

CHAPTER 12

THE ROLE OF ENVIRONMENTAL NGOs IN FISHERIES GOVERNANCE

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Abstract

This chapter explores the evolving role played by environmental NGOs (ENGOs) in UK fisheries governance in recent years. This role has grown exponentially, as the environmental dimension of fisheries activity has become increasingly understood and accepted by regulators and even by fishermen. There are three sections in the chapter: the first section explains how ENGOs have moved on from ‘problem identification’ to embrace ‘problem solving’; the second section provides five illustrations of ENGO engagement in problem solving; and the third section addresses the challenges of the future, focusing on ENGO participation in the new European Regional Advisory Councils (RACs), and discussing ways in which ENGOs can fulfil their vastly increased workload in relation to fisheries governance.

12.1 Introduction

During the last twenty years, the context of fisheries governance has changed dramatically. From a time when the focus was almost exclusively upon managing the exploitation of fish stocks in a way that would maximise long term commercial catches, the focus today is increasingly upon protecting marine ecosystems, so that fishing activity can only take place when and where it is consistent with ecosystem health. Environmental NGOs (ENGOs) have played a central part in bringing about this change, and they continue their efforts to consolidate and implement it. However, they are finding that it is committing them to a major allocation of resources, and they have to find ways of coping with this inflated workload. In a sense, they are the victims of their own success.

In the first section of this chapter, I explain the changing role of ENGOs in relation to fisheries governance – from campaigning for ‘problem identification’ to collaborating in ‘problem solving’. This shift is a familiar pattern for ENGOs who are working in other areas of environmental governance, but in the case of fisheries, it has been a particularly rapid process. This is not to say that ENGOs have abandoned their campaigning for problem identification – far from it; there are many environmental issues about fisheries that still have not been properly recognised, and ENGOs continue to mount campaigns to highlight them (for example, the Royal Society for the Protection of Birds (RSPB) long-standing campaign against industrial fishing, and the Deep Sea Conservation Coalition (DSCC)’s current high profile campaign for a moratorium on deep water trawling on the high seas). Nor is it to suggest that collaboration in problem solving has sorted out all the problems that have been identified. There is still a lot of resistance among resource users to environmental constraints on their activities, and ENGOs have to continue to push hard if they are to make headway. However, at least some progress

is being made in moving beyond issue recognition to doing something about the issues, and ENGOs are contributing significantly to that progress.

In the second section, I examine five instances where ENGOs have been engaged in problem solving, and evaluate how effective they have been. The first case is the Shetland sandeel fisheries management partnership, which was a pathfinding example of cooperation between fishers, regulators and ENGOs (the RSPB) to find a way of protecting seabirds' supply of sandeel prey, while balancing the needs of the commercial exploitation of the sandeel stock. The second case is ENGO participation in the meetings of the influential North Sea Conferences, which materially pushed the agenda forward on the issues of the ecosystem-based approach (EBA) and the precautionary principle (PP), now widely accepted rules of fisheries management. The third case is the 2002 reform process of the European Union (EU) Common Fisheries Policy (CFP), to which the ENGOs contributed, helping to push the CFP in the direction of EBA and PP. The fourth case is more diffuse – the forging of various bilateral links with the fishing industry: some ENGOs have succeeded in working with fishers to bring in environmental measures that they can accept. The fifth case is the ENGOs' recent admission to the European Commission's Advisory Committee on Fisheries and Aquaculture (ACFA), which may stiffen the committee's resolve on environmental impacts of fishing.

In the third section, I discuss the future prospects for ENGOs in European fisheries governance, concentrating on the opportunities provided by their participation in the newly established seven Regional Advisory Councils (RACs). A significant concern here is with the added burden that this and other opportunities entail for ENGOs. One strategy that they can employ to deal with this workload is to work more closely with each other to share the burden. The fact that the ENGOs have such a problem is, however, a welcome sign of their success in stamping an environmental signature on fisheries governance.

12.2 The nature of the change

The role of ENGOs in fisheries governance has developed significantly in recent years, reflecting a transition from the phase of 'problem identification' to include also 'problem solving'. The 'problem identification' phase is the ENGO's classic 'whistleblower' role where it capitalises on its communication resources to raise awareness about an identified conflict in attempts to galvanise the political and practical action which characterises the problem solving phase. Problem identification was the hallmark of the relatively limited ENGO activity in fisheries in the 1980s – 'limited' because fisheries was scarcely perceived as an environmental issue for ENGOs. In addition, there was little progress towards getting involved in problem solving because there was no access route for ENGOs to the levers of fisheries governance in those days. All things considered, we could characterise the ENGOs' role in the early days as 'occasional whistleblower'.

