



The Common Fisheries Policy After 2012

A draft response paper prepared for discussion by the NSRAC

1: Introduction

- 1.1 The European Commission has announced that it will produce proposals for a further major reform of the Common Fisheries Policy during 2011, for adoption by the end of that year and implementation from 1st January 2012.
- 1.2 As part of that process the Commission has initiated a debate on the content of the reforms through a working document entitled Reflections on further reform of the Common Fisheries Policy¹.
- 1.3 A Green Paper is in preparation by the Commission, to be issued around April 2009. This paper will inform the main strands of the debate on the future of the CFP, prior to the preparation of a formal Commission proposal.
- 1.4 It is important therefore for the RACs to ensure that as many as possible of the principal issues of concern are raised at this early stage.
- 1.5 This present paper is an initial contribution to this debate on the future of the Common Fisheries Policy for discussion by the Demersal Working Group of the NSRAC.

2: Present Position

- 2.1 Decisions on how the CFP should change will depend on an analysis of what the CFP has achieved to date, what it has failed to achieve, and the underlying reasons for any lack of performance.
- 2.2 There can be no doubt that the changes introduced during the 2002 review of the CFP have improved fisheries management within the EU. Many fish resources are now harvested under multiannual plans, which was one of the main aims of the reforms. Moves towards a regionalisation of fisheries policy have taken place with the establishment of the Regional

Advisory Councils, and this initiative has led to greater involvement of stakeholders in fisheries management. There has been some integration of fisheries management objectives with nature conservation objectives. Attempts have been made to improve control and compliance. Perhaps the most welcome of these developments, however, has been the stronger engagement of fishers themselves in the process of fisheries management.

- 2.3 It is important not to overstate, as the Commission does in its working paper, the scale of the CFP's failure. The argument that there is still considerable overcapacity of fishing power in relation to the fish resources available is over-emphasised and does not recognise the major reductions in fishing capacity which have taken place in areas like the North Sea. The Commission's unnecessarily pessimistic view of the stocks under the CFP's aegis, and allocation of blame to the Council of Ministers, member states and the fishing industry, may be an over-reaction to the recent highly critical but narrowly focused report by the European Court of Auditors on the CFP.
- 2.4 It must be recognised that the CFP is being measured against constantly shifting criteria. Within a decade or so, the goal of avoiding the collapse of a major commercial stock has given way to the precautionary approach, which in turn has been replaced by a political commitment to achieve maximum sustainable yield by 2015 for those stocks that are currently depleted. This change in the objectives for the CFP has repercussions for both policy makers and the fishing industry.
- 2.5 For better or worse, during the late 1990s North Sea cod took on an emblematic status as a measure of the effectiveness of the CFP. At that juncture biomass was in decline and fishing mortality was at historically high levels. Remedial measures appeared to be ineffective.
- 2.6 By contrast there are now clear signs that North Sea cod is recovering quite rapidly. Although the spawning stock biomass has not yet reached historical peak levels and may not do so because of oceanographic regime shifts, fishing mortality is now greatly reduced and biomass is increasing. Similarly, major stocks such as haddock, mackerel, Nephrops and saithe stocks are all at, or close to desirable long term targets. Other stocks such as North Sea plaice and sole are responding well to management measures and stocks are rebuilding. However, the west of Scotland cod stock and a number of other European stocks have not so far exhibited similar positive trends and are some considerable way outside safe biological limits.
- 2.7 These examples demonstrate that the CFP reform must take place against a background of European fish stocks characterised by very mixed fortunes. The Commission's picture of unrelieved gloom is unduly misleading. Such a pessimistic view, possibly driven by sensitivity to a media generally hostile to the CFP, an environmental lobby, parts of which have a vested interest in exaggerating the woes of the fish stocks and also perhaps, interdepartmental issues within the Commission, have implications for the type of reforms that might be proposed.

