its main and primary objective the protection and conservation of the marine ecosystem, building resilient, healthy and diverse seas which leads to restoring the balance between fishing effort, fish stocks and the wider marine environment. To achieve this, the future CFP has to have an unconditional commitment to apply an ecosystem approach to fisheries management, incorporating a robust application of the precautionary principle. The reformed CFP has a stated obligation to achieving 'good environmental status' of all Community Waters in line with the Marine Strategy Framework Directive as well as maintaining and improving the ecological status of Natura 2000 and other merging MPAs networks.

This submission was developed using the Environmental Pillar processes but is not necessarily the policy of each member group in the pillar.

2.0 A Deep-rooted problem of fleet overcapacity

The Commission states that the European fleets remain far too large for the resources available and this imbalance is at the root of all problems related to low economic performance, weak enforcement and overexploited resources. The Commission also stresses that the future CFP must have in-built mechanisms to ensure that the size of European fishing fleets is adapted and remains proportionate to available fish stocks. This is a pre-requisite for all other pillars of the policy to work (European Commission 2009:8). The Environmental Pillar strongly agrees with the Commission on the above statement. However, in order to address overcapacity, the definition of capacity must be clearly defined. It is currently unclear whether capacity refers to the fishing effort, the combined engine power of each vessel within the fleet of a Member State or the total number of vessels within each Member State.

The Environmental Pillar recommends that the capacity of a vessel is defined by a combination of its gear size and the vessel's engine power, as the pillar considers that this equates to its catching capacity

In addition, the Environmental Pillar strongly recommends the following:

- All subsidies that aim to increase fleet capacity must instantly be halted and removed. The European Fisheries Fund Guidelines must be amended to omit any support for new vessels, modernisation of vessels and capacity enhancing support, except as outlined below. In addition, all fuel subsidies must be removed immediately.

- Instead, subsidies should be redirected to schemes that aim to:

    - Increase environmental protection though the establishment of Marine Protected Areas,

    - Increase onboard monitoring and monitoring technologies,

    - Increase the observer programme to include additional monitoring of biodiversity data and monitoring of biodiversity indicators which is critical for the implementation of an ecosystem based fisheries management.

    - Support participation of all stakeholders in policy engagement and RAC meetings. Our Marine resources belong to all, not simply the fishing industry.

    - Increase the safety measures on board,

  - Provide financial support for the introduction of selective fishing gear, and fishing technologies that favour resource selectivity, and quality rather than capacity.
  - Redeployment of vessels from fishing activity to research, ecotourism, environmental protection and monitoring purposes.
  - Support for socio-economic measures such as alternative employment for the fishing community, training and up-skilling of fishermen for new and alternative sustainable industries.
  - Support towards research on sustainable fisheries management and biodiversity indicators.

- Ambitious, legally-binding and time-bound targets for reducing European and national fleet capacity must be introduced as soon as possible. The targets should be tailored to each of the different fleet segments. Non-compliance of Member States must be legally addressed.
- In addition, policies must be integrated that ensure that the remaining fleet structure is compatible with sustainable fishing by applying qualitative criteria, notably ecological footprint in relation to gear type and reduced/low fuel consumption - the fleet must contribute to CO_2 reduction.

3.0 Imprecise Policy Objectives resulting in insufficient guidance for decisions and implementation

The Commission identifies that the current CFP lacks clear indicators and yardsticks that could provide more concrete guidance or to help measure policy achievements. The Commission also recognises that economic and social sustainability requires productive fish stocks and healthy marine ecosystems. The economic and social viability of fisheries can only result from restoring the productivity of fish stocks, and frequently economic and social short-term pressures clash with ecological sustainability objectives.
The Environmental Pillar fully supports the Commission's statement that ecological sustainability is a basic premise for the economic and social future of European fisheries. (European Commission 2009:9).

The Environmental Pillar recommends that:

- Since environmental sustainability of fish stocks is a necessary pre-condition for long-term economic and social sustainability, the objectives of the CFP must be prioritised accordingly. The Objectives in the Framework Regulation of the CFP must therefore be revised to state explicitly that the ecological and conservation goals of the CFP will be set as the priority objective.

