

*To HELCOM Fisheries/env. Forum meeting 13 October 2009, Copenhagen*

## **CCB comments to the proposed joint submission (HELCOM dok. 3.4/1) by the HELCOM concerning “the green paper - Reform of the CFP”**

CCB appreciates that the proposed paper is clear on the importance of the ecosystem approach and that it underlines the importance of ecological sustainability as a basic premise. It also states the need to integrate biodiversity conservation in fisheries policy. However, the ecosystem approach is stated in the existing CFP and it is obviously a massive failure so far. To really put the sustainability issue in front, policy makers must commit to these words.

The recently signed Stockholm declaration of October 1<sup>st</sup> states, (signed by the Baltic fisheries ministers and the Commission) among others, that more long term management of the fish stocks are needed. This is most important to promote the move away from short term economic considerations and to a way to really establish the ecosystem approach in management, but again nothing will work unless it is controlled and really converted into actions on the field.

To ensure that the future CFP and fisheries policies will meet the standards of the above mentioned words and phrases and to underline the already present wording of the proposal from HELCOM secretariat plus the actions in BSAP, we recommend that the HELCOM joint submission to the review of the CFP contains the following more outspoken statements:

1. The scientific data must continue to improve and decision makers must commit to the scientific assessments and recommendations
2. Long term management plans for all commercial fish species must be developed and be continuously revised
3. A future CFP should control the fleet size in accordance with environmental and social criteria
4. The landings and monitoring of the vessels should be transparent and made available to scientists and to the public to ensure traceability
5. Public funding to the fishing sector should be conditioned to promote more environmental friendly fishing methods
6. The allocation of fishing rights should reflect the history of compliance with the rules of the CFP, and this should apply to member states as well as fishers

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*Coalition Clean Baltic is a network of environmental NGOs sponsored by:*

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- Finnish Association for Nature Conservation • Finnish Society for Nature & Environment • Bund für Umwelt und Naturschutz Deutschland, BUND
- Environmental Protection Club of Latvia, VAK • Latvian Green Movement • Lithuanian Green Movement
- Lithuanian Fund for Nature • Environment Information Centre, Vilnius, Lithuania • Polish Ecological Club, PKE • Green Federation - GAJA, Szczecin, Poland
- Ecobaltic Foundation, Gdansk, Poland • Ecological Library Foundation, Poznan, Poland • Friends of the Baltic, St Petersburg, Russia • Ecodefense, Kaliningrad, Russia • Neva River Clearwater, St Petersburg, Russia • Green World, St Petersburg, Russia • The Guide Environmental Group, Kaliningrad, Russia • Greens of Karelia, Petrozavodsk, Russia • Friends of the Earth, Sweden • Swedish Society for Nature Conservation • Swedish-Polish Association for Environmental Protection
- WWF Sweden • The Western Center of the Ukrainian Branch of the World Laboratory