3: Failures of the CFP

- 3.1 It is undoubtedly true that the CFP has failed to achieve its objective of a fully sustainable and profitable fishing sector, contributing to the food security of the Union. It is this situation that the reforms must address.
- 3.2 There are several schools of thought on why the CFP has failed to achieve its objectives.
- 3.3 One point of view is that the objectives of the CFP have not been sufficiently clear. There has perhaps been insufficient emphasis placed on the fact that fishing is an economic activity, pursued by fishers who have to make a profit from their activities. It must be recognised that when profits for fishers become elusive or non-existent the CFP is failing.
- 3.4 The second point of view is that the CFP has suffered a failure of political will. The main failures of the CFP can principally, if not exclusively, be attributed to:
 - The repeated failure of the Council of Ministers to set Total Allowable Catches in line with ICES scientific advice,
 - The failure of the member states to enforce control rules,
 - The power of the fishing lobby to secure short term considerations over long term objectives
 - The failure of member states to use the resources available to them to address the problem of endemic overcapacity
- 3.5 This is the point of view adopted by the Commission's working paper Reflections on further reform of the Common Fisheries Policy. The Commission's view is that these problems may be resolved by:
 - Establishing long term management plans, on terms set by the Commission, which will reduce scope for the Council of Ministers to dilute the Commission's proposals when setting TACs.
 - Devolving decision-making powers to the process of 'comitology' where decisions in areas like technical conservation measures would be undertaken by Council working groups, bypassing the Council of Ministers.
 - Suspending access to European Fisheries Funds for member states failing to apply the CFP adequately.
- 3.6 The underpinning themes that run through the Commission's vision are that:

- The whole corpus of ICES fisheries science is largely unproblematic; this is the best available science on which policy should be based
- The Commission can be depended on to make consistently reliable and effective proposals on the basis of ICES science;
- Close scrutiny of Commission decisions (most significantly by the Council of Ministers) is at worst an impediment to good fisheries management and at best redundant.
- Reduction in fleet overcapacity, higher levels of compliance, and quotas consistent with desirable fishing mortality levels will all follow, if the political will is available to tackle them
- If more conventional measures are ineffective, days-at-at sea restrictions can be applied.

3.7 A third school of thought is that the main problems of the CFP lie in poor governance. This is the line taken by many academic writers. It is well expressed in the paper prepared for the Commission by David Symes and Mike Sissenwine to inform the debate on the future of the CFP². It is also the position taken by The Net Benefits report³ produced by the British Cabinet Office in 2004; and originally by the Commission's own CFP Green Paper⁴ produced in 2001.

4: The constraints placed upon the CFP

4.1 At this point it is constructive to consider those constraints which act upon the CFP, and which need to be addressed in setting future objectives for the CFP.

4.2 The NSRAC has identified the following constraints:

- The overall objectives of the CFP need to be clear, with strong recognition that fishing is an economic activity. Attention must be paid to ensuring that fishing is profitable
- The CFP has to manage a very wide range of fisheries, some of them highly complex, ranged across 40 degrees of latitude
- Some of these multi-gear, multi-species and multi-jurisdiction fisheries are among the most complex and therefore the most difficult in the world to manage
- The design and formulation of management measures across these widespread and varied fisheries cannot readily be undertaken by a small group of civil servants based in Brussels.

- Nor can they be managed through a centralised command and control approach
 - The development of very large body of highly prescriptive and complex rules must be avoided
 - A culture of compliance requires a minimum level of legitimacy; inappropriate management measures greatly undermine the legitimacy of the CFP and lead to poor compliance
 - Rules must not be allowed to accumulate layer by layer. As new rules are adopted, so older redundant rules must be discarded.
 - The system of management must take account of regional or fleet variations. One size does not fit all
 - There must be greater devolution of management to the appropriate level
 - There must be greater participation in decision taking by those whose activities are being managed. The creation of regional advisory councils has been the first step in this direction.
- 4.3 The 2012 reforms present a fundamental choice over the future of the CFP. Either the current centralised approach will be deepened and intensified in ways spelt out in the Commission's paper. Or new forms of governance will be put in place to give effect to participation by stakeholders in decision making, as advocated by the Commission's paper on good governance.

5: The NSRAC Perspective

The NSRAC has concluded that fundamental reform of the CFP is required. The main elements of the reform should be:

5.1 Strengthen Fisheries Science

5.1.1 The NSRAC does not question the important scientific role which can be played by ICES and the national fisheries research institutions in the provision of high quality and impartial advice. However, it does suggest that that role allocated in the past to ICES has given rise to problems. Very heavy responsibilities have been placed by the Commission upon ICES. While major changes have been taking place within the system of fisheries management ICES has been slow to change. It is notable that countries outside the EU with ICES membership no longer rely heavily upon ICES for the provision of scientific advice. They have their own organisations for integrating science and stakeholder advice into fisheries management.

