



Fishers' opinions on marketization of property rights and the quota system in France



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ABSTRACT

After many years of Common Fisheries Policies in the European Union, 88% of stocks are still being fished beyond their Maximum Sustainable Yield. While several Member States and the European Commission are moving toward Individual Transferable Quotas as a solution, France has declared its opposition to such marketization of fishing access rights and a national law has classified fisheries resources as a collective heritage. This paper discusses the evolution of the French system, principally its distribution of access rights by the Producer Organizations instead of the market. However, the Producer Organizations, which are more linked to the industrial fleet organizations, have not always modified their sharing formulae to include small-scale fisheries, resulting in a demand for more transparency and equity.

1. Introduction: Common fisheries policy in Europe

The European Union (EU) treaties establish marine fisheries management as one of the exclusive competencies of the European Community. This competency seems to find its root in the past and it is related to the fact that fish can run across national jurisdictions and fishers have to move to catch the fish. Before the introduction of Exclusive Economic Zones (EEZ's) and the Common Fisheries Policy (CFP) fishers moved from place to place. To guarantee equal access to the fish resources for fishers of all Member States an exclusive competency in this domain was given to the EU. The first CFP was set up in the 1970s and has since been revised several times. The latest revision is dated December 2013 and came into force in January 2014.

France, like all other members of the EU, has to implement the objectives and rules defined by the CFP. National decisions related to fisheries management take into consideration the objectives defined by the CFP. The main policy areas covered by the CFP are fisheries management, international policy, market and trade policy and finally funding policy.

While the CFP gives equal access to EU waters and resources, National States still have the competency to manage fishing activities within their 12 nautical miles zone and vessels of other Member States having historical activity in this space cannot be excluded. To conserve the resource, the CFP aims to manage fishing effort through limitation of fleet capacity, restricted days at sea, and technical measures regulating fishing areas, gear and catch. The management of

European fish stocks is based on total allowable catch (TAC) or fishing opportunities set up for a great number of commercial species. The European Commission (EC) prepares a proposal, based on scientific advice on the stock status from the International Council of Exploration of the Sea (ICES), Scientific Technical and Economic Committee for Fisheries (STECF) and the decision is made by the council of Ministers and the Parliament which are often accused of making decisions without following formulated recommendations [1,2]. TACs are shared among the different Member States based on a historical rights criterion [1–3]. For each stock a different percentage allocation of the TAC or quota is assigned to each Member State. This fixed percentage is known as the relative stability key. The CFP authorizes the exchange of quota between Member States [4].

Within this complex context, the CFP recommends that national authorities use transparent and objective criteria including the sharing of fishing opportunities among fishers to ensure that quotas are not overfished. When the national quota is reached the country must close the fishery. In the past, the CFP did not mention the quota distribution to small-scale fisheries (SSFs). During the last revision of the CFP some advances were made with the introduction of Article 17. This article calls on Member States to “use transparent and objective criteria including those of an environmental, social and economic nature” [5].

According to the Green Paper (GP) the reform of Common Fisheries Policy based on TAC and quota systems seems to have failed to achieve its objectives, as shown in the following quotation: “... 88% of Community stocks are being fished beyond MSY and 30% of these

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stocks are outside safe biological limits, which mean that they may not be able to rebound” [6]. To remedy these negative results, the GP suggests the introduction of more neoliberal policies including the creation of transferable fishing rights because the “use of market instruments such as transferable rights to fishing” [6] will reduce overcapacity as the industry will adapt its fishing rights in order to achieve economic efficiency. To “avoid excessive concentration of ownership or negative effects on smaller-scale fisheries and coastal communities” the GP added some safeguard clauses [6]. During the public consultation on the proposals of the GP the French fishing industry reacted strongly against the recommendations about Individual Transferable Quotas (ITQs, referred to in the GP as Individual Transferable Concessions) in Europe and more particularly in France.

This paper aims to present the main arguments expressed during the public consultation in France on ITQs and how these discourses influenced the National Fisheries law, how the quota system evolved and how these changes are viewed by SSFs and Environmental Non Governmental Organizations (ENGOs) as well as power relations within the Producer Organizations (POs). This article is based on various written sources: EU regulations and documents, academic literature and the minutes of all public consultation meetings, newspapers and reports published by the French Parliament and Senate. Face-to-face interviews with small-scale fishers, originated from different coastal areas, were also employed.

