



NSAC Response to the request from the EU Commission Ref. 05-1920

NSAC Response to the EU Commission's request regarding the representation of Small-scale Fisheries¹

Dear Veronika Veits,

On 24th October 2019 the NSAC received a letter from the Commission regarding the representation of Small-Scale Fisheries in the NSAC.

As we agree that Small Scale Fisheries is a very important part of the EU fisheries, we have updated an evaluation of their participation in the work of the NSAC.

It is a general perception that the small-scale fisheries at present are well represented in the NSAC and our work. Not only are we very open for anyone to participate in our meetings, the present members do, to a very high degree, also represent the Small-Scale Fisheries in the Member States around the North Sea.

Therefore, the NSAC is convinced that the number of representatives in the NSAC reflects the share of small-scale fisheries within the fishing sector in the North Sea, the Skagerrak and the Kattegat. The NSAC has not felt and does not feel any need to extend its membership beyond 25 members, nor has this been requested by any of the existing or potential members.

There is usually no need for provision of interpretation services as all representatives use English as a *lingua franca*. However, the language regime for meetings in the Skagerrak and Kattegat Working Group is normally the Scandinavian languages, if everyone around the table agree.

It is well known and often reiterated that interpretation services can be provided when considered that this would significantly improve discussions.

¹ This paper was approved by the NSAC Executive Committee via written procedure on 20th December 2019.



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Furthermore, no additional compensation to fishermen has been considered necessary so far as large part of registered small-scale fishermen in the North Sea is represented by one of our members organisations.

To answer this enquiry thoroughly, the NSAC has updated the overview of the participation and representation of Small-Scale fishers amongst its industry members. The results of the survey are presented in the enclosed overview.

The NSAC is of course ready to discuss the matters further, if the Commission needs more information from the NSAC.

Kind regards,

A handwritten signature in blue ink, appearing to read 'Kenn Skau Fischer', is centered on the page.

Kenn Skau Fischer,
Chairman of the NSAC Executive Committee



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Table 1: Representation of small-scale fishermen in the NSAC

Geographical area / region represented	Membership structure	Definition of SSF	Numbers of SSF Represented	Any other organisation representing fishing vessels in region	Comments
NFFO					
England, Wales and Northern Ireland	Executive Committee, with nominees from member producer organisations and regional committees. There are 468 vessels represented from under 10m to 110metres.	Small scale vessels are an integral part of our organisation with equal status and access to officials, ministers etc. Through the organisation.	NFFO's membership contains 514 under-12 meter vessels, which makes it the largest representative body for small-scale fishers in the UK by some considerable margin	Numerous local / sectoral associations of varying size	<p>We acknowledge the challenge involved in representing / communicating with all small-scale vessel operators given, the diversity of the fleets and the geographical and sectoral obstacles. As an organisation we have developed an outreach programme through our regional committees and using modern information technology to ensure that the organisation is as inclusive as possible.</p> <p>There is a major initiative presently in the UK, promoted by</p>



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					the NFFO, and focused on the future management of inshore fisheries , which are of course relevant to many small-scale fishers.
Danish Fishermen's Association					
Denmark	Umbrella organisation. 32 local fishermen's associations from all over Denmark are members. Local associations represent all fishermen in the local area, i.e. owners, skippers and share fishermen / employed fishermen. All commercial vessels with a port registration number are members of local associations and to Danmarks Fiskeriforening.	A specific segment of the Danish fleet has been defined as "coastal fishery segment" containing vessels under 17m and have at least 80% of its landings from fishing vessels of less than 3 days / 72 hours. It is voluntary whether a vessel wants to belong to the coastal segment. Membership lasts for 3 years. A vessel belonging to the coastal segment benefits from extra (more than the historical track record) quota of some stocks.	Almost 700 vessels from all over Denmark are members. 523 vessels are below 17m – 351 are below 12m. The Association is the largest representative body for small-scale fishers in the DK by considerable margin. The catches of the members accounts for more than 95% of the total Danish catches measured in value in demersal and shellfish fisheries.	Vessels may also be members of a producer organisation; there are 3 in Denmark	A committee focusing on the coastal fishing has been established within the Association acknowledging the challenges in this fisheries. This committee contributes to the work in the NSAC and other ACs.
EAA					



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Europe	Pan European organisation, 14 EAA member organisations with over 3 million members.		EAA does not represent small scale fishermen	no	/
CNPMEM					
French areas	<p>CNPMEM is a private organization who has some of its mission delegated by the State authorities. We are officially recognized as performing public services tasks. The CNPMEM gathers all the professionals of Maritime Fisheries and Marine Fish Farming from the production sector.</p> <p>A Council – one of the decision-making Body – consisted of 40 members, among whom 12 representatives of the CRPMEM (regional</p>	<p>In France there is no definition of Small Scale Fishery or Coastal Fishery instead a definition of the “Société de pêche artisanale” (“Artisanal fishing Company”) exists, which is a social definition of an artisanal structure having fishing activities more than a definition of the fishery itself. This artisanal Company is defined as a Company having a professional fishing activity and in which 100 % the capital is held by fishermen who provide leadership and are on board the vessel (or the two vessels) of the Company.</p>	<p>CNPMEM represents all French fisheries without distinction of type of fishery. Most of the work is done in working groups organized by sub-region or by species where all the major actors are represented.</p> <p>Whatever is the category we use, the majority of French fleet, so the majority of CNPMEM. members are artisanal fishing company or small scale and coastal fishery, around 90%.</p>	<p>Fishing vessels are also represented by POs, Unions, Regional and Local Departmental Committees of Maritime Fisheries and Marine Fish Farming (but at a more regional level). All these organisations are covered by the CNPMEM.</p>	/