5.1.2 Unlike ICES, STECF has engaged much more strongly with stakeholders and policy makers. Its work is commissioned and guided by policy

makers, but it is increasingly involving stakeholders in the work of its sub-groups. Although stakeholders are attending the meetings as observers they are in reality playing a more active role which is valued by all the participants. There may be scope for STECF taking on a more central role in providing scientific advice in the future.

5.1.3 In contrast, it has been ICES' steadfast decision to remain independent. It has engaged in only a limited way with stakeholders and policy makers. Major concerns exist in relation to:

- The sole consultancy relationship and limited terms of reference between the European Commission and ICES.
- The provision of advice by ICES in ways that are not particularly useful to fisheries managers or to the fishing industry
- The fact that many of the fish stocks for which ICES provides advice do not achieve analytical status because of weakness in the basic data
- The failure to take a multi-species or fisheries based approach, which recognises that fish stocks are not independent entities
- The inflexibilities that have prevented ICES from using various industry sources of information to supplement and complement more formal assessment techniques
- The failure to assemble data, perform assessments and present advice on a shorter time scale

5.1.4 The fishing industry, fisheries scientists and fisheries managers all have a vested interest in a system that produces high quality, impartial, meaningful, scientific advice in an accessible form. Without confidence in the fish stock assessments and the scientific advice it is difficult to achieve the fishing industry's full commitment to management measures.

5.1.5 There are a number of ways in which the present shortcomings can be resolved:

- Stakeholders should have a more direct role in formulating requests for scientific advice
- More industry science partnerships must be established to provide additional, scientifically valid, sources of data
- The newly instituted ICES benchmark meetings in which stakeholders have direct involvement in in-depth discussions on assessment data, relevance and models, point the way forward towards a more inclusive approach to fish stock assessments

- Each RAC provides a forum in which dialogue between scientists and stakeholders can take place on the limits and uncertainties of current scientific knowledge and outstanding issues can be resolved
- ICES should play a role together with the RACs in preparing management plans and defining management options. These are not tasks for ICES alone.

5.2; Long term Management Plans

5.2.1 There is much merit in moving towards long term management plans for each of the principal fisheries, not least for the stability and predictability that they can offer. However it is vitally important that these long term plans are well founded in both biological and economic terms and are introduced in a fully transparent way, with full stakeholder engagement. There is a real danger that management plans introduced in any other way discredit both the process and objective. It is also important that the long-term management plans should consider impacts of fisheries on the wider ecosystem as well as on exploited stocks. They must take account of species interactions, and it is desirable that in the future they should be prepared each fisheries rather than for single stocks. This broader approach will place pressure on fisheries scientists to adopt a more holistic approach towards assessment of the impact of fisheries.

5.3: Rights Based Management

5.3.1 On the basis of its paper, the Commission's rationale for advocating a move to rights based management appears to be primarily because ministers defend their "national" interests enshrined in their relative stability shares, in the Council of Ministers, thereby repeatedly thwarting and blunting the Commission's proposals. In our view this is the wrong basis on which to advocate rights based management. Above all, clarity is required in defining what is meant by rights based management, and how it meets the main objectives of the CFP. That clarity is missing from the debate so far.

5.3.2 Member states already have systems which allocate fishing rights to individuals on specific terms and conditions. The last thing we require is another clumsy, top-down intervention that creates uncertainty where there is certainty and instability where there is stability. Relative stability has already shown itself to be a flexible instrument through swaps and transfer arrangements and perhaps this is a dimension of the CFP that could be further developed without the undoubted insecurity and disruption that a move away from relative stability would involve. The internationalisation of fleets has already proceeded in many member states and what is not required now is a heavy handed and disruptive policy.

5.4: Results Based Management

- 5.4.1 If the characterisation of the CFP as a system that has delivered a highly prescriptive, yet largely ineffective, set of rules is broadly correct, then it is necessary to conceive an alternative. One possibility is that the Commission, Council of Ministers and European Parliament are removed entirely from micro-management of fisheries; with fishing organisations taking direct responsibility through specifically tailored management plans.
- 5.4.2 Under a radically different system the Commission, and Council along with the European Parliament, and in conjunction with the Regional Advisory Councils, could set broad standards and principles for sustainable fishing in the various fisheries. Fishing industry bodies would then submit (say 5 or 8 yearly) management plans on how that body would fish sustainably in conformity with the standards and principles for that fishery. Plans would be developed in partnership with scientists and would be audited periodically. This arrangement (reversing the burden of proof in fisheries) would radically change fisheries management. The Commission's role would be one of auditing and refereeing rather than carrying out the detailed management for which it is ill equipped. There would be no detailed prescriptive rules. Instead, industry would take responsibility for defining the technical measures under which fisheries would be managed in a sustainable manner. Such a radical departure would require much thought and discussion before implementation but the concept is one that the NSRAC considers sound and one that should be explored further in conjunction with the other RACs, ACFA and industry organisations