2. Debate around the last CFP revision in France

After the publication of the GP, French authorities undertook a substantial consultation with the French fishing industry and other stakeholders. Regional meetings in 2009 brought together fishers, territorial authorities, representatives of national authorities at regional levels, scientists and ENGO's. Participants were asked to address the following four issues: governance, management tools for EU fisheries, market regulation and how fishing products can best have added value. In the regional meetings the different visions of ITQs promoted by the GP were discussed.

For Brittany fishers the implementation of ITQs represented high capitalistic risks which may end with “uncontrollable quota uptake”. They feared speculation in quota prices and believed that the use of such a tool would not impact positively on resource conservation. For them, Member States should be free to manage national quota “in a more adaptive manner” and they called for a more “collective management” at the local level with fishers as active players [7].

Lower Normandy fishers underlined their attachment to the “relative stability principle” and called for the application of the subsidiary principle in the matter of the management of “fishing opportunities”. They were not fully against the idea of Individual Quotas in fisheries but did not agree with adding the “transferability” aspect. For them, liberalization of the European market for fisheries quota would mean “abandoning relative stability” and concentration of quota in the hands of few big fisheries enterprises [7].

Fishers of Upper Normandy were in favor of the implementation of non-transferable Individual Quotas (IQs) that would increase predictability for fisheries enterprises. However, they considered that quotas, even individual ones, must be managed by Producer Organizations (POs). Fishers from the South Atlantic regions reacted to the proposed implementation of ITQs. Pays de la Loire fishers said that they “completely distrust the term transferable rights” which for them is synonymous with the privatization of fishing resources. Poitou-Charentes fishers thought that ITQ would lead to “an excessive concentration of quota without any attachment to territories”. For Aquitaine fishers it was impossible to introduce the ITQ system because “fishing resources are a public good”. All agreed that the collective management of quotas, within POs, is the best system to achieve resources conservation [7].

French authorities conveyed to the European Commission (EC) the ideas expressed by fishers during these public consultations. So France could accept the principle of individual quotas if they were collectively managed, for example by POs, but “... remains against the compulsory introduction of ITQs to monetize a system [which would be] ... conducive to speculation and to excessive concentration of quota through the establishment of a free market” [8]. During the public debates it appeared that French fishers viewed IQs as a good tool if it was managed collectively within the POs framework. But they were vehemently against the concept of privatization and transferability of resource access. Transferability of quota was seen as a way to jeopardize the relative stability and concentrate quota in the hands of a few fishers. Concentration of fishing opportunities would impact negatively on employment and other social aspects within fishing communities.

ENGOs participated in the public consultation and also expressed their disagreement with the implementation of ITQs in France. The French branch of Greenpeace, for example, had the same position as French fishers: that such a system would concentrate fishing rights without reaching the main objective of the CFP: the “reduction of fishing pressure on the resources” [9].

During the 2009 public debate only a few comments were expressed about the protection of SSFs. One of these was formulated during the meeting in Boulogne-sur-Mer and it concerned the distinction between small-scale and industrial fisheries made by the EC. Participants could not understand why the EC divided fisheries into two categories, because in France there is no such distinction, as all are members of the same organizations. Participants wondered if this distinction would impact on the distribution of the fisheries fund dedicated to France [7]. This second concern was expressed by Greenpeace which noted that “... the CFP didn't pronounce any specific measures for SSFs, which constitute 80% of the total employment in fisheries and 20% of the landings in the EU [9]”. In their opinion, the CFP should promote access to resources for vessels having less impact on the ecosystem. The following section examines the French quota system in which SSFs operate and SSFs opinion of that system.

3. The French quota system

Despite the introduction of Total Allowable Catches (TACs) at the European Union level in 1983, France did not implement this system at a national level until 1990. The first sharing of national TACs concerned only six species: cod, pollock, hake, mackerel, plaice and sole. The national TACs were divided among the different coastal regions of the EU except the Mediterranean Sea where the TACs are not applied. The division of TACs or quotas among regions was monitored by the national committee of quota management established for that region. The main concern of the French authorities was the way the quota becomes a sub-quota for each region, itself divided by harbors and vessels. A national committee was established to monitor the quota allocation per region and advise the national administration. Aside from the national fisheries administration, the other members of the committees were the POs which were in charge of the organization of fisheries markets and the National Committee of Maritime Fisheries (CNPM) which has been responsible for resource management within national territorial waters since 1993 through its regional committees (CRPM).

