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Opinion 125 on the renewal of the EMFF (European Maritime and Fisheries Fund)

By the publication of its proposal for new rules for the EMFF 12 June 2018, the European Commission has described the fields for which it considers that public financial support can be envisaged. The fields are as follows: the implementation of the CFP, the EU's maritime policy, the EU's commitments in the field of ocean governance, the implementation of sustainable fishing, compliance with standards, projects to conserve biological resources at sea, contribute to food safety, ensure that the blue economy respects the marine environment that it depends upon, contribute to healthy, safe, secure and clean oceans, resistant to global change and sustainably managed, control borders and fight maritime crime.

At this stage of the process of renewal of the EMFF, SWWAC's members wish to restate their priorities and the fields that they consider deserve to be financed or not.

I. Social and economic aspects

The social objectives are not clearly highlighted in the body of the text according to the members of the SWWAC. Indeed, several social phenomena, established on the basis of studies and rigorous criteria, must be taken into account when these rules are revised.

1. The underuse of the current fund and simplification

While SWWAC supports the need to simplify the use of the fund, we think that this should not be confused with a reduction of the rules on the way public funds are spent, including at least one list of eligible measures and a list of conditions which must be fulfilled in order to obtain financial support.

The fact that the Member States do not spend the allocated resources is mainly due to internal administrative inefficiency at the national and local level, and the policies imposed with respect to the rules on spending, etc.

Consequently, delegating the decision on which spending is eligible and who can obtain national government funds will not reduce the administrative burden. Instead, it will create non-strategic costs and unequal access to funds throughout the EU.

To improve transparency and efficiency of the use of the EMFF, SWWAC members propose in particular that fund utilisation indicators be put in place in order to reveal whether the fund benefits a particular category of actor and whether it helps achieve the objectives of the CFP. Clear mechanisms must be put in place for checking and guaranteeing that public funds are invested where they are most needed and contribute to sustainable ocean management.

A well-managed simplification ensuring continuity from the previous fund would make it possible to restore a dynamic with the professionals and other actors, who have lost confidence in the use of the public funds. Participation in public policies by the





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professionals must moreover be maintained, particularly thanks to support for the reinforcement and long term future of professional structures.

2. Generational renewal

Difficult and unsafe working conditions are responsible for the low attractiveness of the fishing sector: few young people wish to embark upon this profession nowadays. Improvement in onboard comfort, safety and fishing methods are aspects that the EMFF should allow to be financed.

We must create the necessary conditions to encourage young people to take an interest in fishing: promote and enhance maritime careers.

3. The blue economy

The allocation of funds for a sustainable blue economy should guarantee social, economic and environmental benefits for the current and future generation. However, all economic activity must always progress within the limits established by the capacity of the ecosystems in which they are operating. An approach based on the ecosystems should be applied in all maritime activities and not only in fishing.

4. Financial aid for companies

There was no consensus on this point within the SWWAC. The members representing the fishing sector want to see the continuation and reinforcement of the financial aid given to companies and in particular by means of a return to the current rules concerning aid for:

- Temporary or permanent interruption of activities
- Engine replacement
- Young people starting fishing enterprises
- Increased aid for artisanal fishing on the same basis as for the outermost regions
- Storage: This financial aid, allowing postponement and in other segments of certain surplus quantities, have regularly made it possible to avoid or reduce the impact of price drops, when the trading conditions of certain products were unfavourable. To limit the socio-economic consequences of extraordinary situations, the new EMFF must therefore reintroduce the financing of these tools, as provided for in the CMO regulation.

However, the members representing the NGOs are not in favour of these measures which may maintain or increase overcapacity and extractive effectiveness. This could be detrimental to the effectiveness of the management plans and threaten the recovery of fish stocks. These measures are the purchase of new engines, or modernisation, and also storage on board the ships, with the exception of those which are solely aimed at improving safety, health and dignity of work. For the same reason, the NGOs do not agree that the funds should be used to finance temporary or permanent interruption of fishing activities. However, the WWF considers that we should avoid financing temporary or permanent interruptions in fishing activities, except in exceptional cases





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where there is a risk of collapse and on rigorous conditions. Also, all the NGOs are not in agreement with priority access to artisanal fishing or to the outermost regions by default, but thinks that these funds should be invested to ensure the durability of their fisheries, promote co-management as a decision-making system at local level and the local sustainable development strategies.

5. Marketing

Production and Marketing plans contribute in an important manner to organising the market, and aim to achieve several objectives set within the CFP, particularly in Article 35. In this regard, the EMFF, using article 66, helps the fishing organisations to implement actions aimed at facilitating viable and sustainable fishing activities in accordance with the objectives set in articles 3 and 7 of the CMO.

However, this tool does not appear in as easy readable a manner within the proposal for the new EMFF formulated by the Commission. There is no mention of these plans in Article 24 of the Commission's proposal.

In order to maintain and strengthen the role of these plans, the members of the SWWAC ask that the following proposal be included, in line with the provision that is currently in force: "The EMFF supports the preparation and implementation of the production and marketing plans referred to in article 28 of regulation (EU) no. 1379/2013."

II. Environmental aspects

The post-2020 fund should amongst other things provide aid to facilitate the implementation of the landing obligation, the increase in fishing gear and fishing method selectivity, the collection of data and the application of the ecosystemic approach.

1. Implementation of the inspection system and data collection

Data collection, the inspection and effective application of the rules are the essential conditions for sustainable fishing management. However, the appropriate data on several populations are insufficient. The Commission's proposal only suggests a limited change in the current spending system. The post-2020 EMFF should set clear rules for: the implementation of the inspection regulation, the strengthening of support for data collection, research, partnerships with scientists and innovation

2. Improving selectivity

The best option for minimising discards consists first of all in avoiding unwanted catches by advocating measures favouring fishing selectivity at sea, such as the technical modifications of the fishing gear to include fish avoidance devices (grids, panels, turtle,





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shark and rayfish exclusion devices, lighting devices, etc.). To achieve a significant reduction in unwanted catches, EMFF financing should continue to support, among other things:

- Pilot projects aiming to test and improve fishing gear selectivity.
- The dissemination of knowledge of how to reduce unwanted catches.
- The adoption of gear and equipment which improves fishing gear selectivity in terms of size or species, and fishing techniques which eliminate discards by avoiding or minimising unwanted catches of commercial and non-commercial species.

3. Ensuring a prosperous marine ecosystem

The current EMFF allows member states to use the fund to finance activities established in the framework of the DCSMM, and to ensure that the "Birds" directive and the "Habitats" directive are implemented at sea. However, the member states have hardly accepted these activities at all, particularly in the framework of the financing of the monitoring programme and the programme of measures of the Marine Strategy Framework Directive (MSFD), designed to support the management of the Natura 2000 network as laid down in the prioritised frameworks of action.

Conclusion

The members of SWWAC recommend:

- An explicit restatement, at least in the preamble, of the eligible types of actions, based on the existing eligible actions.
- Greater transparency in the use of the funds
- The promotion and enhancement of maritime careers and other measures fostering generational renewal
- An ecosystemic and participative approach for all maritime activities, support for sustainable fishing, protection of the marine ecosystems and support for sustainable means of subsistence on the coast.
- An improvement in data collection and analysis systems to promote adaptive management
- The financing of studies on selectivity devices and their implementation
- Effective implementation of the regulations in the field of fishing inspection and a culture of compliance.