5.5: Regional Advisory Councils

- 5.5.1 Regional Advisory Councils are still in their infancy but despite quite wide variations in performance, generally reflecting different material conditions, it is quite clear that they have been capable of producing serious and worthwhile advice, often through consensus. The RACs now play a central role as stakeholder groups within the CFP. They are consulted extensively by the Commission and Council of Ministers, and are collaborating closely with ICES, the Commission and others in the development of new arrangements for providing advice on the operation of the CFP. The RACs have established their own working groups to assemble information and draft options for advice on a wide range of issues. They have produced reports on a range of topics and have promoted focus groups and symposia on critical issues.
- 5.5.2 The structure chosen for the RACs has proved satisfactory. The mix of representatives from the fishing sector and other interests has worked well. The pressure to reach a consensus view has ensured that all views are taken into account. Some participants have contributed less than others, and there has been a lack of continuity of attendance from some representatives, but these have been minor problems.

5.5.3 The central question now is how the RACs can be further developed to fulfil their full potential. Currently, interaction with scientists is limited by the financial resources of the RACs. The RACs have no budget to pay for scientists to attend RAC meetings. Requirements for scientific assistance have to be sent to ICES well in advance and relayed by the Commission. As a result there is less interaction with scientists than is required.

5.5.4 The NSRAC suggests that a small research and policy support unit should be attached to each RAC. That unit would prepare policy papers for discussion and adoption by the RAC Executive Committees. Neither the RAC secretariat nor the members of the RACs, who generally have other duties in representative or commercial organisations, have the time to undertake this essential work. The quality and quantity of RAC advice could be expected to increase directly as a result of such a change particularly in the area of the development of long term management plans.

5.5.5 This relatively small but important change would equip RACs to play a more significant role within the CFP.

5.6: Regional Decisions

5.6.1 Where policy decisions in fisheries for a given area have no ramifications for other parties we cannot see why they have to be the subject of decision by the Council of Ministers. A clear argument can be made for devolving decision-making authority, in these circumstances, to a sub-committee of relevant regional ministers that would agree an approach for formal ratification at Council.

5.6.2 Measures agreed in this way could be tailored more closely to local requirements and would reduce the workload and complexity of Council negotiations.

5.7 The Fisheries Management Jigsaw

5.7.1 It has been suggested that effective fisheries management is comprised of four interlinked and mutually dependent elements. These are:

- A fleet capacity in broad balance with available resources
- A level of profitability that allows the fleet to absorb external shocks and renew itself without subsidy
- A high degree of compliance with the management rules. Absence of a high degree of compliance denotes a broken system
- A broad consensus that information on which management decisions are based on, including fish stock assessments, is unbiased and relevant.

- 5.7.2 The essential point in this and the reason why it is called a jigsaw is that all the component parts are linked and mutually dependent. The CFP to date has not had clear objectives, and has not progressed in an integrated manner. Control, technical conservation, fleet structures, dialogue with the industry, industry economics are not addressed as an integrated whole. Given the geographic scale of the CFP and the centralised governance model it has been based on perhaps this is unsurprising.
- 5.7.3 The Commission's discussion paper gives clear primacy to the biological and environmental over the social or environmental. At one level this is understandable. Without functioning ecosystems the exploited fish stocks are at risk. At a deeper level however, this approach is seriously misguided. To be effective fisheries policies must take into account the three pillars of sustainability – biological/environmental, social/institutional and economic. The CFP's failure to take account of this central reality is the reason why so many initiatives agreed on paper under the CFP have failed when they come to be implemented. The creation of incentive structures within fisheries that run counter to management objectives is a recipe for failure. If the CFP reforms after 2012 do not take this critically important facet of fisheries management into account they will be likely to replicate the shortcomings that have plagued the CFP to date. Taking economic and social factors into account is not (as they are often characterised) merely a tactic to defer and delay necessary and sometimes tough measures - it is a prerequisite for effective policy.