The first distribution of the national quota was redefined by the Fisheries law in 1997 which asserts the role of the State in the allocation of fisheries licenses and quota and declares the non-individual and non-transferable character of the quota. The 1997 Fisheries Law states that national quota should be shared among vessels operating under the French flag and having economic links with the country. But EU rules on freedom of establishment allow fishing companies from one EU member country to be established in another country's fishing waters and therefore under its quotas. To preserve the

EU member state quotas, there should be some real connection between the fishers in question, their boats and the flag of the country they decide to fish under. For France the following criteria apply: hire a French skipper or sell fish at a French auction. The role of POs was also strengthened by the Fisheries Law in 2010 since POs are also responsible for sub-quota management. POs involvement in quota management is not really new because, before this, they prepared fisheries plans to adapt to the demands of fish markets which in turn helped to stabilize the price of the fish [10,11,15].

From the beginning of the 1990s until 2005 – the date when the State decided to freeze the historical rights of vessels at a three years reference point (2001–2003) – only a few small-scale vessels joined POs. POs membership is voluntary and only fishers wishing to benefit from the minimum price mechanism managed by POs joined these organizations. The services offered by POs, at that period, were not considered sufficient to warrant membership by SSFs and most decided not to join these organizations. Nor did they join later when the State gave the POs authority to manage sub-quotas. So, SSF continued their activities outside of these organizations and fished under the quotas held by national fisheries administration and only the large vessels such as trawlers and purse seines joined POs at those times. This situation did not change until the beginning of 2000 when quota allocation and division into sub-quotas between regions and POs were introduced. But the main change in the French quota system was produced in 2006 by the ministerial order which introduced for the first time the principle of IQs. It clarified the rules of quota allocation by reaffirming the principle of historical rights and also imposed the *historical rights track records* as a “method for calculating how quota may be divided up into sub-quota among POs” [11]. Since historical rights became the main principle for quota allocation to POs, vessel/owner partnerships and the average landings of 2001–2003 constituted historical rights for vessels [12]. Consequently, vessels that entered the fishery after 2003 have no historical rights.

One of the first species to fall under the system of IQs per vessel, after a decision of national authorities, was bluefin tuna in the Mediterranean Sea, a place which is not subject to the EU quota system. The introduction of bluefin tuna quota was done by the International Commission for Conservation of Atlantic Tuna (ICCAT) in 2008 and the French national authorities allocated this quota on an individual vessel level. The irony is that this IQs system was introduced in France for a regional sea originally not concerned with the EU quota system for other species. It appears that this first experience of IQs contributed to the expansion of the system into other regions of France. In 2009, following a negotiation between the French Fisheries Directorate and the different POs, it was decided to test IQs for some species in regions where the EU TAC system was applied. In 2011, the administration prompted POs to use individual catch limitations for all species but many POs did not implement this system during the first years [12].

In brief, it can be said that the French quota system evolved rapidly and the discussions held in France during the 2009 public debates made it easy to introduce IQs. The system moved from national quotas open to all vessels to the division of the national quotas into (1) sub-quotas managed by POs and (2) those managed by the Directorate for Maritime Fisheries and Aquaculture (DPMA) open to non-PO members [13].

In 2010, the French Fisheries Law legalized different changes to the quota system. In 2014, some other changes were made, thanks to the establishment of a national working group called “reform of production rights” which studied the issue of the management of historical rights through a system of reserves. Previously, 100% of the historical rights of retiring boat owners had reverted to the POs in which they were members. Now a retiring boat owner must return 30% of his historical rights to the national reserve and 70% to the PO. Additionally, a part of the national reserve may be reallocated to the PO reserves [14,15]. The same principle is also available when the owner of the vessel changes

but in this case only 20% of historical rights is returned to the national and POs reserves. These changes were aimed at supporting new entrants. The quota in the national reserve managed by Fisheries Authorities was supposed to support small-scale fisheries in accordance with Article 17 of the CFP which recommended Member States to take into account environmental, economic and social criteria for quota allocation. These were the official objectives; the next section examines what happened in practice [6].