As the ENGOs strove to enter the closed shop of fisheries, raise the environmental issues they had identified, and be acknowledged as a stakeholder, they were generally

viewed with suspicion, especially by the fishing industry. Twenty years ago, the fishing industry itself was less well organised as a lobbying force than it is now (one civil servant described it to me then as “a broad church but with very narrow aisles”). As a result, the industry perceived the ENGOS, with their well-oiled publicity machines, as capable of drowning out their own voice. With overfishing the widespread accusation, the industry saw in the ENGOS only a ‘green’ threat exerting yet further pressure on their beleaguered industry. As a result there was lack of mutual trust and dialogue.

12.3 Evidence of effectiveness

We can chart the factors that began to involve the ENGOS with fisheries governance as a series of opportunities for deeper engagement which helped develop their relationship with other players. Five illustrations can be given of this effective engagement: the Shetland sandeel fisheries partnership; the North Sea Conferences; the CFP 2002 Reform; the bilateral links with the fishing industry; and access to the European Commission’s ACFA.

12.3.1 THE SHETLAND SANDEEL FISHERY PARTNERSHIP

As far as the relationship between the ENGOS and the industry was concerned, trust-building had to precede a more constructive dialogue. In the case of the RSPB, a turning point was its engagement with the Shetland sandeel fishery in the 1980s. The collapse of the local sandeel stock at that time and the resulting widespread breeding failure of sandeel-dependent seabirds brought fishermen, fishery managers (initially DAFS: Department of Agriculture and Fisheries Scotland), the country agency (Scottish Natural Heritage) and the RSPB into sharp conflict. It was a steep learning curve for everyone. The RSPB invoked the precautionary principle (probably for the first time in a UK fisheries issue). Engaging seriously with the fisheries science, such as the niceties of Virtual Population Analysis (VPA), we challenged the inadequacy of the scientific basis for managing the fishery. Recognition by the other parties of this comprehensive approach helped to legitimise our place at the negotiating table although it was the eventual collapse of the sandeel stock which actually catalysed most consensus.

In Shetland, there followed an unprecedented level of cooperative research, dialogue and transparency about the best way to move forward, a process greatly assisted in this case by the small size of the Shetland community in which individuals could easily meet on a regular basis and get to know one another. From this debate evolved the current management regime, which balances fishing and environmental interests, with the RSPB having an active voice in governance.

While the Shetland case study was a pioneering application of an ‘ecosystem approach’ (Dunn 1998), the interpretation and operational integration of the approach into the bigger picture of UK and European fisheries management remains a key challenge. Nevertheless, the experience gained from the small, inshore Shetland sandeel fishery did help to facilitate the RSPB’s advocacy for the creation in 2000 of the closed area for the much larger offshore sandeel fishery (prosecuted mainly by Denmark) off the east coast of Scotland and northeast England. The closure, which remains in place to this day, was taken in response to the declining productivity and population of the kittiwake *Rissatrirdactyla* on the adjoining coast and represents the first major management measure

for a Community fishery taken in the interests of wider biodiversity. In the preparation of the relevant advice to the European Commission in 1999, the RSPB participated on an *ad hoc* basis in the ICES Study Group on Effects of Sandeel Fishing, another precedent in the ENGOs' developing stakeholder role in fisheries governance.

12.3.2 THE NORTH SEA CONFERENCES

In retrospect, another watershed for ENGO engagement was the Fourth (1995) International Conference on the Protection of the North Sea in Esbjerg. Welcoming and recognising the growing stakeholder involvement of environmental NGOs at Esbjerg, the high-profile Danish Environment Minister, Svend Auken, said in the Plenary meeting that there was a time when people wondered what such organisations were doing in a serious debate. "On the contrary", he continued, "it is these organisations that make the debate serious".