5.8: Comitology

- 5.8.1 In the context of co-decision making with the European Parliament, the Commission proposes an expansion of the role of 'comitology'. Comitology is EU jargon for the delegation of decision-making authority to working groups comprised of member state officials, working under the chairmanship of the current EU Presidency and operating on the basis of Commission proposals. Comitology is presented as a pragmatic solution to:
- the expansion of the European Union and Council of Ministers to 27
 - Co-decision-making with the European Parliament that will require a much longer time scale for turning legislative proposals into regulations
 - The sheer detailed complexity of much fisheries legislation that is not compatible with the Council workload or format
- 5.8.2 Whilst all of these are very real considerations, there are, equally, problems associated with the adoption of comitology. The management committees are effectively sealed, offering very little transparency and opportunity for stakeholder scrutiny and none for participation. Despite their cumbersome features both the Council of Ministers and the European Parliament have a democratic legitimacy that the more technocratic approach reflected in comitology lacks. Comitology provides little

protection for the rights of fishers and other stakeholders. If comitology is to be expanded consideration must be given to involving stakeholders.

5.9: 6 and 12 Mile Limits

5.9.1 Inshore fishing zones are sensitive for both biological and socio-economic reasons. They harbour nursery and spawning areas for a range of commercially important fish stocks, as well as providing fishing opportunities for a very wide range of small to medium sized vessels. The 2002 review and reform of the CFP saw a rollover of the standing arrangements. Each member state understood the need for protection of their respective inshore zones and the status quo was retained.

5.9.2 The NSRAC believes that there remains an overwhelming case for retaining the present limits. The loss of the 6 and 12 mile derogations would severely constrain the ability of member states to manage inshore fisheries and protected areas within their own coastal waters. However, there may be a case for reviewing the issue of historic rights in these areas in recognition of the requirement to balance those rights with the need to provide additional protection for vulnerable fish stocks within inshore limits.

5.10: Fishing Capacity

5.10.1A balance between fleet capacity and available resources is an essential part of the fisheries management jigsaw. The picture of fleet overcapacity across the European Union is very mixed, with some member states having undertaken much more decommissioning than others.

5.10.2As the Report of the Court of Auditors has pointed out, capacity reduction objectives have been replaced by the concept of reference ceilings which are expressed in capacity units and constitute maximum levels which national fleets may not exceed. Ceilings have been set on the basis of historic levels and will only reduce in cases where vessels are decommissioned from the fleet with Community aid. This system does not oblige or encourage member states to reduce their overcapacity.

5.10.3The NSRAC is in favour of publically funded, voluntary decommissioning schemes where there is a demonstrable need for them. What is not acceptable is indirect reduction in fishing capacity through an effort control regime that increases industry costs, reduces profits and places the fleets in a bureaucratic straightjacket, with no demonstrable benefit in term of a reduction in fishing mortality or improved exploitation pattern.

5.11: STECF

5.11.1The role and significance of advice from the Commission's Scientific Economic and Technical Committee has increased considerably since the last round of reforms in 2002. The Committee is now more open to

stakeholder involvement and the quality of the advice produced is high. Given the increased significance of STECF it is entirely appropriate that the Committee is reviewed in the same way that ACFA and the RACs have been recently, either through an internal but explicit process or by an external body. The Committee's terms of reference, composition and balance of areas of expertise between biological, economic, practical management and enforcement are obvious themes to consider. It goes without saying that we consider that the progress towards openness and transparency that has been made so far should be continued.

5.12 Regulatory Impact Assessments

5.12.1 One area in which the CFP has made considerable progress since 2002 has been the accompaniment of Commission proposals by impact assessments. Rational policy making requires that assessments are prepared that make explicit not just objectives, how they are to be achieved and at what cost, but also consideration of different options for achieving the same end.

5.12.2 Although the content of some impact assessments undertaken to date can be criticised for being a little thin, the principle of impact assessments is a sound one and should continue to be developed and strengthened.

5.13 Control and enforcement

5.13.1 One of the arguments within the previous Green Paper was that poor enforcement of regulations had contributed to over-fishing. One of the major problems it identified was that member states had retained responsibility for monitoring fishing fleets and ports and imposing sanctions, and many of them had not taken these responsibilities seriously. The arrangement had not ensured a level-playing field across the Union. The Green Paper recommended that further progress was needed on the co-ordination of national policies, the harmonisation of sanctions, the follow-up of infringements and on the definition of the respective responsibilities of member states and Commission in the implementation of control schemes. The setting-up of a new Community agency was suggested to coordinate national and Community inspection policies and activities.