4. Where do SSFs stand within this complex system?

In 1995, 4889 vessels out of a national fleet of 6646 vessels were less than 12 m long. In 2015, 3539 vessels out of a national fleet of 4400 vessels were less than 12 m long [16]. In the past, the majority of SSF vessels was found in the Mediterranean Sea but this is no longer the case. According to the data collected by the French Institute for the Exploitation of the Sea (IFREMER) in 2012, the SSF fleet is constituted as follow: 1658 on the Atlantic coast, 1486 on the Mediterranean Sea and 1422 on the North Sea and English Channel. These numbers show the importance of SSFs to the entire French coast.

During the 1990s, none of the SSF vessels on the Atlantic and North Sea-English Channel joined a PO. The first reason mentioned by fishers in the interviews was that “they were skeptical about the implementation of this system in practice”. They considered that this system introduced by Brussels could not be applied in France because it restricted the operational capacity of the vessels. For many SSFs this system could be applied to larger vessels but not to themselves, who operated in coastal waters with more environmentally friendly gear and with small landings. For those reasons the SSF vessels did not join the POs. In addition, the SSFs did not need the support of POs to add value to their production which was of higher quality than that provided by trawlers, for example.

In 2000, 50% of the French small-scale fleet were members of POs and this increased to 60% by 2010 [15]. Some authors explained this change in the attitude of SSFs towards POs as their wish to avoid the “race of fish” affecting all fishers operating under the quota managed by the national fisheries administration which was fast exhausted. Vessels using the quota managed by the fisheries administration do not benefit from historical rights and the principle of first come first served is applied. Therefore, some small-scale fishers decided to secure their catches by joining POs, in an attempt to organize their work throughout the year [12,17].

However, the lack of historical rights was the reason why POs were reluctant to integrate SSFs into their ranks. POs and their members did not wish to discuss the reallocation of their fishing opportunities. The lack of historical rights of SSF can mostly be explained by the misreporting of their catches for many years as only vessels over 12 m long are required to report their catches. Eventually the integration was facilitated, thanks to external changes such as the decommissioning policy applied by the EU from which many larger vessels benefited. With the departure of many larger vessels, there were fewer members in POs and subsequently available quota. So POs decided to facilitate the entrance of SSFs into their organizations. The new policy undertaken by POs was supported by the Fisheries Authorities which allocated historical rights on a few species to some SSF vessels. Unfortunately, it was impossible to learn what criteria were used to allocate historical rights to SSF vessels. This new role of POs coincided with their objective to “obtain EU recognition” and a larger membership required a greater budget to run the POs. But despite all these efforts, many SSFs remained outside of POs.

The potential increase in the value of their vessel was probably one incentive among others for these fishers who joined the POs. In France, vessels without quota (i.e., historical rights) do not obtain the same price as those with quota when they are sold [17,18]. In a vessel transaction, an agreement between buyer and vendor must be approved by the POs and is then submitted to the national advisory

committee of quota for its approval. But in general such an agreement is approved.

Although fish resources are classified by the Fisheries Law (1997 and 2010) as a common heritage in order to avoid their privatization, the quota of vessels can be passed on to the next owner and the value of the quota is included in the price of vessels. As such the quota becomes an individual right with a shadow or hidden price [19]. In interviews with small-scale fishers this idea of giving a value to the vessel through the possession of quota appeared several times. The price of vessels can be higher if they have quota of some valuable species, for example, sole. In other words, IQs became ITQs attached to vessels, but limited by the need for PO approval of any sale.

One interviewee, a small-scale fisher member of a PO allowed to fish 12 t of sole, said that his boat can be sold for several thousand euros more than other vessels that do not have the equivalent sole historical rights. The same fisher admits that quota allocation by POs can lead to the specialization of fishers because in his case, he was able to obtain his large quota as soon he joined the PO because he concentrates on sole fishing. But this quota of sole is not enough to live on and he would like to find 4 t more. This is impossible because he cannot buy more quota as it is prohibited by law. Neither can he buy another boat because very few of them have historical rights equivalent to more than 12 t of sole. So for him the only hope is that the PO may have spare quota every year to share among members.

Another fisher interviewee said that he is doing more multi-species fishing since he joined the PO. But for him the practice of this type of fishing is an obstacle to obtaining new quota since the IQ was introduced. That is because his historical catches were low during the three qualifying years and its quota was dispersed across many species. The same argument was made by other fishers who could not access enough quotas, especially when species fetched good commercial prices. Some of them think that fishers targeting mainly one species could obtain a larger amount of quota and earn enough money to live on. Small-scale fishers consider that nowadays it is difficult to become sole fishers as there is no more available sole quota and the vessels having high quota are old and nobody can buy them as they are expensive.