This was a generous declaration of support but it had a lot to do with the febrile atmosphere at that conference generated by the controversy over the dumping of Shell's 'Brent Spar' oil installation in the North-East Atlantic. Arguably, it marked the start of serious engagement by the ENGOs with European fishing policy issues. The then UK Environment Minister, John Gummer, who had much to teach the ENGOs about grabbing the limelight, was furious with the Danes' threat to censure the UK over dumping oil installations at sea. Gummer accused the Danes of using 'Brent Spar' as a device to divert attention from "raping the North Sea" with their industrial fishing. Interestingly he also accused Greenpeace (the 'Brent Spar' protagonists) of ducking the fishing issue because, he said, "you can't raise money from slithery creatures like fish."

Esbjerg spawned the Bergen Intermediate Ministerial Meeting (IMM) on the Integration of Fisheries and Environmental Issues (IMM 1997): a key conference which enabled the ENGOs to lobby on a wide variety of fisheries-related issues, and not just the industrial-fishing gauntlet thrown down by John Gummer. The ENGOs were particularly instrumental in lobbying for the basic principles that had to underlie fisheries governance in the new millennium, namely the precautionary approach, the ecosystem-based approach, and the overarching goal of sustainable development. Later, they were also influential in helping to shape the European Commission's Fisheries Biodiversity Action Plan.

12.3.3 REFORM OF THE EU COMMON FISHERIES POLICY (CFP)

The North Sea Conference developments, in turn, gave the ENGOs a platform for the looming reform of the CFP, which came to a head in 2002. Key issues for most of the ENGOs were the reduction of fleet capacity, the removal of public subsidies and the implementation of an ecosystem-based approach. At least in the early stages of the reform consultation, the ENGOs put most of their energy into influencing the European Commission, less so the European Parliament whose governance status in EU fisheries policy is currently 'consultation' rather than 'co-decision'.¹

¹This distribution of ENGO effort may conceivably change in future: the Convention on the Future of Europe, a high-level forum of politicians from across Europe, produced a draft Constitution for Europe in July 2003.

The ENGOs appeared to be moderately successful in influencing the European Commission, so much so that the Commission's 2001 'Green Paper' was seen as literally too 'green' by much of the industry (EC 2001). However, at the same time, the Commission arguably had their own agenda, which coincided with parts of the ENGOs' manifesto, notably on subsidies and the ecosystem-based approach, so this created synergy and a win-win situation. Put another way, the Commission might be said to have used the ENGOs as a bridgehead for putting controversial and ambitious proposals to industry.

While campaigning on the big CFP reform issues such as the ecosystem-based approach and subsidy reduction, the RSPB and BirdLife International also decided to focus on a very specific issue, which reflected their traditional concern with inshore fisheries and the importance of inshore waters for biodiversity. Accordingly, we commissioned a report (Coffey and Dwyer 2000) from the Institute for European Environmental Policy (IEEP), which presented a compelling case for a new European inshore fisheries management regime. Among the report's recommendations, the case was made for giving Member States the right to manage all fishing activities within their 12nm territorial waters, including also 'foreign' vessels fishing under historic rights agreements. The CFP reform (EC 2002) did secure this very right for Member States, though the extent to which the RSPB's advocacy actually assisted this change is, as always, hard to judge.

Overall, the ENGOs appeared to have played a greater part in shaping the CFP during this reform period than ever before, but the Green Paper and the Commission's proposals may be described as the high water mark of the ENGOs' aspirations, because opposition hardened thereafter. Compared with their earlier inroads, the ENGOs failed to engage effectively enough with the critical final hurdle, the Fisheries Council. While all stakeholders find the Council particularly intractable, there were other reasons for this shortfall. In particular, the ENGOs are well resourced and organised for fisheries advocacy in northern Europe but, with some notable exceptions, less so in the southern European Member States where – with a sharp divide in the goals of CFP reform – little progress was made in lobbying these so-called 'Friends of Fishing' nations. The environmental agenda became increasingly marginalised as the sense of crisis management deepened. As December 2002 approached, ICES were calling for a cod ban in the North Sea, and the southern Member States became increasingly opposed to reduction of their fishing fleets and subsidies.

