

Stockholm & Brussels, 22 November, 2016

To: The Fisheries Ministers of the EU Member States

Re: Input to the EU Fisheries Council Meeting, 12–13 December 2016

Dear Minister,

On behalf of the Fisheries Secretariat (FishSec) and Seas At Risk (SAR), we send you our recommendations regarding the Commission proposal for a Council Regulation fixing for 2017 the fishing opportunities for certain fish stocks and groups of fish stocks, applicable in Union waters and, for Union fishing vessels, in certain non-Union waters (COM(2016)698). We urge you to take our recommendations into account during your discussions at the upcoming Council meeting.

The CFP has been in place for close to three years now and its objectives, to be achieved by 2019 (landing obligation) and 2020 (MSY) are for many stocks and regions still far off.

Your decisions on TACs are opportunities for you to firmly support the agreed CFP management objectives. With the initial 2015 deadline long passed, it is your responsibility to set fishing opportunities **below** the exploitation level that corresponds with MSY ( $F_{MSY}$ ) as soon as possible, and by 2020 at the latest, in order to bring biomass levels above those capable of producing MSY. The extent to which this happens will be a measure of the Council's commitment to the agreed targets and, ultimately, sustainable and more profitable fisheries.

Regarding your decisions on the 2017 fishing opportunities we call on you to:

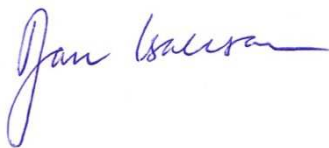
- Set catch limits in line with scientific advice, including limits based on the precautionary approach for data limited stocks without MSY assessment. Council has consistently set catch limits in excess of scientific advice, resulting in stock declines and long-term instability for those fisheries.
- Only grant a TAC top-up for any fleet segment subject to the landing obligation if Member States have provided sufficient, relevant data to the Commission to calculate a TAC top-up. Under no circumstances should the granted TAC top-up increase the fishing mortality of that fleet segment.
- Apply existing long-term management plans once they have been accepted by scientific review as being consistent with the MSY objective of the CFP.
- Align management areas with the assessment areas used in scientific advice, which will significantly facilitate MSY-based management of these stocks.

Due to the large number of stocks covered by this proposal, we limit our specific recommendations to stocks which require close attention, as follows:

- We call on you to manage **Norway lobster** in areas IX and X by functional unit (FU) and to set a zero TAC in FU 26-27, following scientific advice by the International Council for the Exploration of the Sea (ICES).
- We urge you to set the TAC for **sole** in Northern and Central Bay of Biscay (area VIIIab) to no more than 3107 tonnes, as the fishing mortality has been above  $F_{MSY}$  since 1986 and is currently even above precautionary fishing mortality levels ( $F_{PA}$ ).
- For **sole** in the Irish Sea (VIIa) we urge you to follow the Commission proposal and close the fishery in order to allow the stock to rebuild. The stock has been below  $B_{LIM}$  – the biomass reference point below which stocks are at serious risk of recruitment failure and collapse – since 2004 with poor recruitment since 2011.
- We urge you to follow scientific advice and the Commission proposal and set the TAC for **sole** in the Eastern English Channel (VIId) to no more than 2257 tonnes.
- **Plaice** in the Irish Sea (division VIIa) suffers from large quantities of discarding. We urge you agree on landings of no more than 436 tonnes as a basis for the additional top-ups.
- For **cod** in Kattegat (division IIIa) we urge you to agree on landings of no more than 129 tonnes, due to a large amount of unattributed removals and a discarding of about 80% of the catches. Furthermore, we stress the importance of fully implementing and controlling the landing obligation, without this the early closure of the nephrop fishery is a necessity.
- We call on you to close the fishery for **herring** west of Scotland, west of Ireland (divisions 6.a and 7.b-c) and ensure the development of a stock recovery plan that contains broader ecosystem considerations, given that the stock is below  $B_{LIM}$  and its spawning ground is likely damaged.
- For **herring** in the Irish and Celtic Seas and southwest of Ireland (VIIa-h, VIIj-k) we urge you to follow the proposal of the Pelagic Advisory Council and the Commission and set the TAC to no more than 14,467 tonnes.

[See Annex 1 for more detailed comments on Atlantic and North Sea fishing opportunities for 2017.](#)

Yours sincerely,



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