Other small-scale fishers mentioned that POs fix the quota of each vessel and as soon as the quota of each species is taken, they should “stay in the harbor”. Fishers need to organize their activity differently than in the past so as not to exhaust their quota at the beginning of the season but also to be sure that they will find the allocated quantities when they want. For example, fishers from the harbor of Audierne, Brittany, harvest pollock between January and March and then shift to monkfish, red sea bream, etc. But a few years ago they could not follow this calendar because one big boat fished all the available quota of red sea bream and 15 vessels in the harbor who had very little quota for this species could not fish it at all. So all of them had to turn to other species and the equilibrium which they had established over the years was disrupted. Since then the local PO has opened the season of this species first to the small vessels and as soon their individual quotas are reached the PO opens the fishery to trawlers.

But the situation of small-scale vessels that are not in a PO is different. They fish under the part of the quota managed by the DPMA and they are often out of quota especially for species which have good value. So they shift to non-quota species. They can become members of POs but without access to quota because, as one fisher explained, “the PO quotas are entirely used up by the members so it is impossible to share them with newcomers”. This quotation highlights the main difficulty faced by vessels not yet members of POs. Current members, mainly larger vessels, will not agree to share the available quota with newcomers. The current system of quota allocation is closed to newcomers and unlucky fishers who do not have historical rights and were not able to join a PO to secure their access to quota in time no longer have access to them. Newcomers can access IQs only if they buy a vessel with quota, but the price of such a vessel is high, higher than in

the past [20]. For those who cannot access IQ, the only solution is to fish quota species under the quota managed collectively by the Directorate at the national level or to fish species that are not subject to quota. Few valuable species are not subject of European quota, so SSFs without IQ can work but in a limited fashion.

But for SSFs having little IQ or, even more, for those fishing under the national collective quota, the main difficulty is the implementation of the Landing Obligation (LO), which requires that all harvested quota species be landed, not discarded [21]. Implementing the LO can be done only in two ways: make fishers stop fishing or allocate them new quotas in such a way as to prevent discards. If implemented at the EU level, such changes would affect the relative stability principle, which would be an unexpected consequence of the LO.

Most SSF members of POs have little understanding of the governance of POs and particularly of the criteria for allocating quota among members. Some of them have the feeling that fishers with greater lobbying capacity are better served than others by the PO. The challenge for them is to understand how the board makes decisions and to learn whether these are influenced by groups of fishers with high lobbying capacity. This is not easy to discover because internal rules and minutes of board meetings are not made public.

The composition of the board of the largest French PO illustrates what appears to be a typical power imbalance: with 759 vessels of which 59% are less than 12 m, only 16.3% of the seats within its board are occupied by SSFs. The low representation of SSFs within this PO board may explain the weak position of SSFs in the sub-quota allocation process.

5. Different visions of the CFP and quota system

French small-scale fishers did not have their own organizations because by law, from 1945 on, when the first fisheries organizations were established, all fishers were members of the same organizations: the fisheries committees. The fisheries committees are the only organization allowed to represent fishers' interests and rights at the French level [15]. In 2012, small-scale fishers from the Mediterranean Sea appealed to their colleagues from other coastal areas of France to join their initiative and establish together a national organization representing the interests of SSFs. Thus was born the *Plateforme de la Petite Pêche Artisanale* (PPPA), the small-scale and artisanal fisheries platform. This initiative was supported by ENGOs who saw in this initiative the opportunity to fight against the use of non-environmentally friendly gear. Small-scale fishers have viewed this support positively, as the ENGO's have more political weight than they do. Both were beginning to question national authorities, representative fisher organizations and POs about the equity in sub-quota allocation. Traditional fishers' organizations and POs tried to marginalize this new organization which dared to rally to the traditional enemy of fisheries industry: the environmentalists! According to the PPPA leaders, fisheries committees of the POs did not hesitate to exercise their power on SSFs wishing to join the new organization by explaining that, if they joined, they would lose the fishing rights allocated by the committees such as the licenses by gear or species. So only a few fishers from the Atlantic coast joined the PPPA. The PPPA gained more visibility at the EU level by joining the newly established organization called Low Impact Fisheries in Europe (LIFE) which also acts for the recognition of SSFs at the EU level and their inclusion in the CFP.