12.3.4 BILATERAL LINKS WITH THE FISHING INDUSTRY

At country and regional level, however, the CFP reform presented opportunities for a deeper engagement between ENGOs and the fishing industry. To an increasing extent, both could rally under the win-win banner of seeking 'sustainable fisheries'. There was recognition from the industry that the ENGOs – geared up as they are for communication – can function as grit in the oyster to help raise the profile of issues and

This Constitution would give the European Parliament co-decision powers in the area of fisheries policy. From October 2003, the text was discussed by government representatives at the Inter-Governmental Conference (IGC). The IGC came forward with a final Constitution for Europe in Spring 2004, and it was signed in October 2004. It is currently uncertain whether government representatives will agree to an extension of the Parliament's powers on fisheries.

create pressure for mutually advantageous change. Such alliances were also facilitated by the perception that, in the catastrophic failure of the pre-2002 CFP, the industry was the victim of external (especially Commission and Ministerial) mismanagement.

There are numerous recent examples of close and constructive involvement between ENGOs and industry. Apart from the pioneering engagement on the Shetland sandeel fishery (above), the RSPB has a long tradition of working with the Sea Fisheries Committees in England and Wales. In 1999, we collaborated with the Cornwall Sea Fisheries Committee to draft a byelaw (the first ever environmental byelaw for a UK inshore fishery and the first exercising of the 1995 Environment Act by a Sea Fisheries Committee) to mitigate seabird by-catch in the St Ives Bay gillnet fishery. We have also cooperated closely with the Scottish Fishermen's Federation on inshore fisheries, and hopefully this helped to secure the new access restrictions adopted in the CFP reform. Again, the World Wide Fund for Nature (WWF) has worked closely with the fishermen's organisations north and south of the England/Scotland border to lobby for regional management and for short-term investment in the industry to secure long-term sustainable fisheries.

12.3.5 ACCESS TO ACFA

To the extent that the ENGOs have been successful in shaping the growing mountain of fisheries rhetoric with which we all struggle now, the ENGOs have influenced the governance of fisheries. But what of their stakeholder role in the decision-making process? The European Commission's consultation process on the reform of the CFP gave the ENGOs unprecedented access. As part of this, in 1999, towards the end of her term as Fisheries Commissioner, Emma Bonino was instrumental in opening up the Commission's influential ACFA to Environmental (and Development) NGOs. However, while the ENGOs continue to participate in this, their perception is that proceedings and outcomes are dominated by the traditional strength of the offshore producer sector, and this creates the impression of ENGO involvement being 'greenwashing'. Although this deters some ENGOs from engagement with ACFA, others find particular value in the dissemination of information from the Commission that such engagement brings: for example, early indication of intentions, strategies and proposals, enabling the participant ENGOs to be as up to speed as the fishing sector with the Commission's thinking on the evolving CFP.

12.4 Future challenges

I now turn to the future, where I see two challenges for ENGO engagement in fisheries governance. The first challenge is specific, relating to ENGO involvement in the RACs newly established by the European Commission. The second challenge is more general (exemplified by ENGO's membership of the RACs): that of the greatly increasing workload falling on the shoulders of ENGOs who have taken up the opportunities now available to participate in fisheries governance.

12.4.1 ENGAGING WITH REGIONAL ADVISORY COUNCILS (RACs)

Despite its shortcomings, ENGO access to ACFA has helped to consolidate the stakeholder role of ENGOs in fisheries governance, and this, in turn, creates a precedent for the ENGOs' stakeholder role in decentralised management. This has gained considerable momentum with the growing emergence of RACs, seven of which are in various stages of creation following the revision of the CFP, which gave them a mandate. As the IEEP Workshop on Regional Advisory Councils (Anon 2003) demonstrated, there are understandably different views on, and expectations of, RACs. For example, fishermen see RACs primarily as a means for achieving more active participation in the management process as well as building bridges with scientists, and they envision the management guidance role of the RACs as a transitional step to a stronger hand on the tiller in the future. This aspiration was spelled out as early as 2000 in a joint proposal on 'Zonal Management' (that is, management of regional seas) by the National Federation of Fishermen's Organisations (NFFO) and the Scottish Fishermen's Federation (SFF): "Initially the committees would advise the European Fisheries Council but it is expected they would be empowered to make management decisions for their respective zones after a suitable induction period" (NFFO/SFF 2000). For their part, the recreational anglers see an opportunity in the RACs to be recognised as important resource users and contributors to national economies, which qualifies them to have a significant say in management. Environmental interests hope RACs will facilitate ecosystem-based management. The extent to which these respective stakeholder ambitions will be realised will depend on a number of factors, not least mutual trust, respect and openness.