- An ecosystem-based approach to fisheries management, incorporating robust application of the precautionary principle must be fully integrated and applied to a reformed CFP and must be defined in an *operational* way. The CFP should outline and formalise the processes required at the regional sea level to deliver an ecosystem-based approach. This calls for a holistic approach, incorporating the current Recovery Plans and Long Term Management Plans for stocks (see Appendix I). Such an approach should develop and implement regional, stakeholder-led strategies for tackling issues such as the elimination of bycatch and discards of fish, seabirds and other marine wildlife (notably through more selective fishing practices and surveillance by observer programmes), making fisheries-licensing conditional on Environmental Impact Assessments, and restricting or banning fisheries in areas of high conservation value, including for fish stock restoration.

- A revised CFP must have stronger provisions and clear strategies to: eliminate the catching and discarding of unwanted fish and other species like birds and cetaceans; protect juvenile and spawning fish; and establish protections for critical or sensitive habitats. Selective fishing methods must be prioritised over non selective fishing methods. See Appendix II for specific recommendations on selective fishing methods.

- The current TAC allocation system must be revised. See Appendix III for further details.
- Biodiversity indicators must be defined and guide the decision making.
- The objective of the European Union's Marine Strategy Framework Directive[1] (adopted in June 2008) must be fully incorporated into the primary objective of the reformed CFP. The objective of the Marine Strategy Framework Directive is to protect more effectively the marine environment across Europe. It aims to achieve good environmental status of the EU's marine waters by 2021 and to protect the resource base upon which marine-related economic and social activities depend.
- The CFP must fully integrate all relevant EU Environmental Directives, such the Habitats and Birds Directive. The EU Biodiversity Action Plan must be streamlined into the CFP and certain action plans such as the Sea Bird Action Plan must be integrated into the CFP.

[1] Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for community action in the field of marine environmental policy (Marine Strategy Framework Directive) Link: http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:164:0019:0040:EN:PDF

4.0 A decision-making system that encourages a short-term focus

The Commission ascertains that the current decision-making framework of the CFP has led to a focus on short-term considerations at the expense of the longer-term environmental, economic and social sustainability of European fisheries.
The Environmental pillar concurs with the conclusions made by the Commission regarding the current decision making framework. The Environmental Pillar recommends that the decision making structure of the current CFP is completely reversed and models of regional governance should be explored.
The Council of Ministers and the European Parliament (under a ratified Lisbon Treaty) should focus on the overarching vision and objectives of a common fisheries policy, whilst fisheries management decisions, such as fishing allowances and technical measures, must be left to independent bodies such as the Commission, Scientific bodies or new bodies.

More precisely the Pillar recommends that:

- The determination of fishing allowances must be made by relevant independent scientific bodies, based on the ecosystem-based approach and the precautionary principles.
- The advice of the scientific bodies should be coordinated with the European Commission and should be legally binding to the relevant management bodies making subsequent decisions.
- The appropriate management bodies should always involve all relevant stakeholders through a participatory process.
- The role of the Regional Advisory Councils (RACs) needs to be strengthened, and they need to be allowed to engage more formally with third parties. RACs also require more funding resources to enable them to better translate stakeholder knowledge into policy advice and allow stakeholder participation from smaller organisations such as NGOs and small fishermen communities. Without increased support and capacity, RACs will not be in the position to take a stronger role within a system of devolved governance. However, RACs are envisaged as maintaining a strictly *advisory* role within any new, regionalised management framework.
- Total Allowable Catches (TACs) and quotas must be set so as not to exceed the levels recommended by the competent scientists (i.e. ICES). Only scientifically-capped limits will prevent further over-fishing of fish stocks. With catch limits 'locked in' by this empirical approach, there is no need for Ministers to have the final decision which can thus be delegated to the Commission in cooperation with Member States. See Appendix III for further recommendations on TACs.

5.0 A framework that does not give sufficient responsibility to the industry

In a mostly top-down approach, which has been the case under the CFP so far, the fishing industry has been given few incentives to behave as a responsible actor accountable for the sustainable use of a public resource.

The Environmental Pillar believes that the fisheries sector has benefited for too long from a common good without carrying the responsibility of 'maintaining' that common good, and managing the fisheries in a sustainable manner. This has been to the detriment of both present and future generations of fishermen and women as well as other sectors depending on the marine environment.

