Statement by Seas At Risk on the European Maritime and Fisheries Fund
Made at the EMFF stakeholder conference “Beyond 2020: Supporting Europe's Coastal Communities”, 12-13 October 2017, Tallin, Estonia

Last week, at the OurOcean conference in Malta, Seas At Risk launched a petition in support of the marine strategy framework directive. The marine directive is unique in the sense that it has a holistic approach to a very broad spectrum of marine environmental issues, and thus forms an essential framework for ecosystem based management of maritime activities. It requires Member States to achieve ecologically diverse, clean and healthy seas by 2020. We launched this campaign because we see that member states show low ambition in implementing the directive, among others because of lack of resources. In this first week of the petition, already over 100,000 people signed and are asking for healthy and productive seas. That is what the public wants from their tax money.

And that is exactly the basis for prosperous, thriving coastal communities. Abundant fish stocks are key for a viable fishing industry, oxygen-rich waters with a balanced nutrients load and without pollutants are crucial for mariculture, and a sea thriving with wildlife and clean beaches are main attractions for tourists.

So if we want to support coastal communities beyond 2020, this is what the principle objective should be. Any future fisheries and maritime fund therefore must contribute to lower impacts on the marine environment and to abundant fish stocks.

The Common Fisheries Policy does include environmental objectives that contribute to such healthy, productive seas, and it is the purpose of the EMFF to support this. But as we have heard in this conference, there are points where the EMFF needs to be improved.

The EMFF still includes potential capacity enhancing and other harmful subsidies. Is this aligned with the Sustainable Development Goal 14 on oceans which includes the concrete target to prohibit certain forms of subsidies that contribute to overcapacity and overfishing by 2020, and the ongoing negotiations at the World trade Organisation on a prohibiting harmful subsidies?

These “bad subsidies” under the EMFF should not come back in any future fund, in line with international commitments.

There is also the question of effectiveness of the current funds. Over the last 8 years a lot of money has been allocated to growing aquaculture, 1.2 billion in this budget period. In 2014, the European Court of Auditors analysed aquaculture funding under the previous period of funding, the old EFF, and concluded that the Commission and countries failed to direct funds to sustainable practices. We fear the same is happening with the EMFF aquaculture funding. The focus for support is on more jobs and production, and the Commission is not promoting a vision of environmentally responsible aquaculture – guidance on environmental aspects came very late, after adoption of operational plans. Even though
the EMFF covers environmental aspects, it is not clear if the funding is indeed used for innovative approaches to decouple growth from environmental impacts in an already stressed marine environment. We look forward to the results of the Commission’s mid-term evaluation, that will allow us to shed some light on this matter.

A problem we already saw under the previous fund but does not seem to be solved is the difficulty for small scale fishers to access to EMFF funds. This is skewing the use of EU funds to the more profitable large scale sector that contributes less to the fabric of coastal communities. Probably not the most effective use of tax payers’ money.

These are a few examples of the problems of the current EMFF and we must avoid these in any future fund. So what should such a future fund be used for? We need to review the current model. Should we continue to fund the activities we have always funded?

According to the latest annual economic report, the fishing industry is generally speaking profitable, though clearly the large scale fleet more so than the small scale fleet. Stock recovery and low fuel prices are contributing to record profits in certain fisheries. Ending overfishing is the basis for increasing the profitability in all fisheries. With an increasing fleet profitability, it is time to review the direct support to the sector. Should we really support operational costs, in particular where we have a profitable industry?

In addition to direct funding, the fishing industry receives substantial support in terms of fuel tax exemptions, social security exemptions and other indirect subsidies. In light of the Paris agreement, and against the background of the increasing grip that climate change has on the marine environment including fish resources, can we still justify fuel tax exemption? An indirect subsidy that also undermines a shift to more passive, low impact fisheries. Would EU policy coherence not require us to address this fuel tax exemption, also in the context of international commitments? With the current low fuel prices, the time seems right to phase it out.

One could even wonder if the industry should not contribute to the management of their own activities. Through a tax on licence transfers and perhaps a tax on landings, the fishing industry could establish a fund to support data collection and processing, control and monitoring.

I realise these comments could result in a smaller or even disappearing future fisheries fund and will not make me very popular. But there are other ways than subsidies to provide support and incentives. For example, access to fish resources is an important incentive, and art 17 of the current CFP does provide member states the possibility to ensure the most sustainable fishing operations get preferential access to quota. This possibility should be better used.

And the small scale sector could receive funding aimed at organisational support, to help them access available funding and create a better level playing field vis-a-vis the large scale sector.
So let’s take a step back and focus again on the objective of healthy and productive seas. Where would funding make a real difference to reach this, ensuring impacts on the marine environment are reduced and stocks recovered?

Clearly control and data collection are crucial element of proper fisheries management. A good point in the current EMFF is the increased amount available for data collection, monitoring and control which should be maintained in a future fund. In particular, since about 2/3 of the fish stocks are still considered “data limited”, suggesting an urgent need for enhanced support for data collection and especially capacity to process these data.

Also for the implementation of the ecosystem-based approach to fisheries management, one of the objectives of the CFP that hardly received attention so far, wider environmental data collection and scientific advice is needed. There should be more support for the implementation of the Marine Strategy Framework Directive, including the management of marine protected areas. This will contribute to ending overfishing, healthy fish stocks, and fish stock recovery areas. Today, we have about 9% of the EU seas designated as marine protected area, and scientists recommend at least 30%.

Currently funding in support of marine environmental protection is not legally ring fenced, and Member States do not give this highest priority. More funding earmarked for marine protection is direly needed.

Because this is the kind of funding that will render most effect for healthy and productive seas. Whether this comes out of a future fisheries fund, another European structural and investment fund, or even a newly established Sustainable Ocean Fund like Birdlife is proposing, can be discussed. Important is that it is accessible and effectively contributing to healthy and productive seas. Because that is the basis for a prosperous future for our coastal communities.