Resolution of the different aspirations for RACs will also be influenced, however, by their **structure** and **composition**. The framework for this is set out in the 'Council Decision of 19 July 2004 establishing Regional Advisory Councils under the Common Fisheries Policy (EC 2004). Each RAC will have a General Assembly of all interested parties which, in turn, appoints an Executive Committee of up to 24 members, comprising two-thirds from the fishing sector and a third from the other interest groups affected by the CFP. In effect, this means that in an Executive Committee of 24 members, the environmental NGOs need to try and secure representation among the eight seats available.

The first RAC to get up and running was the North Sea RAC, which had its inaugural meeting, effectively the first meeting of the General Assembly, in Edinburgh in November 2004. This had been preceded by several meetings of the 'shadow' North Sea RAC, which served to shape the final proposal for the RAC to Member States the European Commission. The ENGOs helped to ensure that the principle of working towards sustainable management of North Sea fisheries was set in a wider context of environmental integration. In this regard, the RAC's objective (NSRAC 2004) to provide stakeholder-led advice includes the following qualifying statement: "This will be done within the general aim of attaining the sustainable management of fisheries, incorporating an ecosystem based approach and based on the precautionary principle." In an initiative led by the fishing sector, the holistic nature of this goal would have been unimaginable ten years ago. During these meetings of the 'shadow' RAC, the broad composition of the RAC's Executive Committee was also formulated. This resulted in those ENGOs which had a Europe-wide network being offered three seats on the Executive Committee elected at the Edinburgh meeting. As UK Partner of BirdLife International, the RSPB took up one of these seats with the others being occupied by WWF and Seas At Risk.

Each RAC can set up as many subsidiary working groups as it needs to formulate the advice it needs and, in the case of the North Sea RAC, there are three at the time of writing: one for Demersal fisheries, another for Flatfish and most recently one on Spatial Planning, incorporating closed areas and other Marine Protected Areas (MPAs). Each working group should, as far as possible, mirror the balance of representation in the Executive Committee, so the environmental NGOs are represented on all three working groups. The RSPB/BirdLife International representative currently has the chair of the Spatial Planning group, which in itself is indicative of how the RACs can pay more than lip service to the breadth of stakeholder representation. The work of the group is likely to include the impending network of marine Natura 2000 sites and other MPAs (as laid down by OSPAR – Commission for the Protection of the Marine Environment of the North-East Atlantic) and their relatedness to any closed areas set up as a fisheries technical measure.

For the ENGOs, spatial planning is important for effective delivery of an ecosystem-based approach to fisheries management. For the fishermen's part, their willingness to approve such a working group should not be taken to signal a sudden conversion to the ecosystem-based approach, but rather the growing concern they feel for being buffeted and squeezed out of the North Sea and other Community Waters by the increasing plethora of other human activities, notably oil and gas licensing, and the marine renewables industry (especially wind farms). To this end, fishermen are increasingly alive to the opportunity such developments offer them in adopting a more hands-on stewardship role by using their own vessels and experience to contribute to spatial planning by providing data on the distribution of stocks, spawning and nursery areas. For the fisheries sector, marine spatial planning is thus regarded as a potential guarantor of fishing space and fishing rights. They see the growing demand for closing fishing grounds and are aware of the need to enter the spatial planning debate armed with strategic thinking if they are to carry influence in Brussels.

The RACS are only in their infancy, but from their brief engagement with the North Sea RAC, the experience of the ENGOs is of a more interactive and rewarding relationship with the fishing sector and other stakeholders than takes place in the ACFA. There is more dialogue with the sector in the RAC, whereas debate in the ACFA tends to be characterised by set-piece exchanges. In the end, however, the process matters less than the result, and it remains to be seen to what extent the Commission will take on board the advice of the RACs. Certainly, the greater the consensus among the RAC's stakeholders on any particular issue, the more united a front the advice to the Commission will represent, and the more persuasive it is likely to be. This puts genuine pressure on the stakeholders to compromise in order to offer tractable, usable advice to the Commission and thus prevent the RAC degenerating into a talking shop. The North Sea RAC is still finding its way in relatively uncharted waters, but it already has a strong sense of purpose and is keen to assert itself, set its own agenda, and not let the Commission lead it by the nose.