The Environmental Pillar advocates that the following recommendations are implemented:

- Public money must be for public goods. Make access to public financial resources conditional on compliance with the CFP and other relevant EU and international policies, including the Birds and Habitats Directives. Penalise Member States (notably by withholding or withdrawing European Fisheries Fund-EFF aid) who fail to meet such cross-compliance.
- Integrate EU environmental legislation, like the Habitats Directive and the Marine Strategy Framework Directive, into the management of fisheries, in order to guarantee Member States can identify protected areas by 2010 and achieve Good Environmental Status in their waters by 2020. .
- Fisheries management decisions should be taken at the most local level possible to overcome the current centralised and micro-managed decision making structure. A system, in which fishermen co-manage stocks with the involvement of all stakeholders, such as fisheries managers, scientists, NGOs, retailers, processors, and consumers should be devised. This system gives responsibility for the management and preservation of the fish stocks and their marine environment to the fisheries sector and will result in greater compliance of fisheries management measures.
- Ensure that the same conservation and management standards are applied to the EU fleet wherever it operate, inside or outside Community waters.

6.0 Lack of political will to ensure compliance combined with poor compliance by the industry

The Environmental Pillar agrees with the Commission's analysis of a weak fisheries control regime and low compliance of the sector.

The Environmental Pillar recommends that:

- Regulations on the modification of boats must be stricter. Any modifications made to a vessel must be logged. All maintenance and construction of rigging to be logged in a boat's history.

- Obligatory seals on fuel engine pumps to stop the practice of adjusting engines to use more fuel must be introduced. The fuel pumps are often adjusted to increase the kilowatt output of the engine. There are two reasons to introduce a tamper proof seal to fuel engine pumps, the first relating to safety and fire by overheating and the second relating to the accurate measurement of fishing effort.

- A procedure, similar to that of a NCT test for cars, should be introduced for operating fishing vessels. An annual inspection of vessels by an approved marine engineer, and random check-ups must be introduced. Inspectors must check any modifications made to the vessel, check seals on engine pumps and must ensure that the vessel is fit for operation as well as in line with all onboard safety requirements.

7.0 In addition to the priorities listed by the Commission in the Green Paper, the Environmental Pillar proposes that the following should be added:

7.1 Marine Protected Areas

Marine Protected Areas (MPAs) are not mentioned in the Green Paper despite the EU being a signatory of the OSPAR convention, which stipulates that by 2012 a comprehensive network of MPAs should be established. MPAs are defined as coastal or offshore marine areas that are managed to protect natural and/or cultural resources (IUCN-WCPA 2008). When appropriately placed and well-managed, MPAs contribute to:

- Conserving biological diversity thereby protecting ecosystem structure and functions.
- Protecting critical spawning and nursery habitats, protecting the genetic variability of exploited species, thereby allowing for fish stock recovery which will improve fishery yields in the long term.
- Protecting sites and allow for recovery from past damage such as bottom sea trawling.
- Serving as stepping stones for migratory/dispersive species.
- Protecting settlement and growth areas for marine species and spill-over benefits to adjacent areas.
- Focal points for educating the public about marine ecosystems and human impacts upon them and increasing our understanding of marine biodiversity
- Nature-based recreation and tourism.
- Providing undisturbed control or reference sites that serve as baselines for scientific research and for designing and evaluating other areas.
- Providing other direct and indirect social and economic benefits, such as attractions for tourists, by providing benefits to traditional users of biodiversity, or preserving reefs or kelp beds which prevent wave erosion of the shore or shelter moorings.
  (CBD 2004;ICUN 2008; Johnson et al. 2008)

MPAs also have direct benefits for the fisheries sector such as:

- producing fish of exploitable size, which then directly disperse "spill over" into the surrounding area where they become available to fishers;
- producing more offspring (from a greater density of breeding adults within MPAs) which are then dispersed by currents to eventually recruit into surrounding fisheries;

- providing information that is necessary to make regulatory decisions about controls (e.g. measures of natural mortality, reproduction, maximum size, trophic interactions, etc.);
- providing insurance against resource management mistakes outside of MPAs by providing a refuge from the collection of organisms (e.g., corals, sponges, aquarium fish), and from fishing and making overfishing more difficult;
- providing insurance by preserving populations that can accelerate stock recovery in cases of recruitment failures from either overfishing or natural disasters;
- protecting key habitats or life-stages from fishery related damage (e.g. protecting critical spawning and nursery habitats, vulnerable juveniles, and spawning adults);
- protecting the genetic potential of populations from detrimental effects of selective fishing; and
- helping to develop biodiversity indicators for good ecological quality. (CBD 2004)

7.2 Aquaculture

In April 2009, the Commission issued a communication on its strategy for the sustainable development of European Aquaculture[2].This strategy aims to provide EU leadership and guidance to both stakeholders and administrations to ensure consistency and clarity in designing the policies needed for the sustainable development of European aquaculture. The strategy sets out a number of objectives and instruments designed to turn the EU aquaculture challenges into opportunities.

