

Stockholm & Brussels, 13 November, 2012

To: The Fisheries Ministers of the EU Member States

Re: [Input to the EU Fisheries Council Meeting, 28–29 November 2012](#)

Dear Minister,

On behalf of the Fisheries Secretariat (FISH) and Seas At Risk (SAR) we send you our recommendations on fishing opportunities for certain deep sea stocks for 2013 and 2014 (COM(2012)579). We ask you to consider these in order to ensure more sustainable utilisation of our common deep sea resources.

Deep sea species tend to be slow growing, late maturing and have low reproductive capacity. Therefore, they are particularly vulnerable to overfishing, which makes the serious lack of scientific information on the deep sea stocks in the North-east Atlantic all the more problematic.

In the mixed fishery on deep sea species carried out by bottom trawls, bycatch rates are high, resulting in broad adverse impacts on whole communities of deep sea species. Given the large number of deep sea species taken in these mixed fisheries, single species TACs and quotas for some – but not all – species caught in these fisheries are not adequate for managing them. Furthermore, recognising the impact of these fisheries on vulnerable marine ecosystems, a fundamental overhaul of their management is necessary, as outlined by the Commission in the proposal for a revised access regime (COM(2012)371). We therefore hope that the Commission proposal for 2013 and 2014 deep sea TACs (COM(2012)579) will mark the end of the current inadequate TAC management system.

In general, we support the Commission proposal for deep sea TACs where it follows scientific advice. However, we want to emphasise that, given the lack of full stock assessments and the inadequacy of single species TACs and quotas for mixed deep sea fisheries, this advice should be applied in a precautionary way.

- *When setting TACs for deep sea species, it is crucial that the EU applies the precautionary approach as set out under its international commitments, temporarily closing fisheries unless or until sufficient information is available to allow for the adoption and implementation of measures that ensure sustainable exploitation.*
- *We call for zero TAC for roundnose grenadier in area III, and a precautionary roll-over of the 2012 TAC of 2 546 tonnes in areas V, VI and VII – or at the very least a much more moderate increase in TAC than the 77 % increase proposed by the Commission.*

- *We recommend a continuation of a zero TAC for both directed fisheries and bycatch of all deep sea shark species.*
- *We urge you to close the targeted fishery for red seabream in area VI, VII and VIII, and for blue ling in areas II-IV, and to maintain and expand closed areas to protect blue ling spawning aggregations.*
- *There is an urgent need for measures that will minimise levels of bycatch in deep sea fisheries, particularly in bottom trawl fisheries, and the review of the access regime for deep sea fisheries provides a key opportunity to ensure their implementation.*

See Annex 1 for more detailed comments and recommendations on the deep sea TACs and quota proposal.

Yours sincerely,



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