5.13.2 In the event, Regulation 768/2005 of 26 April 2005 established a Community Fisheries Control Agency to reinforce the control system for the CFP. The Agency is intended to coordinate controls and inspections by Member States; pool resources through joint deployment plans; promote harmonised application of rules; develop control and inspection techniques; support the training of inspectors and facilitate the exchange of information. The Commission will continue to formulate policy; provide funding and verify the implementation of Community rules. Member states retain responsibility for control and enforcement. The new Agency does not have the power to impose additional obligations or to sanction member states.

5.13.3 Although the Agency represents a considerable financial investment, it has few teeth. It cannot police and enforce the regulations; only inspect and report. It does not have any strong new instruments or powers. It can only offer advice. It is member states which have general responsibility for ensuring effective control, inspection and enforcement. The European Court of Auditors has pointed out that the current inspection systems do not provide assurance that infringements are effectively prevented and detected, or that this is done in an equitable manner. Although the work of the Community Fisheries Control Agency has only just begun, it will be necessary as part of the review of the CFP to consider whether it has resulted in any improvement to the control, inspection and sanction systems. Has it achieved the 'culture of compliance' which is its chief aim?

5.14 The environmental dimension

5.14.1 There has been increasing pressure to achieve greater integration of marine environmental management with fisheries management. One feature of the 2002 review was a clear commitment to the ecosystem approach, although mechanisms to achieve this have been slow to appear. Until now, the main impact of this commitment upon the CFP has been the placing of obligations upon member states to protect marine species and habitats under existing Directives and to establish Special Areas of Conservation (SACs) in areas like the North Sea.

5.14.2 The application of these Directives to offshore sites has proved more challenging than originally expected. Consultation with stakeholders has varied from one member state to another and it is evident that even where there has been consultation there is a prohibition upon the promoters of these SACs considering economic impacts when designating sites. The legal text of the Directives seeks to protect sites based only on scientific information; other factors must not be allowed to prevail over this objective.

5.14.3 There is a need for the designation of sites to be synchronised and coherent across member states. There is also concern over the lack of coordination in the way different Member States are interpreting the Directives, designating sites and proposing to manage sites. Often, there has been a lack of objective data to aid in site selection and fishers have not been consulted at an early enough stage to bring in their own expertise.

5.14.4 The RACs have a special role to play in establishing offshore marine protected areas, as they provide a regional and international forum where stakeholders can be consulted. The knowledge of the fisheries sector is also vitally important in determining how best to manage fishing in and around designated sites.

5.14.5 Further moves are being made to establish a new Integrated Maritime Policy aimed at strengthening the coherence between the reformed CFP and other Community policies and related to the sustainable development

of seas, oceans and coastal areas. DG Fisheries is now DG Mare. A particular initiative which will impact upon the CFP is the new EU Marine Strategy Framework Directive, which 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. Under the Directive marine strategies have to be developed by each member state.

5.14.6 There will be pressures in the future to make all European fisheries subject to full Strategic Environmental Assessment (SEA) in the future and the RACs will need to arrive at a position on this.

5.14.7 The NSRAC is concerned that the revision of the CFP will need to take account of the requirement to integrate environmental and fisheries interests.

6: Conclusion

6.1 The NSRAC welcomes the Commission's early instigation of a debate on the future of the CFP but are disappointed that the Commission's initial contribution struck such a negative tone, perhaps overly influenced by the criticisms of the European Court of Auditors.

6.2 The 2012 reforms provide an opportunity to move the CFP towards a set of institutional arrangements that deliver sustainable and profitable fisheries. This will not be achieved by an intensification of the centralised command and control model that has characterised the CFP to date and which underpins most of its shortcomings. A different model that encourages and incentivises the fishing industry to take responsibility for its own activities within a broad management framework offers the most productive way forward.

7: References

1. European Commission. DG Mare. Reflections on further reform of the Common Fisheries Policy. Working Document. September 2008
2. Sissenwine M and Symes D. Reflections on the Common Fisheries policy. Report to General Directorate for Fisheries and maritime Affairs of the European Commission July 2007
3. European Commission. Green Paper on the Future of the CFP. (2001)
4. Cabinet Office. Prime Minister's Strategy Unit Net Benefits: A sustainably and profitable future for UK fishing. March 2004.
5. European Union. European Governance: a white paper. 2001