The Environmental Pillar recognises the global growth in the aquaculture sector and the need for an EU wide policy that sustainably promotes as well as regulates this expanding sector. Because of a strong global competition in this sector, the industry is pushing for short term measures that will boost the EU aquaculture sector. However, this sector is currently loosely regulated and can have far fetching impacts on water quality and the wider marine ecosystem. The sector must work towards achieving the aims and objectives of the Water Framework Directive as well as that of the Marine Strategy Directive. The interlinkages between the aquaculture sector and the wild fisheries sector cannot be ignored and the CFP should be a mechanism to pull these together. Therefore, the Environmental Pillar strongly advocates for the full inclusion of the EU aquaculture strategy in the 2012 CFP.

Matching aquaculture development with environmental enforcement

In the document "*Building a sustainable future for aquaculture - A new impetus for the Strategy for the Sustainable Development of European Aquaculture*" the emphasis is clearly on development rather than sustainability. Even where the paper refers to communication with stakeholders, these are the industry and regulators talking amongst themselves, with little reference to the legitimate concerns of the wider community, and the wide range of other stakeholders in the marine environment.

The impacts of intensive aquaculture development have been and continue to be profound, both within the EU and globally. This is the case with respect to shellfish and finfish, albeit with different consequences. In the case of salmon farming we see:

- A demonstrable decline in the sea trout population resulting from the proliferation of sea-lice [*Lepeophtheirus salmonis*] from marine-based farms on migratory salmon routes and within bays and estuaries supporting sea trout;

- Significant impact on water quality resulting from surplus feed and from faeces, contributing material quantities of N and P to the water body;

[2] Communication from the Commission to the European Parliament and the Council. "*Building a sustainable future for aquaculture. A new impetus for the Strategy for the Sustainable Development of European Aquaculture*". COM (2009) 162 final. Brussels, 08.04.2009

- Use of chemicals and pesticides to control sea-lice [e.g. ivermectin; emamectin], anti-biotics to enhance growth; artificial colourants to change flesh colour [astaxanthin] is poorly regulated and enforced.
- Impacts of sea-lice treatments on species such as lobsters, scallops and other crustaceans are poorly researched, despite strong anecdotal evidence of deterioration in bays where such treatments have been applied.

In the case of shellfish there is a range of impacts, due in part to:

- under-regulation:
- Poor enforcement;
- inappropriate locations for aquaculture installations, such as within indigenous oyster fisheries;
- introduction and settlement of alien invasive species, notably *crassostrea gigas* [Pacific oyster]; failure to protect species such as *ostrea edulis* [indigenous or "flat" oyster];
- Poor site management, which has allowed operators to abandon sites and allowing debris such as flotation buoys to drift out of control, imposing navigation hazards, while trestles for cultivation of crassostrea edulis have been allowed to rust and deteriorate in the inter-tidal zone;
- Tolerance and failure to control settlement and breeding of crassostrea gigas is endangering species such as indigenous oyster and mussels.

The orientation of the regulators and of the industry is evidently towards the protection of the environment FOR the aquaculture industry. There is inadequate weight attached to the principle of protecting the environment FROM aquaculture. If the aquaculture industry is to continue its growth, lessons must be learned from the uncontrolled growth of invasive shellfish in areas such as the Waddensee, where *crassostrea gigas* settlements have formed impenetrable clusters reminiscent of giant carbuncles, destroying habitats for indigenous species. In Chile, where outbreaks of infectious salmon anaemia (ISA) have devastated the coastline, a wide and deep footprint of abandoned installations has altered the marine environment to a possibly irreversible degree. In Norway, the impact of sea-lice on migratory salmon has been recognised, and up to 100 fjords and bays supporting wild salmon rivers have been closed to salmon farming.
The aquaculture sector demands intensive regulation and environmental enforcement, as it requires a public resource to conduct its activities. Within the EU an immediate need exists to match the ambitious development targets with equally

ambitious environmental standards. The CFP Green Paper is wholly inadequate in this regard, and falls far short of the Precautionary Principle.