A short overview of the vision of the PPPA and ENGOs for EU policy and the quota system is presented here. Since its creation, the PPPA has acted against the implementation of the fisheries transferable concessions because for them this tool regulates fishing effort through the market, promotes access to the resource to the most economically powerful fishers, and engenders resource concentration. In opposition to this system proposed by the EU, PPPA members suggested the implementation of a new regime of access to the resource based on environmental, social and territorial criteria. These criteria are found in

Article 17 of the CFP, so PPPA calls for the full implementation of this Article, especially in quota allocation that they consider unfair for them. As discussed above, quota allocation is based on historical rights obtained during the period when SSFs were not members of POs. So they contest the current quota system and claim “fair share destinies for SSFs” [22]. In 2016 the co-chairs of the PPPA stated that “quota is a formidable tool to small-scale fishers. It operates on a deeply unfair mechanism, the catch record. It rewards larger vessels and abandons those practicing reasonable fisheries”. They call for a new system which offers more benefits to SSFs, but for the moment nothing has changed. Another article on their website critiques the unfair SSF share of bluefin tuna quota in the Basque country, as the local PO allocated 88 t of tuna to pelagic trawlers while two SSF vessels using hook and line got 500 kilos per year and seven others only 100 kilos per year [22]. This example shows that productive gears which negatively impacted tuna stocks in the past still have more rights than gear which have less impact on the resource. The transparency of quota allocation by POs is also denounced.

Another member of PPPA considers it discriminatory that fishing activity must stop as soon as the quota of one species is reached. In his view, larger vessels are responsible for overfishing so the same rules should not be applied to both fleets. This is actually the practice in one PO's pollock fishery, a major hook and line fishery in which a PO closed the fishery for larger vessels and allowed the SSFs to finish their season. This PO decision satisfies partially SSFs claims.

ENGOS developed the same arguments as the PPPA in public debate and especially in places where they meet decision makers. One example is the public hearing organized in the senate about the future of fisheries following the CFP. The Greenpeace representative at this public hearing explained that they found Individual Quota a good tool but that they are opposed to the trade of these quotas. They argued that the only criteria on which the allocation of sub-quota is based are historical rights and they called for the implementation of a new system based on the criteria found in Article 17 of the CFP. For them the new system should be transparent in contrast to the current situation in which nobody knows on what criteria IQ allocation is based. The lack of transparency of the current system limits the development of a new system. The World Wildlife Fund and Bloom NGO used more or less the same argument vis à vis the current system and also called for transparency [23]. PPPA members and ENGOS are on the same page regarding the current system and constitute a stronger voice together.

6. Conclusion

French fishers, ENGOS, and territorial authorities expressed their opposition to Transferable Concessions as they were proposed by the European Commission in the Green Paper, thus rejecting a full neoliberalization of French fisheries. Transferable concessions or transferable quotas are against of the principle that fisheries resources are a public good and cannot be privatized. Fishing is an activity with significant territorial roots and the concentration of quotas in the hands of few companies may well deprive coastal communities of their identity and jobs. This link between fishing rights and territory was also an objective that the Dutch authorities wished to accomplish in the implementation of their ITQ system (see Hoefnagel and De Vos, this issue). POs are responsible for keeping fishing rights within the geographic area where they operate as a way to preserve the economic link with the local community. This is possible through the collective management of the quotas within the POs and French fishers believe that collective management is a better tool for achieving resource conservation than ITQs which are freely transferable to any area. But there is growing skepticism about recent developments in which some POs have significantly increased their membership and extended their geographical area of responsibility as a consequence of multiple PO mergers. Many fishers view this as a potential watering down of the economic link of the resource to a local area.

The first allocation of quotas in France was viewed by some SSFs as “inequitable” and the non transparency of sub-quotas allocation within the POs has further reduced their confidence in the system. The new organization established by some SSFs, the PPPA, hopes for a revision of the current law regarding quotas allocation by insisting on the implementation of Article 17 of the CFP. A full implementation of this article by Member States would require the introduction of new criteria of sub-quota allocation, for example, the use of more selective gear and the requirement for a smaller ecological footprint. The imposition of these new criteria can be done only by national authorities. Small-scale fishers and ENGOS need to convince policymakers about the unfairness of the current system and demand they act. This objective will be difficult to achieve in a country where decision-makers see larger vessels as successes but have little regard for their impact on the environment and where historically POs viewed ENGOS as the enemy.

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