12.4.2 STAKEHOLDER FATIGUE

Several years ago, environmental NGOs would neither have expected to be stakeholders

in governance bodies nor would they have had the opportunity. So, significant progress is being made. However, the price of involvement in governance is also a huge amount of time and resources in preparation for, and engagement with, these institutions, which presents a daunting challenge for all stakeholders, not just the ENGOS. With seven RACs likely to be up and running by 2006, and each having a number of working groups to service, the prospect of stakeholder fatigue is real. No single development in fisheries has so challenged the ENGOS to respond; having sought for years to influence the management of fisheries, the door has swung open and failure to step in now will send out a damaging signal about commitment and resolve to see the ecosystem-based approach made operational.

This pressure to engage is not coming, however, just from the emergence of RACs. UK devolution alone (which created the Scottish Parliament and the Welsh Assembly) has generated an almost exponential demand on ENGOS for expertise, consultation and direct participation on Government and other institutional advisory committees and steering groups. In recent months, this has been highlighted by the consultation process following the publication in March 2004 of the Prime Minister's Strategy Unit report *'Net benefits: A Sustainable and Profitable Future for UK Fishing'* (PMSU 2004). The Strategy Unit's Stakeholder Advisory Group set up a series of sub-groups dealing with issues such as environmental incentives and MPAs, which gave the ENGOS centre stage for inputting into a high level decision-making process, but at the same time, stretched their capacity to do so.

One outcome of this pressure on individual ENGOS to make an effective stakeholder presence at meetings on fisheries governance, has been growing co-ordination between ENGOS to arrive at common positions and negotiating strategies, so that they can effectively time-share their involvement at the exponentially expanding fora which invite them. While individual ENGOS have retained their specialist areas of expertise (for example the RSPB on industrial fisheries), this cross-ENGO fertilisation has produced hybrid vigour, and helped to sharpen and streamline advocacy messages. Thus, concerted action by ENGOS has significantly increased both in the UK and in Brussels.

It is clear that the ENGOS have an increasingly central role to play in fisheries governance. Nevertheless, they sometimes feel they have an identity crisis, caught as they are between the conflicting pressures to play the inclusive governance game on the one hand, and, on the other, to maintain their traditional external lobbying role. In essence, they have to try and do both, thereby aspiring to maintain the untenable condition of being partly pregnant.

12.5 Conclusion

In this chapter, I have, first, charted the evolution of the ENGOS' role in fisheries governance, showing how it has changed dramatically in the last twenty years from a relatively isolated position to an active stakeholder. Twenty years ago, fisheries were not widely perceived as an environmental issue and were not, therefore, a high priority focus of ENGO activity. With little access to the fishing industry and its decision-making machinery, the ENGOS effectively had only an occasional 'whistle-blowing' role. In this stand-off, the ENGOS were generally regarded with suspicion by the industry.

Second, I have examined the effectiveness of ENGOS in playing their new role of 'problem solving', by looking at five cases of fisheries governance in which they have

been closely involved. In the first case, I have shown how it took the RSPB an intense encounter over the Shetland sandeel fishery for barriers to break down and for a more inclusive approach to develop towards conflict resolution; mutual trust also developed as a result. In the second case, I explained how the recognition of fisheries as a major environmental issue by the North Sea Conferences also assisted the ENGOs towards greater participation in governance, not least by helping them to contribute to the agenda for CFP reform. In the third case, I discussed how, in the CFP reform process, the ENGOs generally appeared to be successful in influencing European Commission proposals, but less successful at influencing the Fisheries Council, partly because the ENGOs' advocacy is poorer in the southern European Member States. In the fourth case, the CFP reform process fostered new lobbying alliances between ENGOs and the UK fishing industry. In the fifth case, I noted that, in the run-up to CFP reform, the ENGOs were granted access to the ACFA, although the ENGOs appreciate that their actual influence is generally limited, encouraging the perception that their involvement is merely 'tokenism'.

Third, I have looked at the future challenges for the ENGOs in the sphere of fisheries governance, focusing on their participation in the RACs, and on their capacity to cope with increasingly heavy demands on their resources. I drew attention to the fact that the pressure to meet growing stakeholder demand has resulted in more concerted action between ENGOs, enabling them to pool their resources and lobby better as a collective set of organisations. But this changing advocacy arena highlights an ongoing debate within ENGOs about how to be most effective, weighing up the relative benefits of external lobbying and a more hands-on stakeholder role in governance. Perhaps ENGOs are becoming the victims of their own success?

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