7.3 Climate Change

The Green Paper omits any reference to climate change. The Environmental Pillar advocates that climate change considerations are fully integrated into the CFP. Viz:

- Include climate change predictions into the all scientific advice regarding fish populations. Climate change is very likely to impact on the distribution and number of fish species in European waters. This must be taken into consideration in fisheries management plans and in the TACs. The UN FAO has warned that fishery Managers must take climate change into account.

- The Carbon footprint of the fisheries sector can no longer be ignored. A Carbon levy should be introduced to the most carbon intensive fishing methods. A carbon emissions trading system for the fisheries sector should be explored.

8.0 References

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Appendix I Implementation of long-term management plans

To date only 17 of the 96 EU stocks are covered either by recovery or management plans. The quality of the different plans has varied considerably (WWF 2009). While some have brought about improvements, others have been criticised for failing to be precautionary enough. Critically most plans to date have been stock specific rather than addressing fisheries that often catch a range of species. For instance, in the cod recovery plan a larger numbers of days at sea were allowed to smaller mesh fisheries not targeting cod, such as Norway prawn fisheries as an effort limiting method for recovering cod fisheries (MRAG 2009). This led to a shift in effort to such fisheries, which take a significant bycatch of cod and in turn to a consequent increase in the proportion of bycatch cod taken by them.
Well designed mandatory long term management plans must be introduced under the new CFP for all EU fish stocks. These management plans would allow the management of fisheries on a multi annual basis in line with the precautionary principle and an ecosystem based approach. The long term management plans must:

- Develop targets that are specific, precautionary and measurable. Harvest control rules must be the element of all plans. The key to success of the plans will be the criteria and their implementation.

- Establish clear time frames with deadlines by which to meet management targets be they operational, data collection or assessment. This will assist in the delivery of targets and provide a guiding structure for implementation.

- Be fisheries (or region) based instead of stock specific**.** This is a major change from what is happening at present, and will be one of the main issues to address but is essential if we are to take an ecosystems approach.

- Take into consideration predicted climate change impacts. Fish populations must be rendered more resilient to climate change impacts. Reducing impacts on by-catch and habitats will increase biodiversity resilience. In this regard mixed stock fisheries offer more protection to the industry than reliance on a single stock, or species.

- Appropriate stakeholder groups need to be established, as well as a means of co-ordination at a Regional level. Plans need to be agreed, implemented and reviewed by balanced stakeholder groups, which should include government managers,

scientists, industry (processors as well as catching sector), control agencies and NGOs.

- Description of the fisheries must be made clear, this should include vessels, gear, species, economics (revenue, management costs), employment, recreational interests.

- Plans must be ecosystem based – they need to introduce impact assessments, taking account of a wide range of impacts on target and non target species (including non fish species) in addition to habitat, as well as the impact of other fisheries/activities on the target species within a fishery.

- Plans must incorporate existing national and EU environmental laws, such as the Habitat and Birds Directive and the Marine Strategy Directive.

- Management must be based on total removal and overall impact rather than landings.

- Analysis and risk assessment must be used to address poor fisheries data and allow precautionary quotas to be set.

- At multi Member State level, the plans will need to establish targets other than simply stock and will be informed by the impact assessment process. These could include discard mitigation plans, by-catch reduction plans, habitat protection strategies.

- The fisheries should be assessed for overcapacity which if identified should require a strategy to bring it into line with resources.

- Periodic reviews need to be build into the plans to allow for adjustments to be made in face of new data.

To make those long term plans successful, the reformed CFP should:

- Introduced a mandatory requirement for all European fisheries to be managed by long term management plans by 2015.

- Set clear actions for failure to develop plans within the required time period and introduce penalties for failure to comply with plans once agreed.

- Effective monitoring and control requirements must be devised to ensure the success of the long term management plans.

- Set clear criteria as to what must be included in the development and implementation of plans.

- Set high level sustainability objectives for the plans.

All relevant stakeholders must be included in the design of each long term management plan, in order for it to be successful.

