

Coalition for Fair Fisheries Arrangements (CFFA)
Evangelischer Entwicklungsdienst (EED)
Preliminary comments on UNEP draft 'Green Economy Report'
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General comments

The UNEP paper questions 'the current economic models', explaining they are unlikely to achieve the multiple international community goals for sustainable development, emphasizing in particular environmental goals, and demonstrates how 'greening' the economy may help reach such goals.

In particular, the paper wants to 'inform governments of two unique opportunities':

- *public funding, if targeted at environmental investments, will revive the global economy;*
- *such investments, if coupled with domestic policy reforms, the development of international policy and market infrastructure, could set the stage for a transition towards a truly 'Green economy': one which achieves increasing wealth, provides decent employment, successfully tackles inequalities and persistent poverty, and reduces ecological scarcities and climate risks.*

Although we agree with the need for a transition to a new development model, the approach detailed by UNEP raises the following issues:

- Sustainable development needs environmental, **social** and economic goals to be simultaneously reached. Social inequalities existing in the current economic models are largely ignored in this paper and it is unclear how the 'greening of the economy' as proposed will help meet other internationally agreed objectives mentioned in the paper such as poverty alleviation. In terms of 'social concerns', the paper mainly insists on job creation opportunities offered by the greening of the economy, without qualifying what type of jobs, for who, for what type of production, under which working conditions¹, etc.

Not addressing these issues fully means that the 'greening of the economy', based on the view that fisheries is primarily a 'wealth production system' could result in a 'global division of labor', whereby developing countries producers will mainly produce raw material at low costs, in an environmentally friendly way, for wealthy industrialized countries markets. This may have detrimental consequences on the level of (over) exploitation of developing countries resources, on fishing communities whose livelihoods depend on these resources, and on food security to which these fishing communities largely contribute.

¹ *The ILO 2007 convention on working conditions in the fisheries sector would be a useful starting point to look at what kind of social conditions may help develop sustainable fisheries*

- For fisheries, in as much as we (NGOs) wish to emphasize its contribution to food security, it is also important to look at it as a **food production system**, rather than simply as an 'economic wealth production system' as presented in the UNEP paper. Looking at fisheries as a food production system will not only help to find solutions that address food issues in developing countries, but will also help highlight the necessity of transition in the industrialized countries fish consumption and supply patterns (towards a consumption of less fish, of higher qualities) if we want the global fish production system to be sustainable.
- Finally, an aspect which is absent from the paper is the fact that (fisheries) sustainable development can only be built on **transparency, accountability and participation**. As recognized by the FAO Code of Conduct for Responsible Fisheries (and by the latest FAO Fisheries Committee in 2009), informing and involving all stakeholders, in particular fishing communities depending on fisheries for their livelihoods, is central for designing and implementing sustainable fisheries.

Some specific comments on 'Enabling a Green Economy Transition' for fisheries

Four proposals are made:

- ***Reforming fisheries subsidies and other economic distortions***

We agree that subsidies have played a negative role and led to over-exploitation and over fishing. It needs to be emphasized that subsidies have largely benefitted large scale operators, artificially cutting their operating costs and fuelling the competition with local fishing communities. However, for a transition towards a sustainable development models, public monies should be invested not only in 'the fish resource' as proposed, but also in improving living and working conditions in coastal fishing communities, in order to ensure they can fully play their role as an 'engine of sustainable development'.

- ***Adjustment costs***

We agree that the reduction of capacity should first be targeted at the most ecologically damaging practices. We also agree that education and fishers retraining are key to ensure the impacts of capacity reduction are properly mitigated.

- ***Building effective national, regional and international institutions***

We agree with this. We need to emphasize the importance to ensure developing countries are properly represented in regional and international institutions. We also need to insist on the fact that fisheries institutions can only be effective if they encourage participation, and have mechanisms to ensure transparency and accountability.

- ***Strengthening regulatory reforms and fisheries management***

We agree with the need to invest in the sustainable exploitation of marine ecosystems (control, research, development of participative fisheries management plans, etc).

We also agree that only limiting fish catches doesn't work. The paper seems to be supporting ITQs as 'THE' solution.

We are of the opinion that there is not one solution that fits all situations. Generalizing a system of quotas, as seems to be proposed here, will not be appropriate for many developing countries tropical fisheries (a system of quotas is by species, and doesn't include bycatch, which can be very high in tropical waters given that there is a high diversity of species in a given area). What we need is an ecosystem based management, which will not translate in all situations by the setting up of quotas.

In terms of allocation of access, we feel priority access should be reserved for those operators who fish most sustainably (selective fishing methods, providing high levels of 'good quality' jobs, contributing to food security, using low levels of fossil energy, etc). We are of the opinion that small-scale fisheries, in the vast majority of cases, present characteristics that meet such 'sustainable development criteria' and should therefore be given priority access.

The transferability of quotas/fishing rights, which present a high risk of concentration of fishing rights in the hands of a small number of economically powerful operators, will be detrimental to small-scale fisheries, and goes against priority access being given to small-scale fishing communities.

We feel therefore that, in particular for developing countries with tropical fisheries and important small-scale fishing communities, the setting up of quotas systems and their transferability are neither desirable nor conducive to sustainable development.

CFFA is a platform of NGOs based in Brussels. CFFA documents the development and environmental impacts of EU-ACP (European Union - African, Caribbean and Pacific states) fisheries relations on small-scale fishing communities.

Our aim is to supply detailed information to coastal fishing communities with a view to promoting their active and informed participation in the decision making processes affecting their livelihood, with a special focus on fisheries relations between the European Union and ACP countries.

<http://www.cape-cffa.org>

*Evangelischer Entwicklungsdienst is a member of CFFA
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