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	<p>level), 14 representatives of the Unions of sea fishing entrepreneurs, 3 representatives of the maritime cooperatives and 11 representatives of producers' Organizations (PO). The President is elected by the Council.</p> <p>All professionals are mandatory members of the CNPMEM, therefore CNPMEM represents all the 7500 French Vessels and approximately 15 000 fishermen. That is the reason why, alongside the National level, there are 12 Regional Committees and 13 Departmental ones.</p>	<p>We also have 5 "navigation titles" based on the type of fishing activity (without consideration about length or gear used). In those 5 titles, one defined "small scale fishery" as vessels that get off the harbor less than 24 hours, and another one called "coastal fishery" for vessels that get off the harbor more than 24 hours and less than 96.</p>			
VisNed					



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The Netherlands	VisNed is an umbrella organisation of 5 Dutch Producers – organisations representing 70% of the Dutch demersal fleet and 50% of the Dutch brown shrimp fleet.	All vessels less than 12 metres length.	If they are a member of a PO, they are represented by VisNed, which is approximately 20 vessels. PO Ned Vissersbond has about 20 members with vessels under 12meters.	30% of the demersal and 40% of the brown shrimp fleet is represented by the PO Ned Vissersbond and 10% by PO Rousant.	In the Netherlands most vessels shorter than 12 metres in length are recreational fishers. There are about 60 vessels that do this professionally, mostly with static gear. VisNed has entered into an association agreement with NetViswerk, a newly formed organisation in the Netherlands for coastal and inland small-scale fishers. Through VisNed their opinions form an integral part of the discussions within NSAC.
Deutscher Fischerei-Verband					
North Sea and Baltic Sea	6 state fisheries associations, in the North Sea more than 90% of German commercial fishermen are represented by the organisation (all sizes).	A number of criteria, most which have to be fulfilled; <ul style="list-style-type: none"> - Less than 24m; - Max 3 people per vessel; - Owner on-board; - 221 KW; 	Majority of the association (board and assembly) are from small scale fisheries.	An organisation of part-time fishermen (especially in the Baltic) is not a member of our organisation. In the North Sea they have	/



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		<ul style="list-style-type: none"> - First sale and first processing local; - Distance from coast 35 miles max; - Revenue less than €400,000 per annum; - Time at sea less than 72 hours per week. 		less than 20 members.	
SFF					
Scotland	<p>The SFF is the umbrella group for 8 regional/sectoral associations throughout Scotland representing everything from small creel vessels to large pelagic vessels. There are about 570 fishing vessels in membership, who debate and develop policy within their own association, which is then transmitted to the SFF for adoption by consensus as national policy.</p>	<p>Due to the nature of the industry it is neither easy nor desirable to pigeon-hole vessels into any poorly defined sector. In fishery management terms the main driver is simply whether a vessel has entitlement to fish for quota species or not. What passes for a SSF vessel in the Mediterranean may not be capable of operating viably in Scottish waters. But for the purposes of this survey we shall focus on the vessels which generally fish inshore</p>	<p>Within the 500 members of the SFF constituent associations 205 of these normally, but not exclusively, operate within the Inshore. As described above, each of these vessels can participate in the democratic decision making process which exists within the SFF structure.</p>	<p>There are a number of small unaffiliated groups throughout Scotland, which generally may have little desire or capacity to engage in full-time representational activities.</p>	/



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		waters, with small crews and usually spend no more than a day at a time at sea.			
Rederscentrale					
Fisheries in ICES areas 4bc, 7a, 7d-k, and 8ab	<p>Rederscentrale is a recognised Producers Organisation and Federation of Belgian fishing vessel owners, led by a Board of 14 Directors, all Rederscentrale members.</p> <p>Rederscentrale represents 72 shipping companies holding a Belgian licence to operate a professional fishing vessel. The ratio in terms of small (LOA < 24 m, max 221 kW) and large fleet segment is approximately equal.</p>	<p>There are no Belgian professional fishing vessels with LOA < 12 m and operating static gear. Coastal Fishery in Belgium is:</p> <p>Vessels with a capacity of max 221 kW, max 70 GT, max time at sea 48 consecutive hours with departure and arrival in a Belgian port and as such recognised by the Belgian authorities.</p>	There is no difference in the way Rederscentrale represents the owners of larger or smaller vessels and common and distinctive issues are addressed in exactly the same way for large, small and coastal fleet segment.	no	/



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Swedish Fishermen PO					
Sweden	253 member vessels, economic association in accordance with Swedish legislation.	Small scale vessels are an integral part of our organization with equal status.	Largest member vessel 34,1 m and the smallest 4,6 m. The average length of our member's vessels is 12,09 m. If a definition of 15 m is chosen 199 of our members are small scale, and if 12 m 175 of our members are small scale.	/	/



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