Appendix II Stronger provisions to phase out non-selective fishing methods

A revised CFP must have stronger provisions and clear strategies to eliminate the catching and discarding of unwanted fish and other species like birds and cetacean, protect juvenile and spawning fish and establish protections for critical or sensitive habitats. More specifically:

a) Ban the use of two nets for trawling. Trawling is damaging to the seabed and it results in large quantities of juvenile fish by-catch. Limiting each boat to a single net of a defined maximum size would reduce the destruction of benthos (the organisms and habitats of the sea floor) and the by-catch of juvenile fish. In the case of Nephrops trawls only the use of unmodified prawn nets should be allowed.

b) Minimise the thickness of twine in the cod ends of nets to 6mm, releasing juvenile prawns. The current thickness of twine in cod ends is 8mm and juvenile prawns are trapped in the net. Sustainable fisheries depend on the survival of juvenile fish to reproduce.

c) The harvesting of razor clams is carried out by hydraulic dredging and the techniques used cause considerable incidental damage and disturbance to razor clams (juvenile clams are killed) and associated fauna. Methods to control the damage carried out on the fauna, such as abolishing the prohibition for diving as a method for a more selective and eco-friendly method of harvesting should be implemented. Dredging in designated sites should be banned.

d) Ban trawling in spawning and nursery areas. To ensure the long term sustainability of the commercial fishing sector, there is a need to protect spawning and nursery areas from non-selective fishing methods to protect juvenile fish from being caught. Trawling by its very nature is non-selective and catches and kills large numbers of juvenile fish. Besides the commercial species, Skate and Angle Shark were once widespread in the Irish Sea. These species are now endangered in the Eastern Atlantic.

Trawling in known spawning and nursery areas should be banned with immediate effect. Known areas include sectors JG - 3 miles offshore North East from Balbriggan, IH - East of Lambay and IF - 10 miles North East of Balbriggan. The simple exclusion of commercial nets from inshore spawning and nursery areas would benefit the commercial fisheries in

the long-term with an increase in spawning stock biomass, leading to the recovery of fish stocks. Certain sustainable methods cannot operate where trawling is done (creeling for prawns being an example).

e) Encourage selective fishing methods. Encouraging more selective fishing methods will ensure less by catch and reduced habitat destruction. Hand-line fisheries (fishing with a single fishing line) and selective pot and creel fisheries for crabs, lobsters and prawns are a good example of selective fishing methods. Hand-line fisheries, such as those operating off the Southwest coast of England and the Irish Southeast, emphasise the selectivity and sustainability of this method of fishing, appealing to an educated market, which is looking for the origin of foodstuffs.

Appendix III Revise the current TACs system to incorporate an effective precautionary approach to fisheries management

Year after year, the annual allocation of Total Allowable Catches (TACs) have been set significantly higher than is sustainable or advised by ICES. Between 2003-2008, this was the case for 48% of stocks with the difference between TACs and sustainable catch varying between 43-57%, which has undoubtedly contributed to the poor status of European fish stocks (WWF 2009). The current system of annual allocation of TACs has shown not to lead to sustainable fisheries management.

Some of the issues surrounding the TACs system are that neither allowable catch nor recorded landings reflect actual mortality. TACs set a target for 'catch' which only relates to what is officially landed. Other unquantified elements of mortality arise through (i) bycatches, (ii) discards, and (iii) misreported landings. The incentives for fishermen 'at the point of catch' are inconsistent with the overall objective of sustainable use for the fishery as a whole. In the mixed demersal fishery of most European waters this creates huge wastage of fish through the anomalous incentive for fishers to catch and discard species which have reached their TACs for the year, and only land the most marketable individuals of species which are below the TACs (JNCC 2009).

A new fisheries harvest limit that incorporates the ecosystem and precautionary approaches must be developed in cooperation with scientific research bodies. Each fishery harvest limit should be carefully devised as part of its long term management plan (as mentioned above). In addition, the following points should be considered:

- For all fisheries, review of the need for closer oversight of actual fish mortality, rather than landings. This may involve more effective monitoring of fishing effort at sea - e.g. via broadening the use of vessel monitoring systems;
- Assessing the need to decrease outputs (i.e. lower catch limits), especially for fisheries at the limit;
- Widening the approaches taken towards input controls - e.g. through spatial management using permanent and temporary exclusion zones, or by limiting days at sea;
- The need to develop indicators (both for the fishery and for the wider environment) as a key component providing feedback on the effects of fishing activity;
- Reviewing the responsiveness of existing management structures to different interests;

- For new fisheries, to start small and expand slowly until good scientific data has been collected and to incorporate the use of environmental assessment prior to fishing activity commencing.
- The landing of species designated as being threatened with extinction should be banned. This would include a lot of shark species, Skate and Bluefin Tuna.

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